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July 19, 2023

The Honorable City Council
c/o Holly L. Wolcott
City Clerk
Room 360, City Hall

COUNCIL FILE NO. 08-3420-S1: SILVER LAKE RESERVOIR COMPLEX MASTER PLAN PROJECT – CERTIFICATION OF FINAL ENVIRONMENTAL IMPACT REPORT (EIR) (STATE CLEARINGHOUSE NO. 2022010055) AND PROJECT APPROVAL

SUMMARY

In accordance with the California Environmental Quality Act (CEQA), the Bureau of Engineering (BOE) recommends that the City Council review, consider, and certify the attached Final Environmental Impact Report; make the required CEQA findings; and approve the Silver Lake Reservoir Complex Master Plan Project (proposed Project), as described in the Final EIR. The proposed Project would redesign approximately 116 acres of the 127-acre Silver Lake Reservoir Complex (SLRC) with community park amenities, which includes the City constructing various community park facilities and allowing some new public park uses within portions of the SLRC. The proposed Project is based on the Silver Lake Reservoir Complex Master Plan, completed in December 2020, which involved a robust community engagement process.

RECOMMENDATIONS

That the City Council:

1. CERTIFY that the Final EIR (Transmittal 1) was completed in compliance with CEQA; that the Final EIR was presented to the Council, as the decision-making body of the City of Los Angeles (City); that the Council reviewed and considered the information contained in the Final EIR; and that the Final EIR reflects and expresses the City's independent judgment and analysis;
2. ADOPT the Findings and Statement of Overriding Considerations (Transmittal 2);
3. ADOPT the Mitigation Monitoring Program (Transmittal 3);



4. SPECIFY that the documents constituting the record of proceedings in this matter are at the Office of the City Clerk, 200 North Spring Street, Los Angeles, California 90012; at the Department of Public Works, Bureau of Engineering (BOE), 1149 South Broadway, Suite 600, Los Angeles, California 90015; and any other relevant City department; and
5. APPROVE the proposed Project as described in the Final EIR.

TRANSMITTALS

1. Silver Lake Reservoir Complex Master Plan Project Final Environmental Impact Report (State Clearinghouse No. 2022010055), dated July 2023

Link: <https://eng2.lacity.org/sites/g/files/wph726/f/FinalEnvironmentalImpactReport.pdf>

2. Findings of Fact and Statement of Overriding Considerations (Attachment)
3. Mitigation Monitoring Program (Attachment)

BACKGROUND

The SLRC, owned and managed by the Los Angeles Department of Water and Power (LADWP), is located in the Los Angeles neighborhood of Silver Lake, and contains the Silver Lake and Ivanhoe Reservoirs, water infrastructure, and the LADWP field and maintenance facilities. Due to the adoption of new water quality regulations, the reservoirs were removed from service and no longer serve as a drinking water resource. LADWP asked BOE to work with the community to analyze how to repurpose the reservoirs for community use, while maintaining LADWP required on-site operations.

On January 9, 2018, the Board of Water and Power Commissioners (LADWP Board) approved a Memorandum of Agreement (MOA) that designated the BOE as the Project Manager and committed the LADWP to transfer up to \$2,920,000 in funding to the BOE to develop a Master Plan for the SLRC. The City Council approved the MOA on March 27, 2018, between the BOE and LADWP which began the SLRC Master Plan process, a comprehensive, community-based effort.

In coordination with LADWP, Council District Nos. 4 and 13, the community and other relevant stakeholders, the SLRC Master Plan Project was officially initiated in March 2019 and involved a robust community engagement process. Public review was conducted over an 18-month period and included extensive community and stakeholder input, including five large community workshops and eight focused meetings with the Stakeholder Working Group. The goal of the Master Plan was to provide a long-range planning tool for future improvements, serve as a guide for community enhancements, detail potential land uses for the site, and examine capability for expanded recreation opportunities while preserving reservoir aesthetics and maintaining current and future LADWP operational needs. The Master Plan was completed in December 2020.

To further study the Master Plan components and allow projects at the SLRC to be competitive for funding and to proceed to construction, an EIR is required. On February

9, 2021, the LADWP Board approved Amendment No. 1 to the original MOA to complete the EIR, with the remaining funds of the Master Plan, and extended the MOA until September 12, 2023.

PROJECT DESCRIPTION

The primary objective of the proposed Project is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character and significantly improving the habitat value of the reservoirs and surrounding landscape. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is not usable for storing potable water, unless significant alterations are made to comply with current government regulations. Because LADWP intends to maintain the reservoirs for other purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit Angelenos.

The proposed Project would redevelop the SLRC with a contemporary design that would create park zones blending vegetated areas with public spaces. The design would enhance the visual and recreational quality of the area to be consistent with goals and objectives of the Community Plan and provide the opportunity for the public to access natural park space. None of the existing public park facilities within the SLRC would be removed, rather public spaces and facilities would be expanded, renovated, and redesigned to improve visitor experience, including the perimeter walking path/promenade. The proposed Project would impact approximately 116 acres of the 127-acre SLRC, including the approximately 77 acres of open water. The existing area would be organized into a series of new spaces (park zones) surrounding the reservoirs. The proposed Project design would consist of seven park zones connected by a 2.5-mile, tree-lined promenade. These zones would include the Meadow, the Knoll, Ivanhoe Reservoir, the Eucalyptus Grove, the East and West Narrows, the South Valley, and Habitat Islands.

The proposed Project would remove portions of the existing perimeter fence over time as the park zones are constructed while maintaining or introducing new fencing needed to secure existing LADWP facilities, protect habitat, and protect the public. Fences around LADWP facilities would be approximately 8 feet high and with a minimum 6-inch clear zone along the bottom for small mammals to pass through. The proposed Project would include offsite improvements along areas surrounding the SLRC. One improvement would include the addition of 90-degree parking along the north side of West Silver Lake Drive, east of Redesdale Avenue along the grassy area adjacent to the Silver Lake Recreation Center. Trees would be avoided along this area and parking would be added in a way that it would not encroach on trees. Currently, there are 10 parallel parking spaces along this segment of West Silver Lake Drive. Converting to 90-degree parking would result in a total of approximately 25 parking spaces, thus adding a net increase in parking of approximately 15 spaces at this location. Two of the new parking spaces would be dedicated to electric vehicle (EV) parking.

Additionally, offsite improvements would occur along Silver Lake Boulevard, between Armstrong Avenue and Duane Street for a length of approximately 3,000 feet. Design

Option 2, as discussed in the Draft EIR, would include restriping along Silver Lake Boulevard with improvements to the bike lane only and no addition of street parking.

SUMMARY OF ENVIRONMENTAL REVIEW PROCESS

Scoping

A Notice of Preparation (NOP) was circulated to various responsible agencies, trustee agencies, and interested parties for a 30-day scoping period, between January 6, 2022, and February 7, 2022. The NOP was mailed to a total of approximately 6,500 properties within a 0.5-mile radius of the proposed Project area. In addition, it was emailed to approximately 1,100 stakeholders. The NOP was also published in the LA Times, La Opinion, and the Eastsider. The purpose of the NOP was to formally announce the preparation of a Draft EIR for the proposed Project, and that, as the lead agency, the City was soliciting input regarding the scope and content of the environmental information to be included in the EIR.

A virtual public meeting was held during the scoping period on January 19, 2022, from 6:00 p.m. to 7:30 p.m., via Zoom. A total of 206 comment letters were received in response to the NOP and 26 verbal comments were obtained during the NOP scoping meeting. The following environmental concerns were raised during the scoping period and were addressed during the preparation of the Draft EIR: Removal of the perimeter security fencing and related concerns regarding homeless encampments, public safety, and impacts to wildlife; Increased parking and traffic circulation on local streets; Pedestrian connections and pedestrian safety; Connectivity with the bike network and cyclist safety; Potential impacts to habitat and tree removals; Noise impacts from construction activities and amplified sound during special events.

Draft EIR

The Draft EIR was circulated for a 70-day public review period starting on October 6, 2022 and ending on December 16, 2022. Notice of the availability of the Draft EIR was published in the LA Times, La Opinion, and Eastsider, and mailed to approximately 1,100 stakeholders. In addition, an eBlast was sent to over 3,000 additional interested parties. A virtual public meeting was held in English and Spanish on October 26, 2022, via Zoom at 6:00 pm. The proposed Project includes 34 project design features that were incorporated during the design process to exhibit best practices and be responsive to stakeholder concerns. In addition, 22 mitigation measures are included to reduce environmental impacts to the greatest extent feasible.

The Draft EIR found that the proposed Project would result in less than significant impacts after mitigation is implemented for aesthetics, air quality, biological resources, cultural resources, geology and soils, vibration – structural damage, tribal cultural resources, and utilities. The EIR identifies feasible mitigation measures that would reduce these impacts to less than significant.

In the Draft EIR, the only resource areas that were found to have significant and unavoidable impacts, even after the implementation of mitigation measures, were noise

and vibration and recreation. Noise impacts during construction and vibration impacts from construction activities with respect to human annoyance would continue to be significant and unavoidable, even with the implementation of mitigation. Operational noise impacts associated with amplified music from special events would also be significant and unavoidable, even with the implementation of mitigation. The proposed Project would also have significant and unavoidable construction and operational (during special events) impacts related to recreational facilities due to the significant and unavoidable impacts associated with noise. In addition, there would be cumulative impacts related to construction noise and operational noise related to amplified sound during special events that would remain significant and unavoidable, despite implementation of mitigation measures.

Final EIR

Over 900 comments were received on the Draft EIR. The Final EIR includes the comments received and responses from the City. Master responses were prepared on key topics that were commonly raised among the comments on the Draft EIR, which include the following: Community Engagement Process, Fence Removal, Homelessness, Traffic/Transportation, including the Parking/Bike Option off-site improvements, Biological Resources, Noise, Public Safety, Drought Conditions, Funding and Operations, Alternatives, and EIR Recirculation Requirements.

Chapter 3 of the Final EIR includes revisions that were made to the proposed Project. As a result of the agency and public feedback received on the Draft EIR, the following modifications were made: 1) two pedestrian-activated flashing beacon crossings along West Silver Lake Drive at the corner of Silver Lake Boulevard and Armstrong Avenue would be converted to high visibility crosswalks; 2) The City would implement Option 2, the Bike-Only offsite improvement along Silver Lake Boulevard. Street parking would not be included; 3) The floating dock and kayaking opportunities have been removed from the proposed Project; 4) The option to have amplified sound during special events has been removed. Due to the removal of amplified speaker use from proposed Project operations, the significance determinations related to operational noise and operational impacts to recreation have been reduced to less than significant.

The Final EIR found that the proposed Project would result in less than significant impacts after mitigation is implemented for aesthetics, air quality, biological resources, cultural resources, geology and soils, vibration – structural damage, tribal cultural resources, and utilities. The EIR identifies feasible mitigation measures that would reduce these impacts to less than significant.

The Final EIR finds that even with the implementation of all feasible mitigation measures, the proposed Project would still result in significant and unavoidable impacts to construction noise and vibration, with respect to human annoyance. Cumulative noise impacts related to construction, along with impacts to recreational facilities from construction noise and vibration would also be significant and unavoidable. As such, the proposed Project requires that the Findings and Statement of Overriding Considerations be adopted by the City Council to approve the Project.

As discussed in the Final EIR, in November 2022, the LADWP Board adopted a resolution (No. 023 097) that directed LADWP staff to “provide the Board with a status report pertaining to water usage at non-operating reservoirs, lakes, ponds, and other water features on LADWP properties,” which would include the SLRC. In addition, the resolution directed LADWP staff to “develop a policy for filling and re-filling of non-operating reservoirs and other LADWP properties containing ponds, lakes, and other water features, that (1) is consistent with state and local mandates and policies regarding the reasonable and beneficial use of water, particularly in times of drought; (2) allows LADWP to properly maintain its non-operating reservoirs and the related real property for Departmental purposes, including for emergencies and future water storage; and (3) requires improvements or projects on LADWP properties to be self-sustainable, where feasible.” As part of its duties to manage the water supply, in particular in times of drought or other water emergencies, LADWP conducts future reviews of water resources, and has determined after review that currently there is no feasible alternate source of water for the SLRC. Previously, LADWP directed BOE to analyze the proposed Project using the non-potable Pollock Well # 3 as the water source for the reservoirs, which met prior LADWP CEQA actions that would maintain water in the reservoirs. As of preparation of this Final EIR, any proposed, new non-operating reservoirs and water features policy has not been considered by the LADWP Board; however, LADWP is subject to state and local conservation mandates and policies that may impact the filling and refilling of the reservoirs during periods of drought and other emergencies.

The proposed Project analyzes impacts based on current baseline conditions as required by CEQA. Specifically, the Draft EIR on page 2-4 described historic operational water level elevations “between 440 – 451 above mean sea level” and acknowledged that future water levels may fluctuate depending on operational considerations and groundwater conditions, such as drought conditions or other emergencies identified by local, state, or federal agencies.

The Final EIR clarifies that if, in the future, LADWP takes an action consistent with any adopted policy that conflicts with current baseline conditions related to refilling of the Silver Lake and Ivanhoe Reservoirs, beyond exceptions outlined in Section 2.7.4 of the Draft EIR for drought and other emergency conditions, a new CEQA assessment to analyze the impacts to the changing operational reservoir water levels would be necessary.

The Findings are based on information contained in the Draft EIR and Final EIR, as well as information contained within the administrative record. The administrative record includes, but is not limited to, the public hearing records, public notices, written comments on the proposed Project and Alternatives and responses to those comments, proposed decisions and the findings on the proposed Project and alternatives, and other documents relating to the agency decision on the proposed Project and alternatives.

Project Alternatives

In accordance with the requirements of CEQA, the EIR describes a range of reasonable alternatives to the proposed Project that could feasibly attain most of the objectives of the proposed Project but would avoid or substantially lessen any significant environmental

impacts. The No Project Alternative (Alternative 1), Reduced Project Alternative (Alternative 2), and Silver Lake Natural Lands and Open Space Preserve Alternative (Alternative 3) were analyzed in detail in the Draft EIR. The Environmentally Superior Alternative was found to be Alternative 2, due to the removal of buildings and structures and reduced construction. Although Alternative 2 would be the Environmentally Superior Alternative, it would not achieve the objectives for the Project to the same extent as the proposed Project. Therefore, the proposed Project is recommended because it best meets the project objectives.

In addition, other alternatives were considered but rejected from further consideration. The Recreation Focused Alternative, which included more intensive active recreational uses identified in the SLRC Master Plan, along with public water activities, such as boating and swimming, was considered and rejected. This alternative was rejected and not considered further because it did not reduce any of the proposed Project's significant impacts, would increase operational noise impacts, and would not meet the Project Objectives of enhancing and expanding wildlife habitat. Another project alternative, Alternative Project Site, was also considered and rejected because it did not fulfill the fundamental Project objective to repurpose the site. Hybrids of the evaluated alternatives were also considered but rejected because they did not result in a substantially different conclusion when comparing environmental impacts and meeting the project objectives relative to the proposed Project and the alternatives considered.

FISCAL IMPACT

Approval of the proposed Project and certification of the EIR does not have a direct fiscal impact as there is no obligation of funding. However, it does enable fundraising efforts to be initiated while funding sources are pursued. Upon certification of the EIR, the City would work to identify a site operator and potential sources of funding for design and construction, such as Federal, State, and City special funds, general funds, and grant funding. Non-profit grants and donations may also be potential sources of funding. It is possible that the proposed Project would be implemented in phases, as funding is secured.

Respectfully submitted,



for

Ted Allen, P.E.
City Engineer

TA/DW/JF/SF/JGR:WD:ja

Box\EXE_Ready for Signature\TSA\Outbox\Archived\2023\ BOE Council Report
SLRCMP Project EIR 07-17-2023.pdf

Attachments:

1. Silver Lake Reservoir Complex Master Plan Project Final Environmental Impact Report (State Clearinghouse No. 2022010055), dated July 2023
Link: <https://eng2.lacity.org/sites/g/files/wph726/f/FinalEnvironmentalImpactReport.pdf>
2. Findings of Fact and Statement of Overriding Considerations
3. Mitigation Monitoring Program

cc: Randall Winston, Office of the Mayor
Ryan Jackson, Office of the Mayor
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Councilmember Hugo Soto-Martinez, CD 13
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TRANSMITTAL 1

SILVER LAKE RESERVOIR COMPLEX MASTER PLAN PROJECT **FINAL ENVIRONMENTAL IMPACT REPORT**

California State Clearinghouse #2022010055
July 2023

PREPARED FOR:
Bureau of Engineering
Department of Public Works
City of Los Angeles

Contact:
Dr. Jan Green Rebstock, Environmental Affairs Officer
jan.green.rebstock@lacity.org

SILVER LAKE RESERVOIR COMPLEX MASTER PLAN PROJECT

Final Environmental Impact Report

Prepared for
Bureau of Engineering
Department of Public Works

July 2023

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- B. Air Quality Emission Memorandum

CHAPTER 1

Introduction

In accordance with Section 15089 of the California Environmental Quality Act (CEQA) Guidelines, the Lead Agency must evaluate comments received on the Draft EIR and prepare written responses and consider the information contained in a Final EIR before approving a project. Pursuant to CEQA Guidelines Section 15132, a Final EIR consists of: (a) the Draft EIR or a revision of the Draft EIR; (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (e) any other information added by the Lead Agency.

This Final EIR constitutes the second part of the EIR for the Silver Lake Reservoir Complex Master Plan Project (Project) and is intended to be a companion to the Draft EIR. The Draft EIR for the proposed Project, which was circulated for public and agency review and comment from October 6, 2022, to December 16, 2022, constitutes the first part of the EIR and is incorporated by reference and bound separately.

Accordingly, the Final EIR for the proposed Project comprises two parts as follows:

- Part 1: Draft EIR and Appendices
 - Draft Environmental Impact Report (Chapters 1 through 6)
 - Draft Environmental Impact Report – Appendices A through L
- Part 2: Final EIR and Appendices
 - Final Environmental Impact Report (Chapters 1 through 4)
 - Final Environmental Impact Report – Appendices A and B

1.1 Organization of the Final EIR

This Final EIR is organized into four main chapters as follows:

- **Chapter 1 – Introduction:** This section provides an introduction to the Final EIR, presents the contents of this Final EIR, summarizes the EIR public review process, and provides a summary of the proposed Project and a summary of the environmental impacts.
- **Chapter 2 – Responses to Comments:** This section presents master responses to key topic areas among the comments received on the Draft EIR. A matrix of the parties that commented on the Draft EIR is also included. This matrix is followed by copies of the public comments received on the Draft EIR, as well as a transcript of the verbal comments received

during a public meeting. Numbered responses are provided for each of the written and verbal comments made regarding the Draft EIR. A copy of the full public meeting transcript is provided in Appendix A of this Final EIR.

- **Chapter 3 – Revisions, Clarifications, and Corrections to the Draft EIR:** This section provides a list of revisions, clarifications, and corrections that have been made to the Draft EIR for the proposed Project based on comments received from the public and agencies.
- **Section 4 – Mitigation Monitoring Program (MMP):** This section provides the full MMP for the proposed Project. The MMP lists project design features and mitigation measures by environmental topic and identifies for each of the features and measures the applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

This Final EIR also includes the following appendices:

- **Appendix A, Draft EIR Public Meeting Transcript:** This appendix to the Final EIR includes a copy of the entire public meeting transcript on the Draft EIR.
- **Appendix B, Air Quality Emission Memorandum:** This appendix to the Final EIR includes a memorandum completed by AMBIENT Air Quality and Noise Consulting to update the operational and construction air quality emission estimates in response to comments received from the South Coast Air Quality Management District.

1.2 Project Summary

The proposed Project would redevelop the Silver Lake Reservoir Complex (SLRC) with a contemporary design that would create park zones blending vegetated areas with public spaces. The design would enhance the visual and recreational quality of the area to be consistent with goals and objectives of the Community Plan and provide the opportunity for the public to access natural park space. None of the existing public park facilities within the SLRC would be removed, rather public spaces and facilities would be expanded, renovated, and redesigned to improve visitor experience, including the perimeter walking path/promenade. The proposed Project would impact approximately 116 acres of the 127-acre SLRC, including the approximately 77 acres of open water. The existing area would be organized into a series of new spaces (park zones) surrounding the reservoirs. The proposed Project design would consist of seven park zones connected by a 2.5-mile, tree-lined promenade. These zones would include the Meadow, the Knoll, Ivanhoe Reservoir, the Eucalyptus Grove, the East and West Narrows, the South Valley, and Habitat Islands.

The proposed Project would remove portions of the existing perimeter fence over time as the park zones are constructed while maintaining or introducing new fencing needed to secure existing LADWP facilities, protect habitat, and protect the public. Fences around LADWP facilities would be approximately 8 feet high and with a minimum 6-inch clear zone along the bottom for small mammals to pass through.

The proposed Project would include offsite improvements along areas surrounding the SLRC. One improvement would include the addition of 90-degree parking along the north side of West Silver Lake Drive, east of Redesdale Avenue along the grassy area adjacent to the Silver Lake Recreation

Center. Trees would be avoided along this area and parking would be added in a way that it would not encroach on trees. Currently, there are 10 parallel parking spaces along this segment of West Silver Lake Drive. Converting to 90-degree parking would result in a total of approximately 25 parking spaces, thus adding a net increase in parking of approximately 15 spaces at this location. Two of the new parking spaces would be dedicated to electric vehicle (EV) parking.

Additionally, offsite improvements would occur along Silver Lake Boulevard, between Armstrong Avenue and Duane Street for a length of approximately 3,000 feet. Design Option 2, as discussed in the Draft EIR, would include restriping along Silver Lake Boulevard with improvements to the bike lane only and no addition of street parking.

1.3 Public Review Process

In accordance with CEQA, the environmental review process for the proposed Project commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties in the scope of the Draft EIR, through a Notice of Preparation (NOP) Process. The City prepared and circulated an NOP to members of the public, local and state agencies, organizations, and interested parties to solicit comments on the proposed Project between January 6, 2022, and February 7, 2022. A virtual public meeting was held during the scoping period on January 19, 2022, from 6:00 p.m. to 7:30 p.m. via Zoom for reviewing agencies and the public. A recorded presentation was shown during the public meeting and was made available to the public on the City's website during the 30-day scoping period (<https://eng.lacity.org/silver-lake-reservoir-complex-master-plan/eir>).

The NOP was available on the City website and at local public facilities. Hard copies of the NOP were also available at the following public facilities during the public review period:

- Silver Lake Branch Library, 2411 Glendale Blvd, Los Angeles, CA 90039
- Los Angeles County City Terrace Library, 4025 E. City Terrace Drive, Los Angeles, CA 90063

Following the comment period for the NOP, a Draft EIR was prepared for the proposed Project. The NOP, and NOP comment letters were included in Appendix A of the Draft EIR. Consistent with the requirements of Sections 15087 and 15105 of the CEQA Guidelines, the Draft EIR was submitted to the Los Angeles County Clerk and the State Clearinghouse, a division of the Governor's Office of Planning and Research, and circulated for public review. The public comment period for the Draft EIR was from October 6, 2022, to December 16, 2022, exceeding CEQA's 45-day public comment period requirement. During the comment period, the Draft EIR was made available for review on the proposed Project's website: <https://eng.lacity.org/silver-lake-reservoir-complex-master-plan/eir>.

In addition, hard copies of the Draft EIR were made available at the following public facilities:

- Silver Lake Branch Library, 2411 Glendale Blvd, Los Angeles, CA 90039
- Los Angeles County City Terrace Library, 4025 E. City Terrace Drive, Los Angeles, CA 90063

A virtual public meeting was held in English and Spanish on October 26, 2022, at 6:00 pm on Zoom during the 45-day public comment period for the Draft EIR. Comments were accepted online and by mail via the following:

Website <https://eng.lacity.org/silver-lake-reservoir-complex-master-plan/eir>.

Mail Dr. Jan Green Rebstock
City of Los Angeles
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015

This Final EIR was prepared following the Draft EIR comment period. In accordance with CEQA Guidelines Section 15088, this Final EIR includes responses to comments on environmental issues that were received during the comment period for the Draft EIR.

1.4 Summary of Environmental Impacts

The proposed Project, as described in the Final EIR, results in significant and unavoidable impacts related to construction noise and vibration, with respect to human annoyance. Cumulative noise impacts related to construction, along with impacts to recreational facilities from construction noise and vibration would also be significant and unavoidable. All other environmental impacts are either less than significant or less than significant with mitigation. The proposed Project includes 22 mitigation measures to reduce environmental impacts to the greatest extent feasible. In addition, 34 project design features were incorporated during the design process to exhibit best practices and be responsive to stakeholder concerns.

CHAPTER 2

Response to Comments

2.1 Introduction

Section 21091(d) of the Public Resources Code states that: “With respect to the consideration of comments received on a draft environmental impact report, the lead agency shall evaluate comments on environmental issues that are received from persons who have reviewed the draft and shall prepare a written response.” The lead agency is not required to provide a response to comments provided outside of the allotted comment period. Section 21092.5 of the Public Resources Code requires that “At least 10 days prior to certifying an environmental impact report, the lead agency shall provide a written proposed response to a public agency on comments made by that agency which conform with the requirements of this division.” The City of Los Angeles (City) is the CEQA Lead Agency for the Silver Lake Reservoir Complex Master Plan Project (proposed Project). This section of the Final EIR provides the City’s responses to the written comments received during the comment period for the Draft EIR. Section 2.2, *Master Responses*, includes responses to common issues raised during the Draft EIR comment period. Section 2.3, *Comments Received on the Draft EIR*, includes a table with an assigned comment number, individual and/or organization names, and date the comment was received. The table also includes those commenters who provided comments during the Draft EIR public comment meeting held on October 26, 2022. Section 2.4, *Response to Comments*, provides the City’s responses to the comment letters and verbal comments received on the Draft EIR. Copies of the original comment letters and the oral transcript from the public meeting are provided in Appendix A of this Final EIR.

As required by CEQA Guidelines Section 15088(c), the focus of the response to comments is “the disposition of significant environmental issues raised.” Therefore, detailed responses are not provided to comments that do not relate to environmental issues. However, in some cases, additional information has been added for reference and clarity.

2.2 Master Responses

Several Master Responses have been prepared in order to provide comprehensive responses to address multiple, similar comments that have been raised on key topics during the Draft EIR public review period. Where appropriate, references to the Master Responses are provided within the individual responses to comments prepared in Section 2.4, *Responses to Comments*. The

Master Responses focus on the following key topics that were commonly raised among the comments received on the Draft EIR:

- Community Engagement Process
- Fence Removal
- Homelessness
- Parking/Bike Option
- Traffic/Transportation
- Biological Resources
- Noise
- Public Safety
- Drought Conditions
- Funding and Operations
- Alternatives Analysis
- EIR Recirculation Requirements

2.2.1 Community Engagement Process

Master Plan Preparation

As described in Section 4 of the Master Plan (included as Appendix B of the Draft EIR), the Silver Lake Reservoir Complex Master Plan is the result of an inclusive public engagement and participatory planning process led by Hargreaves Jones in partnership with the City of Los Angeles Bureau of Engineering (BOE), Los Angeles Department of Water and Power (LADWP), and the Council Districts 4 and 13 over a period of 2 years. Beginning in 2019, public feedback was solicited and integrated at all critical stages in the planning process: analysis, visioning and programming, Master Plan Alternatives, Preferred Master Plan, and Final Master Plan. The overall process for the Master Plan development included the following: bi-weekly meetings with City Staff and Council Districts; multiple focused meetings with City officials and departments regarding Project goals and design features; eight Stakeholder Working Group Meetings held at critical moments throughout the process; and five Community Workshops with attendance by more than 220 to 600 community members at meetings and more than 8,400 questionnaire responses. The City understands that the Silver Lake community has a long history of organizing around the reservoirs. There are multiple community groups, including formalized non-profit organizations, with missions directly involving the Complex. Because of this, early in the Master Plan process, a Stakeholder Working Group (SWG) was formed comprised of members from five active groups representing a diverse range of interests in the community: Silver Lake Forward; Silver Lake Neighborhood Council; Silver Lake Now; Silver Lake Reservoirs Conservancy; and Silver Lake Wildlife Sanctuary.

Environmental Review Process

A Notice of Preparation (NOP) was prepared pursuant to Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, to notify agencies and interested parties that the City will be preparing a Draft Environmental Impact Report (EIR) to evaluate potential environmental impacts of the proposed Project (see Appendix A of the Draft EIR). The NOP was also posted by the County Clerk in Los Angeles and was mailed on January 6, 2022, to a total of approximately 6,500 properties within an approximately 0.5-mile radius of the Project area. In addition, the NOP was mailed to 23 interested parties, including local, state, and federal agencies, and tribes, and emailed to a total of approximately 1,100 agencies, interested parties, groups, or individuals who had previously expressed interest in the proposed Project. A Notice of Completion (NOC) was prepared by the City and uploaded to the State Clearinghouse website, and the proposed Project information was posted on the CEQAnet Database. The NOP was made available online at the City's website, and at two public libraries: Silver Lake Branch Library at 2411 Glendale Boulevard in Los Angeles, and the Los Angeles County City Terrace Library at 4025 East City Terrace Drive in Los Angeles. The NOP was published in the Los Angeles Times on January 6, 2022, and La Opinión on January 9, 2022, and available on the EastSider, a neighborhood news blog and website, for the duration of the 30-day scoping period starting January 6, 2022.

Similarly, after completion of the Draft EIR, an NOC was prepared along with a Notice of Availability of a Draft EIR (NOA) by the City and uploaded to the State Clearinghouse website and posted with the Los Angeles County Clerk. The public comment period started on October 6, 2022, and was extended through December 16, 2022. The NOA was made available online at the City's website, and the same two public libraries. The NOA was published in the Los Angeles Times on October 6, 2022, and La Opinión on October 9, 2022, and available on the EastSider for the duration of the public comment period. In addition, the NOA was mailed to approximately 1,100 agencies, interested parties, groups, or individuals who had previously expressed interest in the proposed Project and an eBlast was sent to over 3,000 additional interested parties. A virtual public comment meeting was held on October 26, 2022 to present the proposed Project, discuss the findings of the Draft EIR, and obtain verbal comments from the public.

2.2.2 Fence Removal

As described in Chapter 2, *Project Description*, the entire SLRC is currently enclosed by a perimeter chain-link fence varying in height from approximately 4 feet at the Meadow and 6 to 12 feet around the remaining areas. An interior fence in the Meadow area establishes the Meadow's boundary and the park area open to the public. Existing LADWP facilities cover approximately 11 acres of land within the SLRC and would remain fenced and not accessible to the public. These LADWP facilities and those illustrated on Figure 2-2 in the Draft EIR are not a part of the proposed Project area and would not be altered or changed as a result of proposed Project implementation.

The proposed Project would remove portions of the existing perimeter fence over time as the park zones are constructed while maintaining or introducing new fencing needed to secure existing LADWP facilities, protect habitat, and protect the public. Figure 2-4 in Chapter 2 of the Draft

EIR provides a conceptual plan for locating fences and guardrails. Fences around LADWP facilities would be approximately 8 feet high and with a minimum 6-inch clear zone along the bottom for small mammals to pass through.

As described in Chapter 2, *Project Description*, to protect wildlife and keep people out of planted areas, habitat fences would be installed along all nature trails and specifically within the following proposed park zones: The Knoll, Ivanhoe Reservoir, and the Eucalyptus Grove. Habitat fencing would be approximately 3 feet high with swing gates where necessary to allow for walkways to be closed at night and as needed seasonally to protect wildlife.

The Draft EIR concludes that the removal of the chain-link perimeter fence would eliminate barriers to wildlife and provide the availability for larger wildlife to access the water and created wetlands areas. Areas with the most habitat value for wildlife will be closed at night and off limits to the public. No impacts to wildlife are anticipated from the removal of the perimeter fence or installation of the smaller habitat fencing.

For the protection of the public, a Security Plan would be prepared prior to Project construction and implemented during operation of the Project (refer to Master Response – Public Safety). The Security Plan would be implemented in connection with the removal of the perimeter fence, as each proposed park zone is constructed. Based upon the analyses contained in Chapter 3 of the Draft EIR, removal of the existing fencing as part of the proposed Project would not result in any significant environmental impacts related to biological resources or public safety.

2.2.3 Homelessness

Please refer to Section 3.13, *Population and Housing*, of the Draft EIR, for a discussion on strategies regarding homelessness within the city. For purposes of CEQA, homelessness itself is not a physical impact on the environment, but rather a socioeconomic impact that does not require analysis. In addition, the City has not identified any supported evidence that the proposed Project would attract additional homeless individuals than the existing environment.

2.2.4 Parking/Bike Option

As described in Chapter 2.0, Section 2.5.2, *Offsite Improvements*, the proposed Project would include offsite improvements along areas surrounding the SLRC. One improvement would include the addition of 90-degree parking along the north side of West Silver Lake Drive, east of Redesdale Avenue adjacent to the Silver Lake Recreation Center (refer to Figure 2-3 of the Draft EIR). Currently, there are 10 parallel parking spaces along this segment of West Silver Lake Drive. By converting to 90-degree parking, a total of approximately 25 parking spaces would be added, resulting in a net increase in parking of 15 spaces at this location. Two of the new parking spaces would be dedicated to electric vehicle (EV) parking. Existing mature trees would be avoided when creating parking along this area.

Additionally, two design options were proposed in the Draft EIR for improvements along Silver Lake Boulevard, between Armstrong Avenue and Duane Street. However, based on comments received during the Draft EIR, the City has decided to proceed with Option 2, the Bike-only

improvement (see Figure 2-16 as revised, in this Final EIR Chapter 3). Option 1, which included the addition of street parking along the west side of Silver Lake Boulevard is no longer being considered for the Project as discussed in this Final EIR in Chapter 3. As discussed, since the proposed Project is currently at the conceptual design phase, BOE has committed to creating a design committee during the development of final design drawings which would include other City entities, such as City Planning, LADOT, and the local Council Districts, to determine the final configuration of Option 2. The Draft EIR fully analyzed the maximum environmental impacts of Option 2, regardless of the outcome of the final configuration. The design committee would provide input into final design decisions based on the needs of the local area, safety requirements and desired features (including lane and buffer widths, raised pedestrian crossings, etc.), buffer design features, drainage features, local connectivity, and consistency with existing City plans. Final design would be constrained by the width of the current right-of-way and the existing historic, low concrete wall along the west side of Silver Lake Boulevard. In addition, the committee would determine if the bike lanes should be placed along the same side of the road nearest to the reservoir or be split between the north and southbound side of the road. The design committee may also review the parking design at West Silver Lake Drive to make sure considerations around pedestrian safety, bike connectivity, and room for public transit connections are addressed.

2.2.5 Traffic/Transportation

As discussed in Section 3.16 *Transportation*, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in Appendix K, Transportation Impact Assessment (TIA), of the Draft EIR. The TIA itself includes both CEQA and non-CEQA required analyses, in compliance with the City of Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG).

The Project's construction and operation traffic/transportation impacts were fully evaluated in Section 3.16, *Transportation*, which was primarily based on the TIA prepared for the Project. In accordance with the LADOT's TAG adopted in July 2019 (updated in July 2020), the CEQA-required analysis to be included within the Draft EIR section includes an assessment of whether the Project would result in: (1) potential conflicts with transportation-related plans, ordinances, or policies; (2) a substantial increase in vehicle miles traveled (VMT); or (3) increased hazards due to a geometric design feature or incompatible use. In addition, in accordance with Appendix G of the CEQA Guidelines, an assessment of whether the Project would result in inadequate emergency access is included.

The TAG also requires assessment of "non-CEQA" transportation issues, which include: (1) pedestrian, bicycle, and transit access; (2) Project access, safety, and circulation; (3) construction traffic; and (4) residential street cut-through analysis. The analyses of these "non-CEQA" issues are included in the TIA. However, since they are non-CEQA issues, they are not analyzed in the Draft EIR, unless they relate to the assessment of potential conflicts with transportation-related plans, ordinances, or policies mentioned above. In addition, an analysis of intersection levels of service (LOS) is included as appendices to the TIA for informational purposes only and is similarly a non-CEQA issue.

As described in Section 3.16, *Transportation*, of the Draft EIR all CEQA-required transportation impacts would result in less than significant impacts without mitigation. Although the analysis indicated that the proposed Project would result in less than significant impacts, the City has opted to further improve traffic and transportation during construction and operations by including several Project Design Features as described in Section 3.16.4 of the Draft EIR. These include PDF-TRA-1: Construction Traffic Management Plan, PDF-TRA-2: Construction Staging Plan, PDF-TRA-3: Construction Traffic, PDF-TRA-4: Access to Parcels, PDF-TRA-5: Site-Specific Traffic Control and Transit Plan for Large Events, and PDF-TRA-6: Expand Public Transit Connections. Details of these PDFs are included in the Mitigation Monitoring Plan.

2.2.6 Biological Resources

Public comments on the Biological Resources section focused on these recurrent themes:

- Baseline Condition
- Impact Assessment
- Public Access Impacts
- Special Events Impacts
- Perimeter Fencing Removal Impacts
- Tree Removals
- Wildlife Corridors

The following discussion clarifies the Draft EIR's assessment of these issues.

Baseline Condition

Draft EIR Section 3.4, *Biological Resources*, provides a detailed description of the existing biological resources within the Project area that includes the proposed Project impact area plus a 500-foot buffer area. This area of interest is called the Biological Study Area (BSA) and is shown on Appendix D, Figure 4, of the Draft EIR. The Draft EIR also includes a summary of applicable regulations related to biological resources and an evaluation of the potential impacts of the proposed Project on the existing baseline condition. A Biological Technical Report was prepared to support the Draft EIR's impact analysis and included as Appendix D, Subappendix E. The objective of the Biological Technical Report and Draft EIR Section 3.4 is to compile a detailed and comprehensive characterization of the baseline condition in order to assess the potential for the Project to result in significant impacts to biological resources.

The baseline condition was characterized through a review of existing scientific literature and previous field studies and through new field surveys conducted by ESA. A comprehensive list of sensitive plant and wildlife species and their habitats that are known to occur within the BSA was compiled primarily from the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB), and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants. In addition, the United States Department of Agriculture Natural Resources Conservation Service (NRCS) soils mapping, U.S. Fish and Wildlife Service

(USFWS) critical habitat maps, the Information for Planning and Consultation (IPaC), and the National Wetlands Inventory (NWI) were reviewed. This comprehensive review of existing literature supported the baseline condition characterization described in the Draft EIR. The Draft EIR did not include biological data created through citizen-based science collection since this anecdotal information is not scientifically reviewed or professionally recorded.

Field surveys were conducted to support the baseline condition characterization of the proposed Project area, including vegetation mapping, habitat suitability assessments for special-status species, and protected/park and street tree inventories. The Draft EIR also includes lists of all species directly observed during the field assessments in Appendix D, Subappendix E, *Biological Technical Report*. The protected/park and street tree inventories are presented in the *Silver Lake Reservoir Complex Master Plan Project, Protected Tree Report* and Appendix D, Subappendix F, the *Silver Lake Reservoir Complex Master Plan Project, Park and Street Tree Inventory Results Report*.

The baseline condition described in the Draft EIR includes areas with semi-natural woodlands, ornamental landscapes, developed areas, and open-water reservoirs surrounded on all sites by a residential neighborhood. These areas currently provide suitable nesting habitat for many species of birds including numerous passerines, great blue herons, great horned owls, red-tailed hawks, red-shouldered hawks and other species. The open water also provides foraging and loafing habitat for numerous waterfowl. Some small mammals were identified as residents of the BSA including rats, mice, raccoons, and opossum. Occasional visits by larger predators such as coyotes, bobcats, and mountain lion were also acknowledged. The existing great blue heron rookery sites at the SLRC are identified in Figure 5 of Appendix D, *Biological Technical Report*.

Impact Analysis

The Draft EIR concludes in Section 3.4, *Biological Resources*, that construction activities could impact nesting birds during the general avian nesting season from February 15 to August 31 for songbirds and January 15 to August 31 for raptors. These interruptions would be temporary during construction activities. Two nearby reservoirs that could provide temporary nesting habitat during this time are located within less than 4 miles of the proposed Project site: Echo Park located less than 1.5 miles to the south and Hollywood Reservoir, located less than 4 miles to the northwest. PDF-BIO-2 included in the Draft EIR would require pre-construction nesting bird surveys and the implementation of avoidance measures during construction if nests are found to be active within 300 feet of construction activities, reducing potential impacts to nesting birds to less than significant. The Draft EIR concluded that temporary impacts to nesting birds during construction would be less than significant with mitigation.

Once constructed, the Draft EIR concludes that each of the proposed Project Alternatives would preserve or improve conditions for biological resources that utilize the BSA. Migratory bird species currently use the open water within the Project site. Once constructed, the creation of native habitat within the Project site, including coastal scrub and wetlands would result in a net gain of avian-supporting vegetation. The proposed diverse native upland and wetland habitat would particularly serve as supportive habitat for many species of wading birds which often nest in woody vegetation that is either submerged or surrounded by water, adding to the open water

currently available for birds. Additionally, the created upland and coastal scrub areas within the Knoll and Meadow park zones would provide foraging and nesting habitat for avian species. The proposed Project would maintain or increase areas with natural habitats that support nesting birds.

The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. The proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time.

Public Access

The SLRC is an existing city park and open water reservoir within the heart of urbanized Los Angeles that is used daily for recreation by the public. The objective of the proposed Project is to modify the park to enhance both biological resource values and public access opportunities for the benefit of the residents of Los Angeles. In Chapter 2, *Project Description*, Section 2.5.1, *Proposed Park Zones*, has been revised to remove the water access amenities, including the proposed floating dock and guided kayak tours, in order to minimize the effects of public access.

The proposed Project area is surrounded by a residential neighborhood on all sites. Although used by urbanized wildlife, the habitat value is that of an urban environment. The proposed Project does not change this condition or degrade the baseline habitat values. As stated in Section 3.4, the proposed Project could increase visitorship to the proposed Project area by approximately 390 people daily. The proposed Project would expand the available space for recreational activities by opening up areas of the reservoir currently closed to the public and part of the LADWP operational facility. Therefore, although the proposed Project may attract a higher level of visitorship, the recreational area would be expanded and visitors would be spread out over larger areas within the SLRC. In order to be sensitive to the needs of wildlife use within the SLRC, the proposed Project incorporates several features to limit human interaction in areas of higher habitat value. The proposed Project includes wildlife-friendly habitat fencing within the Knoll and Eucalyptus Grove (see Figure 2-4 of the Draft EIR) to delineate public walkways from the created habitat and keep the public out. The fencing would be designed to allow wildlife to jump over or crawl through and interpretive signage would be posted on the fencing to educate the public on the sensitivity of wildlife as outlined in PDF-BIO-3 of the Draft EIR. In addition, although lighting would be added to the proposed Project area to allow for extended use of the SLRC by the public, the location of new lighting has been carefully considered to avoid several habitat areas (see Figure 2-8 of the Draft EIR). All lighting would be shielded and pointed away from habitat areas. High-level lighting would only be used at the park facilities in the South Valley, where such lighting already exists. New pathways and walking areas would have medium-level lighting to allow for nighttime recreational use and new low-level or accent lighting would be added to the Meadow, including the Education Center. The proposed Project would be designed to limit lighting within areas with the most habitat value for wildlife species, therefore, no lighting would be proposed for secondary paths within habitat areas or in areas such as the Knoll, Ivanhoe Outlook, and the Eucalyptus Grove. These areas would be closed with swing gates where necessary to limit public access at night and seasonally, as needed, to protect wildlife and limit impacts to nocturnal species and other species utilizing the habitat areas.

Operational noise levels and associated human activities are expected to generally be similar to existing conditions, which includes the residential neighborhood and surrounding roads along the border of the SLRC, and would not diminish wildlife use including nesting birds or roosting bat species, as the species currently utilizing the site are adapted to living in the densely urbanized setting. As concluded in Section 3.4, *Biological Resources*, impacts to wildlife would be considered less than significant.

Special Events

The proposed Project would allow for 12 special events to occur during the summer months, with an assumed visitorship of up to approximately 600 people per event. Allowable event hours would be from noon to 10:00 p.m. Events occurring during the nighttime would result in increased noise, light, and general disruption, but these events would be temporary and infrequent. The Draft EIR concludes that the use of the area for special events would not degrade habitat values and would not significantly impact wildlife using the urban area since any wildlife using the site would be accustomed to an urban environment. Special events would occur at the Meadow, which is an area currently in frequent use by the public. As discussed in Chapter 3 of this Final EIR, there will be no amplified sound. The noise analysis (see Section 3.12, *Noise and Vibration*) found that ambient noise levels due to special events would not exceed ambient noise levels at the southern perimeter of the Knoll with decreasing noise levels to the north. Thus, the Draft EIR concludes that operational noise, including from special events would not significantly impact biological resources. In addition, during operation of the proposed Project site, PDF-TRA-5 would require that a Site-Specific Traffic Control and Transit Plan be implemented for large special events, in order to ensure that information on parking, circulation, and transit options are available for event attendees to minimize congestion and vehicle miles traveled.

Tree Removals

The proposed Project will result in direct impacts to native shrubs and trees regulated by the City Tree Ordinance, City of Los Angeles Recreation and Parks Department (RAP) Policy, and the BSS tree permit application. The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies and to minimize impacts to habitat values. The Tree Succession Plan would include the incorporation of native plants into the understory thus providing food sources and habitat for native wildlife including native sages (*Salvia* sp.) and milkweeds (*Asclepias* sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly, respectively. The native plant species planting palette would take into account the surrounding habitat quality and site appropriateness.

The preparation of a Tree Succession Plan as outlined in Chapter 2, *Project Description*, calls for the phased removal of trees over 15 years to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Additionally, these trees can be selectively identified for removal thus avoiding trees with active rookeries, nests, and roosts. As the new tree plantings mature, new habitat would be established over time. The successional tree removal practice would ensure that nesting and foraging habitat would not be eliminated during implementation.

As stated in Section 3.4, *Biological Resources*, PDF-BIO-13, and the City Tree Ordinance would require tree replacement at a 4:1 ratio for removal of all protected trees under the ordinance. The City Tree Ordinance has established this replacement ratio as an acceptable practice to address the loss of trees valued under the ordinance. A replacement ratio is intended to compensate for the loss of mature trees taking into account the temporal loss of the trees including the time required for a replacement tree to mature and establish equal habitat values. The replacement trees would address loss of mature trees taking into account their maturity (trunk diameter) and species type and would require replacement of like-to-like species within the SLRC at a 4:1 ratio. The replacement requirements in the ordinance including the 4:1 replacement ratio is established to compensate for the habitat values of the trees to be affected resulting in a less than significant impact of the Project.

RAP Tree Policy states that whenever trees are removed, the existing trees' aggregate diameter, measured at DSH (diameter at standard height) shall be replaced at an equal or greater rate of caliper of new trees. For the proposed Project, the City would be required to replace trees protected by the RAP Tree Policy at a 1:1 ratio for total trunk diameter. Additionally, RAP Tree Policy requires at least a 4:1 ratio for native species regardless of the caliper requirements. PDF-BIO-14 outlines the RAP Tree Policy requirement by stating that replacement trees would mitigate loss of mature trees taking into account their maturity (trunk diameter), habitat value, and species type. The 1:1 replacement requirement sufficiently compensates for the values of the trees to be affected resulting in a less than significant impact of the Project.

BSS Tree Policy, as adopted by the Board of Public Works and implemented by BSS Urban Forestry Division and the Board of Public Works, require tree replacement at a 2:1 ratio for removal of all street trees. The BSS Tree Policy was adopted by the Board of Public Works in 2015 with expert analysis concluding that it was an acceptable practice to address the loss of any removed street tree. For the proposed Project, the City would be required to replace street trees at the 2:1 replacement ratio.

In addition to the various tree policies as outlined above, the Draft EIR also provided further analysis in Section 3.4.5 to address potential biological impacts to the removal of trees, including classification of special status, habitat, and conflicts with tree preservation ordinances. The analysis considered the impacts to baseline conditions and concluded that the proposed Project would not result in significant impacts to biological resources at the site after mitigation.

Wildlife Corridors

SLRC Protected Area for Wildlife (PAW) designation as determined in the City of Los Angeles Protected Areas for Wildlife & Wildlife Movement Report (PAWS Report). The PAWS Report states that the SLRC PAW only meets one (Criteria 5). Criteria 5 is defined as "Habitat that at some point in the life cycle of a species or suite of species serves as concentrated breeding, feeding, resting, or migrating grounds and is limited in availability within Southern California or within the City of Los Angeles." Specifically, the SLRC PAW meets the Criterion 5 threshold as a site that supports breeding, feeding, resting, and migrating grounds with limited availability in Southern California/Los Angeles region. The PAWs Report found that the SLRC PAW does not support native vegetation and that it provides an island of and landscaped habitat in a highly

urbanized area. In addition, the report states that the PAW has a moderate potential to support medium mammals and a low potential to support large mammals. There is a high potential to support birds and a moderate potential for other wildlife species (e.g., insects and small mammals). Coyote, bobcat, and striped skunk have been documented within this PAW.

Overall, the proposed Project is not in conflict with the goals of the PAWS Report and the SLRC would continue to function at the baseline conditions for biological diversity and wildlife connectivity. Furthermore, Appendix D of the Draft EIR discusses wildlife movement and notes that the SLRC does not provide uninterrupted connectivity to other local open space areas. The proposed Project would not decrease connectivity. The Draft EIR concludes as a result that the Project would not significantly affect wildlife movement or habitat connectivity.

2.2.7 Noise

Operations

The Silver Lake Reservoir has unique geography and is surrounded by hills on all sides. This can potentially lead to sound reverberations and amplification due to Project activities. The on-site operational noise from the Project was analyzed using the CadnaA noise modeling software. CadnaA is a Windows-based software Project that predicts and assesses noise levels in the vicinity of noise sources based on International Organization for Standardization 9613-2 algorithms for noise propagation calculations. CadnaA considers environmental factors, such as topography, intervening structures, and distance (both horizontally and vertically) from a noise source. This is particularly relevant for projects containing outdoor meeting, performance, and gathering areas at varying elevations that would have amplified sound and could potentially affect surrounding land uses and receptors. Since the Project has various open-air areas that create a relatively complex soundscape, the CadnaA model was used to estimate the various noise sources and their effects on the ambient noise environment. The CadnaA modeling accounted for 14 receptor points surrounding the Project site. Operational noise from the Project was evaluated at each modeling point and compared to the closest ambient noise levels measured for each respective modeling point.

Thus, the Draft EIR analysis considers the topography of the surrounding area and the results of the CadnaA modeling are reported in Chapter 3, Tables 3.12-19 through 3.12-22. The results show that impacts would be less than significant for all onsite operational noise excluding special events with amplified noise. However, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project and these are no longer being considered under the proposed Project. As shown in Table 3.12-21 of the Draft EIR, onsite noise levels during special events without amplified speakers would be less than significant.

Construction Noise

Section 3.12, *Noise and Vibration*, of the Draft EIR presents a conservative analysis of construction noise by assuming all equipment during a construction phase is operating simultaneously, assuming that the noisiest equipment is closest to the sensitive receptors,

measuring distances to sensitive receptor property lines, and using a more conservative attenuation rate for noise.

The above assumptions are conservative because, in reality, multiple pieces of equipment cannot occupy the same physical space at the same time, and all equipment related to a construction phase is rarely used simultaneously, and construction equipment is typically mobile and physically spaced throughout a construction site. Additionally, for the purposes of providing a conservative analysis, no noise reduction from trees was applied to the Project construction noise calculations. For a detailed account of assumptions, refer to Section 3.12.3, Subsection *Methodology*, of the Noise section in the Draft EIR.

The Draft EIR disclosed a conservative analysis of potential construction noise levels in order to avoid underestimating Project construction noise impacts. As concluded on page 3.12-32 of the Draft EIR, the Project would result in the generation of a temporary increase in ambient noise levels in the vicinity of the Project in excess of standards established by the City, and on-site construction noise impacts would be potentially significant. The Project would include Project Design Features (PDFs) and Mitigation Measures aimed at reducing the impacts pertaining to construction. PDF-NOISE-1 and PDF-NOISE-2 would establish approved haul routes to minimize off-site roadway noise on local roadways and would establish a community liaison to respond to any issues and/or concerns related to construction activities. Additionally, the Project would implement mitigation measures NOISE-1 through NOISE-4 (refer to Chapter 3 and 4 of the Final EIR) which include stationary equipment enclosures, mobile noise barriers, mufflers and other noise control devices, and vibration equipment setback distances. The Draft EIR concludes that the incorporation of these PDFs and implementation of mitigation measures would help reduce construction noise and vibration impacts, however, construction noise impacts associated with on-site noise sources and construction vibration impacts related to human annoyance would remain significant and unavoidable (Draft EIR pages 3.12-30-37 through 3.12-38 and 3.12-53 through 3.12-56).

2.2.8 Public Safety

As described in Chapter 2, *Project Description*, an Operations and Maintenance Plan, including a Security Plan, would be prepared prior to Project construction and implemented during operation of the Project for public protection. The Security Plan would incorporate a security program to ensure the safety of park visitors, which could include the use of security staff, emergency call boxes, and other public safety devices. Staff would provide oversight over the area's large acreage and address safety concerns related to the reservoir space and unsafe behavior. The Security Plan would be implemented in connection with the removal of the perimeter fence, as each proposed park zone is constructed.

Regarding crime and public safety, police service impacts were addressed in Section 3.14, *Public Services*, of the Draft EIR. Pursuant to the CEQA Guidelines, and the thresholds used by the City to determine the significance of impacts to police services, the focus of the analyses is on whether or not new or expanded facilities are needed to maintain adequate public service and whether a potential physical impact could occur if construction of facilities was warranted. In the case of the Project, it was determined that the Project would not generate a demand for additional police

protection services that would result in the need for new or expanded police services facilities. As such, Section 3.14 concluded that impacts to police services would be less than significant. In addition, during construction Project Design Feature PDF-1: Construction Security Measures, would be implemented and would include on-site security measures such as security lighting and a construction security fence with gated and locked entry around active construction areas. During Special Events, Project Design Feature PDF-2: Operational Security Measures, would be implemented during Special Events that occur after dusk and that may require security lighting. As previously stated, the Project's Safety Plan would include security features that would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services.

2.2.9 Drought Conditions

As discussed in the Project Description, Section 2.7.3, LADWP would continue to replenish the reservoir water as needed, through the existing Pollock Well No. 3, similar to existing conditions. The proposed Project would be designed to accommodate operational water level fluctuations and to support varied shallow wading habitat. Water level monitoring would be described in the proposed Project's Wetland Management Plan. As described in Chapter 2, Project Description, LADWP's Water Shortage Contingency Plan (WSCP) has been developed to fortify LADWP's drought resilience through the use of existing storage facilities and water supplies that do not include the Silver Lake Reservoir Complex. The Silver Lake Reservoir Complex was removed from LADWP's water supply system in 2008 and Ivanhoe Reservoir was removed in 2018. Since that time, the reservoir has been off-line and does not contribute to LADWP's drought resilience portfolio. As noted in the Project Description, Section 2.7.4, under certain drought conditions or other emergencies declared by local, state, or federal agencies, water levels in Silver Lake and Ivanhoe Reservoirs may be lowered to conform to emergency water conservation requirements. Further, as discussed in Section 3.10 of the Draft EIR, Hydrology and Water Quality, operational constraints may require modification to the water levels corresponding to overall system needs, including the need to prioritize use of local groundwater to augment potable water supplies during periods of drought. In addition, the proposed Project would be designed to include minimal vegetation along the south end of the reservoir, where water could be drawn from via helicopter by the City and the County of Los Angeles Fire Departments in order to continue to support the use of the reservoir for firefighting needs.

2.2.10 Funding and Operations

At this time, funding is needed to construct and operate the proposed Project. In addition, an operator for the proposed Project still needs to be identified. As described in Chapter 7 of the Master Plan, *Capital Funding Strategies*, a range of potential public and other funding mechanisms were analyzed that could be leveraged to fund construction capital and operating needs of the proposed Project. Six public mechanisms were reviewed including: Community Finance Districts (CFD), Development Agreement Fees, Enhanced Infrastructure Financing Districts, Parcel Taxes, Quimby Fees, and Special Assessment Districts. Additional funding sources identified were Grant Funding and Philanthropic contributions.

Chapter 8 of the Master Plan, *Park Governance, Operations & Maintenance*, includes a recommendation for park governance centered around the formation of an independent, special-purpose, non-profit entity charged with stewarding the build out and operation of the proposed Project. A special-purpose entity can provide the leadership to manage Project implementation and long-term operations. It can also fundraise to support construction capital and O&M costs, with a Board of Directors that is representative of committed Project stakeholders.

2.2.11 Alternatives Analysis

This master response discusses the requirements of CEQA with respect to the development of alternatives in the Draft EIR, and why the additional alternatives suggested by commenters were found to either be infeasible or not required to be considered in detail.

Substantive Mandate of CEQA

Although CEQA is primarily a procedural statute, it does contain a ““substantive mandate” requiring public agencies to refrain from approving projects with significant environmental effects if “there are feasible alternatives or mitigation measures” that can substantially lessen or avoid those effects.””¹ A basic purpose of CEQA is to “[p]revent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.”² As the Legislature found and declared with respect to CEQA:

[I]t is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by [CEQA] are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

(Public Resources Code § 21002.)

CEQA Requirements Regarding the Scope of Alternatives

For a detailed discussion of the alternatives analysis in the Draft EIR, please refer to Chapter 5, *Analysis of Alternatives*. Section 21100(b)(4) of the Public Resources Code states that an EIR shall include a detailed statement setting forth alternatives to the Project. Under the CEQA Guidelines, the range of alternatives to the proposed Project should include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially

¹ California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957, 978 (CNPS), quoting County of San Diego v. Grossmont–Cuyamaca Community College Dist. (2006) 141 Cal.App.4th 86, 98.

² CEQA Guidelines § 15002(a)(3); see also *id.* at § 15021 (a) (“CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible”).

lessen one or more significant effects.³ The Draft EIR discusses two alternatives to the proposed Project, in addition to the “no project” alternative. The Draft EIR compared the potential environmental effects of the proposed Project to the potential effects of each alternative, in relation to the existing conditions (i.e., baseline).

CEQA Requirements for “A Reasonable Range of Alternatives”

Under the CEQA Guidelines, the lead agency for a project must consider a reasonable range of alternatives that would feasibly attain all or most of the project objectives but would avoid or substantially lessen any of the significant impacts of the proposed project.⁴ The requirements regarding the selection of alternatives under CEQA are laid out in CEQA Guidelines Section 15126.6.

Subdivision (a) of that section provides:

Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subdivision (b) provides:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

Subdivision (c) further provides:

Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that

³ CEQA Guidelines § 15126.6(a).

⁴ CEQA Guidelines § 15126.6(a).

may be used to eliminate alternatives from detailed consideration in an EIR are:
(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

And lastly, subdivision (f) emphasizes the “rule of reason” applicable to the selection of alternatives:

Rule of reason. The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

Under these principles, alternatives to be included in an EIR must: (1) be potentially feasible, (2) attain most of the basic objectives of the project, and (3) avoid or substantially lessen any of the significant effects of the project. Under CEQA, a lead agency may structure its alternatives analysis around a reasonable definition of a fundamental underlying purpose, and need not study alternatives that cannot achieve that basic purpose.⁵ An EIR need not consider alternatives that are infeasible.⁶ CEQA defines “feasible” as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.⁷

An EIR need not consider all potential alternatives to the project. Rather, CEQA requires that an EIR discuss only a “reasonable range” of alternatives.⁸ CEQA does not require that the EIR study specific alternatives proposed by the public or other agencies.⁹ The lead agency must make a good faith effort to identify and study a reasonable range of appropriate alternatives to the proposed project.¹⁰

Because CEQA establishes no legal imperative as to the scope of alternatives to be analyzed in an EIR, there is no set number of alternatives that must be analyzed to fulfill the requirements of CEQA.¹¹ Rather, as stated in the CEQA Guidelines and supported by abundant CEQA case

⁵ In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1165.

⁶ CEQA Guidelines § 15126.6(a).

⁷ Public Resources Code § 21061.1; CEQA Guidelines § 15364.

⁸ CEQA Guidelines § 15126.6(a).

⁹ Center for Biological Diversity v. Department of Fish and Wildlife (2015) 234 Cal.App.4th 214, 256.

¹⁰ City of Maywood v. Los Angeles Unified Sch. Dist. (2012) 208 Cal.App.4th 362, 420.

¹¹ See, e.g., Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 566; Save San Francisco Bay Association v. San Francisco Bay Conservation and Development Commission (1992) 10 Cal.App.4th 908, 919; Mann v. Community Redevelopment Agency (1991) 233 Cal.App.3d 1143, 1151.

law,¹² the range of alternatives required in an EIR is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.¹³

Furthermore, according to CEQA case law, where the alternatives analyzed in the EIR allow for a wide range of choices with varying degrees of environmental impacts, the document may support the ultimate approval not only of the fully developed alternatives, but also what might be called “hybrid” alternatives whose features and impacts occur within the analytical continuum between the “bookends” created by the least-impacting and most-impacting alternatives, respectively.¹⁴

CEQA Requirements Regarding Project Objectives

A project description must state the objectives sought by the proposed project. The statement of objectives also describes the underlying purpose of the project, and guides the evaluation of alternatives in the EIR.¹⁵ The alternatives considered should be able to “feasibly attain most of the basic objectives of the project” while reducing or avoiding any of the project’s significant impacts.¹⁶

While project objectives should not be so narrowly defined that they preclude consideration of reasonable alternatives, a lead agency has broad discretion to formulate project objectives.¹⁷ A lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal.¹⁸

How a Proposed Project and EIR Alternatives Inform Public Decision-making

Some comments imply that the CEQA process is more rigid than it is intended to be. It is to be expected—and hoped—that a project may change for the better over the course of, and as a result of, the environmental review process:

The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.¹⁹

¹² See, e.g., *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566; *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143; *California Native Plant Soc. v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 980.

¹³ CEQA Guidelines § Section 15126.6(c),(f).

¹⁴ See, e.g., *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1028–1029; *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 274–277; *Cherry Valley Pass Acres and Neighbors et al. v. City of Beaumont* (2010) 190 Cal.App.4th 316, 353–356; *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 334–336.

¹⁵ See CEQA Guidelines §15124(b).

¹⁶ See CEQA Guidelines §15126.6(a).

¹⁷ See, e.g., *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276.

¹⁸ See, e.g., *In re Bay-Delta*, 43 Cal.4th 1143, 1166; *North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 668.

¹⁹ *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199.

Once an EIR has been prepared evaluating a project and alternatives, CEQA *encourages* project modifications that reduce environmental impacts.²⁰ “The EIR itself does not control the way in which a project can be built or carried out.”²¹ Rather, a primary purpose of an EIR is to facilitate the generation of concrete suggestions as to how projects may be modified to avoid causing, or to reduce the severity of, significant environmental impacts. Recognized means of modifying a project in response to environmental concerns include: (1) revising a project proposal; (2) imposing conditions on project approval; (3) choosing an environmentally superior alternative; or (4) disapproving the project.²²

“CEQA does not handcuff decisionmakers The action approved need not be a blanket approval of the entire project initially described in the EIR. If that were the case, the informational value of the document would be sacrificed. Decisionmakers should have the flexibility to implement that portion of a project which satisfies their environmental concerns.”²³ It is therefore permissible for agency decisionmakers to approve an EIR alternative instead of the proposed project as found in an EIR. Indeed, if an alternative can lessen the significant effects of a proposed project and the alternative is feasible, then CEQA favors approval of the alternative over approval of the proposed project. It is also permissible for an agency to approve a variation on either a proposed project or an alternative that does not exactly match either the proposed project or any of the alternatives.²⁴

Alternatives Considered (No Project, Alternative 2, and Alternative 3)

The City considered a number of potentially feasible alternatives to the Project, as discussed in Section 5.0 of the Draft EIR. These were initially developed for the Project based on comments received during the NOP period and those that arose as part of the Draft EIR preparation. These alternatives are discussed in Section 5.3 of the Draft EIR.

No Project Alternative

As required by CEQA Guidelines Section 15126.6(e), among the project alternatives, an EIR should include a “no project” alternative. The No Project Alternative would retain existing conditions...as well as what would be reasonably expected to occur in the foreseeable future if the Project were not approved.

As discussed in Section 5.3.1 of the Draft EIR, improvements to the SLRC would not occur and existing operations by LADWP and RAP would continue. The Project site would not be redesigned with new community park amenities. The perimeter fence would not be removed and additional areas within the SLRC would not be open to the public. The SLRC would remain as an enclosed facility, with public access limited to the existing areas managed by RAP. LADWP facilities would continue to operate under existing protocols, including maintenance of the dams and reservoirs. The No Project Alternative would avoid the significant unavoidable impacts

²⁰ Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 738.

²¹ CEQA Guidelines § 15002(h).

²² *Ibid.*

²³ South of Market Community Action Network v. City and County of San Francisco (2019) 33 Cal.App.5th 321, 336 (South of Market), quoting Dusek v. Redevelopment Agency (1985) 173 Cal.App.3d 1029, 1041.

²⁴ *South of Market, supra*, 33 Cal.App.5th at p. 336.

associated with the adoption and implementation of the Project (under Scenario 3), but sidewalk repairs undertaken under existing regulations and policies may still result in environmental impacts. Under the No Project Alternative, the fundamental objective of the proposed Project—to repurpose the SLRC as a public park—would not be met. Although the No Project Alternative would not result in significant environmental impacts, it would also not include the benefits that would occur with implementation of the proposed Project or the other alternatives evaluated, Alternative 2 – Reduced Project or Alternative 3 – Natural Lands and Open Space Preserve.

Alternative 2 – Reduced Project

As discussed in Section 5.3.2 of the Draft EIR, Alternative 2 would modify the existing SLRC into a public park, similar to the proposed Project, but it would not build any new structures. Alternative 2 would be constructed within a similar overall footprint as the proposed Project and would focus only on the habitat enhancement aspect of the proposed Project. This alternative would include some updates to the South Valley’s existing Recreation Center, but the center would not be reconfigured. Special events would not be allowed as part of this alternative. Offsite bike improvements would occur along Silver Lake Boulevard and no new parking would be added near the South Valley along West Silver Lake Drive.

The expected environmental impacts of Alternative 2 would be less than the proposed Project due to the reduced amount of construction and elimination of permitted special events. Since Alternative 2 would construct the fewest structures, it would result in the least amount of construction and least noise, vibration, and air emissions, and is considered the Environmentally Superior Alternative (outside of the No Project Alternative), as discussed in Section 5.7 of the Draft EIR. Alternative 2 would meet all of the Project objectives, but to a lesser degree than the proposed Project. Eliminating the ability to provide special events at the park diminishes the objective to “increase spaces for community and family gatherings.” In addition, by eliminating all built structures, Alternative 2 would not provide all the recreational and community benefits included in the proposed Project and envisioned in the primary Project objective.

Alternative 3 – Natural Lands and Open Space Preserve

As discussed in Section 5.3.4 of the Draft EIR, Alternative 3 – Silver Lake Reservoirs Natural Lands and Open Space Preserve Alternative was proposed during the public scoping period and, as a result, is essentially a hybrid of Project components, focused on improving/maintaining current habitat values in much of the park, while maintaining some recreational features such as the Multi-Purpose Facility in the South Valley. Alternative 3 would be constructed within a similar overall footprint as the proposed Project and would focus on limiting public access to the Knoll, Eucalyptus Grove, and the water’s edge. As part of this Alternative, an 8-foot-high, non-scalable, continuous perimeter fence with access gates would be constructed. This alternative would retain all current public use facilities while improving the more heavily-used facilities on the South Valley. In addition, Alternative 3 would reduce the overall construction and operation intensity by eliminating some of the public-use built structures. This alternative would create less wetland habitat, which would exist only around the perimeter of Silver Lake Reservoir; no habitat islands would be added, and no embankment improvements would occur.

The environmental impacts of Alternative 3 would be less than the proposed Project due to the reduced amount of construction and elimination of permitted special events. However, Alternative 3 would result in more noise, vibration, and air emissions than Alternative 2 because it would construct more structures. However, Alternative 3 would result in a greater benefit to habitat values. Alternative 3 would meet some of the Project objectives, but would not enhance the public points of access to the water's edge or improve community and family gathering opportunities. Alternative 3 would also not enhance and expand wildlife habitat by introducing wetland and aquatic ecologies.

The impacts of the Alternative 1 –No Project Alternative and Alternatives 2 and 3 and a comparison of impacts between the Project, the No Project Alternative, and Alternatives 2 and 3 are provided in Sections 5.5 and 5.6 of the Draft EIR.

Alternatives Rejected from Further Consideration

Recreation Focused Alternative

As discussed in Section 5.2 of the Draft EIR, several other alternatives were considered but rejected from further consideration. Under the Recreation Focused Alternative, the Project would include more intensive active recreational uses identified in the SLRC Master Plan, such as a new playground, pool, splashpad, boat house, pool house, and café. Public water activities, including boating and swimming, would be permitted. Under this alternative, the Project site would be intended to accommodate special events on a regular basis and extended hours would be allowed with additional lighting for nighttime activities. Project elements related to wildlife habitat creation, including wetland terraces, islands, and embankment enhancements would not occur. This alternative was rejected because it: (1) would not serve to reduce any of the proposed Project's significant impacts; (2) would increase operational noise impacts with the increase in park attendance focused around the reservoir and active recreational activities and increase water use related to swimming pool and splashpad operations; and (3) would not meet the Project objectives of enhancing and expanding wildlife habitat by introducing wetland and aquatic ecologies and improving upland habitat and providing opportunities for connecting with nature, environmental education, and stewardship.

Alternative Project Site

Creating new recreational facilities in a different location would not meet the fundamental Project objective to repurpose the site. The City already owns the Project site and cannot reasonably be expected to acquire, control, or access an alternative site that would meet the Project's basic objectives in a timely fashion. It is anticipated that significant and unavoidable impacts associated with noise for any other site within Los Angeles where land is available for use as a park would still occur, as the city is built out, and funds for acquiring a new property are not available. Therefore, this alternative site was rejected because the City does not own another suitable site that would achieve the underlying purpose and objectives of the proposed Project.

Hybrid Alternatives

As discussed in Section 5.5.4 of the Draft EIR, hybrids of the evaluated alternatives were considered, but they were rejected because, if the components of any of these alternatives were

combined to create a new alternative, the new Project alternative would not result in a substantially different conclusion when comparing environmental impacts and meeting the Project objectives relative to the proposed Project and the alternatives considered. An EIR need not include multiple hybrid variations on the alternatives that it does consider when the relative advantages and disadvantages of other alternatives can be assessed from a review of the alternatives presented in an EIR.²⁵ Furthermore, as stated previously, the EIR allows for a wide range of choices with varying degrees of environmental impacts. An EIR may support the ultimate approval by decision-makers of hybrid alternatives whose features and impacts occur within the analytical continuum between the “bookends” created by the least-impacting and most-impacting alternatives.

Consideration of Alternatives at the EIR Stage and at Project Approval

When evaluating alternatives for an EIR, the lead agency’s task is to identify a range of “potentially feasible” alternatives that will satisfy basic project objectives while reducing significant impacts and excluding infeasible alternatives that will not meet most project objectives, cannot be implemented, or will not reduce a significant impact.²⁶ Subsequently, at the project approval stage, the lead agency’s decisionmakers weigh the relative advantages and disadvantages of the project and the alternatives after weighing environmental factors, as well as legal and policy considerations.²⁷ If the agency determines that the project will best achieve project objectives, taking account of relevant economic, environmental, social, technological, legal, and other factors, it may approve the project and find the alternatives “infeasible.”²⁸

2.2.12 EIR Recirculation Requirements

CEQA Guidelines Section 15088.5 requires that an EIR that has been made available for public review, but not yet certified, be recirculated whenever significant new information has been added to the EIR. The entire document need not be circulated if revisions are limited to specific portions of the document.

The relevant portions of CEQA Guidelines Section 15088.5 are as follows:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term ‘information’ can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not

²⁵ See, for example, *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1028; *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 355; *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 577.

²⁶ See CEQA Guidelines § 15126.6(a),(c). See also *South County Citizens for Smart Growth v. County of Nevada* (2013) 221 Cal.App.4th 316, 327; *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1504 n5; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 489.

²⁷ See Pub. Resources Code § 21081(a)(3); CEQA Guidelines § 15091. See *California Native Plant Soc’y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 981.

²⁸ See Pub. Resources Code §§ 21061.1, 21081(a)(3); CEQA Guidelines § 15091(a)(3) and (c)(3), 15364. Pub Res C §21061.1; 14 Cal Code Regs §15364. See also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1002; *No Slo Transit, Inc. v. City of Long Beach* (1987) 197 Cal.App.3d 241, 257.

“significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043)
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The information contained in Chapter 3 of the Final EIR clarifies or refines information in the Draft EIR but does not make any changes that would meet the definition of “significant new information” as defined above. The information added to the Draft EIR does not change the Draft EIR in a way that deprives the public of a meaningful opportunity to comment upon a new or substantially increased significant environmental effect of the proposed Project or disclose a feasible alternative or mitigation measure the Applicant has declined to adopt. As provided by the discussion in Chapter 3 of the Final EIR, the revisions, clarifications, and corrections to the Draft EIR would not result in new significant impacts or increase any impact already identified in the Draft EIR.

2.3 Comments Received on the Draft EIR

**TABLE 2-1
COMMENTS RECEIVED IN RESPONSE TO THE DRAFT EIR**

No.	Name	Date Received
State Agency		
S-1	Miya Edmonson; Caltrans, District 7	11/14/2022
Local Agency		
L-1	Daniel Cooper; Resource Conservation District Santa Monica Mountains	12/14/2022
Community Organization		
C-1 to C-6	Doranne Jung; Micheltorena WEPA Wildlife Ecosystem Protection Advocates	11/3/2022 to 11/12/22
C-7	Andrea Horwatt; Silver Lake Now	11/21/2022
C-8 to C-12	Doranne Jung; Micheltorena WEPA Wildlife Ecosystem Protection Advocates	11/21/2022 to 11/28/22

No.	Name	Date Received
C-13	Adelina Sorkin; Knights of Kenilworth	11/30/2022
C-14 to C-15	Doranne Jung; Micheltorena WEPA Wildlife Ecosystem Protection Advocates	11/30/2022 and 12/01/22
C-16	Benjamin Harris; Los Angeles Waterkeeper	12/2/2022
C-17	Amanda Zellmer; Occidental College	12/6/2022
C-18	Eli Kaufman; BikeLA (LA County Bicycle Coalition)	12/7/2022
C-19 to C-20	Doranne Jung; Micheltorena WEPA Wildlife Ecosystem Protection Advocates	12/6/2022 to 12/8/22
C-21	Adam Sieff; Silver Lake Forward	12/9/2022
C-22 to C-26	Doranne Jung; Micheltorena WEPA Wildlife Ecosystem Protection Advocates	12/9/2022 to 12/14/22
C-27	Stephanie Bartron; Silver Lake Reservoirs Conservancy	12/14/2022
C-28 to C-29	Amy Minter; Chatten-Brown Carstens & Minter LLP	12/15/2022
C-30 to C-36	Anonymous; Silver Lake Wildlife Sanctuary	12/15/2022
C-37	Doranne Jung; Micheltorena WEPA Wildlife Ecosystem Protection Advocates	12/15/2022
C-38	Doranne Jung; Micheltorena WEPA Wildlife Ecosystem Protection Advocates	12/15/2022
C-39	Travis Longcore; Los Angeles Audubon Society	12/16/2022
C-40 to C-41	Caren And Robert Singer and Wolin; Silver Lake Residents for Less Is More	12/17/2022
C-42	Michael Schneider; Streets For All	12/16/2022
Individual		
I-1	Alyssa Reponen	10/6/2022
I-2	Robert Ashton	10/7/2022
I-3	Jesse Gillan	10/7/2022
I-4	Michael Hayes	10/7/2022
I-5	Linda Okamura	10/9/2022
I-6	Alex Freedman	10/9/2022
I-7	Isaac Rubinstein	10/9/2022
I-8	Ainsley Cohen	10/9/2022
I-9	Andrew Lush	10/10/2022
I-10	Mary Anne Hattemer	10/12/2022
I-11	Anonymous Anonymous	10/12/2022
I-12	Anonymous Anonymous	10/12/2022
I-13	Anonymous Anonymous	10/12/2022
I-14	Glen Beard	10/12/2022
I-15	Kristen Mcgrath	10/13/2022
I-16	Patricia Mcgrath	10/13/2022
I-17	Beth Rabin	10/13/2022
I-18	Michelle Fauchaux	10/13/2022
I-19	Theresa Sterling	10/13/2022
I-20	Shirley Egbert	10/13/2022
I-21	John Butcher	10/13/2022
I-22	Mary Frauchiger	10/13/2022
I-23	Hugh Kenny	10/14/2022
I-24	Jayson Matthews	10/14/2022
I-25	John Butcher	10/14/2022
I-26	Scott Sternberg	10/17/2022
I-27	Mcshane Murnane	10/17/2022
I-28	Elzie Whitlow	10/21/2022
I-29	Woody Thompson	10/21/2022
I-30	Sherry Walker	10/21/2022
I-31	Lenore Dowling	10/21/2022
I-32	Joy Boyajian	10/21/2022

No.	Name	Date Received
I-33	Wendy Klein	10/21/2022
I-34 to I-35	Brian Wakil	10/21/2022
I-36	Mike Jordan	10/22/2022
I-37	Guillermo Bordarampe	10/22/2022
I-38	Karen Cusolito	10/23/2022
I-39	Lena Najarian	10/23/2022
I-40	Adam Kopald	10/23/2022
I-41	August Brown	10/23/2022
I-42	Annie Arsha	10/23/2022
I-43	Donald Parker	10/23/2022
I-44	Debbie Slater	10/23/2022
I-45	Doris Slater	10/23/2022
I-46	Peter Taylor	10/24/2022
I-47	Terence Heuston	10/24/2022
I-48	Dan Gaffey	10/24/2022
I-49	Chris Young	10/24/2022
I-50	Waseem Jafar	10/24/2022
I-51	Christi Moore	10/25/2022
I-52	Charles Herman-Wurmfeld	10/25/2022
I-53	Hope Arnold	10/25/2022
I-54 to I-55	Andrew May	10/25/2022
I-56	Sailor Made	10/25/2022
I-57	Florence Rosen	10/25/2022
I-58	Julia Stuart Yilmaz	10/25/2022
I-59	Irene Tanji	10/25/2022
I-60	Patricia Silva	10/25/2022
I-61 to I-64	Paul Feldman	10/26/2022
I-65	Robert Moore	10/26/2022
I-66	Marsea Goldberg	10/26/2022
I-67	Donald Parker	10/26/2022
I-68	James Ellsworth	10/26/2022
I-69	Ilene Wilson-Thompson	10/27/2022
I-70	Chris Aaron	10/27/2022
I-71	Erica Goebel	10/27/2022
I-72	Paul Feldman	10/27/2022
I-73	Yvette Boleslav	10/27/2022
I-74	Dene Feldman	10/27/2022
I-75	Elizabeth Keenan	10/27/2022
I-76 to I-78	Mike Jordan	10/27/2022
I-79	Meghan Rogers	10/29/2022
I-80	Erica Goebel	10/30/2022
I-81	Anna Donlin	11/1/2022
I-82	Marinda Kaiser	11/2/2022
I-83	David And Irene Tanji	11/2/2022
I-84	Ethan Lower	11/2/2022
I-85	Tanya Tolmachoff	11/2/2022
I-86	Keren Yilmaz	11/2/2022
I-87	Christi Moore	11/3/2022
I-88	Manohla Dargis	11/3/2022
I-89	Adam Pergament	11/5/2022
I-90	Julia Grant	11/5/2022
I-91	James Chinlund	11/9/2022
I-92	Fred Aronow	11/9/2022
I-93	Jerold Kress	11/10/2022

No.	Name	Date Received
I-94	Noah Baylin	11/10/2022
I-95	Anonymous Anonymous	11/11/2022
I-96	Silka Luisa	11/11/2022
I-97	A T	11/11/2022
I-98	Sue Iri	11/17/2022
I-99	Nathaniel Koenig	11/14/2022
I-100	Grigor Bakchajian	11/14/2022
I-101	Brian Wakil	11/15/2022
I-102	Janet Upjohn	11/15/2022
I-103	Carol Ng	11/15/2022
I-104	Peter Alexander	11/15/2022
I-105	Joyce Peyton	11/15/2022
I-106	Pamela Burian	11/15/2022
I-107	Jeff Lindfors	11/15/2022
I-108	Anonymous Anonymous	11/15/2022
I-109	Geoffrey Booth	11/16/2022
I-110	Paul Feldman	11/18/2022
I-111 to I-112	Alexander M	11/18/2022
I-113	Geoffrey Lower	11/18/2022
I-114	Hugh Kenny	11/18/2022
I-115 to I-116	Paul Feldman	11/18/2022
I-117	Vincent Brook	11/20/2022
I-118	Leslie Edmonds	11/21/2022
I-119	Robert Burton	11/21/2022
I-120	Karen Cusolito	11/21/2022
I-121	La Ship	11/22/2022
I-122	Ethan Gold	11/23/2022
I-123	Jackson Sweeney	11/23/2022
I-124	Rolando Riggio	11/23/2022
I-125	Austin Lozano	11/23/2022
I-126	Dene Feldman	11/23/2022
I-127	Pat Saperstein	11/23/2022
I-128	Yasmin Grewal-Kok	11/24/2022
I-129	Andrew Sears	11/24/2022
I-130	Morgan Blair	11/25/2022
I-131	Casey Wollenberg	11/25/2022
I-132	Patricia Mcgrath	11/25/2022
I-133	Bruce Burke	11/25/2022
I-134	Maryann Kuk	11/25/2022
I-135	Nicole Antoine	11/25/2022
I-136	Mandy Kaiser	11/25/2022
I-137	Joshua Shenk	11/26/2022
I-138	Wendy Mitchell	11/26/2022
I-139	Sandy Kaye	11/26/2022
I-140	Christopher Covella	11/26/2022
I-141	Geoffrey Lower	11/26/2022
I-142	Christopher Covella	11/26/2022
I-143	Kate Schley	11/26/2022
I-144	Jonathan Schley	11/26/2022
I-145	Kelly Coyne	11/26/2022
I-146	Brandon Depriest	11/26/2022
I-147	Rita Valencia	11/26/2022
I-148	Susan Borden	11/26/2022
I-149	Chris Young	11/26/2022

No.	Name	Date Received
I-150	Andrew Bush	11/26/2022
I-151	Cash McBride	11/27/2022
I-152	David Jones	11/27/2022
I-153	Pilar Munoz	11/27/2022
I-154	Karen Lower	11/27/2022
I-155	Tara Pattie	11/27/2022
I-156	Hugh Kenny	11/28/2022
I-157	Lenore Dowling	11/28/2022
I-158 to I-164	Paul Feldman	11/28/2022
I-165	Dorcas Tokes	11/28/2022
I-166	Berkley Johnson	11/28/2022
I-167	Paul Feldman	11/28/2022
I-168 to I-169	David Shayne	11/29/2022
I-170	Dan Gershon	11/29/2022
I-171	Joseph Hankins	11/29/2022
I-172	Guy Vidal	11/29/2022
I-173	Geoffrey Lower	11/29/2022
I-174	Maegan Houang	11/29/2022
I-175	Johnny Wahba	11/29/2022
I-176	Mike Pessah	11/29/2022
I-177	Jason Mcdade	11/29/2022
I-178 to I-179	Louise Steinman	11/29/2022
I-180	Lloyd Hamrol	11/29/2022
I-181	Leo Malek	11/29/2022
I-182	Brent Butler	11/29/2022
I-183	Jennifer Stoller	11/29/2022
I-184	Adam Kopald	11/29/2022
I-185	Khoi Pham	11/30/2022
I-186	John Kerr	11/30/2022
I-187	D Mcarthur	11/30/2022
I-188	Jennifer Stoller	11/30/2022
I-189	Andrew Foster	11/30/2022
I-190	Kabir Akhtar	11/30/2022
I-191	Jeff Carr	11/30/2022
I-192	Robert Soderstrom	11/30/2022
I-193	Laurien Alexandre	11/30/2022
I-194 to I-195	Joy Boyajian	11/30/2022
I-196	Marsian De Lellis	11/30/2022
I-197	Janice Tanaka	11/30/2022
I-198	Jackson George	11/30/2022
I-199	Debbie Slater	11/30/2022
I-200	Christopher Covella	11/30/2022
I-201	Louis Guin	11/30/2022
I-202	Simon Miller	11/30/2022
I-203	Elizabeth Bougart-Sharkov	11/30/2022
I-204	Martin Gottlieb	11/30/2022
I-205	Julia Grant	11/30/2022
I-206	Frederick Silny	11/30/2022
I-207	Dana Duff	11/30/2022
I-208	Molly Siple	11/30/2022
I-209	Linden Waddell	11/30/2022
I-210	Heather Lowe	11/30/2022
I-211	Henrik Rehbinder	11/30/2022
I-212	Stephanie Bartron	11/30/2022

No.	Name	Date Received
I-213	Cecilia Bordarampe	11/30/2022
I-214	Joyce Bordarampe	11/30/2022
I-215	Guillermo Bordarampe	11/30/2022
I-216	Ian Becker	12/1/2022
I-217	Kayten Schmidt	12/1/2022
I-218	Michael Kortlander	12/1/2022
I-219	Kevin Bannerman	12/1/2022
I-220	Ken Lee	12/1/2022
I-221	Mollie Mcdowell	12/1/2022
I-222	Douglas Loewy	12/1/2022
I-223	Shirley Egbert	12/1/2022
I-224	Sara Collis	12/1/2022
I-225	Megan Burton	12/1/2022
I-226	Catherine Geanuracos	12/1/2022
I-227	Damir Vukovljak	12/1/2022
I-228 to I-233	Paul Feldman	12/1/2022
I-234	Rosalyn Steiner	12/1/2022
I-235	Marol Butcher	12/1/2022
I-236	Barbara Hoff	12/1/2022
I-237	Amelia Casanova	12/1/2022
I-238	Daniel Weidlein	12/1/2022
I-239	Eric Krikorian	12/1/2022
I-240	Kerry Hannawell	12/1/2022
I-241	Andrew Parker	12/1/2022
I-242	Lynda Obst	12/1/2022
I-243	Tanya Peacock	12/1/2022
I-244	Michael Elowitz	12/1/2022
I-245	Morgan Blair	12/1/2022
I-246	Suzanne Obdrzalek	12/1/2022
I-247	Steven Klein	12/1/2022
I-248	James Cory	12/1/2022
I-249	Julia Grant	12/1/2022
I-250 to I-251	Peter Benoit	12/1/2022
I-252	Christi Moore	12/1/2022
I-253	Suvi	12/1/2022
I-254	L Cohn	12/1/2022
I-255	Jason Filipow	12/1/2022
I-256	Aaron Burrows	12/1/2022
I-257	Quyen Tran	12/1/2022
I-258	Jenna Schoenefeld	12/1/2022
I-259	Josh Warner	12/1/2022
I-260	Laura Gowen	12/1/2022
I-261	Alan Berman	12/1/2022
I-262	Joseph Hogg	12/1/2022
I-263	Larry Bamberger	12/1/2022
I-264	Joseph Hogg	12/1/2022
I-265	Marlys Gilgen	12/1/2022
I-266	Leigh Jacoby	12/1/2022
I-267	Diana Nitchman	12/1/2022
I-268	John Butcher	12/1/2022
I-269	Matthew Brown	12/1/2022
I-270	Terrence Jackson	12/1/2022
I-271	Joseph Hogg	12/1/2022
I-272	Kathleen Johnson	12/1/2022

No.	Name	Date Received
I-273	Bill Spater	12/1/2022
I-274	Ryan Parmenter	12/1/2022
I-275	Rattanawadee Salukkam	12/1/2022
I-276	Lorraine Sarles	12/1/2022
I-277	Joseph Sarles	12/1/2022
I-278	Robin Singleton	12/1/2022
I-279	Paul Tzanetopoulos	12/1/2022
I-280	Kim Fisher	12/1/2022
I-281	Donald Parker	12/2/2022
I-282	Mara Kuge	12/2/2022
I-283	Elsie Acevedo	12/2/2022
I-284	Ramon Chi	12/2/2022
I-285	Patricia Wong	12/2/2022
I-286	James Martin	12/2/2022
I-287	Amanda Lasher	12/2/2022
I-288	Vivien Kotler	12/2/2022
I-289	Courtney Allen	12/2/2022
I-290	Eli Bonerz	12/2/2022
I-291	Chris Hogan	12/2/2022
I-292	David Magid	12/2/2022
I-293	Susan Simon	12/2/2022
I-294	Ja Lu	12/2/2022
I-295	John Paul Drayer	12/2/2022
I-296	Judith Serlin	12/2/2022
I-297	Jasmin Miller	12/2/2022
I-298	Jonathan Gluckman	12/2/2022
I-299	Benjamin Stilp	12/2/2022
I-300	Janet Carol Norton	12/2/2022
I-301	Sascha Rice	12/2/2022
I-302	Dana Balkin	12/2/2022
I-303	Juliann Budimir	12/2/2022
I-304	John Southern	12/2/2022
I-305	Andras Kanegson	12/2/2022
I-306	Michael Mahler	12/2/2022
I-307	Gorgi Angelkovski	12/2/2022
I-308	Michael Sweeney	12/2/2022
I-309	Anil Baral	12/2/2022
I-310	Susie Fukuhara	12/2/2022
I-311	Joyce Peyton	12/2/2022
I-312	Casey Wollenberg	12/2/2022
I-313	Christopher Rogers	12/2/2022
I-314	Paul Byrne	12/2/2022
I-315	Gerry Hans	12/2/2022
I-316	Jeremy Benjamin	12/2/2022
I-317	Alessandra Franco	12/2/2022
I-318	Donna Barstow	12/2/2022
I-319	Kristen Gutoskie	12/2/2022
I-320	Jake Grandchamp	12/3/2022
I-321	Rocky Collis	12/3/2022
I-322	Howard Foon	12/3/2022
I-323	Fredrik Lidskog	12/3/2022
I-324	Barbara Hoff	12/4/2022
I-325	Nicole Antoine	12/4/2022
I-326	Sara Greene	12/5/2022

No.	Name	Date Received
I-327	Julie Cash	12/5/2022
I-328	Clare Crespo	12/5/2022
I-329	Alyssa Reponen	12/5/2022
I-330	Peter Breitmayer	12/5/2022
I-331	Cam Shaw	12/5/2022
I-332	James Speed	12/5/2022
I-333	Ward Wolff	12/5/2022
I-334	Erik Reponen	12/6/2022
I-335	Olga Lexell	12/6/2022
I-336	Hillary Mushkin	12/6/2022
I-337	Lane Mcfaddin	12/6/2022
I-338	Aaron Small	12/6/2022
I-339	Michael Schneider	12/6/2022
I-340	Adam Linder	12/6/2022
I-341	William Wilbur	12/6/2022
I-342	Neale Stokes	12/6/2022
I-343	Natalie Karic	12/6/2022
I-344	Natalie Chyba	12/6/2022
I-345	Elias Platte Bermeo	12/6/2022
I-346	Peter Abraham	12/6/2022
I-347	Aida Ashouri	12/6/2022
I-348	Nick Cron-Devico	12/6/2022
I-349	Kyle Traynor	12/6/2022
I-350	Diego Tamayo	12/6/2022
I-351	Henric Nieminen	12/6/2022
I-352	Stephen Schaller	12/6/2022
I-353	Jesse Brown	12/6/2022
I-354	Kelsey Stefanson	12/6/2022
I-355	Preston Melbourneweaver	12/6/2022
I-356	Jesse Paster	12/6/2022
I-357	Nolan Thomas	12/6/2022
I-358	Lindsay Kerby	12/6/2022
I-359	Joseph Gawor	12/6/2022
I-360	James Hernandez	12/6/2022
I-361	Reed Alvarado	12/6/2022
I-362	Elizabeth Korelitz	12/6/2022
I-363	Joel Weinberger	12/6/2022
I-364	Michael T	12/6/2022
I-365	Mollie Goldberg	12/6/2022
I-366	Trevor Reed	12/6/2022
I-367	Robert Brown	12/6/2022
I-368	Nicole Antoine	12/6/2022
I-369	Ayelet Ifrah	12/6/2022
I-370	Jeff Hallstead	12/6/2022
I-371	Tieira Ryder	12/6/2022
I-372	Zeke Wapner	12/6/2022
I-373	Fred Le	12/6/2022
I-374	Ryan Leifield	12/6/2022
I-375	Kevin Massoudi	12/6/2022
I-376	Joseph O	12/6/2022
I-377	Ross Cussen	12/6/2022
I-378	John Farren	12/6/2022
I-379	Kyle Kramer	12/6/2022
I-380	Mike Royce	12/6/2022

No.	Name	Date Received
I-381	Jeffrey Hawkins	12/6/2022
I-382	Robert Funke	12/6/2022
I-383	Steven Massey	12/6/2022
I-384	Claire Levinson	12/6/2022
I-385	Gabriel Marcus	12/6/2022
I-386	Steven Stanton	12/6/2022
I-387	Christina Fan	12/6/2022
I-388	Gina Kosty	12/6/2022
I-389	Hannah Gray	12/6/2022
I-390	Sarah Gray	12/6/2022
I-391	Le Wang	12/6/2022
I-392	Nik Syam	12/6/2022
I-393	Mark Saul	12/6/2022
I-394	Auguste Miller	12/6/2022
I-395	Leslie Ridings	12/6/2022
I-396	Robert Kinsfather	12/6/2022
I-397	John Carrera	12/6/2022
I-398	Bradley Bain	12/6/2022
I-399 to I-400	Colin Kronholm	12/6/2022
I-401	Michael Schafner	12/6/2022
I-402	Marius Facktor	12/6/2022
I-403	Patrick McNally	12/6/2022
I-404	Steve Skripnik	12/6/2022
I-405	Nathan Fan	12/6/2022
I-406	Aryeh Cohen	12/6/2022
I-407	Taylor Tobin	12/6/2022
I-408	Riley McNair	12/6/2022
I-409	Laura Michet	12/6/2022
I-410	Matthew Wehner	12/6/2022
I-411	Arnav Patel	12/6/2022
I-412	Elliott Hanson	12/6/2022
I-413	Andrew Yeo	12/6/2022
I-414	Katharine Towne	12/6/2022
I-415	Sean Gilbreath	12/6/2022
I-416	Arjun Kolachalam	12/6/2022
I-417	Michelle Fink	12/6/2022
I-418	Nathan Adair	12/6/2022
I-419	Samuel Shapiro-Kline	12/6/2022
I-420	Matt Barnes	12/6/2022
I-421	Garrett Smith	12/6/2022
I-422	Peter Foster	12/6/2022
I-423	M. David Lopez	12/6/2022
I-424	Giovani Ramirez	12/6/2022
I-425	Kevin Ferguson	12/6/2022
I-426	Brett Max Kaufman	12/6/2022
I-427	Rebecca Snavelly	12/6/2022
I-428	Kevin Cao	12/6/2022
I-429	Jessica Warren	12/6/2022
I-430	Russell Bates	12/6/2022
I-431	Jessica Warren	12/6/2022
I-432	Amy Seidenwurm	12/6/2022
I-433	Katie Edgerton	12/6/2022
I-434	Lionel Mares	12/6/2022
I-435	Declan Kamonka	12/6/2022

No.	Name	Date Received
I-436	Heather Hoffman	12/6/2022
I-437	James Ingram	12/6/2022
I-438	Geoffrey Booth	12/6/2022
I-439	Peter Norwood	12/6/2022
I-440	Alex Guillemette	12/6/2022
I-441	Benjamin Feldman	12/6/2022
I-442	Gregory Kay	12/6/2022
I-443	Ilana Saul	12/6/2022
I-444	Brendan Cheng	12/6/2022
I-445	Alex Marchinski	12/6/2022
I-446	Carter Moon	12/6/2022
I-447	Giancarlo Marayag	12/6/2022
I-448	Matt Stewart	12/6/2022
I-449	Margaret Douridas	12/6/2022
I-450	Susannah Lowber	12/6/2022
I-451	Lambda Moses	12/6/2022
I-452	Kyeong Hoon Jung	12/6/2022
I-453	John English	12/6/2022
I-454	Joe Linton	12/6/2022
I-455	Charles Mulford	12/6/2022
I-456	Cristina Jung	12/6/2022
I-457	Nate Koller	12/6/2022
I-458	Aaron Stein-Chester	12/6/2022
I-459	Nick Robinson	12/6/2022
I-460	Todd Munson	12/6/2022
I-461	Robert Goldberg	12/6/2022
I-462	Jason Couse	12/6/2022
I-463	Akeem Street	12/6/2022
I-464	Stefani Manger	12/6/2022
I-465	Richard Burnam-Fink	12/6/2022
I-466	Eric Chu	12/6/2022
I-467	Ben Bressette	12/6/2022
I-468	Ethan Stockwell	12/6/2022
I-469	Andrew Reich	12/6/2022
I-470	Patrick Cleary	12/6/2022
I-471	Stuart Selonick	12/6/2022
I-472	Nicholas Bottomley	12/6/2022
I-473	Anonymous Street	12/6/2022
I-474	Sherin Bennett	12/6/2022
I-475	Annie Zaruba	12/6/2022
I-476	Michael Salazar	12/6/2022
I-477	Walid Bizri	12/6/2022
I-478	Jason Knoll	12/6/2022
I-479	Byron Smith	12/6/2022
I-480	Sarah Lippai	12/6/2022
I-481	Austin Chase	12/6/2022
I-482	Erial Tompkins	12/6/2022
I-483	Eric Pierce	12/6/2022
I-484	John Baierl	12/6/2022
I-485	Anastasia Baran	12/6/2022
I-486	Mason Makram	12/6/2022
I-487	Michael Chen	12/6/2022
I-488	Karen Canady	12/6/2022
I-489	Mark Jacobsen	12/6/2022

No.	Name	Date Received
I-490	Andy Wong	12/6/2022
I-491	Sidney Sherland	12/6/2022
I-492	Ben M	12/6/2022
I-493	Johnathan Cahill	12/6/2022
I-494	Michael Velarde	12/6/2022
I-495	Ian Lundy	12/6/2022
I-496	Benjamin Morris	12/6/2022
I-497	Andrew Soto	12/6/2022
I-498 to I-499	Philip Labes	12/6/2022
I-500	Adam Kearney	12/6/2022
I-501	Haley Thompson	12/6/2022
I-502	Daniel Kwan	12/6/2022
I-503	Renata Keck	12/6/2022
I-504	Nancy Hoven	12/6/2022
I-505	Andy Kadin	12/6/2022
I-506	Jamie Farrell	12/6/2022
I-507	Pat Chow	12/6/2022
I-508 to I-509	Samuel Digiovanni	12/6/2022
I-510	Caro Vilain	12/6/2022
I-511	Toni Wells	12/6/2022
I-512	David Matsu	12/6/2022
I-513	Charlie Sponsel	12/6/2022
I-514	Dani Gonzalez	12/7/2022
I-515	Ithyle Griffiths	12/7/2022
I-516	David Fenn	12/7/2022
I-517	Suzana Ajib	12/7/2022
I-518	Stephen Messer	12/7/2022
I-519	Malia Schilling	12/7/2022
I-520	Dustin Ebert	12/7/2022
I-521	Erik Abriss	12/7/2022
I-522	Amanda Gail Plott	12/7/2022
I-523	Rosie Dwyer	12/7/2022
I-524	Katherine Harrison	12/7/2022
I-525	Danny Vega	12/7/2022
I-526	Jonah Roth-Verity	12/7/2022
I-527	Sun Yu	12/7/2022
I-528	Ross Rivas	12/7/2022
I-529	Paula Outon	12/7/2022
I-530	Jay Helberg	12/7/2022
I-531	Addie Daddio	12/7/2022
I-532	Benjamin Climer	12/7/2022
I-533	Rick Corsini	12/7/2022
I-534	Kristen Studard	12/7/2022
I-535	Luke Allen	12/7/2022
I-536	Laurie Pepper	12/7/2022
I-537	Katelan Cunningham	12/7/2022
I-538	Chelsea M	12/7/2022
I-539	Matthew Feige	12/7/2022
I-540	Khaia Brogan	12/7/2022
I-541	Sam Junio	12/7/2022
I-542	Valerie Veg	12/7/2022
I-543	Jodhan Fine	12/7/2022
I-544	Nelson Flores	12/7/2022
I-545	Patrick Lewis	12/7/2022

No.	Name	Date Received
I-546	Jennifer A. Gill	12/7/2022
I-547	Daniel Weidlein	12/8/2022
I-548	Kevin Rutkowski	12/8/2022
I-549	Nicole Antoine	12/8/2022
I-550	Ann Phillips	12/8/2022
I-551	John Butcher	12/8/2022
I-552	Howie Goldklang	12/8/2022
I-553	Jennifer Mirabile	12/8/2022
I-554	Jim Pfenninger	12/8/2022
I-555	Lynda Obst	12/8/2022
I-556	Roanne Wahba	12/8/2022
I-557	Laura Kruper	12/8/2022
I-558	Jordan Wilson	12/8/2022
I-559	Sydney Simmering	12/8/2022
I-560	Lucy Spriggs	12/8/2022
I-561	Susan Matranga	12/8/2022
I-562	David Warren	12/8/2022
I-563	Amanda Lasher	12/8/2022
I-564	Guy Vidal	12/8/2022
I-565	Donna Zweig	12/8/2022
I-566	Raff Rushton	12/8/2022
I-567	Andrew Takeuchi	12/8/2022
I-568	Marisa Miller	12/8/2022
I-569	Jango Circus	12/8/2022
I-570	Helmi Hisserich	12/8/2022
I-571	Ralph Sanchez	12/8/2022
I-572	Andrew Wenzlaff	12/8/2022
I-573	Polly Estabrook	12/8/2022
I-574	Josh Logan	12/8/2022
I-575	Marilyn Oliver	12/8/2022
I-576	Janelle Brown	12/8/2022
I-577	Sam Riegel	12/8/2022
I-578	Ida Dambrauskas	12/8/2022
I-579	Indu Subaiya	12/8/2022
I-580	Karen Numme	12/8/2022
I-581	Christine Weir	12/8/2022
I-582	Daniella Southgate	12/8/2022
I-583	James Stathas	12/8/2022
I-584	Jozef Bilman	12/8/2022
I-585	Helen Levenson	12/8/2022
I-586	David Henry	12/8/2022
I-587	Anonymous Anonymous	12/8/2022
I-588	Cailyn Nagle	12/8/2022
I-589	Dorcas Tokes	12/9/2022
I-590	Cheryl Brock	12/9/2022
I-591	Dan Gordon	12/9/2022
I-592	Traci Yee	12/9/2022
I-593	Nora Paller	12/9/2022
I-594	Alicia Bleier	12/9/2022
I-595	Martin Morales	12/9/2022
I-596	Nancy K	12/9/2022
I-597	Gary Williams	12/9/2022
I-598	Marsian De Lellis	12/9/2022
I-599	Vince Meghrouni	12/9/2022

No.	Name	Date Received
I-600	Stephanie Brown	12/9/2022
I-601	Kora Brown	12/9/2022
I-602	Kelly Sharbaugh	12/9/2022
I-603	Charlton Mcmillan	12/9/2022
I-604	Karen Mccluskey	12/9/2022
I-605	Joshua Stamberg	12/9/2022
I-606	Kerry Hannawell	12/9/2022
I-607	Diane Zurn	12/9/2022
I-608	Robin Raida	12/9/2022
I-609	Janet Wolsborn	12/9/2022
I-610	Tamara Braun	12/9/2022
I-611	Kelly Donahue	12/9/2022
I-612	Laura Burhenn	12/9/2022
I-613	Kristian Martinez	12/9/2022
I-614	Hope Arnold	12/9/2022
I-615	Adriana Leal	12/9/2022
I-616	Robert Szeles	12/9/2022
I-617	Cathy Thornburn	12/9/2022
I-618	Diana Wagman	12/9/2022
I-619	Melissa Libertelli	12/9/2022
I-620	Dylan Jones	12/9/2022
I-621	Kathy Tardy	12/10/2022
I-622	Linda Guthrie	12/10/2022
I-623	Rhonda Casper	12/10/2022
I-624	C Ellis	12/10/2022
I-625	Denise Miyakawa	12/10/2022
I-626	Rose Aleman	12/10/2022
I-627	Gwen F	12/10/2022
I-628	Julia Difrancesco	12/10/2022
I-629	Alisia Stone	12/10/2022
I-630	Noelle Armand	12/11/2022
I-631	Wendy Yao	12/11/2022
I-632	Alvina Louie	12/11/2022
I-633	Mike McGill	12/11/2022
I-634	Jennifer McGill	12/11/2022
I-635	Ron McGill	12/11/2022
I-636	Dana Buchanan	12/11/2022
I-637	Amie Farquhar	12/11/2022
I-638	Adam Mekrut	12/12/2022
I-639	Judie Itzin	12/12/2022
I-640	Dylan Campbell	12/12/2022
I-641	Brian Latimer	12/12/2022
I-642	Charles Mack	12/12/2022
I-643	Jacqueline Sloan	12/12/2022
I-644	Benjamin Decter	12/12/2022
I-645	Rick Marshall	12/12/2022
I-646	Jennifer Hickson	12/12/2022
I-647	David Garfinkel	12/12/2022
I-648	Mark McGonigle	12/12/2022
I-649	Dogan Ozkan	12/12/2022
I-650	Allison Morse	12/12/2022
I-651	Geneva Robertson-Dworet	12/12/2022
I-652	Christopher Covella	12/12/2022
I-653	Judy Sloan	12/12/2022

No.	Name	Date Received
I-654	William Sloan	12/12/2022
I-655	Paul Franceschi	12/12/2022
I-656	Ryan Perella	12/12/2022
I-657	Ted Marsden	12/13/2022
I-658	Georgette Pillen	12/13/2022
I-659	Inta Krukke	12/13/2022
I-660	Jim Royce	12/13/2022
I-661	Jeff Carr	12/13/2022
I-662	D Wood	12/13/2022
I-663	Mark Phillips	12/13/2022
I-664	Brendon Bolin	12/13/2022
I-665	Adrianna Decter	12/13/2022
I-666	Jim Shippee	12/13/2022
I-667	Virginia Watson	12/14/2022
I-668	M Choy	12/14/2022
I-669	Thomas Parnell	12/14/2022
I-670	Christopher Covella	12/14/2022
I-671 to I-673	Freda Shen	12/14/2022
I-674	Karen Cusolito	12/14/2022
I-675	Joseph Hogg	12/14/2022
I-676	Robert Moore	12/14/2022
I-677	Pamela Dreyfuss	12/14/2022
I-678	Alan L	12/15/2022
I-679	Dogan Ozkan	12/15/2022
I-680	Susan Murphy	12/15/2022
I-681	Rebecca Ruben	12/15/2022
I-682	Marnie Aulabaugh	12/15/2022
I-683	Tony Michaelis	12/15/2022
I-684	Keith Schofield	12/15/2022
I-685	Mike McGill	12/15/2022
I-686	Ron McGill	12/15/2022
I-687	Joshua Stamberg	12/15/2022
I-688	Jeremy Lubin	12/15/2022
I-689	Kevin Droke	12/15/2022
I-690	Rachelle Arslan	12/15/2022
I-691	Joy Boyajian	12/15/2022
I-692	Freda Shen	12/15/2022
I-693 to I-694	Mike Krose	12/15/2022
I-695	Mirelle Lindquist	12/15/2022
I-696	Jiyoung Carolyn Park	12/15/2022
I-697	Jamie York	12/15/2022
I-698	Barbara Ringuette	12/16/2022
I-699	Cristina Perez	12/16/2022
I-700	Albert Chiang	12/16/2022
I-701 to I-702	Mike Krose	12/16/2022
I-703	Glen Gold	12/16/2022
I-704	Michael Masterson	12/16/2022
I-705	Nina Woodson	12/16/2022
I-706	Kamille Mosqueda	12/16/2022
I-707	Anne Johnson	12/16/2022
I-708	Ben Louis	12/16/2022
I-709	Lisa Hart	12/16/2022
I-710	Andrew Werner	12/16/2022
I-711	Hollis Sherman-Pepe	12/16/2022

No.	Name	Date Received
I-712	Nicholas Constant	12/16/2022
I-713	Anthony Burton	12/16/2022
I-714	Betsy Isroelit	12/16/2022
I-715	Ianthe Zevos	12/16/2022
I-716	Kristen Egermeier	12/16/2022
I-717	Sidney Howard	12/16/2022
I-718	Jane Cook	12/16/2022
I-719	Victor Marquez	12/16/2022
I-720	David Gross	12/16/2022
I-721	Amparo Jelsma	12/16/2022
I-722	Kelsey Guy	12/16/2022
I-723	Laura Sweet	12/16/2022
I-724	Nick C	12/16/2022
I-725	Cynthia Brown	12/16/2022
I-726	Alfred Bie	12/16/2022
I-727	Brittney Black	12/16/2022
I-728	Sunterra Palmer	12/16/2022
I-729	Alli Belli	12/16/2022
I-730	Emy Christoffersen	12/16/2022
I-731	Cynthia Hubach	12/16/2022
I-732	Roberto Ramirez-Franco	12/16/2022
I-733	Jane Cook	12/16/2022
I-734	Gerry Hariton	12/16/2022
I-735	Becky Patel	12/16/2022
I-736	Elisa Cortez	12/16/2022
I-737	Sylvia Czeglényi	12/16/2022
I-738	Gary Byrd	12/16/2022
I-739	Joan Watanabe	12/16/2022
I-740	Jane Cook	12/16/2022
I-741	Betty Lourie	12/17/2022
I-742	Rochelle Peterson	12/17/2022
I-743 to I-744	Jesse Southern	12/17/2022
I-745	Paige Hubbard	12/17/2022
I-746	Laurie Pepper	12/17/2022
I-747 to I-748	Elizabeth Fillmore	12/17/2022
I-749 to I-750	Elena Siantz	12/17/2022
I-751	Mike Krose	12/17/2022
I-752	Nancy Torres	12/17/2022
I-753	Genevieve Lozano	12/17/2022
I-754 to I-755	Mike Krose	12/17/2022
I-756	Blair Dowis	12/17/2022
I-757	Oscar Garza	12/17/2022
I-758	Caroline H Mankey	12/17/2022
I-759	John Wingler	12/17/2022
I-760	Jane Cook	12/17/2022
I-761	Edward Songaila	12/17/2022
I-762	Joan Harrison	12/17/2022
I-763	Jane Cook	12/17/2022
I-764	Megan Shaw	12/17/2022
I-765	Michelle Luna	12/17/2022
I-766	Marianne King	12/17/2022
I-767	Freda Shen	12/17/2022
I-768	Alec Rice	12/17/2022
I-769	Jane Cook	12/17/2022

No.	Name	Date Received
I-770 to I-772	Freda Shen	12/17/2022
I-773	Sandra Wisot	12/17/2022
I-774	Freda Shen	12/17/2022
I-775	Jane Cook	12/17/2022
I-776	Gregory Borchardt	12/17/2022
I-777	Daisy Lynn Austin	12/17/2022
I-778	Freda Shen	12/17/2022
I-779	Diana Lopez	12/17/2022
I-780	Freda Shen	12/17/2022
I-781	Alexandra Arellano	12/17/2022
I-782 to I-783	Freda Shen	12/17/2022
I-784	Julia Grant	12/17/2022
I-785	Jane Cook	12/17/2022
I-786	Joseph Silva	12/17/2022
I-787 to I-788	Jane Cook	12/17/2022
I-789	Freda Shen	12/17/2022
I-790 to I-791	Jane Cook	12/17/2022
I-792	Deborah Hart	12/17/2022
I-793	Jennifer Swirtz	12/17/2022
I-794	Jane Cook	12/17/2022
I-795	Amy G	12/17/2022
I-796	Carolyn Wessling	12/17/2022
I-797	Chip McDonald	12/17/2022
I-798	Tanya Tolmachoff	12/17/2022
I-799	Freda Shen	12/17/2022
I-800	Eric Quirk	12/17/2022
I-801	Jill Nakaoki	12/18/2022
I-802	Denecia Jones	12/18/2022
I-803	Ethan Gold	12/19/2022
I-804	Anna Molter	12/21/2022
I-805	Renee Nahum	12/01/2022
I-806	Karen Lower	12/14/2022
I-807	Gina Acuna	10/25/2022
I-808	Joanne D'Antonio; NCSA Trees, CFAC Rep	12/17/2022
I-809	Theresa Chavez	12/17/2022
I-810	Joy Boyajian	10/21/2022
I-811	Lynda Obst	10/24/2022
I-812	Vasken Hagopian	11/5/2022
I-813	Barbara Rinquette	12/01/2022
I-814	Phyl and Ronald Van Ammers	10/16/2022
Public Meeting Comments		
P-1	Andrew Thomas	10/26/2022
P-2	Scott Sternberg	10/26/2022
P-3	Cyndi Hubach	10/26/2022
P-4	Freda Shen	10/26/2022
P-5	Debbie Slater	10/26/2022
P-6	Adam Sieff	10/26/2022
P-7	Sandy	10/26/2022
P-8	Andras K	10/26/2022
P-9	Rachel	10/26/2022
P-10	Marc Ernestus	10/26/2022
P-11	Linden Waddell	10/26/2022
P-12	Leslie Edmonds	10/26/2022
P-13	Chip McDonald	10/26/2022

No.	Name	Date Received
P-14	Nina Woodson	10/26/2022
P-15	David Wheatley	10/26/2022
P-16	David Jones	10/26/2022
P-17	Cyndi Hubach	10/26/2022
P-18	Ainsley Cohen	10/26/2022
P-19	Mike Krose	10/26/2022
P-20	Stephanie Bartron	10/26/2022
P-21	James Ellsworth	10/26/2022
P-22	Bob Soderstrom	10/26/2022
P-23	Nicole Antoine	10/26/2022
P-24	Glen David Gold	10/26/2022
P-25	Anne-Marie Johnson	10/26/2022
P-26	Alex Magnin	10/26/2022
P-27	Gian	10/26/2022
P-28	Martin Grey	10/26/2022
P-29	Mary	10/26/2022
P-30	Paul Tzanetopoulos	10/26/2022
P-31	Paul Neuman	10/26/2022
P-32	Betsy Isroelit	10/26/2022
P-33	Paul Feldman	10/26/2022

2.4 Responses to Comments

S-1 Miya Edmonson / California Department of Transportation, District 7

COMMENT

RESPONSE

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



November 9, 2022

Dr. Jan Green Rebstock
City of Los Angeles
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

RE: Silver Lake Reservoir Complex Master Plan
Project – Draft Environmental Impact Report
(DEIR)
SCH# 2022010055
GTS# 07-LA-2022-04086
Vic. LA Multiple

Dear Dr. Jan Green Rebstock,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project would redevelop approximately 116 acres of the 127-acre Silver Lake Reservoir Complex (SLRC) with a contemporary design that would create seven park zones blending vegetated areas with public spaces. These park zones would be connected by a 2.5-mile, tree-lined promenade and would include the Meadow, the Knoll, Ivanhoe Overlook, the Eucalyptus Grove, the East and West Narrows, the South Valley, and Habitat Islands. In addition, offsite improvements, including the addition of an improved bicycle and/or parking lane, would be proposed along Silver Lake Boulevard and/or West Silver Lake Drive.

After reviewing the DEIR, Caltrans has the following comments:

Regarding Chapter 2.5.2 "Offsite Improvements":

- If the creation of additional 90-degree car parking spaces along the north side of West Silver Lake Drive would result in a widening of the total roadbed width, then it should be avoided at all costs. Caltrans recommends that the existing parallel parking instead be moved away from the existing curb to create space for a parking protected Class 4 bikeway. This would help create a continuous route around the reservoir for people riding bikes, as well as a pleasant buffer between people using the grassy area and the presence of cars.
- For the changes proposed along Silver Lake Boulevard, Caltrans recommends a combination of features from both Option 1 and 2 be used. The two-way buffered cycle track from Option 2 should be used, as it creates an acceptable amount of space for each

"Provide a safe and reliable transportation network that serves all people and respects the environment"

S-1-1

This comment is introductory and describes the proposed Project. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review.

S-1-2

As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. The addition of parking would not result in the widening of the total roadbed width. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

S-1-3

The comment recommends parking configurations on Silver Lake Boulevard. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Please see Master Response - Parking/Bike Option.

S-1-1

S-1-2

S-1-3

S-1 Miya Edmonson / California Department of Transportation, District 7

COMMENT

RESPONSE

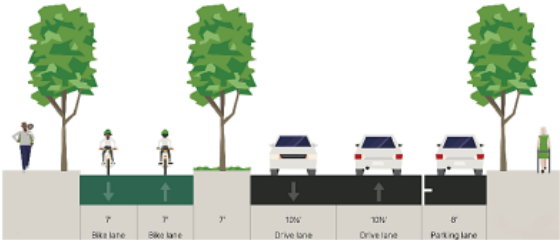
S-1-4

Based on comments received during the public comment period, the City has decided to go with Option 2 and not add any additional parking spaces along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Dr. Jan Green Rebstock
November 9, 2022
Page 2

lane direction. However, instead of excessive additional parking on the west side of the street, the 4-foot buffer should be increased to 7 feet and the 10.5-foot-wide car travel lanes from Option 1 should be used. This would allow cars to travel at safer speeds and provide an excellent opportunity for a landscaped buffer between the two-way bikeway and moving cars. Please see the example below:

Silver Lake Boulevard
(Facing North)



State-level policy goals related to sustainable transportation seek to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG), and encourage alternative modes of travel. Caltrans' Strategic Management Plan has set targets for increased trips made by bicycle, walking, and public transit, as well as achieving a reduction in statewide, per capita, vehicle miles traveled (VMT). Similar goals are embedded in the California Transportation Plan 2050, and Southern California Association of Governments (SCAG) Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Statewide legislation such as AB 32 and SB 375, as well as Executive Order S-3-05 and N-19-19, echo the need to pursue more sustainable development. By minimizing car parking and maximizing multi-modal safety and accessibility, this Project can help California meet these goals.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2022-04086.

Sincerely,
Miya Edmonson
MIYA EDMONSON
LDR Branch Chief
cc: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

L-1 Dan Cooper / Resource Conservation District Santa Monica Mountains

COMMENT

RESPONSE

Hi,

These comments will likely be included as an attachment to a letter submitted by Amy Minter, CHATTEN-BROWN, CARSTENS & MINTEER LLP, but are also submitted separately here.

L-1-1 These comments address deficiencies in the "Biological Technical Report" of the project. They do not advocate for one alternative over another, and do not represent a position for or against the project.

Thanks,
Dan Cooper
RCDSMM

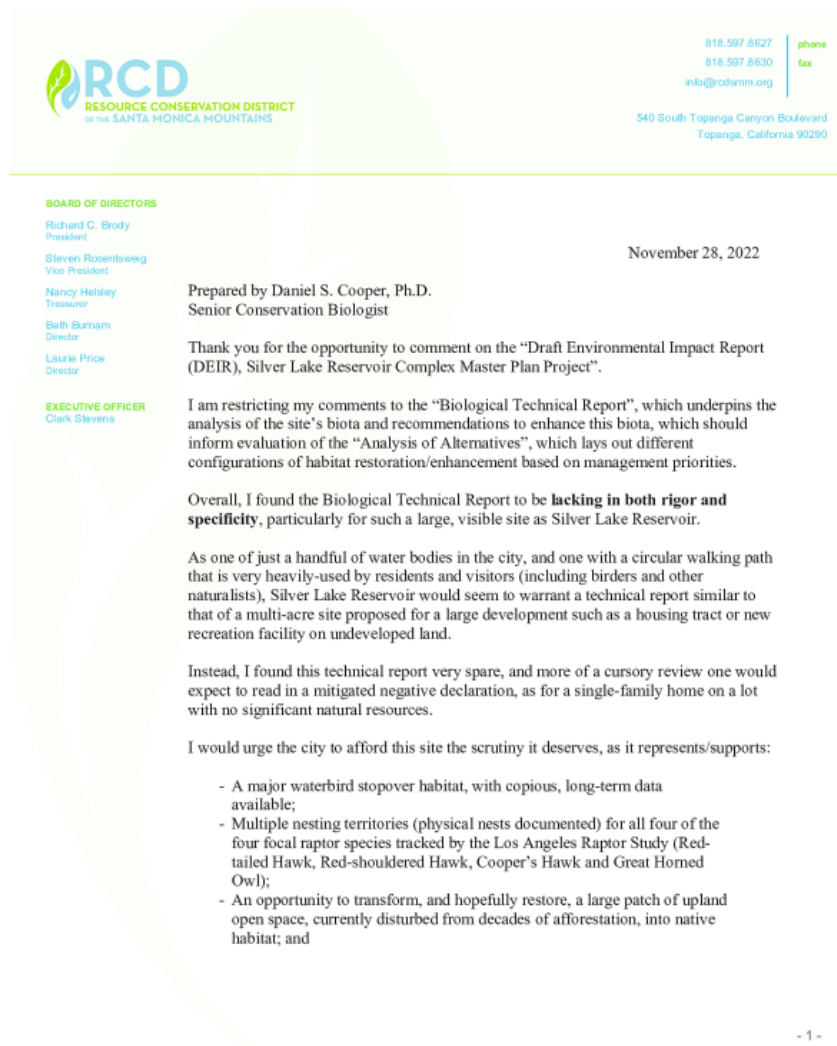
L-1-1

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

L-1 Daniel Cooper / Resource Conservation District Santa Monica Mountains

COMMENT

RESPONSE



L-1-2

This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

L-1-3

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Biological Technical Report provides a detailed overview of wildlife species that may utilize the site and focuses specifically on special status wildlife. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

L-1-4

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Biological Resources Technical Report provided in Appendix D includes a detailed characterization of wildlife that currently utilizes the site. The SLRC provides habitat values, but also serves the public as an important recreational site. The proposed Project balances habitat values with recreational opportunities. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

L-1 Dan Cooper / Resource Conservation District Santa Monica Mountains

COMMENT

RESPONSE



- An opportunity to introduce native riparian and wetland habitats back into the central city for the benefit of wildlife, and the enjoyment of human observers.

Without current, accurate, and credible data on the biological resources of the site/surrounding area, efforts at restoration will either fall short, or could actually result in further degradation of the site.

I have summarized what I consider four main weaknesses of the Biological Technical Report, which stem from either an incomplete assessment of the local resources on the part of the preparers, or a failure by them to recognize local natural communities for what they are.

1. Silver Lake Represents a major (local) migratory waterbird stopover habitat.

In the city's own report (ESA 2021), Silver Lake Reservoir has been designated a "Protected Area for Wildlife" (PAW) based on the criterion that it "Supports Breeding/Feeding/Resting/Migrating Grounds with Limited Availability in Southern California/Los Angeles".

The Biological Technical Report very briefly discusses waterfowl on p. 59, but provides no specific detail on numbers, seasonality, or habitat use:

"Ivanhoe and Silver Lake Reservoirs do serve as foraging habitat for migratory avian species including waterfowl and shoreline species...The floating islands and shoreline wetland habitat will create habitat underneath them within their below-the-water root zone which is a highly ecologically productive area that attracts fish (which will be introduced as a local prey source) and other aquatic species. These wetlands will provide a net gain in habitat values within the SLRC by increasing habitat diversity, providing predator protection, and providing increased foraging opportunities. Regionally, the created wetlands and the SLRC as a whole will serve as a great attractant and resource for migratory avian species (GPA 2020)."

While probably true, the preparers offer no specific information on a) what avian species such islands would attract, nor b) how these would be different from species already present.

- 2 -

L-1-5

The Biological Technical Report characterizes the existing conditions at the SLRC and evaluates impacts of the project. The SLRC is an urban park in a dense residential area with substantial biological values. The proposed project balances biological values with recreational opportunities. This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

L-1-6

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

The comment describes that the Draft EIR fails to discuss the importance of the PAWS designation for the SLRC. Master Response - Biological Resources provides additional detail of the SLRC PAW designation as determined in the City of Los Angeles Protected Areas for Wildlife & Wildlife Movement Report (PAWS Report). The PAWS Report states that the SLRC PAW only meets one (Criteria 5). Criteria 5 is defined as "Habitat that at some point in the life cycle of a species or suite of species serves as concentrated breeding, feeding, resting, or migrating grounds and is limited in availability within Southern California or within the City of Los Angeles." The PAWs Report found that the SLRC PAW does not support native vegetation and that it provides an island of and landscaped habitat in a highly urbanized area.


The proposed project is consistent with development standards of the pending Wildlife District Ordinance in which the use of native plant species are prominently emphasized in the SLRC Master Plan, non-security fencing will be designed to preserve access to habitat and to facilitate wildlife movement, lighting will be minimized, shielded and of low intensity, and building materials would emphasize non-reflective surfaces, including windows (see Impact 3.1-4 in the Draft EIR).

Overall, the SLRC Master Plan is not in conflict with the goals of the PAWS Report and the SLRC would continue to function at the baseline conditions for biological diversity and wildlife connectivity.

L-1 Dan Cooper / Resource Conservation District Santa Monica Mountains

COMMENT

RESPONSE



There is the assertion that fish “will be introduced as a local prey source”, but the report offers no detail on what species these might be (many species of introduced fish are considered highly-invasive, and introduction may be illegal!). Importantly, several local fish species are documented predators on amphibian eggs and larvae, so the goals of creating a robust novel wetland ecosystem would need to be carefully considered in light of which species are to be introduced. The introduction of non-native fish into a reservoir would be something that requires permits and follow-up monitoring, which local agencies would need to weigh-in on; there is no indication that CDFW or other agencies commented on such plans. By contrast, a recent memo by CDFW (dated Feb. 4, 2022) outlines major concerns about future management of wetland habitat and their associated species at the site, particularly in light of the proposed increase in human/pet activity here.

Surprisingly, the Biological Technical Report contains no counts of waterbirds and no data on sightings, other than a list of **five waterfowl species** (with no status or seasonal information) as part of a “Faunal Compendium” at the report’s end. Was any local source consulted to create this list? Was it based on the observations of the project biologist(s)? It is unclear, despite the abundance of readily-available bird data from the site, including from eBird, whether any sources at all (published or otherwise) were used to prepare this report.

From eBird, a quick search (conducted Nov. 11, 2022) of local bird species recorded at Silver Lake Reservoir (<https://ebird.org/barchart?r=L621817&yr=all&m=>) reveals **25 waterfowl species** documented at the site, not five. Several of the most frequently-recorded waterfowl were not among the five species in the report’s faunal compendium, namely Northern Shoveler, American Wigeon, Ring-necked Duck, Lesser Scaup, and Bufflehead (oddly, one relatively rare waterfowl species, Cinnamon Teal, is listed in the faunal compendium, without details!).

Many other waterbirds known from, and frequently seen, at Silver Lake Reservoir were also omitted from the faunal compendium, despite the fact that they are presumably among the targets of the proposed habitat enhancement there. A partial list of high counts of common waterbirds (including waterfowl, grebes and gulls) from Silver Lake Reservoir (per eBird), below.

- Ruddy Duck: 3500 (<https://ebird.org/checklist/S9323607>)
- California Gull: 2200 (<https://ebird.org/checklist/S63186362>)
- American Coot: 1400 (<https://ebird.org/checklist/S121073188>)
- Northern Shoveler: 250 (<https://ebird.org/checklist/S62676005>)
- American Wigeon: 150 (<https://ebird.org/checklist/S50126591>)

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L-1-7 This comment as it relates to fish, does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment also describes concern from CDFW on management of wetland habitat and resources for the site. The Draft EIR Section 2.7, Project Operations and Maintenance, describes the preparation of a Wildlife Management Plan that minimizes impacts during operation of the proposed Project. In addition, Draft EIR Section 3.4.4 Project Design Features includes preconstruction surveys for nesting birds and other special-status wildlife in PDF-BIO-2. In addition, Mitigation Measures BIO-2 and BIO-3 provide additional wildlife protection.

L-1-8 The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. Appendix D includes a list of species identified on site during reconnaissance surveys. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis. The methodology section references the existing data sources referenced for the analysis, which was supplemented by site surveys described also in this section.

L-1-9 The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. Appendix D includes a list of species observed on site during reconnaissance surveys. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

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- Ring-necked Duck: 170 (<https://ebird.org/checklist/S61909252>)
- Eared Grebe: 100 (<https://ebird.org/checklist/S75498472>)

In addition, counts of swallows include 200-700 individuals during spring and fall migration (Northern Rough-winged, Cliff, Barn, and Violet-green; eBird).

Figure 1 below gives an idea of just how important Silver Lake Reservoir currently is to local wintering waterfowl, in comparison to other reservoir/wetland habitats in the Los Angeles area (see Table 1, below, for values used).

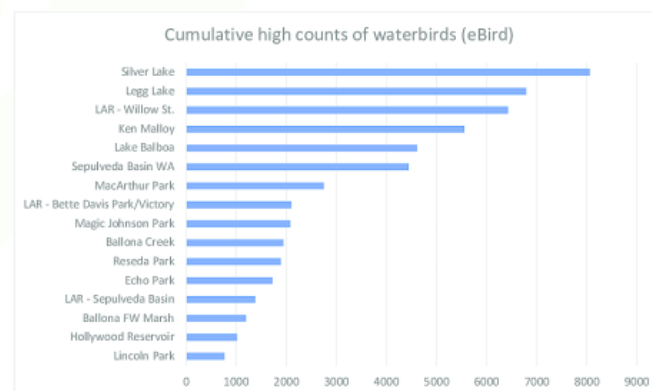


Figure 1. Comparison of highest counts (pooled/cumulative) of the most abundant waterfowl (>100 individuals in any single-visit count, 2000-present) at Silver Lake Reservoir. Data compiled from thousands of individual observer checklists submitted eBird as of Nov. 9, 2022.

In addition, the waterbird species *diversity* at Silver Lake Reservoir is similarly high compared to other sites in the region, as shown in Figure 2; only two sites examined, Legg Lake near South El Monte, and the Los Angeles River estuary at Willow St. in

L-1-10


The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Biological Resources Technical Report included as Appendix D of the Draft EIR characterizes the habitat values that attract wildlife including common local species, migratory species, and special status species. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

L-1-10

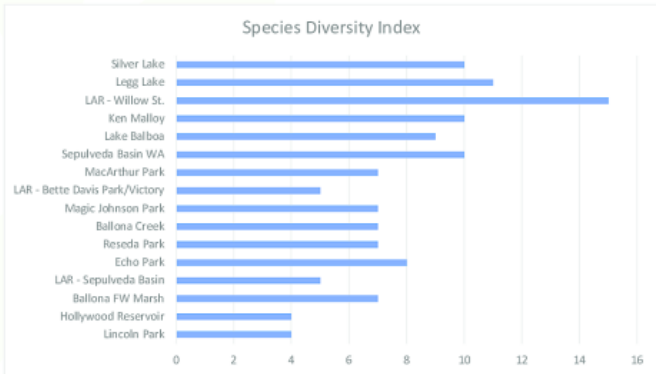
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Long Beach, have recorded a higher diversity of the most abundant (counts of >100 individuals) waterbirds.



Site	Index
Silver Lake	10.5
Legg Lake	10.2
LAR - Willow St.	15.5
Ken Malloy	10.0
Lake Balboa	9.0
Sepulveda Basin WA	10.0
MacArthur Park	7.0
LAR - Bette Davis Park/Victory	5.0
Magic Johnson Park	7.0
Ballona Creek	7.0
Reseda Park	7.0
Echo Park	8.0
LAR - Sepulveda Basin	5.0
Ballona FW Marsh	7.0
Hollywood Reservoir	4.0
Lincoln Park	4.0

Figure 2. Comparison of most-common species richness (species with >100 single-visit counts only) from sites listed in Figure 1.

Interestingly, historical data (from early Audubon Christmas Bird Counts) suggests a much *lower* usage of site by waterbirds prior to the 1990s-2000s, with single-digit/low double-digit counts of ducks and gulls normal 1970s/early 80s (Los Angeles Audubon Society, unpubl. data). Reasons for this are unclear.

2. Little detail on potential impacts from proposed wetland restoration, including floating islands.

One of the few mentions of waterbird use of Silver Lake Reservoir in the Biological Technical Report was on p. 53, where it was speculated that waterbirds, including “waterfowl”, would *forage and nest* on constructed floating islands:

- L-1-11

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.
- L-1-12

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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COMMENT

RESPONSE



L-1-13

"The creation of 23-acres of native habitat including coastal scrub (4-acres) and wetlands (7-acres) will result in a net gain of avian-supporting vegetation. The proposed diverse native habitat including floating islands, will particularly serve as a supportive habitat for many species of wading birds which often nest in woody vegetation that is either submerged or surrounded by water. The habitat islands would be varied in size and set-back from the shoreline approximately 50 feet or more, to offer a variety of protected foraging and nesting spaces for waterfowl and other aquatic species."

L-1-13 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

L-1-14

Yet, because the report presented no data on either floating islands elsewhere, or on *existing* waterbird use of the site, it is simply impossible to determine if the proposed habitat transformation would result in a "net gain of avian-supporting vegetation". Other area reservoirs in the Los Angeles area have floating islands, including lakes at Echo Park and Reseda Park – were these assessed by the preparers for use by aquatic birds? And, how would these islands – which require constant attention to ensure that plants are alive and that they remain structurally sound – be maintained into the future?

L-1-14 The proposed project would enhance habitat for use by wildlife including increasing the diversity of habitat types such as wetlands. The Silver Lake and Ivanhoe Reservoirs are lined and therefore provide limited opportunities for riparian or aquatic habitats other than as envisioned in the proposed project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

L-1-15

In general, Los Angeles urban parks support very low numbers of nesting freshwater marsh bird species, mainly because they have almost no freshwater marsh or aquatic nesting habitat, but also because people are generally allowed around the entire perimeter of park lakes, affording no areas for wildlife to feel safe and undisturbed in what little habitat is present.

A review of sightings uploaded to eBird (www.ebird.org) suggest that counts of local freshwater wetland bird species known from Silver Lake Reservoir that maintain nesting populations in the region (e.g., Great Egret, Snowy Egret, Green Heron, Pied-billed Grebe, Gadwall, etc.) are currently almost identical to counts from other urban reservoirs in parks around Los Angeles (e.g., Echo Park, Reseda Park, Lincoln Park), with just 1-2 individuals of each species counted during most visits. These other sites already have a combination of floating islands and "traditional" islands which have been planted with vegetation; and yet, their avifauna is not substantially different from that of Silver Lake Reservoir's.

Based on my own (DSC) observations, floating islands at Echo Park and Reseda Park support very few waterbirds, and fewer nesting birds, other than widespread/pest species such as domestic waterfowl. The one iconic nesting waterbird currently using the site, the Great Blue Heron, wouldn't nest on a floating island (they nest in tall trees). Based on their current condition elsewhere (structurally degrading, attracting invasive/non-native plants, collecting trash, etc.), floating islands seem difficult to maintain and

L-1-15 The proposed project would enhance habitats at the SLRC compared to existing conditions. The FEIR includes revisions to the statement regarding the floating islands creating habitat and increasing species diversity, to *potentially* increasing diversity. See Chapter 3, 3.2.2.

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COMMENT

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L-1-16

perhaps inappropriate for a long-term feature at Silver Lake Reservoir. And notably, no nesting waterbirds were observed using floating islands as nest sites during countywide surveys in either 2010 and 2019 (Cooper and Hamilton 2010, Cooper and Hamilton 2019). Thus, the assertion that “floating islands” will support wading birds “which often nest in woody vegetation that is either submerged or surrounded by water” is not only unsupported by specifics in the report, it does not appear to be the case anywhere else in the region. It is unclear which species the preparers are referring to, as nesting wading birds – of any species – all highly localized in the region, were simply not analyzed in the report.

L-1-17

The effectiveness of proposed wetland creation along the borders of the reservoir also sounds like a positive, but it is similarly difficult to assess without bird data from the site or surrounding region. No detail was provided by the Technical Report on how these wetlands would be constructed, maintained or protected, what plant species would be used, or which target bird species that might use them. Therefore, it is not possible to comment on their anticipated effectiveness at the site.

L-1-18

Finally, the Technical Report fails to describe potential impacts from increased human usage on the reservoir and its shoreline to these created wetlands, including from proposed watercraft, pets, or from increased human intrusion into the shoreline (as depicted in artistic renderings in the DEIR). Given that the majority of the site – including the entirety of both Silver Lake and Ivanhoe reservoirs – has been securely fenced from the public for many decades, it seems reasonable to assume to that an increase in human presence would have a major detrimental effect on the wetland avifauna and other wildlife therein.

L-1-19

3. Little information was provided on existing nesting waterbirds at the site, notably the long-term Great Blue Heron rookeries.

Silver Lake Reservoir currently supports one of the few nesting waterbird colonies in the Los Angeles area (Shuford et al., 2020), and sightings from this location have been exhaustively documented since 2009 in eBird (www.ebird.org); yet these sightings went unmentioned in the Biological Technical Report.

A single figure in the Technical Report (Figure 5) shows three separate locations for “Great blue heron rookery”, with no detail on these sites, such as number of nests, tree species/structures supporting the nests, foraging habitats used by adults or young, dates active, etc. Thus, because of this omission of data, it is very difficult to determine whether proposed “improvements” – such as widening of walking paths, the

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L-1-16

There is no action to the Draft EIR referenced by this comment, thus no response is required.

L-1-17

The comment states that no detail was provided on the constructed wetlands. The Draft EIR concludes that the additional of wetland features will enhance diversity of wildlife using the site. However, final designs of the wetland areas have not been completed. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

L-1-18

Please see Master Response - Fence Removal.

As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.

The Draft EIR notes on page 3.4-31 that the removal of the fence will increase accessibility to the water by wildlife. The Draft EIR concludes that many of the habitat areas would be in accessible during nighttime hours resulting in less than significant impacts.

Please see Master Response - Biological Resources

L-1-19

The comment states that nesting waterbirds were not included in the analysis. The existing great blue heron rookery sites were identified in Figure 5 of the Biological Technical Report Appendix D of the Draft EIR. Project design features and mitigation measures aimed at protecting nesting birds include these rookeries. The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources

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COMMENT

RESPONSE

is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

Please see Master Response - Biological Resources and Master Response Fence Removal.

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COMMENT

RESPONSE



L-1-20

construction of observation decks, increases in night-time/special event use, and changes in fencing – will have positive or negative impacts to what appears to be the site's only nesting waterbirds.

Based on information gathered by local biologists, birders local residents (including notes and photos uploaded to eBird and provided by Silver Lake Wildlife Sanctuary), the following is a summary of Great Blue Heron nesting at Silver Lake Reservoir:

Three separate rookery sites have been used in different years by up to 14 nesting pairs of Great Blue Herons in and around the northwestern corner of Silver Lake Reservoir/Ivanhoe Reservoir, with sites and numbers variable from year to year.

While we found an unsupported reference to nesting as early as 2005 (see below), the first confirmed nesting record came in 2011, when at least one pair was present at a nest in the eucalyptus grove at the northwestern corner of Silver Lake Reservoir, within a fenced-off area (hereafter referred to as the "eucalyptus grove") in February-March 2011 (<https://ebird.org/checklist/S7609469>; <https://ebird.org/checklist/S7934475>). However, with nine birds reported on 23 Feb. 2011, more nests may actually have been present that year than observed (high fencing precludes good visual access to this rookery area, which may in part be why herons selected it).

L-1-21

During a statewide survey of nesting waterbirds in 2012 (Shuford et al., 2020), three active nests (with at least one young observed) were observed in the eucalyptus grove on 6 June 2012. The following year, a report of 10 birds "all up in the trees" on 16 Feb. 2013 (<https://ebird.org/gbbc/checklist/S13100553>) again suggests this colony was larger than the 1-3 nests estimated in 2011 and 2012.

In 2020, an Initial Study/Mitigated Negative Declaration for a proposed Aeration and Recirculation system (part of a prior Master Plan process ongoing in 2020) reported that:

"a great blue heron rookery has been present within the Eucalyptus grove on the west side of the Silver Lake Reservoir since at least 2005...approximately 14 nests in the rookery [were observed] during regular surveys and monitoring in 2015".

¹ Text excerpted from a letter submitted by California Dept. of Fish and Wildlife (https://files.ceqanet.opr.ca.gov/261648-2/attachment/HDA3Rk_eWQYP2Dmf-cFJsIWHskoghYnDl77gPZ91DqIC9JRqoPeyMX0HqHwU0u2ywoNlmecjZamc6-Q0). We have not located evidence for heron nesting in 2005 (nor prior to 2011), though it is possible it was occurring then, since this year marked a surge in nesting heron activity elsewhere in the county, in Marina del Rey. Still, in a regional assessment of nesting waterbirds in 2009, Cooper and Hamilton (2010) found no evidence of

L-1-20

There is no action to the Draft EIR referenced by this comment, thus no response is required.

L-1-21

The comment describes a heron rookery on site. The Draft EIR was prepared consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis. See Master Response - Biological Resources.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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COMMENT

RESPONSE



L-1-22

This 2015 estimate would have been the same sighting uploaded to eBird, of “14 nests” (<https://ebird.org/checklist/S61858966>), with the (eucalyptus grove) rookery apparently split into a northern and southern portion (see: <https://ebird.org/checklist/S61879541> for photos).

Three nests were again noted in the eucalyptus grove in 2016 (<https://ebird.org/checklist/S29018357>), yet by spring 2017, the colony appeared to have abandoned the eucalyptus grove, and relocated to a deodar (*Cedrus deodorus*) in the yard of a house at Tesla Ave. and Rokeby St. (northwest of Ivanhoe Reservoir), with a single nest present here that year (e.g., <https://ebird.org/checklist/S36426695>).

The following year (spring 2018) three Great Blue Heron pairs were apparently using the Tesla rookery, and not the eucalyptus grove (<https://ebird.org/checklist/S43180319>), and did so again in both 2019 (e.g., <https://ebird.org/checklist/S55632193>; <https://ebird.org/checklist/S58238102>) and 2020 (<https://ebird.org/checklist/S69946234>).

A county-wide assessment of nesting waterbirds (Cooper and Hamilton 2019) noted not only the three active nests of Great Blue Herons at the Tesla Ave. rookery, it also found five inactive nests (presumably from 2016 or prior) in the eucalyptus grove on the northwestern corner of the reservoir (<https://ebird.org/checklist/S55632193>), suggesting this rookery was indeed inactive, with all birds shifting to the Tesla Ave. site.

In spring 2021, up to three nests were discovered in a third rookery site, a row of large Aleppo pines (*Pinus halepensis*) above the walking path on the northwestern edge of Ivanhoe Reservoir (photos/video; Silver Lake Wildlife Sanctuary). This new rookery was also documented in eBird (<https://ebird.org/checklist/S87145501>), with two active nests in “in tall Aleppo Pines along the west side of IR (and bordering W. Silver Lake Drive, within about 75m of Tesla.)” (<https://ebird.org/checklist/S86744014>)².

nesting herons at Silver Lake Reservoir that year. However, we note that the earliest sighting of Great Blue Heron at Silver Lake Reservoir in the popular online platform eBird was not until 2009, despite numerous records of the species here – albeit not nesting – dating back to at least the late 1960s (Los Angeles Audubon Christmas Bird Count, unpubl. data). This is more an illustration of the relative recent use of eBird than an indication of the species’ status here prior to the 2010s.

² That same year, a fledgling from this rookery was captured on the ground below the nest, “rescued”, and transported to a rehab facility in San Pedro. It was later released at Dominguez Gap wetlands near Carson, Los Angeles Co. (Silver Lake Wildlife Sanctuary, via email). This rookery was possibly also active in 2020 (single nest?), and possibly again in 2022, based on sightings uploaded to eBird.

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L-1-22

The comment notes nest observations at SLRC. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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COMMENT

RESPONSE



L-1-23

In 2021, the Tesla nest tree was *also* active (at least one nest), and while heron counts in spring 2022 reached nine individuals (eBird), no direct evidence of nesting was submitted to eBird this past season.

L-1-24

Reasons for the loss of the eucalyptus grove colony (which now supports an active nesting territory of Red-tailed Hawk) are unclear. It seems possible that construction activity and de-watering of the reservoir during 2015-2017 played a role. However, we should also note that Great Blue Herons frequently shift rookeries every few years even without obvious reasons, and that a Red-tailed Hawk – a species typically sensitive to disturbance under the nest – found the eucalyptus grove suitable for a nesting site during this same time. Either way, the history of each of these nesting species should have been thoroughly presented and analyzed in the Technical Report, but was not. Additionally, any proposed changes to features at the northwestern portion of the reservoir area should be analyzed with this history in mind.

4. Silver Lake Represents an important (local) hotspot of nesting raptors, yet these nesting species – and their documented nests – were left out of the DEIR.

L-1-25

In 2017, Friends of Griffith Park launched the “Los Angeles Raptor Study”, an effort to map and monitor nesting hawks and owls across Los Angeles (<https://friendsofgriffithpark.org/raptor-study/>). This project has been advertised through numerous local and regional media outlets, including articles, interviews, podcasts, and websites. Yet, the preparers of the DEIR did not mention this study, nor did they address the specific presence of *any* nesting raptors in the Silverlake area. This project has documented more than 400 active and suspected territories of raptors around Los Angeles, several of which occur in the vicinity of Silver Lake Reservoir. These are mapped in Figure 3.

L-1-23

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

L-1-24

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

L-1-25

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

Please see Master Response – Biological Resources (Baseline Conditions).

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COMMENT

RESPONSE



Figure 3. Raptor nests in the vicinity of Silver Lake Reservoir. Note: several other nests are present in the area shown in the map (i.e., farther away from the reservoir area), but have not been depicted here to protect their locations (Los Angeles Raptor Study, unpubl. data).

No fewer than three nests active since 2017 are located directly *within* the Silver Lake Reservoir study area boundary used in the DEIR (Red-tailed Hawk territory #200, including two alternate nest sites; and Great Horned Owl territory #038). Each of these nests is well-known to the public using the reservoir's perimeter walking path, based on conversations with Raptor Study volunteers and local residents. These went unmentioned in the Technical Report.

Other raptor territories are located in the neighborhoods surrounding the reservoir, each with individual raptors that doubtless forage widely during the nesting season, including those of Cooper's Hawk (not mentioned in the Technical Report), Red-shouldered Hawk (not listed in the faunal compendium of the Technical Report), and other Red-tailed Hawk territories.

L-1-26

The comment states that other raptor nests may exist on site in addition to the nests identified in the Draft EIR. PDF-BIO-2 identified in the Draft EIR requires that nesting surveys are conducted prior to construction activities to be sure that all active nests, including those not identified in the baseline condition, be avoided. The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

Please see Master Response – Biological Resources (Baseline Conditions).

L-1-26

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COMMENT

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L-1-27

Red-tailed Hawks in particular can remain in the same territories for decades – even using the same nests year after year. In fact, Los Angeles Audubon Christmas Bird Count data documented a report of a “screaming” pair of Red-tailed Hawks in “pines and eucalyptus” around the reservoir from field notes in December 1974, indicating that the territory here (which is still active today) may be up to 50 years old, if not older.

Nesting raptors – including Red-tailed Hawks and Great Horned Owls – are frequently sensitive to human disturbance, and we note that both species have been nesting in fenced-off areas, including the eucalyptus grove along the western edge of the reservoir, and the fenced-off portion of the knoll north of the “meadow”. *Both of these areas are slated for opening-up to increased human use, and fence removal, and yet the impact of these changes was not addressed anywhere in the DEIR.*

L-1-28

5. Habitat restoration at “the knoll” failed to include ecological-function goals for existing or future upland habitat, including oak/walnut woodland already present.

The Technical Report’s proposed habitat restoration vision for “the knoll” area on the northeastern end of the lake did not include habitat goals, aside from listing the number of acres targeted. It did not include target wildlife species that would benefit from this habitat, nor did it include impacts to species currently present (such as nesting Red-tailed Hawk and Great Horned Owl). Puzzlingly, it recommended leaving in place highly-invasive trees such as Chilean pepper (*Schinus molle*)!

I suggest the following steps for effective habitat restoration:

L-1-29

1. Re-do bird and wildlife surveys in the targeted area (“the knoll”), including visits at different times of year with competent local biologists;
2. Pay close attention to special-status species, several of which were either missed by surveyors for the DEIR, and/or were not addressed;
3. Develop a list of species currently using the site, and assess their approximate abundance/relative abundance;
4. Develop a list of indicator species that might be encouraged to colonize the site following habitat restoration;
5. Propose specific planting/weeding/restoration goals that match the needs of the indicator species, and which do not harm populations of existing special-status species (or mitigate appropriately).

L-1-30

L-1-31

L-1-32

L-1-33

L-1-27

The comment notes areas within the SLRC that are occupied by raptors. The Draft EIR notes that nesting raptors occur in the area. PDF-BIO-2 requires that nesting surveys be conducted to avoid impacts to active nests. The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

Please see Master Response – Biological Resources (Baseline Conditions, Impact Analysis and Public Access Impacts).

L-1-28

The comment states that the Draft EIR does not identify what specific goals or target species associated with restoration. The Draft EIR, Section 3.4.5, Impacts and Mitigation Measures, discusses the creation of 23-acres of native habitat including upland and wetland habitats. This creation of native habitat replaces non-native landscape and developed areas and is not considered restoration. The Draft EIR baseline conditions were analyzed and summarized consistent with the CEQA statutes and the State CEQA Guidelines. Additionally, the Draft EIR Section 3.4, Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources.

L-1-29

The comment provides suggestions for restoration. See response to Comment L-1-28.

L-1-30

The comment requests attention to special status species. The Draft EIR identifies potential special status species on site in Table 3.4-3. The Draft EIR concludes that with incorporation of PDFs outlined in the Project Description and implementation of Mitigation Measures, impacts to biological resources would be less than significant. The Draft EIR baseline conditions were analyzed and summarized consistent with the CEQA statutes and the State CEQA Guidelines. Additionally, the Draft EIR Section 3.4, Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources.

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COMMENT

RESPONSE

- L-1-31 The comment suggests that a list of species currently using the site be developed. The Draft EIR identifies special status species that may occupy the SLRC in Table 3.4-3. The Draft EIR concludes that with incorporation of PDFs outlined in the Project Description and implementation of Mitigation Measures, impacts to biological resources would be less than significant. The Draft EIR baseline conditions were analyzed and summarized consistent with the CEQA statutes and the State CEQA Guidelines. Additionally, the Draft EIR Section 3.4, Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources.
- L-1-32 The comment suggests that target species should be identified to colonize the site after the restoration has occurred. Section 2.4 of the Draft EIR identifies habitat enhancement as a project objective. The proposed project would plant native species to enhance native habitats. These native habitats would then attract native wildlife species. The Draft EIR baseline conditions were analyzed and summarized consistent with the CEQA statutes and the State CEQA Guidelines. Additionally, the Draft EIR Section 3.4, Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources.
- L-1-33 The comment suggests that restoration goals should be identified. Section 2.4 of the Draft EIR identifies habitat enhancement as a project objective. The proposed project would plant native species to enhance native habitats. These native habitats would then attract native wildlife species. The Draft EIR concludes that with incorporation of PDFs outlined in the Project Description and implementation of Mitigation Measures, impacts to biological resources would be less than significant. The Draft EIR baseline conditions were analyzed and summarized consistent with the CEQA statutes and the State CEQA Guidelines. Additionally, the Draft EIR Section 3.4, Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources.

L-1 Dan Cooper / Resource Conservation District Santa Monica Mountains

COMMENT

RESPONSE



L-1-34

Since none of these steps was followed, I have included a table of special-status species (Table 2, below) to help identify target species. I recommend that the applicants discuss and analyze each of these species appropriately, and ensure that habitat improvements and mitigation accommodate each.

L-1-35

In addition, I recommend treating all nests of colonial waterbirds (including Great Blue Heron) and raptors (four species; see above) as “special elements” to address in any proposed design alternative. In particular, bringing additional pedestrian traffic, and increased human activity in general, into areas currently occupied by nesting raptors is of great concern, and should be addressed thoroughly in the DEIR.

L-1-36

Turning to plants, southern California black walnut woodland, a CNPS-Ranked species is mischaracterized as “not present”, yet multiple walnuts were observed. In the Biological Technical Report (ES-2, Executive Summary), the preparers state:

“The BSA does not support black walnut woodland and its occurrence onsite is not within typical habitat.”

Not only do they not provide a definition of this habitat, they apparently fail to recognize that oak, walnut and oak-walnut woodland *are dominant plant communities across northeast Los Angeles*. In the Technical Report’s Figure 5, numerous individual black walnuts are mapped, and shown to co-occur with other native woodland elements, such as coast live oak and blue elderberry (as stated on p. 22). Yet this apparent oak-walnut community was not considered present. Helpfully, Keeler-Wolf and Evens (2006) provide a definition the preparers could have used: “*Juglans californica* (black walnut) >50% relative cover in the tree canopy, or >30% relative cover with *Quercus agrifolia* (coast live oak) present.”

L-1-37

Based on the mapped trees on the site (see Figure 5, Figure 7a), both black walnut and southern California black walnut *are present*, and *do form* a cohesive woodland (albeit one with other species interplanted and naturalizing due to a century of afforestation by the city).

This downplaying of sensitive resources is pervasive in the entire report, and contributes to the confusion over, and obfuscation of, what is actually present – and worth preserving – on the site. It also precludes a serious evaluation of impacts from the proposed project.

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L-1-34

The comment provides a table with special-status species potentially occurring on the site. The Draft EIR provides a special status species table (Table 3.4-3). The Draft EIR provides a detailed analysis of potential impacts to wildlife including special-status wildlife that may be occurring on site. Appendix D of the Draft EIR provides a Biological Technical Report that characterizes the ecological conditions on the site and evaluates impacts of the proposed project. The Draft EIR concludes that with incorporation of PDFs outlined in the Project Description and implementation of Mitigation Measures, the impacts would be less than significant.

Please see Master Response - Biological Resources.

L-1-35

The comment requests that waterbird nests be considered as special elements. The Draft EIR concludes that with incorporation of PDFs outlined in the Project Description and implementation of Mitigation Measures, impacts would be less than significant. The locations of the heron rookeries are identified in Figure 5 of Appendix D.

Please see Master Response - Biological Resources.

L-1-36

The comment states that the Draft EIR is deficient in its analysis of Southern California black walnut woodland. The Draft EIR Section 3.4, Biological Resources, states that Southern California black walnuts and coast live oaks observed onsite are not likely naturally occurring. As stated in Section 3.4, the entire Knoll and Silver Lake Meadow Park is overlaid with Urban land-Dapplegray-Soper complex soils resulting from human-transported material. Additionally, remnants of an irrigation system were observed adjacent to the Southern California black walnut and coast live oak trees. These two tree species need to be dominant or co-dominant in the tree canopy and attain 30% to 50% relative cover (Keeler-Wolf and Evens 2006). As stated in Section 3.4, neither of these species acquire that level of dominance or co-dominance as all woodlands present within the project site are dominated by non-native species (see Impact 3.4-2). The occurrences of these two species are not related to a remnant stand of native woodlands but rather likely planted trees in an urban ruderal landscape. Additionally, the City’s Protected Areas for Wildlife & Wildlife Movement Report found that no documented sensitive natural plant communities were found within SLRC.

L-1 Dan Cooper / Resource Conservation District Santa Monica Mountains

COMMENT

RESPONSE

CNPS currently considers southern California black walnut (*Juglans californica*) a List 4 plant (CRPR 4.2). CRPR 4 species do not per se meet the definition under CEQA Section 15380(b) as an Endangered, Rare or Threatened Species ("special-status"). Information for these species is often limited due to the difficulty in obtaining current data on the number and condition of the occurrences and few if any of these CRPR 4 species are eligible for state listing (CNPS 2023). CDFW does not include southern California black walnut in their State and Federally Listed Endangered, Threatened, and Rare Plants of California (CDFW 2023). Therefore, according to both CNPS and CDFW, southern California black walnut does not meet their criteria as List 1 or 2 species or as Endangered, Threatened, and Rare Plants of California, respectively.


L-1-37 See response to Comment L-1-36.

L-1 Dan Cooper / Resource Conservation District Santa Monica Mountains

COMMENT

RESPONSE

L-1-38 Comment noted. The references and attachments do not contain comments regarding the adequacy of the Draft EIR. The information is noted for the record.



Literature Cited

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Hamilton, R.A. and D.S. Cooper. 2010. Conservation & Management Plan for Marina del Rey, Los Angeles Co., California, September 16, 2010. Prepared for: County of Los Angeles, Dept. of Beaches and Harbors, Marina del Rey, CA. Available online at: <https://beaches.lacounty.gov/download/conservation-and-management-plan-for-marina-del-rey-hamilton-biological-inc-robert-a-hamilton-and-daniel-s-cooper-2010/>

Hamilton, R.A. and D.S. Cooper. 2019. Draft Regional Colonial Waterbird Survey Report, Los Angeles County, California. Prepared by Robert A. Hamilton and Daniel S. Cooper, Hamilton Biological, Inc. Prepared for County of Los Angeles Dept. of Beaches and Harbors. Oct. 25, 2019. Available online at: https://file.lacounty.gov/SDSInter/dbh/docs/1064662_RegionalColonialWaterbirdSurveyReport2019.pdf

Shuford, W.D., J.P. Kelly, T.E. Condeso, D.S. Cooper, K.C. Molina, and D. Jongsomjit. 2020. Distribution and abundance of colonial-nesting herons, egrets, and night-herons in California, 2009–2012. Western Birds 51:190-220. DOI: 10.21199/WB51.3.2

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COMMENT

RESPONSE



Table 1. Comparison of high counts of selected waterfowl (those with >100 individuals in any single visit), Los Angeles-area reservoirs (prepared by DSC).

Species	Lincoln Park	Hollywood Reservoir	Ballona Wet Marsh	LAR - Sepulveda Basin	Echo Park	Pasadena Park	Ballona Creek	Magic Johnson Park	LAR - Santa Anita Park/V	Sepulveda Basin WA	Lake Balboa	San Morley	LAR - Wilson St.	Long Lake	Silver Lake
American Coot	300	100	410	500	500	300	500	500	800	1500	2110	780	2000	2222	1400
California Gull	-	300	150	-	100	350	210	270	310	520	160	1500	1000	1300	2200
Ruddy Duck	-	-	-	-	118	-	-	-	-	246	160	100	250	250	800
Canada Goose	200	-	145	300	250	318	150	300	-	770	751	233	100	718	100
American Wigeon	-	-	128	280	-	500	-	365	620	350	300	-	600	620	120
Western Gull	-	500	-	200	250	250	250	350	310	427	150	700	400	-	220
Mallard	250	-	110	105	150	250	-	-	400	225	400	200	300	555	-
Ring-billed Gull	-	-	100	-	-	200	225	100	-	215	200	-	500	250	100
Northern Shoveler	115	-	150	-	-	-	-	200	-	-	-	100	100	200	150
Double-crested Cormorant	-	-	-	-	250	-	-	-	-	235	360	-	120	300	-
Bonaparte's Gull	-	-	-	-	-	-	500	-	-	-	-	700	-	-	-
Ring-necked Duck	-	-	-	-	105	-	-	-	-	-	-	500	-	220	170
Northern Pintail	-	-	-	-	-	-	-	-	-	-	-	-	120	350	-
American White Pelican	-	-	-	-	-	-	-	-	-	180	-	140	100	-	-
Green-winged Teal	-	-	-	-	-	-	-	-	-	-	-	-	375	-	-
Cinnamon Teal	-	-	-	-	-	-	-	-	-	-	-	-	290	-	-
Blue-winged Teal	-	-	-	-	-	-	-	-	-	-	-	-	120	-	-
Gadwall	-	-	-	-	-	-	104	-	-	-	-	-	-	-	-
Rarest Grebe	-	119	-	-	-	-	-	-	-	-	-	-	-	-	100
TOTAL	765	1059	1195	1381	5	1880	1959	2080	2100	6648	4611	5513	6425	6788	8060
# Spp >100	4	4	7	5	8	7	7	7	5	10	9	20	15	11	10

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COMMENT

RESPONSE




Table 2. Special-status species known from or potentially occurring at Silver Lake Reservoir (prepared by DSC).
LACBSSC = Los Angeles County Bird Species of Concern (Allen et al., 2009).


Scientific Name	Common Name	Federal Status	State Status	CDFW Status	Other Status	Regional Status	Potential for Occurrence/ Status at SLR
<i>Accipiter cooperii</i>	Cooper's hawk (nesting)	None	None	WL	-	Common breeding resident throughout region, to be expected in virtually any habitat, at least seasonally. Favours tall trees in residential areas, or, in woodland habitats. Nests March-July, with young dispersing more widely during July into fall.	PRESENT: Multiple breeding territories documented by LA Rapese Study (2017-2022). These local birds are resident on territories (DSC, unpubl. data). See figure. MODERATE: Unlikely today (single record of a presumed dispersing bird, Sept. 16, 2021, eBird). However, with extensive habitat restoration of coastal sage scrub community (e.g., at the Knoll), this species may colonize the site, and would be an ideal indicator species for this process. Nearest populations occur in Griffith Park and Debs Park.
<i>Aimophila nificeps canescens</i>	southern California rufous-crowned sparrow	None	None	WL	-	Common resident in local hills in large areas of grassy, low scrub, often in burned-over areas. Favours habitat with boulders and scattered shrubs for perch sites, and frequently found on slopes invaded by non-native fountain grass (<i>Cochlosia</i> sp.). Extremely sedentary, with virtually no seasonal movement. Nests placed on the ground, usually at the base of small shrubs.	

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COMMENT

RESPONSE

L-1-38
cont.

							Status in Elysian Park unclear, but may also occur there.
Ardea herodias	great blue heron (nesting colony)	None	-	-		Nests in tall trees near permanent water bodies. Forages widely when nesting, including in adjacent water bodies and fields. Not "listed" as protected by ESACESA, but nonetheless included in California Special Animal List (CDFW 2022).	PRESENT: small but long-standing colony along western edge of reservoir moved to residential area just north of Ivanhoe Reservoir in recent years.
Calypte costae	Costa's hummingbird (nesting)	None	-	-	USFWS: BCC	Arid scrub, most commonly in the interior portions of the region, away from the immediate coast.	LOW: As with Rufous-crowned Sparrow, occurs in larger areas of open space (coastal sage scrub/low chaparral) in region, but localized near urbanized portions of city. Could be used as an indicator species with future restoration attempts.
Cathartes aura	turkey vulture (breeding)	None	None	-	LACBSC	Rock outcrops and steep, cliff-like areas, usually very far from roads/habitat.	LOW: Turkey Vultures frequently fly overhead, and may occasionally feed, but would not be expected to breed here.
Catharus ustulatus	Swainson's thrush (breeding)	None	None	-	LACBSC	Riparian woodland and mesic oak woodland, though widely extirpated as a breeder, and may not nest in the area every year, or in recent years.	LOW: Swainson's Thrush would be expected as a (scarce) migrant, but would not breed.


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COMMENT

RESPONSE

L-1-38
cont.


								
						Formerly more widespread and a localized breeding resident in Los Angeles Basin; now best considered a rare transient through most of the region, with a handful of pairs remaining at the far periphery of the Los Angeles area. Transients (esp. in fall) occur over a variety of habitats, but may remain to overwinter only during periods of higher precipitation, when prey levels are high. Historically nested in riparian trees near extensive grassland, and generally requires multiple habitat types to persist as a breeding species.	LOW: White-tailed Kite could occur as a scarce transient (though records in the central city area are few), but would not breed, and would not overwinter.	
<i>Elanus leucurus</i>	white-tailed kite (nesting)	None	None	FP	-	Nests far to the north of Los Angeles Co. (the rare extreme race was formerly present as a breeder, but has been extirpated for many decades). Migrants still occur commonly through region.	LOW: A handful of records of fall migrants (eBird), but no indication of over-summering or nesting.	
<i>Empidonax traillii</i>	willow flycatcher (nesting)	None	Endangered	-	-		PRESENT: Annual winter visitor (singly), per eBird. Favors areas with scattered tall trees for perching. Forages on small birds.	
<i>Falco columbarius</i>	merlin (wintering)	None	WL	-		Regular in small numbers in various habitats, including urbanized areas.		
<i>Falco peregrinus anatum</i>	American peregrine falcon (nesting)	Delisted	Delisted	FP	-	Uncommon winter visitor and transient nearly year-round. Urban-nesting pairs wander widely from eyrie sites in downtown Los Angeles and elsewhere. A handful of pairs also nest in remote rock outcrops/ledges on peaks (e.g., San Gabriel Mtn., Santa Monica Mtn.).	Recorded (1-2 birds) annually, but not a full-time resident of the site. Visits from urban-nesting pairs are likely during the nesting season (spring, summer).	

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COMMENT

RESPONSE

L-1-38
cont.

							
Icteria virens	yellow-breasted chat (nesting)	None	None	SSC	-	Localized breeder, present April - August (with occasional transients possible later in fall). Ideal breeding habitat includes several components, including extensive, dense riparian scrub/low woodland, fresh water (either running or ponded), and mesic, woody habitat for foraging. Would not be expected far from permanent drainages, but also occurs in areas where anthropogenic water has produced dense riparian and even woody habitat.	MODERATE: Single record of a fall transient (9/15-23/2021, eBird). This species would not occur as a breeder (or in summer) without extensive riparian restoration/landscaping. However, if this is done, it could occur (it has overwintered along the L.A. River, and at Rio de Los Angeles SP) and could serve as an indicator species here.
Lanius ludovicianus	loggerhead shrike	None	None	SSC	-	More widespread and common historically (pre-2000), now a localized transient and rare winter visitor, nesting outside the region. Favours highly-disturbed (generally by grazing/farming) areas, where bare soil provides foraging opportunities, and where high perches such as utility wires and bare trees allow for hunting. Generally absent from higher grassland (where not grazed), and rarely encountered in natural habitat, but occurs in recent burns, where fire has removed most of the vegetation; declines as scrub grows back.	LOW: Rare transient in area, individuals would be expected occasionally, but would likely not overwinter due to (current) rarity in area today.
Nannopterum auritum	double-crested cormorant (nesting colony)	None	WL	-	-	Nests in tall trees near permanent water bodies with food source (fish). Forages widely when nesting, including in adjacent water bodies, but also (coastal colonies) in offshore waters.	LOW: Occurs in small numbers (<5 birds) in winter and migration, with no nesting documented. The lack of fish likely limits the abundance of this species here (in other urban lakes their numbers can approach pest status).


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COMMENT

RESPONSE

L-1-38
cont.

							
Podiceps nigricollis	carol grebe (breeding)	None	None	-	LACBSC	Open water, of lakes, large ponds and rivers, and inshore marine/estuarine areas	LOW: Small numbers (max. c. 20 birds) occur in migration and winter on the reservoir, but breeding requires extensive freshwater marsh vegetation, and would not be expected.
Poocetes gramineus	vesper sparrow	None	None	-	LACBSC	Extensive grassland	LOW: Rare migrant with two recent records, both in Sept. (ditto). Unlikely to occur with regularity due to the lack of extensive grassland habitat.
Pyrocephalus rubinus	vermillion flycatcher (nesting)	None	None	SSC		Rare but increasing resident (mainly winter/non-breeding) in urbanized/disturbed habitats. Most typical habitat includes extensive irrigated lawn with small scattered trees for perching and nest-placement.	LOW: Rare migrant with two recent records (ditto). May become more common in area, though Los Angeles lies outside the current regular range of this species, which only has a handful of local outposts on the coastal slope in the county.
Rallus limicola	Virginia rail	None	None	-	LACBSC	Resident locally in permanent freshwater marsh habitat, with small populations in the Whittier Narrows and Ballona area. Probably occurred much more widely historically, but not in the past 100+ years.	LOW: No records, and unlikely to occur without extensive (wetland) habitat restoration. Even so, this species does not occur in many local areas of freshwater marsh habitat (e.g., Los Angeles River), so habitat needs are likely highly-specific, perhaps related to stability of wetland structure and hydrology (the river floods throughout the year).


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COMMENT

RESPONSE


L-1-38
cont.

							
Setophaga petechia	yellow warbler (nesting)	None	None	SSC	-	Localized breeding resident (March - August) in a variety of riparian habitats, usually with at least a few tall trees (e.g., sycamores and willows). Does not occur in pure oak woodland, but will accept non-native trees of sufficient size, in areas of permanent (fresh) water. Very common and widespread transient, in both spring and fall.	MODERATE: Only a single (recent) record at Silver Lake Res. for June-July, likely a late migrant (6/1/22; eBird). While a very common breeding species along the nearby Los Angeles River (Glendale Narrows, Elysian Valley), this species is essentially absent as a breeder away from the river (e.g., Griffith Park, Elysian Park). Thus, it is likely that extensive riparian habitat restoration, using willows, would be necessary for this species to occur in the future.
Spirus lawrencei	Lawrence's goldfinch	None	-	-	USFWS: BCC	Various habitats, mainly in arid/interior areas (rare on immediate coast). Prefers some combination of trees and fields with seed-producing wildflowers, often near waterways or irrigated areas. Generally found far from intensely-urbanized areas, but occurs in large parks within urban zones (e.g., Balboa Park).	LOW: Rare visitor, with most records from a single (invasion?) year (2021; eBird). Unlikely to occur, or nest, since this area is outside the species' normal range in more interior portions of the region.
Sturnella neglecta	western meadowlark	None	None	-	LACBSC	Extensive grassland; athletic fields and other large lawn areas in winter.	PRESENT: Uncommon fall migrant, with records of 1-2 birds in recent years.

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COMMENT

RESPONSE



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EDUCATION

University of California, Los Angeles, Ph.D. 2020 (Biology)
University of California, Riverside, M.Sc. 1999 (Biogeography)
Harvard University, A.B. 1995 (Biology)

EXPERIENCE

Resource Conservation District – Santa Monica Mountains, Topanga, CA. 2022 - present
Senior Conservation Biologist. Continuing and developing the long-term research program of the RCD, focused on sensitive species and habitat protection in the Los Angeles area.

Cooper Ecological Monitoring, Inc. Los Angeles, CA. 2005 - present
President. An independent ecological consulting firm specializing in land use, wildlife and biodiversity issues, we provide expertise in study design & analysis, ecological assessment, and management recommendations.

- Manage projects in the \$1,000 - \$100,000 range for up to 20 clients per year in the Los Angeles area.
- Part clients include municipalities (Los Angeles, Torrance), non-profit groups (The Nature Conservancy, Trust for Public Land), agencies (U.S. Fish and Wildlife Service, California Coastal Conservancy), and various private firms and individuals.
- Hire and supervise up to five subcontractors per year.

National Audubon Society Los Angeles, CA. 2001 - 2005
Director of Bird Conservation, Audubon California.
Member of senior management team for Audubon California, worked with national staff and partner organizations to shape bird conservation agenda in California; organized donor cultivation seminars, and retained development staff to grant writing; wrote and published a landmark reference guide (Sagegrouse Bird Areas of California, findings later incorporated into state legislation); helped draft Audubon California's strategic plan; visited and evaluated sites for new Audubon nature centers; wrote staff training manuals for existing centers and programs.

Biologist, Audubon Center at Doheny Park 1999 - 2001
Member of core team charged with developing an urban nature education center at a large city park in urban Los Angeles (Doheny Park); drafted and implemented habitat management plan; organized neighborhood focus groups for parents and teachers in northern Los Angeles to assess public perception of nature and conservation organizations; initiated baseline natural history research in surrounding region for development of educational materials and programs for new Audubon Center.

APPOINTMENTS/BOARDS

Research Associate, Dept. of Ornithology, Natural History Museum of Los Angeles County, 2020 - present
RUCN World Protected Areas, 2017 - present
Associate Editor, *Western Bird* 2014 - present
Oak Park - Park and Recreation Planning Committee (Elected member, 2020-present)
Southern California Academy of Sciences 2013 - 2015
SLATAC (Los Angeles Co. Dept. of Regional Planning) 2009 - 2013
Los Angeles Dept. of Recreation and Parks - Griffith Park Prairie Recovery Team, 2007 - 2008
California Dept. of Water Resources - Salton Sea Restoration Advisory Committee 2003 - 2005
Central Valley Habitat Joint Venture - Management Board 2002 - 2005
California Partners-in-Flight - Executive Steering Committee 2003 - 2005
Los Angeles and San Gabriel Rivers and Mountains Conservancy - Technical Advisory Board 2002 - 2005
Friends of the Los Angeles River - Technical Advisory Board 1989 - 2001

C-1 Doranne Jung

COMMENT

RESPONSE

C-1-1	<p>The Micheltorena WEPA , Wildlife Ecosystem Protection Advocates are homeowners, some since the 1950's, others are legacy members of non-profit organizations whose goals are to protect wildlife and earth's natural ecosystem. Our vision for the SLRC is to create an exemplary habitat for natural wildlife to prove that a community of humans can stand back, and observe Mother nature to thrive naturally and learn how to protect a wildlife habitat with as little human interaction as possible.</p> <p>Thus our support goes to Alternative 3 with some elements of Alternative 2! The proposed Project proposes to develop approximately 116 acres of the 127-acre Silver Lake Reservoir Complex; we advocate that this space should be a wildlife ecosystem designed support the wildlife inhabitants with no new public spaces. We agree with Alternative 3 for these current spaces:</p> <ul style="list-style-type: none"> - The Knoll - no shade structure/ pavilion to be built on Knoll or Meadow - The South Valley - all changes here to match Alternative 2: updating the Rec Center, minor updates to the Dog Park, no add/relocate picnic tables, no relocate or resize play field and basketball court, no construction of entry plaza/ seating or new Multi-Purpose Facility, yes tree planting. <p>We are opposed to adding new street parking along W SL Drive and/or Silver Lake Blvd.</p> <p>We, the Micheltorena WEPA, urge the City to adopt Alternative 3.</p>	C-1-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-1-2		C-1-2	As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The comment is noted and will be forwarded to the decision-makers for consideration.
C-1-3		C-1-3	The comment expresses support for Alternative 3 with some elements of Alternative 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-1-4		C-1-4	The proposed Project is described in Chapter 2 of the Draft EIR. This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-1-5		C-1-5	The comment expresses support for elements of Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-1-6		C-1-6	The comment expresses support for elements of Alternative 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-1-7		C-1-7	The comment expresses opposition to the parking on W. Silverlake Blvd, which is an element of the proposed Project. Please see Master Response - Parking/Bike Option. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-1-8			

C-1 Doranne Jung

COMMENT

RESPONSE

C-1-8 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-2 Doranne Jung

COMMENT

RESPONSE

C-2-1	As the Micheltorena WEPA -Wildlife Ecosystem Protection Advocates, we are Silver Lake homeowners, who believe that wildlife interaction with members of the human race in a natural wildlife habitat is not natural at all.	C-2-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-2-2	There are Environmental Impacts of close human interaction with vegetation, mammals, birds, and insects, if the Master Plan Project were to move forward, that cannot be mitigated and may cause lasting harm to both the community and all the wildlife that shares the space aka SLRC.	C-2-2	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
C-2-3	If we could choose to abandon the Master Plan completely that would be our choice. However, if we must choose, we support Alternative 3 because it is, unquestionably the an Environmentally Superior Alternative that is feasible and still meets the Project objectives, with open habitat as an irreplaceable educational resource.	C-2-3	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-2-4	"Thankfully, we have a powerful ally in our fight against climate change: animals and the ecosystems of they are a natural part. The United Nations estimates that healthy ecosystems could account for 37% of the carbon reductions needed to limit global temperature rise."	C-2-4	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record.
C-2-5	"Healthy ecosystems with abundant plants and trees absorb carbon from the atmosphere and store it. So, preserving or restoring nature is a powerful tool in the race to stop climate change. Healthy ecosystems also filter water, buffer against flooding, reduce the impact of disasters, improve soil health and support rich biodiversity. Keystone species and nearly all animals play vital, sometimes invisible, roles in securing biodiversity and conserving habitats."	C-2-5	This comment expresses concern regarding impacts to natural ecosystems and air quality. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
C-2-6	We, the Micheltorena WEPA, agree with the IFAW (International Fund for Animal Welfare), a global non-profit, about protecting and restoring natural ecosystems. https://www.ifaw.org/journal/impact-climate-change-animals		As discussed in Chapter 2, Project Description, of the Draft EIR, the proposed Project would plant approximately 500 trees. The Project would include a Tree Succession Plan that would provide guidance for the gradually removal of mature trees to avoid temporary elimination of habitat value within the SLRC and replant areas primarily vegetated with non-native trees with native trees and understory. The plan would be prepared by a qualified arborist. The Tree Succession Plan would identify trees to be removed in the initial year of construction giving priority to trees that are dead, in poor health, and/or pose a safety risk to the public, including those with fungal and/or pest infestations. The plan would identify a sequence of phased removals for selected trees on a schedule throughout the 15-year period. Additionally, it would include the replacement of 80 percent of existing non-native trees over a 15-year timeline. Also, please see Master Response - Biological Resources.

C-2 Doranne Jung

COMMENT

RESPONSE

According to the California Emissions Estimator Model (CalEEMod) User’s Guide, Appendix A, “planting trees will sequester CO2 and is considered to result in a one-time carbon-stock change. Trees sequester CO2 while they are actively growing.” Modeling was conducted in CalEEMod to estimate sequestered CO2 for the Project’s 500 new trees, based on the Intergovernmental Panel on Climate Change (IPCC) assumed active growing period of 20 years and annual CO2 accumulation factors for miscellaneous trees, which is the average of all broad species classes and should be used if the specific tree types are not known. The results of the modeling indicate a total sequestration of approximately 354 metric tons of CO2 (or approximately 17.7 metric tons of CO2 per year during the 20-year growing period). Modeling results are provided in Appendix C of the Draft EIR.

As provided in Table 3.8-6 of Section 3.8, *Greenhouse Gas Emissions*, of the Draft EIR, the Project would result in approximately 1,486 metric tons of carbon dioxide equivalents (MTCO2e) per year without account for sequestration. Accounting for sequestration, the Project would result in approximately 1,468 metric tons of carbon dioxide equivalents (MTCO2e) per year during the 20-year growing period. Project GHG emissions impacts would be less than significant as was determined in the Draft EIR.

C-2-6

The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-3 Doranne Jung

COMMENT

RESPONSE

C-3-1	We, the WEPA, Wildlife Ecosystem Protection Advocates, are represent generations of Silver Lake homeowners on Micheltorena who believe close interaction of people with wildlife in their habitats is not a natural ecosystem. We agree that "...the fence is the single most important conservation management tool at the site after the presence of wate,," (LA Audubon Society: Statement on the Future Management of Silver Lake Reservoir).	C-3-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-3-2	To allow members of the community to view wildlife in a natural ecosystem, we advocate for Alternative 3 with some elements of Alternative 2 such as:	C-3-2	Please see Master Response - Fence Removal.
C-3-3	<ul style="list-style-type: none"> - an elevated ADA-compliant wood walkway from the top of the Armstrong path to the top of the Knoll, where a wood viewing platform can be built for a spectacular view of the entire Complex. - 2 or 3 similar wood viewing platforms, with free public telescopes, at strategic locations on the shore, to view the birdlife that comes to the Reservoir. - perimeter fencing to remain or to be replaced in total with wildlife-friendly perimeter fencing featuring gates designed by Tongva artists. - any pathways to be permeable, to promote groundwater recharging and reduce runoff. 	C-3-3	The comment expresses support for Alternative 3 with elements of Alternative 2. Please see Master Response - Alternatives Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-3-4	<p>Furthermore, we urge that the City ensure sufficient financing to provide:</p> <ul style="list-style-type: none"> - maintenance of all trees and plants on the grounds - consistent litter and food clean-up 	C-3-4	As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
C-3-5	<p>Human-wildlife conflict: Climate change intensifies human-wildlife conflict through habitat loss and extreme climate events, forcing people and wildlife to share increasingly crowded spaces. As ecosystems change, people and wildlife roam farther in search of food, water and resources. Human-wildlife conflict often results in devastating impact for the animals affected.</p> <p>We, the Micheltorena WEPA, urge the City to adopt Alternative 3 with some Alternative 2 elements is an Environmentally Superior Alternative that is feasible and still meets the Project objectives, with open habitat as an irreplaceable educational resource.</p>		<p>The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>This comment also expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
		C-3-5	The comment expresses support for Alternative 3 with some aspects of Alternative 2. Please see Master Response - Alternatives Analysis for a discussion on hybrid alternatives. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-4 Doranne Jung

COMMENT

RESPONSE

C-4-1	We, the Micheltorena WEPA, Wildlife Ecosystem Protection Advocates, believe that the closer the interaction with members of the human race with wildlife in their habitat will harm the ecosystem. This we agree that "....the fence is the single most important conservation management tool at the site after the presence of water." (LA Audubon Society: Statement on the Future Management of Silver Lake Reservoir).	C-4-1	Please see Master Response - Fence Removal.
C-4-2	The WEPA are in favor of Alternative 3. The most important part of Alternative 3 is an 8-foot high, non-scalable, continuous perimeter fence with access gates would be constructed. In addition, Alternative 3 focuses on improving upland habitat and wetland creation along the shoreline. The proposed promenade and walking paths would be constructed under this alternative, but would be moved further away from the water's edge where feasible. This alternative would retain all current public use facilities while improving the more heavily-used facilities on the South Valley.	C-4-2	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-4-3	Animals and habitats: our allies in fighting climate change The United Nations estimates that healthy ecosystems could account for 37% of the carbon reductions needed to limit global temperature rise. Healthy ecosystems with abundant plants and trees absorb carbon from the atmosphere and store it. So, preserving or restoring nature is a powerful tool in the race to stop climate change. Healthy ecosystems also filter water, buffer against flooding, reduce the impact of disasters, improve soil health and support rich biodiversity. Keystone species and nearly all animals play vital, sometimes invisible, roles in securing biodiversity and conserving habitats. Homeowners who are the Micheltorena WEPA (WILDLIFE ECOSYSTEM PROTECTION ADVOCATES) agree with these comments from FAW (International Fund for Animal Welfare) is a global non-profit helping animals and people thrive together. (https://www.ifaw.org/journal/impact-climate-change-animals)	C-4-3	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

C-5 Doranne Jung

COMMENT

RESPONSE

C-5-1	<p>The Micheltorena WEPA, Wildlife Ecosystem Protection Advocates, urge the adoption of Alternative 1 because it avoids the issues of unnatural NOISE and lights that have harmful effects on wildlife and human residents alike. Just 2 house remodel projects on 1 Micheltorena block cause noise, traffic congestion, and parking space scarcity so much that residents are unable to park in front of their homes just to unload their groceries from 7:30am-6pm. However, if not Alternative 1 then under Alternative 3 fewer construction activities would occur that could generate noise or vibration. Retention of the fence would affect views of the SLRC from off-site, but would remain consistent with land use plans policies toward visual resources and character of park land uses. However, since this alternative would avoid impacts associated with additional lighting and reflective surfacing of new structures, it would result in fewer impacts than the proposed Project relative to aesthetics. Alternative 3 would not allow permitted special events with the use of amplified sound. In addition, operational noise impacts would be less under Alternative 3 than under the proposed Project. The exception is Alternative 2's South Valley elements which are preferable.</p> <p>New lighting would only be added within the South Valley for the proposed sports facilities, Dog Park, and Recreation Center, similar to the proposed Project. However, no visitor access to the Knoll would be allowed and no nighttime access would occur within the other park zones. Gates would be locked from dusk to dawn.</p> <p>In response to increased traffic and more parking spaces which would be the result of the Master Plan, we must reduce harmful emissions by rapidly developing clean renewable energy, and that we must do this without harming sensitive wildlife and habitat. The Micheltorena WEPA, Wildlife Ecosystem Protection Advocates, are residents who have decades of first-hand experience with the perils of increased traffic and how far sound (noise) can travel for all living creatures in the Silver Lake hills.</p>	C-5-1	The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-5-2		C-5-2	The comment describes construction impacts associated with other projects. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-5-3		C-5-3	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-5-4		C-5-4	This comment expresses support for Alternative 3 and concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.
C-5-5		C-5-5	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-5-6		C-5-6	<p>This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Please see Master Response - Traffic/Transportation.</p> <p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.</p>

C-6 Doranne Jung

COMMENT

RESPONSE

C-6-1	Due to “climate changes”, wildlife habitats are beginning to shift, shrink, melt and even disappear entirely. Here in Los Angeles unusual heat and droughts stress plants and animals alike. And increasingly, animals’ life cycles are out of sync with plant growth and seasonal changes. As first and second-generation home-owner-residents of Silver Lake, the Micheltorena WEPA -Wildlife Ecosystem Protection Advocates, we have seen evidence of this in our lifetimes in our own back and front yards.	C-6-1	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-6-2		C-6-2	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-6-3	Therefore, the Micheltorena WEPA STRONGLY support Alternative 3, not the master plan.	C-6-3	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-6-4	Under Alternative 3, the intensity of the proposed Project would be reduced and habitat areas (without the habitat islands) would provide some opportunities to create and conserve green space and open space, and encourage growth of native plant species to create habitat. This Alternative would limit public access to the water (NO kayaking) and would not include habitat islands or other built facilities. Impacts to scenic vistas or scenic resources would be similar to the proposed Project.	C-6-4	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-6-5		C-6-5	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-6-6	However, no visitor access to the Knoll would be allowed and no nighttime access would occur within the other park zones. Gates would be locked from dusk to dawn. Tree removal for habitat improvements would still be required, but this alternative would focus on removing damaged or dying trees and preserving mature trees where feasible. Offsite bike improvements would occur along Silver Lake Blvd. To conserve wildlife and habitat in this rapidly changing climate, we must use the best available science to understand the specific threats that wildlife and ecosystems are expected to face not just in the future but right now; and use this opportunity to develop measures to mitigate these impacts and provide opportunities for wildlife species and habitats to shift in response here in Silver Lake.	C-6-6	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-7 Andrea Horwatt

COMMENT

RESPONSE

Silver Lake Now Comments
Silver Lake Reservoir Complex Master Plan Project
Draft Environmental Impact Report

C-7-1	Silver Lake Now (SLN) welcomes the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for Silver Lake Reservoir Complex Master Plan Project. Silver Lake Now has been a member of the Master Plan Stakeholder Working Group, and has actively participated in the Master Planning process since the outset of the project. For the reasons described below, we recommend adoption of the DEIR and implementation of the Master Plan as proposed. In our comments we also provide three recommendations regarding the future operations of the reservoir complex to mitigate potential impacts on the neighborhoods adjoining the reservoir.	C-7-1	The comment is introductory and expresses support for portions of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-7-2	We found the DEIR prepared by Environmental Science Associates (ESA) to be comprehensive and thorough. We believe that they have characterized the impacts of the project in a reasonable and rational manner. ESA's analyses were based on empirical and quantitative data when available, and on qualitative information and reasonable assumptions when quantitative data were not available. SLN would like to acknowledge thoughtful input to the Master Plan and DEIR by stakeholder groups and members of the Silver Lake community. This input has broadened the range of thinking regarding the elements of the Master Plan and their impact on the community.	C-7-2	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-7-3	The Master Plan achieves the project objectives better than any of the alternatives described in Chapter 5 of the DEIR. As described in the DEIR, "The only resource areas that would remain at a significant and unavoidable level even after implementation of mitigation measures would be noise/vibration and recreation." Many of these noise/vibration impacts would only occur during the construction phase of the Master Plan. The DEIR recognizes that other sources of noise from special events, especially nighttime events, and recreation may occur. These impacts could be mitigated by changes regarding the reservoir complex operating hours, and how and when special events are permitted to occur. Silver Lake Now recommends that the reservoir complex be operated only during daylight hours, much like how the existing walking paths through the eucalyptus grove and South Dam are closed now at dusk. In addition, we recommend that special events take place only during daylight operation. If these operational mitigation measures prove inadequate, special events and excessively noisy recreation activities could be eliminated.	C-7-3	The Draft EIR evaluates the project and considers alternatives in Chapter 5. As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant. And as noted in the comment, the only significant and unavoidable impacts of the proposed Project would occur during construction. As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. This 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule.
C-7-4		C-7-4	The proposed Project's operational hours, including allowable hours for special events, are described in Section 2.7.2. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-7-5	Silver Lake now believes that the MP strikes appropriate balance between the needs of residents and wildlife. The Master Plan specifically aims to limit human/wildlife interactions through design and operations to protect habitat. The MP appropriately recognizes that wildlife can thrive even when recreational activities occur at the site. Arguably, multiple elements of the Master Plan (e.g., habitat islands, wetlands habitat terraces, restored upland habitat) actually increase the habitat available for wildlife more than any of the alternative	C-7-5	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-7 Andrea Horwatt

COMMENT

RESPONSE

C-7-6	plans in Chapter 5. In the Los Angeles area multiple examples exist of formerly industrial sites that have been repurposed into parks where wildlife and recreation co-exist. Examples of these sites include: Franklin Canyon Park, Baldwin Hills Parklands, The Cornfield, Taylor Yard, Kenneth Hahn State Recreation Area, etc. An additional consideration regarding operation of the reservoir complex concerns the perimeter fence. For purposes of protecting wildlife and maintaining public safety, Silver Lake Now recommends installation of an upgraded perimeter fence. If this fence is not included as part of the initial Master Plan construction, it should be revisited if problems regarding wildlife and/or public safety occur in the future.
C-7-7	In the development of the Master Plan it has been envisioned that it will be funded primarily through sources outside of existing budgets for the City of Los Angeles, e.g., grants from private, state, and federal funds. Consequently, implementation of the Master Plan will not adversely impact park poor neighborhoods in Los Angeles, or take away funding for homelessness or other community needs.
C-7-8	DEIR acknowledges that there will be short-term inconveniences for the neighborhood. However, the neighborhood will receive long-term benefits through implementation of the Master Plan. Silver Lake has seen previous projects in the past, such as The Meadow and South Dam walkway that have caused short-term disruptions to the neighborhood, but that have created amenities that will benefit the community for decades into the future.
C-7-9	In summary, Silver Lake Now supports the findings of the DEIR and we recommend moving forward with implementation of the Master Plan. However, we recommend that the following three areas should be considered regarding the operational plans for the reservoirs complex: 1) allow daylight operation of the reservoirs complex only, 2) allow special events only during daylight hours, and 3) maintain or upgrade existing perimeter fencing.

C-7-6	Please see Master Response – Fence Removal and Master Response – Public Safety.
C-7-7	Please see Master Response – Funding and Operations.
C-7-8	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-7-9	The comment provides a conclusion to the letter and expresses overall support for the proposed Project with the suggested changes covered in comments C-7-1 through C-7-8. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-8 Doranne Jung

COMMENT

RESPONSE

- C-8-1 To create an example of how a community of humans respects and protects wildlife by creating a natural habitat in which humans act only as observers, not invaders, is the vision of the Micheltorena WEPA - Wildlife Ecosystem Protection Advocates. "Wildlife needs habitat to thrive. Science shows that one of the best ways to provide essential habitats is by setting areas aside from development and conserving them for the long-term, both directly for the places that animals and plants need to live and for linkages that allow wildlife to move across the landscape. In short, this is an unparalleled moment of opportunity to ensure lands that protect wildlife are prioritized and designated as part of "America the Beautiful"—and the very best way to do this is through refuge expansion." Homeowners who are the Micheltorena WEPA (WILDLIFE ECOSYSTEM PROTECTION ADVOCATES) agree with these comments provided by Defenders of Wildlife (<https://defenders.org/national-wildlife-refuge-expansion-campaign>).
- C-8-2 The Micheltorena WEPA urge the adoption of Alternative 1 first but if necessary then Alternative 3 because it is the Environmentally Superior Alternative proposed with the exception of Alternative 2's South Valley elements.

- C-8-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
- C-8-2 The comment expresses support for Alternative 1 or Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-9 Doranne Jung

COMMENT

RESPONSE

C-9-1	<p>We, the homeowners of the Micheltorena WEPA, some of whom have lived in Silver Lake for generations, want true "Environment Protection." EIR stands for Environmental Impact Research. "For years now, humans have mistreated and contaminated the very environment that sustains them. But the broad concern for the environment can be so overwhelming that people don't know what to do or where to start making a difference." (By Erich Lawson, Nov 25, 2019 ,https://eponline.com/articles/2019/11/25/three-environmental-issues-and-ways-to-com</p>	C-9-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-9-2	<p>As Wildlife Ecosystem Protection Advocates, we believe that human visitors should be kept at a distance from natural wildlife and their inhabitants as true ENVIRONMENT PROTECTION.</p> <p>In order of preference, we first support Alternative 1 and if not this, then Alternative 3 because it is the Environmentally Superior Alternative. We especially object to one element of Alternative 2 that is similar to the proposed Project: Alternative 2 would remove the perimeter fence to allow for increased public access and improved wildlife access to the water. But, we support the South Valley element of Alternative 2.</p>	C-9-2	The comment expresses support for a combination of Alternatives and opposition to removal of the perimeter fence. Please see Master Response - Fence Removal and Master Response - Alternative Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-9-3	<p>We agree with the LA Audubon Society about using the fencing as a management tool: "...the fence is the single most important conservation management tool at the site after the presence of water." - LA Audubon Society: Statement on the Future Management of Silver Lake Reservoir</p>	C-9-3	Please see Master Response - Fence Removal.

C-10 Doranne Jung

COMMENT

RESPONSE

C-10-1	<p>The Micheltorena WEPA, Wildlife Ecosystem Protection Advocates, want Alternative 1 as the best choice; but will also support Alternative 3 with some Alternative 2 elements regarding only the South Valley, because these are the Environmentally Superior Alternatives that are feasible and still meet the Project objectives, with open habitat as an irreplaceable educational resource: BIODIVERSITY.</p>	C-10-1	<p>Please see Master Response - Alternatives Analysis.</p> <p>The comment expresses support for a combination of Alternatives. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-10-2	<p>"Biodiversity helps maintain the balance of the ecosystem and provides biological resources which are crucial for our existence. Loss of biodiversity can be countered in a number of ways:</p> <ul style="list-style-type: none"> • Encourage natural habitat restoration • Practice sustainable living • Reduce invasive species, such as the human race amongst other natural wildlife • Educate the populace about innovative ways to preserve biodiversity as nature intended." 	C-10-2	<p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
C-10-3	<p>Alternative 3 would promote natural features of the SLRC park for humans and reduces public access to areas that could support wildlife. Wetland habitat but with no islands, would be created around the perimeter of the Silver Lake Reservoir, and wildlife corridors would not be adversely affected, and no impact to habitat conservation plans would occur. Alternative 3 would create new wetland habitat and some areas would have limited public access and the perimeter fence would be retained, reducing disturbance to habitat.</p>	C-10-3	<p>The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-10-4	<p>"....the fence is the single most important conservation management tool at the site after the presence of water."</p> <p>- LA Audubon Society: Statement on the Future Management of Silver Lake Reservoir</p>	C-10-4	<p>Please see Master Response - Fence Removal.</p>
C-10-5	<p>"Awareness and adaption are two key steps towards conserving this boon called environment. Our community can create an example of how to COMMIT TO NATURE to ensure that our future generations have a healthy planet in which to live...The decade ahead is crucial for tackling these major ecological and systemic threats. The nature we need is under threat; but it is also profoundly resilient and can regenerate if we work with it instead of against it."</p> <p>Our wildlife cannot post their comments about their ecosystem so as homeowners the Micheltorena WEPA (WILDLIFE ECOSYSTEM PROTECTION ADVOCATES) are speaking for the wildlife with these comments from The Nature Conservancy (https://www.nature.org/en-us/what-we-do/our-insights/perspectives/biodiversity-crisis-n)</p>	C-10-5	<p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>

C-11 Doranne Jung

	COMMENT	RESPONSE
C-11-1	<p>The Micheltorena Wildlife Ecosystem Protection Advocates WEPA), are home owners who strongly feel the existing Reservoirs Complex — a gem of our community— should NOT be modified in any way (DEIR Chapter Five, table 5-1 Alternative 1.) However, if we must be FORCED to choose, we strongly urge for the implementation of Alternative 3 because it is not only the superior Environmentally Superior Alternative but provides for the best eco-friendly education component such as:</p> <ul style="list-style-type: none">- an elevated ADA-compliant wood walkway from the top of the Armstrong path to the top of the Knoll, where a wood viewing platform can be built for a spectacular view of the entire Complex.- 2 or 3 similar wood viewing platforms, with free public telescopes, at strategic locations on the shore, to view the bird life that comes to the Reservoir.	<p>C-11-1 The comment expresses support for Alternative 1, or Alternative 3. Please see Master Response - Alternatives Analysis. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-11-2	<p>The Micheltorena WEPA are warning of the environmental consequences when human life behavior respects wildlife inhabitants and their ecosystem ; and the ways that humans can protect its natural inhabitants in a natural setting. Families, adults, children and seniors should have access to “OBSERVE” the effects of action in an environmentally-friendly setting with little or no human interference with wildlife. The above components of Alternative 3 give everyone a chance to engage in observing nature naturally.</p>	<p>C-11-2 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

C-12 Doranne Jung

COMMENT

RESPONSE

C-12-1	<p>The Micheltorena WEPA, Wildlife Ecosystem Protection Advocates, are in favor of Alternative 1 and advocate for the natural habitat as an irreplaceable educational resource. Developing the SLRC to enhance the area to promote a true wildlife habitat will educate current and future generations that the reversal of environmental degradation is possible and shows the ways that nature responds to little/no human interaction when it is in an “environmentally protective way”. We advocate for making positive change for the wildlife ecosystem by not allowing humans to interfere with nature. The goals of the Micheltorena WEPA, Wildlife Ecosystem Protection Advocates, are to protect wildlife and save the planet from unnecessary human intervention which has already caused the climate crisis. As the members of the human community, we respect and want to protect wildlife in its natural habitat with no human interaction. We advocate that humans only be observers of a wildlife ecosystem and learn to respect nature, naturally.</p>	C-12-1	<p>The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-12-2		C-12-2	<p>This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-12-3	<p>We are property taxpaying home owners who are questioning the validity of the enormous expense of the Master Plan in a city that has a population of nearly 4 million people. How many of residents of the Greater LA City will this project serve and how can the local residents of the smaller surrounding neighborhoods that are nearest in proximity (i.e., Silver Lake, Atwater, Los Feliz, East Hollywood absorb the weight of the influx in terms of increased traffic, parking, noise and added congestion of human beings?</p>	C-12-3	<p>Please see Master Response - Funding and Operations, Master Response - Traffic/Transportation, and Master Response - Public Safety.</p>
C-12-4	<p>We also question the added cost for maintenance and security needed to keep this area clean and safe for all who come with good intention and be mindful of those whose intentions are otherwise not welcomed? How much of the first responder resources will be needed to save/rescue children and adults who inadvertently get into the deep water and are not able to swim to safety. Even this last year, many of the beaches were not open to the public due to a life guard shortage. Given the current decrease in K-6 teachers who will be hired teach at the educational center, we question what type of certified person will be hired to conduct workshops for children and parents alike? It takes a minimum of 5 years to educate a person to become a certified teacher in LAUSD and the person who is hired needs a specific type of background and training in wildlife habitat preservation.</p>		<p>As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.</p>
C-12-5		C-12-4	<p>The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-12-6	<p>Where is the proposed line-by-line budget to implement the Master Plan? We are asking for transparency for all taxpayers in Los Angeles City to see how and</p>		<p>As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. Operations would not require additional fire or hazard services such that substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities would occur. LAFD would be able to serve the proposed Project and would not result in the need for new</p>

C-12 Doranne Jung

	COMMENT	RESPONSE
C-12-6 cont.	where the funds will be obtained for this project. Perhaps the new incoming Los Angeles City Controller will want to look at these numbers: "People have a lot of questions about how the city operates and how the money is spent ... and that's my specialty," Mejia he stated in a recent LA Times article. (Lopez, S. Nov. 19, 2022, https://www.latimes.com/california/story/2022-11-19/column-l-a-s-city-controller-elect-r	or altered fire facilities. In addition, the proposed Project was designed in order to allow LAFD to continue to use the reservoir for water for emergency purposes.
	C-12-5	Comment noted. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	C-12-6	Please see Master Response - Funding and Operations.

C-13 Adelina Sorkin

COMMENT

RESPONSE

The Knights of Kenilworth

Los Angeles City Bureau of Engineering:

We are The Knights of Kenilworth, a group of neighbors and friends who came together in 2008 as a team at the American Cancer Society Relay For Life of the Griffith Park Communities. Through the years we have addressed issues regarding cancer but also issues affecting our community.

We have reviewed the draft Environmental Impact Report (DEIR) for the Silver Lake Reservoirs Complex Master Plan (SLRCMP) and feel it does not properly evaluate the effects to our neighborhood. It should be noted that the vast majority of the Knights of Kenilworth participated at the community outreach meetings held at Friendship Auditorium, John Marshall High School, the walking path tour, and completed the surveys. We attended the Silver Lake Neighborhood Council Reservoir Committee meetings and are concerned that the current draft EIR, would significantly alter the character of our community in a negative way.

Though some in our group believe nothing should be done to alter the Silver Lake Reservoir Complex (SLRC), we have come to accept that some change is appropriate. We carefully reviewed Chapter 5, Alternative 2 and believe it should be considered as the final proposal. It provides for the needed updates to our facilities while maintaining a balance between nature, wildlife and the community.

Traffic: We are greatly concerned the DEIR minimized the issue of traffic and feel the traffic study did not capture the reality of traffic flow around the SLRC area. Monday through Friday, there is gridlock during morning and evening rush hour from the 101 Freeway and Silver Lake Blvd to Fletcher and Riverside Drive. Duane Street is a nightmare for residents; left turns prohibited during rush hours for using this street linking Glendale Blvd. and Silver Lake Blvd. When the traffic study was being conducted, we saw no equipment on West Silver Lake Drive. Recently, LADWP was working on widening the entrance on Armstrong and Tesla. This small project created gridlock for the week. In our work with the Community Police Advisory Board and speaking with our Senior Lead Officer Ramirez and Traffic Officer Henderson, we have documented other traffic issues impacting the surrounding SLRC area not addressed in the DEIR.

Parking: The proposed parking is unrealistic and dangerous. Diagonal parking near the Recreation Center will create a dangerous situation. From curb to curb, is only 35 feet. By installing diagonal parking, this curved area will create an accident ready to happen. One can see what happens in the City of Glendale with their diagonal parking on Brand Blvd. Currently there is only one handicap parking place next to the Silver Lake Recreation Center and no additional spot is planned. Additionally, the parking proposed along Silver Lake Blvd along with reassigning bike lanes, is going to make an already congested corridor much worse.

Educational Center/Restroom Facility: At Silver Lake Neighborhood Council Reservoir Committee meetings, it was stated by a member of the Silverlake Conservancy, that the

- C-13-1 The comment expresses support for Alternative 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-13-2 Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.
- C-13-3 Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.

C-13 Adelina Sorkin

COMMENT

RESPONSE

C-13-4

Educational Center is needed because that is where the bathrooms would be located. We are proposing using modular self-cleaning commodes that are being used in the North Hollywood area. With respect to the Educational Center, children should be in nature rather than going from one classroom to another classroom. We have queried many times about where school buses will drop off/park with no response. We are concerned this structure will be used as another meeting place or event use and bring further congestion to our community.

C-13-4

As described in the Project Description, Section 2.5.1 of the Draft EIR, a proposed Education Center would be constructed at the base of the Knoll landscape and would include small indoor and outdoor teaching and assembly spaces, including two interior classrooms. The large classroom would be approximately 1,400 square feet (sf) and would accommodate up to approximately 50 people. A slightly smaller classroom would be approximately 1,000 sf and would accommodate up to approximately 35 people.

C-13-5

Walking Path: Prior to the walking path, one of our neighbors was killed as she walked with her family on West Silver Lake Drive. We are pleased that the walking path around the SLRC became a reality, and welcomed it. But who is responsible for their upkeep? Maintenance must be consistent and currently there is none. When it rains, there are great puddles of water especially near West Silver Lake Drive and Moreno. This results in walkers and joggers needing to move into the street risking safety. Regrade and restore the walking paths and make them safe year-round.

C-13-5

Please see Master Response - Traffic/Transportation.

C-13-6

Maintenance: We are greatly concerned about the maintenance of any improvements in the SLRC. We see tree limbs fall on the walking path and impede our taller neighbors requiring dodging of these hazards. Show us how maintenance is part of the plan. Again, we have queried many times about who will be responsible for these improvements and how they will be paid for without any response.

As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

C-13-7

Noise: Many of us have witnessed the SLRC being drained at least four times and the construction projects that have ensued. We are concerned about the construction noise the proposed project will produce. However, of more concern is the proposed events 12 times a year that could result in more than 600 people descending on the SLRC. This is NOT acceptable since the surrounding streets such as Kenilworth, would experience a *noise bowl* effect. This past Summer, there were some rogue concerts at the Meadow. The amplified sound could be heard on the streets such as West Silver Lake Drive, Kenilworth, Moreno and Micheltorena. Amplified music must be PROHIBITED regardless of any SLRCMP proposed improvements.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-13-8

Dog Park: We are in support of upgrades to the Dog Park in its current location. However, we are concerned as to who will maintain this area since upkeep has been sparse and no improvements have been made through the years except for the shade structures. We think that the addition of more permanent benches for seating would be beneficial, since currently many residents bring their own chairs to the park.

C-13-6

See response to Comment C-13-5.

C-13-9

Lighting: We strongly feel that low placed path-directed lighting is appropriate. However, lighting that would affect the wildlife should not be considered anywhere in the SLRC.

C-13-7

This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.

C-13-10

Park Equity: All Angelinos should be able to walk to a green space. Our neighbors in Koreatown do not have this luxury. Has the City thought of creating small pocket parks in

C-13-8

As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

C-13 Adelina Sorkin

COMMENT

RESPONSE

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The suggested addition of bench seating would be considered during final project design. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-13-9 As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

Regarding the fence, please see Master Response - Fence Removal.

C-13-10 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

C-13 Adelina Sorkin

COMMENT

RESPONSE

C-13-10
cont.

these park poor areas rather than invest more than \$260 million and counting that is not accessible by public transportation. Where are our priorities? We do NOT believe Silver Lake is one of the communities in need. We urge the city to focus funds and future design plans on communities which are park poor, which will benefit Los Angeles as a whole.

C-13-11

Amplified Sound: This is a neighborhood, not a destination location. At a minimum, the City needs to prohibit amplified music or other loud activities in the complex regardless of what is being proposed.

C-13-12

Drought: As a neighborhood, we are mindful of the drought we are experiencing locally, statewide, nationally and worldwide. All activities for humans involving water use should be excluded.

C-13-13

Protected Area for Wildlife: We are anticipating the final vote in designating SLRC a Protected Area for Wildlife (PAW) as part of the City's Wildlife Ordinance. Therefore, we must be prepared to comply with PAW which has the backing of Councilmember Ramen.

C-13-14

Security: At a recent gathering of concerned neighbors, we heard from LA Parks Rangers who indicated the SLRC not a high priority area for surveillance. As a result, LAPD is frequently called when there is a need for intervention such as an altercation at the Dog Park, homeless encampments or unauthorized use of the Meadows. Again, our queries of who will be responsible for security have been ignored.

C-13-15

Los Angeles Department of Water and Power (LADWP) is required to maintain the reservoirs for other environmental purposes, including maintaining the dams. An opportunity exists to repurpose a decommissioned drinking water facility in a way that could benefit the community, restore habitats, and provide ecological benefits to ecosystems within the complex. We ask that the concerns raised by Knights of Kenilworth be carefully considered and that every city official involved in decisions regarding the Reservoirs complex carefully read Chapter 5 of the DEIR and consider the impact this project would have on residents, Stakeholders and wildlife.

Sincerely,

Knights of Kenilworth

Adelina Sorkin
Co-Chair
2354 Kenilworth Ave

Patricia Tashma
Co-Chair
2363 Kenilworth Ave

Earl Hough
Dorrie Hall
Laura Kruper
Elexa Williams
Kathie Sullivan

Stephen Sorkin
Greg Baxter
Doris Slater
Lorena Soto
Keme Odem

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

Please see Master Response - Noise.

C-13-11 Please see Master Response - Noise.

C-13-12 Please see Master Response – Drought Conditions.

C-13-13 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

C-13-14 Please see Master Response - Public Safety.

As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department.

LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.

Please refer to Master Response – Homelessness.

C-13 Adelina Sorkin

COMMENT

RESPONSE

C-13-15 This comment is conclusory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The commenter is also referred to Master Response - Alternative Analysis.

C-14 Doranne Jung

COMMENT

RESPONSE

C-14-1	<p>The Micheltorena WEPA, Wildlife Ecosystem Protection Advocates, are concerned about the loss of wildlife and the safety of our community. We are in favor of Alternative 1 and the parts of Alternative 3 that provide for adequate perimeter fencing and agree with what Jane Cook, Silver Lake resident and SLWS Board member wrote in this Comment: Re Public Services Impacts: "The DEIR team's omission of in-depth study of possible severe impacts to public safety and wildlife welfare caused by eliminating the 8-12' perimeter fence now protecting the Reservoirs is a serious flaw in this report. Their finding of "Less than Significant Impact; no mitigation proposed" [Table 3.14-4] is wrong, because this DEIR ignores critical security changes that would be brought by fence removal. They also ignore the need for increased policing in urban parks in general, and in large unfenced areas. These dangerous omissions in fact render the DEIR estimations of necessary police presence entirely invalid."</p>	C-14-1	<p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>Please see Master Response - Fence Removal and Master Response - Public Safety for further details of how the Draft EIR considers site safety and security.</p>
C-14-2	<p>"The DEIR provides no research comparing crime statistics after drastic changes to urban environments such as opening up 116 acres to easy public access, all night, and all day within residential neighborhoods near two freeways."</p> <p>"There is no research at all on the special security needs of public parks. The writers of the DEIR appear to have consulted only one LAPD captain, an organization chart, and a general LAPD contacts tally online. This is egregiously insufficient research."</p> <p>We especially agree with Ms. Cook that "The current perimeter fence provides a baseline condition of safety and protection from criminal incursion into the Reservoirs area. All DEIR projected policing needs are derived from this baseline condition. There is no discussion at all of changes in opportunistic criminal activity that certainly will be brought by the alteration of these critical variables: removal of the fence, opening so wide a land area within an urban setting, enabling incursions around the clock. The DEIR provides only an undetailed description with very general statistics about current citywide LAPD numbers and anti-crime activity. They are not specific to the Project area, or of parks as a special public environment."</p>	C-14-2	<p>Please see Master Response - Fence Removal and Master Response - Public Safety.</p> <p>As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department.</p> <p>LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. The proposed Project is being designed to include wetland habitat and other edge treatments, where feasible, around the reservoir that would allow separation from the public to the water's edge. In the unlikely event that someone would enter the reservoir water, these wetland areas and edge treatments would also provide places where one could exit the reservoir (as opposed to the current smooth surface and slope of the concrete walls). During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.</p>
C-14-3	<p>In addition, we are concerned about increased crime as most homeowners are like Jane Cook who commented on Impact 3.14-13" An increase in visitorship of approximately 390 park visitors daily is anticipated. However, these visitors</p>		

C-14 Doranne Jung

COMMENT

RESPONSE

C-14-3 cont.	<p>and the new proposed full-time employees would not reside in or permanently occupy the project site and service demands per person within the area would not increase.</p> <p>"This obtuse statement ignores the fact that crime in parks is often a problem due to the difficulty of policing a wide land area containing many freely-moving people and the ease, for criminal elements, of escape. "</p> <p>"LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The closest station to the proposed Project area would be LAPD Northeast Community Police Station located approximately 1.3 miles to the northeast, near Tesla Avenue. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. (LAPD Pers comm 2022)." [3.14-11]</p> <p>"Accordingly, new or altered government fire and police facilities would not be needed for the operation of the proposed Project, and impacts would be less than significant." [3.14-12]</p> <p>Where specified in the SLRCMP, the fencing described is of a kind that has proven entirely ineffective in protecting the area it encloses.</p>	C-14-3 Please refer to Master Response – Public Safety and Master Response - Fence Removal for further details regarding site security and public safety.
		C-14-4 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-14-4	<p>The Micheltorena WEPA support Alternative 3 of the Master Plan because it specifies a perimeter fence of the same height of the present fence, open during daylight hours and closed at night. Hence, the presence of park visitors during the day, and the activity around neighboring homes would deter much illegal incursion. The extent of this deterrence, of course, available in numerous "Neighborhood Watch" statistics, should also be researched far more; this DEIR Team has not even considered it. As homeowners who have fences and hedges much higher than 3' to protect our private property and deter theft/break-ins as well as have installed electronic security devices, we are quite familiar with what it would take to protect the perimeter of the entire Silver Lake. At night, when criminal elements take advantage of the lack of watching eyes, the Park MUST be protected by this, an adequately maintained fence.</p>	<p>C-14-5 Please see Master Response - Fence Removal and Master Response - Public Safety.</p> <p>As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. Operations would not require additional fire or hazard services such that substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities would occur. LAFD would be able to serve the proposed Project and would not result in the need for new or altered fire facilities. In addition, the proposed Project was designed in order to allow LAFD to continue to use the reservoir for water for emergency purposes.</p>
C-14-5	<p>The Micheltorena WEPA support Alternative 3 of the Master Plan because it specifies a perimeter fence of the same height of the present fence, open during daylight hours and closed at night. Hence, the presence of park visitors during the day, and the activity around neighboring homes would deter much illegal incursion. The extent of this deterrence, of course, available in numerous "Neighborhood Watch" statistics, should also be researched far more; this DEIR Team has not even considered it. As homeowners who have fences and hedges much higher than 3' to protect our private property and deter theft/break-ins as well as have installed electronic security devices, we are quite familiar with what it would take to protect the perimeter of the entire Silver Lake. At night, when criminal elements take advantage of the lack of watching eyes, the Park MUST be protected by this, an adequately maintained fence.</p>	<p>LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. The proposed Project is being designed to include wetland habitat and other edge treatments, where feasible, around the reservoir that would allow separation from the public to the water's edge. In the unlikely event that someone would enter the reservoir water, these wetland areas and edge treatments would also provide places where one could exit the reservoir (as opposed to the current smooth surface and slope of the concrete walls). During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.</p>

C-15 Doranne Jung

COMMENT

RESPONSE

C-15-1	The DEIR is failing the wildlife. The Micheltorena WEPA urge you to prioritize the needs of nature above those of us humans.	C-15-1	As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.
C-15-2	The DEIR Biological Resources section is inaccurate and ill-researched.. The Master Plan's "Floating Islands," the "Wetland Terraces" and "fish stocking" that are supposed to benefit birds, will not do so! The expert opinion of Dan Cooper, Chief Conservation Biologist of the Santa Monica Mountains Conservancy: This DEIR is "lacking in both rigor and specificity.... Without current, accurate, and credible data on the biological resources ..., efforts at restoration will either fall short, or could actually result in further degradation of the site."		
C-15-2	Ironically, the massive excavation, grading and construction of much-touted "nature trails," the "scenic overlooks," and "nature education" structures will instead uproot and destroy Nature.		
C-15-3	The Knoll's lost natural forest is now vital habitat for an ecosystem of ground-dwelling animals and local birds that will lose nests, burrows and food. Disruption of the open waters drives away migratory flocks we love. The DEIR fails to even mention the loss of these birds and animals.		This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
C-15-3	The Master Plan would remove the Reservoirs' Perimeter Fence. This will have major impacts on wildlife welfare and neighborhood safety. Vandalism, vagrancy and crime have been documented as serious problems in other unfenced parks in Los Angeles. There is no Public Safety mitigation for the loss of the Perimeter Fence suggested in this DEIR.	C-15-2	Please see Master Response - Fence Removal.
C-15-4	The horrific noise, vibration, mess and traffic blockages caused by massive construction could last from five to fifteen years. Nevertheless, this Deir calls this, incredibly, a "Less Than Significant Impact." As to noise and vibration mitigations: "None Required." [DEIR 3.16-18]	C-15-3	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
C-15-5	Please consider that in a recent study provided by the National Wildlife Foundation, we have lost 1 in 4 breeding birds from the U.S. and Canada in the past 50 years.	C-15-4	Please refer to Master Response – Public Safety and Master Response - Fence Removal.
	Trees serve as sources of food and habitat for thousands of bird species globally, along with at least half of all known land species. Trees are also integral to providing more than 75% of the world's freshwater supply. Native trees are critically important if we want to address declining bird populations		This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on

C-15 Doranne Jung

COMMENT

RESPONSE

C-15-5 cont. and build a future where both people and wildlife survive and thrive. Over the past half century, rufous hummingbirds, chimney swifts, and 88 other U.S. bird species have lost more than half of their populations. Unless we take immediate action, scientists estimate that at least 39 of those species will lose another half of their remaining populations over the next 50 years. We cannot cut down native trees to plant new ones and wait for them to grow; waiting 1-5 years without fully developed native trees will harm our birdlife that depend on those trees currently growing in this area right now. Imagine going to a farm to buy vegetables that are yet ripe enough to pick; do we wait for our next meal until spring? It is lunacy to expect birds to wait for their trees to grow back to what they are today on which they depend to live NOW. The DEIR also claims, "significant irreversible changes to our community have been deemed acceptable." [DEIR 4.3]

C-15-6 They are not!

The DEIR claims the negative impacts of construction, the years of disturbance, and when finished, the increased daily noise, crowds, traffic, and harm to our wildlife with be worth it.

It is not!

Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

C-15-5 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Also, please see Master Response - Biological Resources.

C-15-6 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-16 Benjamin Harris / Los Angeles Waterkeeper

	COMMENT	RESPONSE
C-16-1	<p>Please see the attached letter from Los Angeles Waterkeeper and Heal the Bay regarding the Draft EIR for the Silver Lake Reservoir Complex Master Plan. Please feel free to reach out to ben@lawaterkeeper.org with any questions.</p> <p>Best,</p> <p>Benjamin Harris Staff Attorney Los Angeles Waterkeeper</p>	<p>C-16-1 The comment states that the alternative analysis in the Draft EIR is not robust and that the Project could impact water supplies. The Draft EIR assumes that the proposed Project would be implemented within the existing SLRC site. The Draft EIR identifies the existing conditions at the SLRC including maintaining water in the reservoirs. If in the future, water was unavailable to maintain a water feature in the park, an environmental analysis of that modification to the existing condition would be required. Since removal of water from the reservoirs would not reduce any significant impacts of the proposed Project, it is not evaluated as an Alternative in the Draft EIR. Furthermore, the proposed Project would reduce demands on groundwater compared with existing conditions (see page 3.18-23 of the Draft EIR). New water demands of the proposed new facilities would be minor, within ranges typical for park uses, and would be supplied by LADWP's potable water distribution system without the need for system upgrades. Please see Master Response - Alternative Analysis.</p>

C-16 Benjamin Harris / Los Angeles Waterkeeper

COMMENT

RESPONSE



December 2, 2022

Dr. Jan Green Rebstock
City of Los Angeles
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

Submitted online via <https://eng.lacity.org/silver-lake-reservoir-complex-master-plan/eir>

RE: CEQA Comments on the Draft Environmental Impact Report for the Silver Lake Reservoir Complex Master Plan Project

To whom it may concern,

On behalf of Los Angeles Waterkeeper ("LA Waterkeeper or LAW") and Heal the Bay, non-profit environmental watchdogs that seek to promote and protect the health of all coastal and inland water resources in Los Angeles County and ensure a sustainable water supply for the Los Angeles region, we are writing to express our concerns that the Environmental Impact Report ("EIR") for the Silver Lake Reservoir Complex Master Plan Project ("Project") did not include a sufficiently robust alternatives analysis and could thus unduly impact our local water supplies and the health of the Los Angeles River.

We would first like to recognize that we are on unceded Indigenous land. The main office of Heal the Bay, the main office of LA Waterkeeper, and the Silver Lake Reservoir all sit on Tongva and Chumash land.

The Silver Lake Reservoir Complex Master Plan Project ("Project") seeks to preserve the Silver Lake Reservoir as a recreational resource that is unconnected from the local drinking water system, which is a laudable goal. We want to express our support the Project and the expansion of greenspace and ecological habitat generally. Such projects can provide a myriad of environmental and community benefits, from enhancing critical habitat, reducing local heat island effect, increasing recreational opportunities, and promoting greater community health. That said, even greenspace projects must be done as sustainably and equitably as possible. The Silver Lake Reservoir is quite large, with a surface area of about 100 acres and a capacity of 800 million gallons of water. As such, it is crucial for the City of Los Angeles to ensure that such a large quantity water for the reservoir is sourced from a sustainable water supply that will not have long-term impacts on local drinking water supplies.

Our review of the Environmental Impact Report ("EIR") for the Project shows no analysis of the impacts of the Project to water supplies. We believe those impacts could be significant. The Project intends to source water to maintain the reservoir from the nearby Pollock Wellfield, which draws up groundwater from the San Fernando Valley Groundwater Basin ("SFV Basin") that is contaminated by a variety of pollutants including hexavalent chromium, TCE, and PCE. LADWP treats this groundwater before it is sent to the reservoir. The Project

- C-16-2 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-16-3 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-16-4 The comment suggests that use of water from the Pollock Wellfield may result in significant impacts. The Silver Lake and Ivanhoe Reservoirs are currently filled with water from the Pollock Wellfield. The proposed Project would not change this baseline condition. As a result, the proposed Project would not result in a significant impact to water supplies. Also, please see Master Response – Drought Conditions.

C-16 Benjamin Harris / Los Angeles Waterkeeper

COMMENT

RESPONSE



C-16-5

estimates that it will require about 227 acre-feet per year ("AFY") of groundwater from Pollock Well. The Project would apply about 2.27 acre-feet per year per acre of reservoir cover, which far exceeds the average groundwater use of 0.39 acre-feet per acre within the basin. Moreover, groundwater levels in the SFV Basin have begun declining in recent years due to increased urbanization and decreased infiltration, reduced artificial basin recharge, and continued groundwater extractions by the cities of Los Angeles, Burbank, and Glendale.¹

The Project would continue the same trend of consumptive groundwater use in the SFV Basin. It is particularly concerning that groundwater from the SFV Basin may overflow from Silver Lake Reservoir into the MS4 system during high precipitation events, ultimately being lost to the Pacific Ocean (also presenting water quality concerns given the polluted nature of MS4 discharges). Yet the EIR fails to consider whether this quantity of groundwater withdrawal, for a non-potable purpose, would have significant impacts on the SFV Basin and local water supplies over time. The only consideration in the EIR is reduced groundwater pumping during periods of drought emergencies, which are expected to continue occurring at regular intervals as the climate crisis worsens, but the Project is vague as to when those restrictions would be in place or what the effects might be on groundwater pumping.

C-16-6

Courts have rejected CEQA analysis for projects that fail to evaluate the water supply impacts to upstream water sources. See *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 432 ("An EIR for a land use project must address the impacts of likely future water sources, and the EIR's discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability."); *Habitat & Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1304 (rejecting a city's CEQA analysis because "the draft EIR and the final EIR neither discussed nor analyzed a limited-water alternative" and therefore "the decision makers were not provided with any information about the effect that such an alternative might have on water supply impacts or other impacts"); cf. *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 23 (environmental review for conceptual projects or plans complies with CEQA "by identifying the likely source of water for new development, noting the uncertainties involved, and discussing measures being taken to address the situation in the foreseeable future"). The EIR contains no analysis of the water supply impacts resulting from ongoing pumping of 227 AFY of groundwater from the SFV Basin, for non-potable purposes, in perpetuity.

Furthermore, the EIR fails to consider the environmental impacts on flows in the LA River from continued groundwater pumping. As aquifer levels continue to decline in the SFV Basin, the lowered groundwater table may impact the amount of artesian upwelling that occurs in the Glendale Narrows stretch of the LA River. Groundwater upwelling is a vital component of ensuring suitable flows in the river year round---in fact, groundwater is the only natural source of dry weather flows given that the rest of the flows in the river come from wastewater treatment discharges and dry weather runoff. The EIR does not analyze or even mention the potential impacts that continued groundwater extraction might have on LA River flows, the habitat in the soft-bottom stretch of the river, and the species that rely on that habitat. The

¹ See http://ularawatermaster.com/index.html?page_id=914.

C-16-5

The comment states that the Project's groundwater use far exceeds average groundwater use within the basin and the Draft EIR does not assess impacts to water supplies. As described on page 3.10-1 of the Draft EIR, LADWP currently maintains water levels in Silver Lake Reservoir using treated Basin 4-12 groundwater supplied from Pollock Well #3. As specified on page 3.10-3 of the Draft EIR, Basins 4-11 and Basin 4-12 are both designated by the California Department of Water Resources (DWR) as very low priority basins under the Sustainable Groundwater Management Act (SGMA). The San Fernando Valley Groundwater Basin has not been identified as a critically overdrafted basin by SGMA and, as such, does not have a specific groundwater management plan and is not subject to SGMA. The San Fernando Groundwater Basin is an adjudicated basin managed under the authority of the Upper Los Angeles River Area (ULARA) Water Master. Allocations of groundwater to serve beneficial uses are approved by the Water Master. The use of treated impaired water to supply a recreational water feature is approved by the Water Master as an appropriate use. The Draft EIR evaluates potential impacts to groundwater supplies on page 3.10-29, concluding that impacts would be less than significant. The proposed Project would not increase groundwater demands compared with existing conditions.

C-16-6

The comment states that courts have rejected projects that fail to evaluate impacts to water supplies. The Draft EIR evaluates potential impacts to groundwater supplies on page 3.10-29, concluding that impacts would be less than significant. The proposed Project would reduce groundwater demands compared with existing conditions. The Draft EIR evaluates impacts to water supplies on page 3.18-22. Since the project would reduce demands compared to existing conditions, the Draft EIR concludes that the project would have a less than significant impact on water supplies.

The comment states that the Draft EIR fails to address impacts to the Los Angeles River. The Draft EIR evaluates the proposed Project's effects on existing conditions. The proposed Project would not increase groundwater demands compared with existing conditions. As a result, the Draft EIR concludes that the project would have less than significant impacts on water supplies. The proposed Project would not affect flows in the Los Angeles River.

C-16 Benjamin Harris / Los Angeles Waterkeeper

COMMENT

RESPONSE

C-16-6
cont.

omission of these potential environmental impacts from the scope of the EIR is inconsistent with CEQA's mandate to consider all such impacts.

Finally, the EIR fails to consider alternatives for the Project that would minimize impacts to water supplies. First, the Project assumes that the reservoir levels would remain the same, without considering the viability of the Project components with a shallower reservoir. Lowering the reservoir levels would also create more green space for the Project, serving the Project's objectives while minimizing water use. While we do not take a specific position on what the appropriate reservoir levels should be on balance, the City of Los Angeles should have conducted an analysis of alternative reservoir levels and the associated environmental impacts in the EIR.

Second, the EIR fails to consider alternative water sources for Silver Lake Reservoir aside from Pollock Well groundwater, in tandem with considering impacts on LA River flows. There have been numerous efforts underway in the Los Angeles region to recycle wastewater for non-potable uses, including at nearby wastewater treatment plants that discharge into the LA River--the Donald C. Tillman Water Reclamation Plant, the LA-Glendale Water Reclamation Plant, and the Burbank Water Reclamation Plant. Along with the Hyperion Water Reclamation Plant, which is operated entirely by the City of Los Angeles and discharges millions of gallons of treated wastewater per day into the Pacific Ocean, these plants function as an interconnected wastewater treatment system called the North Outfall Sewer System. While we have concerns about reduced LA River flows resulting from wastewater recycling at Tillman, LA-Glendale, and Burbank, the Project's groundwater use also may impact flows and cannot be analyzed in isolation from wastewater recycling objectives. Thus, the EIR must consider whether recycled wastewater from the North Outfall Sewer System could be a sustainable local source for Silver Lake Reservoir water that would ease the strain on the SFV Basin groundwater supplies, while simultaneously maintaining suitable flows in the LA River for ecological health. As the City of Los Angeles moves forward with wastewater recycling projects, it is critical to ensure integration of all city projects that rely on water and to analyze the different projects from a holistic perspective to achieve maximum efficiency and minimize unintended consequences. The EIR for the Project fails to do that, presenting a lost opportunity and violating CEQA at the same time.

To comply with CEQA and its regulatory Guidelines, an EIR "shall describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project, and evaluate the comparative merits of the alternatives." 14 C.C.R. § 15126.6 (emphasis added). Although "the range of alternatives required in an EIR is governed by a rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice, the alternatives "shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project" on the environment. 14 C.C.R. § 15126.6 (emphasis added). The alternatives must adequately represent the spectrum of environmental concerns in order to permit a reasonable choice of alternatives, and the EIR must provide the rationale for selecting or defining the alternatives evaluated throughout the document, including identifying any alternatives that were

C-16-7

The comment states that the Draft EIR fails to evaluate Alternatives that used less water or that derived water from other sources. The Draft EIR assumes that the proposed Project would be implemented within the existing SLRC site. The Draft EIR identifies the existing conditions at the SLRC including maintaining water in the reservoirs. If in the future, water was unavailable to maintain a water feature in the park, an environmental analysis of that modification to the existing condition would be required. Since removal of water from the reservoirs would not reduce any significant impacts of the proposed Project, it is not evaluated as an Alternative in the Draft EIR. Furthermore, the proposed Project would not increase demands on groundwater compared with existing conditions (see page 3.18-23 of the Draft EIR). New water demands of the proposed new facilities would be minor, within ranges typical for park uses, and would be supplied by LADWP's potable water distribution system without the need for system upgrades.

The Draft EIR notes that under existing conditions, the reservoirs are filled by LADWP with water from the Pollock well #3. The proposed Project would not change this condition. If in the future, LADWP proposes to fill the reservoir with water from a different source, additional environmental analysis would be required. Please see Master Response - Alternative Analysis.

C-16 Benjamin Harris / Los Angeles Waterkeeper

COMMENT

RESPONSE

C-16-7
cont.

considered but rejected as infeasible during the scoping process. 14 C.C.R. § 15126.6. A robust alternatives analysis also must analyze the alternative of maintaining the status quo and not developing a project at all. 14 C.C.R. § 15126.6(e)(1).

C-16-8

CEQA Guidelines and California case law have determined that “an agency may not approve a project that will have significant environmental effects if there are feasible alternatives or feasible mitigation measures that would substantially lessen those effects.” Cal. Pub. Resources Code §§ 21002, 21002.1(b); 14 C.C.R. § 15021(a)(2); *Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 134. As such, the City of Los Angeles cannot approve the Project unless it finds as to each significant environmental impact identified that (1) mitigation measures required in or incorporated into the project will avoid or substantially lessen the significant effect; (2) those measures are within the jurisdiction of another public agency and have been adopted, or can and should be adopted, by that agency; or (3) specific economic, legal, social, technological, or other considerations make the mitigation measures or alternatives identified in the EIR infeasible, and specific overriding economic, legal, social, technological, or other benefits outweigh the significant environmental effects. Cal. Pub. Resources Code §§ 21081, 21081.5; 14 C.C.R. § 15091(a), (b).

C-16-9

LA Waterkeeper and Heal the Bay have long been an ardent supporter of preserving and restoring the Los Angeles River, in a manner that maximizes both ecological health and community health and resilience. To that end, we have worked hard to preserve minimum flows in the LA River to support important habitat and beneficial uses. We have also been heavily engaged in water supply issues in the Los Angeles region. Enhancing local (climate-smart) water supplies throughout Southern California is essential to provide regional water security in the face of ongoing drought, to reduce our carbon footprint to help slow climate change, and to reverse the catastrophic impacts our “pump-and-dump” water policies have had on the Colorado River, the Bay-Delta, and Owens Valley.

C-16-10

We applaud the City of Los Angeles for pushing to enhance local water supplies and promote greater water resiliency in various planning efforts—including the LA100 Study, Operation Next, and One Water LA, leading groundwater remediation and conservation efforts, and its strong support for the Safe Clean Water Program. But it is imperative that the City implement the objectives of those efforts into each of its individual projects. Spending money to continue pumping groundwater for the non-potable use of the Silver Lake Reservoir is not wise policy when the same money could be used to expand greenspace for communities throughout Los Angeles that lack local park access. LA Waterkeeper and Heal the Bay urge the City to revise its EIR for the Project to address the potential significant impacts related to local water supplies and to rethink how it approaches water use for similar projects moving forward.

* * * * *

C-16-8

The comment states that an EIR must evaluate alternatives that may avoid significant impacts of the proposed Project. The Draft EIR evaluates impacts to groundwater and water supplies and concludes that no significant impacts would occur. The Draft EIR evaluates impacts to water supplies on page 3.18-22, concluding that the proposed Project would not increase demands compared to existing conditions. As a result, the Draft EIR does not include Alternatives that would reduce impacts to water supplies.

C-16-9

The comment describes the work done by the commenting entities regarding water supplies. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-16-10

The comment requests that the Draft EIR address significant impacts to water supplies. The Draft EIR evaluates impacts to water supplies on page 3.18-22, concluding that the proposed Project would not increase demands compared to existing conditions. As a result, the Draft EIR does not include Alternatives that would reduce impacts to water supplies. Recirculating the Draft EIR is not required.

C-16 Benjamin Harris / Los Angeles Waterkeeper

COMMENT

RESPONSE



Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Silver Lake Reservoir Complex Master Plan Project. We look forward to continuing our collaborative work with the City of Los Angeles agencies to preserve, enhance, and restore the quality of water resources in the Los Angeles region for current and future generations. If you have any questions concerning these comments, please contact Benjamin Harris by email at ben@lawaterkeeper.org or by phone at (310) 394-6162 ext. 102.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Harris".

Benjamin Harris
Staff Attorney
Los Angeles Waterkeeper

A handwritten signature in black ink, appearing to read "Luke Ginger".

Luke Ginger
Staff Scientist
Heal the Bay

C-16-10
cont.

C-17 Amanda Zellmer

COMMENT

RESPONSE



OCCIDENTAL COLLEGE
LOS ANGELES, CALIFORNIA 90041-3314

BIOLOGY DEPARTMENT
Phone: (323) 239-2697
Fax: (323) 341-4974

November 24, 2022

Prepared by Amanda J. Zellmer
Associate Professor, Occidental College

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Silver Lake Reservoir Revisioning Project. I have focused my review on the Biological Technical Report and the Land Use Chapter, with the intention of evaluating the impacts of the proposed project on wildlife connectivity and habitat restoration.

I am an Associate Professor of Biology at Occidental College and I have been studying wildlife connectivity in urban areas for nearly 20 years and have studied urban wildlife in Los Angeles specifically for the past 10 years. I have experience modeling and assessing wildlife connectivity, leading monitoring programs of urban mammal populations, and modeling the impacts of habitat fragmentation on wildlife populations.

The Silver Lake Reservoir is a uniquely situated open space within the City that currently protects habitat for multiple species of wildlife. The area was recently designated as one of the City's "Protected Areas for Wildlife" (PAWs) based on the criterion that it "Supports Breeding/Feeding/Resting/Migrating Grounds with Limited Availability in Southern California/Los Angeles."

While I think there is much potential for a revisioning of the Silver Lake Reservoir, I found the plans for habitat restoration, assessment of the current biological resources, and the evaluation of impacts to wildlife connectivity to be lacking in the DEIR. Below I detail how and where these plans fall short and provide recommendations for addressing these concerns.

1. The DEIR disregarded the role of stepping-stone habitat as an important source of connectivity between significant open habitat spaces within Los Angeles.

The Silver Lake Reservoir is conveniently located between two significant preserved open habitat spaces within Los Angeles – Griffith Park and Elysian Park. These two parks provide some of the only open space for wildlife near downtown Los Angeles. Wildlife that live within these parks, as well as wildlife that live within the Silver Lake Reservoir, rely on habitat connectivity for movement to access resources, find mates, and escape threats. As the only significant stopover between these two parks, the Silver Lake Reservoir is a crucial piece to the puzzle of maintaining

C-17-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-17-2 This comment refers to the pending and yet to be adopted Wildlife District Ordinance. The proposed Wildlife District applies to Santa Monica Mountains between the Interstate 405 freeway and State Route 101. The SLRC is not located within this geographical area and provisions of the pending Wildlife District Ordinance would not be applicable. Consistent with the PAW Report for the SLRC, the SLRC PAW is isolated and surrounded by development, such that movement of wildlife species is limited to within the PAW, except for insect and avian species that can fly in and urban-adapted terrestrial species that may be in the area. This agrees with the Draft EIR discussion concerning wildlife movement, in which Section 3.4 Biological Resources states "The proposed Project site is not a designated wildlife movement corridor, would be isolated within a residential neighborhood, and would not function as a wildlife movement corridor within the region." (Section 3.4.5 Impacts and Mitigation Measures).

Also, please see Master Response – Biological Resources (Wildlife Corridors).

The proposed Project is consistent with development standards of the pending Wildlife District Ordinance in which the use of native plant species are prominently emphasized in the SLRC Master Plan, non-security fencing will be designed to preserve access to habitat and to facilitate wildlife movement, lighting will be minimized, shielded and of low intensity, and building materials would emphasize non-reflective surfaces, including windows (see Impact 3.1-4 in the Draft EIR).

C-17 Amanda Zellmer

COMMENT

RESPONSE

C-17-2
cont.

connectivity for wildlife in Los Angeles. In fact, Omniscape connectivity models for the Greater Los Angeles Area indicate potential connectivity through the Silver Lake Reservoir (Figure 1). Recent sightings of the well-known mountain lion P-22 in Silver Lake further support the potential role of the Silver Lake Reservoir in aiding connectivity for mammals in Los Angeles. Maintenance and enhancement of connectivity through the Silver Lake Reservoir would help the City achieve stated goals of LA's Green New Deal and the Draft Wildlife Ordinance.

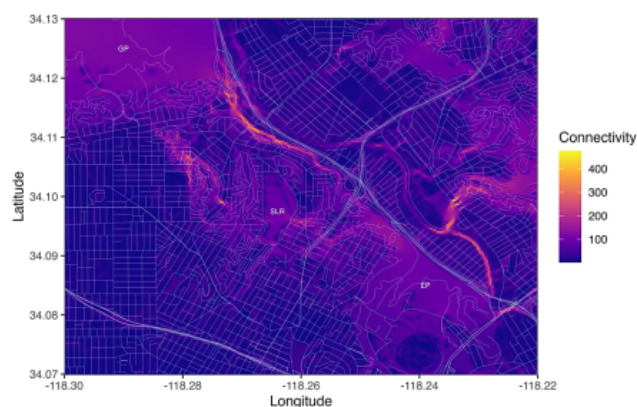


Figure 1. Omniscape connectivity model for the Silver Lake Reservoir (SLR; middle) showing potential connectivity with Griffith Park (GP; upper left corner) and Elysian Park (EP; lower right corner). The model assumes that costs to wildlife movement increase with increasing urban development. Warmer colors indicate higher flow potential.

The potential for wildlife connectivity through the Silver Lake Reservoir is addressed in Appendix D, Section 4.8, which after recognizing the importance of connectivity states that “the BSA does not serve as a contiguous regional corridor between two larger stands of habitat.” Yet, in the proposed plan (Table 3.11-1), the removal of fencing is touted as being a move to improve wildlife connectivity “Removal of the perimeter fence would also expand connectivity and wildlife access to the water” that would support the objectives of LA's Green New Deal. While the Silver Lake Reservoir is clearly not part of a continuous corridor between Griffith Park and Elysian Park, it does provide a stepping-stone between the two parks. However, no attempts were made to evaluate the potential Silver Lake Reservoir holds to provide connectivity to other habitats. Moreover, as I detail below, the lack of assessment of the non-avian faunal diversity at the Silver Lake Reservoir significantly limits the ability to evaluate the impacts of the proposed plan on wildlife connectivity.

C-17 Amanda Zellmer

COMMENT

RESPONSE

C-17-2
cont.

Yet, our previous research suggests that numerous wildlife species continue to be observed throughout urban wildlife corridors in Los Angeles (Zellmer & Goto 2022).

To mediate these limitations in the DEIR, I recommend explicitly evaluating the potential for wildlife movement by conducting connectivity models to evaluate functional connectivity through the Silver Lake Reservoir for key species. In addition, there needs to be a clear assessment of wildlife movement in and around the reservoir, for example with camera traps, radio collars, or citizen science observations. Multiple aspects of the proposed project have the potential to impact wildlife connectivity, including the removal/modification of fencing, increased presence and activity of humans, and added presence of buildings. Habitat connectivity assessments could help inform where to avoid fencing and where fencing could be used in a way to keep humans out of natural areas while guiding wildlife to safe passageways, reducing human-wildlife conflict.

2. Biological surveys were insufficient for most terrestrial mammal, bat, reptile, and amphibian species.

The Faunal Compendium has a surprising lack of terrestrial mammals, bats, reptiles, and amphibians. Only two terrestrial mammal species were noted in the Faunal Compendium, coyote and desert cottontail, both of which were simply observed during surveys. Yet, numerous mammal species have been observed on and within 1 mile of the Silver Lake Reservoir (Figure 2) that were not listed, including Botta's Pocket Gopher, Bobcat, and Mountain Lion (although this observation was noted in the report). There are no bats listed in the Faunal Compendium, and the report makes no indication that bat specific surveys were done. Neglecting to survey the area's bat species would be problematic considering that three special-status species are known to occur within a 5 mi radius of Silver Lake Reservoir. Finally, no reptiles or amphibians were observed during the surveys, yet at least 8 species of lizard, snake, and turtle¹ and 4 species of salamanders and frogs² have been recorded in and around the Silver Lake Reservoir by community scientists. Western fence lizards for instance are ubiquitous throughout Los Angeles and near impossible to miss while at Silver Lake Reservoir.

The lack of terrestrial mammals, bats, reptiles, and amphibians listed in the Faunal Compendium indicates that sampling efforts were not sufficient for documenting diversity of these species present at the Silver Lake Reservoir. The report indicates that biological surveys were only done on two days, once in the fall and once in the spring, but does not note any methodological approaches aside from visual inspection and is lacking important details such as the time of day that surveys were completed. Such methodological details are essential since survey methods will highly influence which species are observed. For instance, bird activity is highest in the early morning and late evening, while lizards are most abundant in late morning. Because no times of day were listed for when observations were completed it's impossible to know if surveys were conducted during optimal parts of the day. If done during peak heat, many species could have gone unnoted during the survey. Similarly, many species require more intentional survey approaches

¹ https://www.inaturalist.org/observations?place_id=185136&subview=map&taxon_id=26036

² https://www.inaturalist.org/observations?place_id=185136&subview=map&taxon_id=20978

C-17-3

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis. The analysis in the Draft EIR focuses on the potential for special status species to be present on site that could be affected by construction activities or habitat conversions. Impact avoidance and minimization measures have been included to minimize impacts to sensitive species. The analysis recognizes that more common species may utilize the existing park and concludes that once construction is complete, these species will have access to similar habitats on site. The Draft EIR also concludes that additional aquatic habitats would be introduced to the site to provide a more diverse wildlife occupancy from current conditions, consistent with the project objectives to improve habitat values on site. Furthermore, a bat survey was conducted in 2022 and the results have been incorporated into the Final EIR.

C-17 Amanda Zellmer

COMMENT

RESPONSE

because they are not readily observed with visual surveys. Mammals, especially any species with special-status, are unlikely to be observed during field surveys.

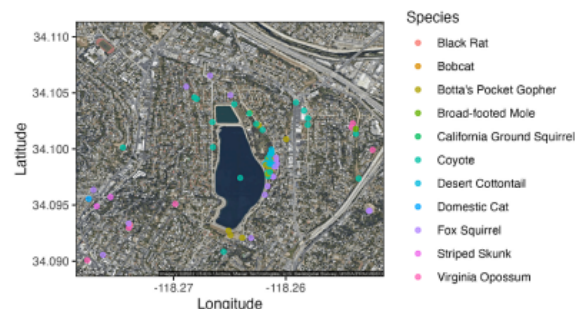


Figure 2. Community science mammal observations from the Silver Lake Reservoir and surrounding areas. Observations were downloaded from iNaturalist.

In order to evaluate the impact of the proposed project on wildlife at the Silver Lake Reservoir, more intensive biological surveys are necessary. Accurate assessment of medium- to large-sized mammal occupancy requires a sample size of over 20 camera traps for approximately one month (Kays et al. 2020). Remote detection is necessary since many of these species are avoidant of humans. Small mammal surveys should include Sherman traps. Bat species would require night time call surveys. Reptile and amphibian surveys require approaches such as cover boards, snake traps, and/or pitfall traps, since many of these species are not readily observed by simple visual surveys.

Understanding which species currently reside in or utilize the Silver Lake Reservoir is essential for evaluating the impact of the proposed changes. For instance, opening access to the reservoir by removing fencing will attract more people for recreation. Recreational activities are known to impact numerous wildlife species (Larson et al. 2016). Furthermore, some of the proposed work has the potential to degrade habitat for some species. For example, grading will compact soil and eliminate habitat for ground dwelling species and walking paths will fragment existing habitat. However, without knowing which species are present it will be difficult to determine the impact of these activities.

3. The proposed plans for habitat restoration are undermined by development for human use.

C-17-3
cont.

C-17 Amanda Zellmer

COMMENT

RESPONSE

C-17-4

The comment asserts that habitat restoration planned for the site undermines actions taken to restore habitat. The Draft EIR, Biological Resources, Section 3.4.5, discusses the creation of 23-acres of native habitat including upland and wetland habitats. This creation of native habitat replaces non-native landscape and developed areas and is not considered restoration.

The comment asserts that the removal of existing fencing preventing access to habitat by humans and pets would be a significant change from current baseline conditions, adversely impacting wildlife. In the Draft EIR, the perimeter fence will be removed in phases as different park zones are constructed. The Draft EIR concludes that the removal of the perimeter fence would eliminate barriers to wildlife and provide access for large wildlife to access the water and created wetlands. Areas with the most habitat value will have low-level habitat fencing to demarcate access restricted areas (see Figure 2-4 in the Draft EIR). Additionally, these areas will be closed at night and off limits entirely to the public (see Master Response, Public Access). No impacts to wildlife are anticipated from the removal of the perimeter fence.

The comment also asserts that increased human use will negatively impact wildlife. The Draft EIR acknowledges that the SLRC accommodates existing human utilization for recreational uses as a component of baseline conditions. Draft EIR Section 3.4, Biological Resources, describes the existing biological resources under the current intensity of recreational use, with inference to existing use by visitors. Draft EIR Section 3.4.5, Biological Resources, analyzes the probable increase visitation of the SLRC to special-status species and concludes that impacts to wildlife will be less than significant.

As noted in the DEIR, there is high potential for habitat within the Silver Lake Reservoir to be restored in such a way that it helps the City achieve multiple goals for conservation of natural resources within the City. However, as described, the plans for habitat restoration are underwhelming and in multiple cases, the plans for development within the proposal undermine actions taken to restore habitat.

In Chapter 3.1 on Land Use, Table 3.11-1, the DEIR lists the proposed plan for the Silver Lake Reservoir as consistent with the City's Open Space and Conservation Goals: "Objective 6.1: Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region." Specifically, the DEIR states that the proposed work is not at odds with this objective because "The proposed Project would include improvements to habitat within the SLRC. The proposed Project would not convert the existing land use and zoning designation of the site. The Project site would remain open space and would include the addition of new passive and active recreational spaces for use by the public, and enhancement of habitat areas. The proposed Project would not conflict with policies that protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region."

However, there are multiple aspects of the proposed plan that will degrade rather than enhance the natural resources of the City. First, removal of fencing will allow for increased human presence within natural areas such as the Knoll and within the Eucalyptus Grove. Human activity in these areas will reduce the quality of these habitats for use by wildlife (Kowarik 2011). Second, proposed added structures throughout the Silver Lake Reservoir will add to increased encroachment of urban development within existing natural areas. Finally, the creation of a Promenade and walking paths that cross through the Knoll and the Eucalyptus Grove will fragment existing habitat, both physically and because of the increase of human activity along these trails. While walking trails may not be a deterrent to larger-bodied wildlife species, smaller species and ground-dwelling species such as snakes will experience habitat fragmentation as a result of added trails.

To mediate the impacts of the proposed work on the quality of existing habitat within the Silver Lake Reservoir, the following steps should be taken:

1. Maintain areas that are accessible to wildlife and inaccessible to humans through the use of wildlife friendly fencing that does not impede movement of wildlife but at the same time detracts humans from entering the habitat.
2. Reduce nighttime lighting throughout the Silver Lake Reservoir. Lights that remain should be directed toward the ground.
3. In addition to staff horticulturists, staff biologists should be hired to monitor biodiversity of animals within the Silver Lake Reservoir.
4. Reduce the number of buildings, paths, and structures to be built as part of the proposed project. The project's proposed development would reduce and degrade habitat and would increase urban encroachment on natural areas.
5. Properly assess the Silver Lake Reservoir's wildlife biodiversity and work with a biologist to determine habitat restoration needs specific to wildlife.

C-17 Amanda Zellmer

COMMENT

RESPONSE

C-17-4
cont.

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C-18 Eli Kaufman

COMMENT

RESPONSE



December 6, 2022

Department of Public Works, Bureau of Engineering
1149 S. Broadway, Suite 700
Los Angeles, CA 90015-2213

SUBJECT: Support for Silver Lake Reservoir Protected Bike Lanes

Dear Los Angeles Bureau of Engineering,

We at BikeLA, formerly the Los Angeles County Bicycle Coalition, are writing to voice our enthusiastic support for protected bike lanes around the Silver Lake Reservoir. We recognize the potential that the reservoir, once renovated, has to become one of the most beautiful and utilized public spaces in Central Los Angeles, and we firmly believe that creating a safe cycling network is essential to this vision.

We specifically advocate for Option 2 of the plan's offsite improvements, which calls for protected bike lanes and a 4-foot physical barrier to safely separate cyclists and vehicle traffic. This physical barrier would ensure that the reservoir area offers a safe space for people to ride bikes, whether they're commuting or riding for leisure. While we're happy to see protected bike lanes represented in this option, we also want to encourage the city to ensure that gutters and/or stormwater features are designed to not impact the rideability of the bike lanes in order to make this infrastructure truly safe and accessible to all kinds of cyclists from 8 to 88.

We know that safe, protected bike lanes around the reservoir will encourage more Angelenos and tourists to ride bikes, in turn helping reduce traffic congestion and improving air quality in Silver Lake in particular and for the greater region as a whole. And as active streets are good for businesses, the many shops, restaurants and bars on Silver Lake Boulevard would also reap meaningful economic benefits, with more people coming to the area on bike to shop, dine and play.

Thank you for moving forward with the Silver Lake Master Plan and for including options for bike lanes in the plans. We hope to see Option 2, without stormwater features inside the lanes, selected in the final option.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eli', followed by a horizontal line.

Eli Akira Kaufman
Executive Director, BikeLA

C-18-1 The commenter's support for Option 2 off-site improvements is noted. Please see Master Response - Parking/Bike Option.

C-18-1

C-19 Doranne Jung

COMMENT

RESPONSE

- C-19-1 Noise pollution affects humans and wildlife alike. According to the National Geographic Society (May 19, 2022, <https://education.nationalgeographic.org/resource/noise-pollution>), "Noise pollution can cause health problems for people and wildlife, both on land and in the sea. From traffic noise to rock concerts, loud or inescapable sounds can cause hearing loss, stress, and high blood pressure." Noise pollution is considered to be any unwanted or disturbing sound that affects the health and well-being of humans and other organisms. Exposure to loud noise can also cause high blood pressure, heart disease, sleep disturbances, and stress. These health problems can affect all age groups, especially children. Many children who live near noisy airports or streets have been found to suffer from stress and other problems, such as impairments in memory, attention level, and reading skill. Noise pollution also impacts the health and well-being of wildlife. Studies have shown that loud noises can cause caterpillars' dorsal vessels (the insect equivalent of a heart) to beat faster, and cause bluebirds to have fewer chicks. Animals use sound for a variety of reasons, including to navigate, find food, attract mates, and avoid predators. Noise pollution makes it difficult for them to accomplish these tasks, which affects their ability survive." The Master Plan calls for "Construction Noise Pollution" which will take place over years, not weeks, months, but FIVE years. A man working with a jackhammer in construction of any structure is unnecessary, unnatural noise pollution.
- C-19-2 We, the Micheltorena WEPA, Wildlife Ecosystem Protection Advocates, are long-time homeowners in Silver Lake urge you to please consider the effects of noise and prefer Alternative 1, (do nothing) or, if not, we only want elements of Alternative 3 that do not remove the fences and trees, and avoid construction of the education building and Alternative 2 element that addresses anything in the South Meadow.

- C-19-1 As discussed in Section 3.12.5 and included in Table 3.12-11, Table 3.12-12, Table 3.12-14, and Table 3.12-15 of the Draft EIR, daytime construction noise levels from simultaneous operation of multiple pieces of equipment could result in occasional unmitigated noise levels of up to 89 dBA and mitigated noise levels of up to 79 dBA, *Leq* at the nearby receptors over several months of activity. However, construction would be restricted to only occur during daytime hours per Los Angeles Municipal Code (LAMC) Section 41.40 and health effects associated with the potential for nighttime awakenings would be avoided.
- Short-term noise levels constituting the thresholds of pain and hearing damage are 120 dB and 140 dB, respectively (Kinsler, 1982). Table 3.12-14 and Table 3.12-15 shows average daytime mitigated construction noise levels at each of the studied receptors; the predicted levels are substantially below the thresholds of pain and hearing damage. The Occupational Safety and Health Administration require hearing conservation plans when noise levels continuously exceed 85 dBA over an 8-hour period; The predicted noise levels at the nearest receptors would not exceed 85 dBA with the exception of occasional use of concrete saws, operation of individual pieces of construction equipment. Consequently, the significant and unavoidable noise impact is not generated by virtue of noise levels that would be considered harmful but, rather, as a result of the magnitude of the increase over existing ambient noise levels without construction at certain receptor locations. Therefore, Project construction noise would not result in adverse health effects related to pain, the onset of hearing loss or other significant health effects.
- For impacts related to noise impacts on wildlife, please refer to the Master Response for Biological Resources.
- C-19-2 The comment expresses support for Alternatives. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- Please see Master Response - Alternative Analysis and note that Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.

C-20 Doranne Jung

COMMENT

RESPONSE

The planned 5 years of construction means 5 years of added noise to the noise that already plagues the surrounding communities of residents and wildlife. Please consider how noise affects every living being.

In an article, Here's How Noise Pollution Affects the Environment, by Lizzy Rosenberg, April 28, 2022, (<https://www.greenmatters.com/p/noise-pollution-environmental-impact>): For decades, biodiversity has suffered massive losses worldwide. Urbanization is one of the major drivers of extinction because it leads to the physical fragmentation and loss of natural habitats and it is associated with related effects, e.g. pollution and in particular noise pollution given that many man-made sounds are generated in cities," a report from Environmental Evidence reads. (<https://environmentalevidencejournal.biomedcentral.com/>):

"However, all human activities generate sounds, even far from any human habitation."

"Ecological research now deals increasingly with the effects of noise pollution on biodiversity. Many studies have shown the impacts of anthropogenic noise and concluded that it is potentially a threat to life on Earth," the report continues.

"The present work describes a protocol to systematically map evidence of the environmental impact of noise pollution on biodiversity."

C-20-1

How does noise pollution impact the environment?

Noise pollution takes a major toll on the environment and human health alike. But according to National Geographic, it especially impacts wildlife. Loud sounds from air and car traffic, construction, and other human activities span across ecosystems. Many birds, bats, and insects rely on sound for mating, communicating, navigating, and hunting."

The Master Plan not only includes noise sources for years of construction but future, on-going increased noise from over 100 additional parking spaces; over 300 additional human visitors PER DAY and increased motor vehicle noise from more traffic congestion. The DEIR predicts an "average of 390 additional visitors per day", as well as higher attendance with proposed monthly "Special Events" with amplified sound. Neighborhoods packed with visitors' cars plague the Reservoirs area even now. And with the DEIR's plan to cut down lane widths to add parking spots on these already congested and gridlocked streets, traffic

C-20-1

In regard to the impact of noise on wildlife and ecological resources, please refer to Master Response – Biological Resources.

Please see Master Response - Traffic/Transportation.

As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant.

C-20 Doranne Jung

COMMENT

RESPONSE

C-20-1
cont.

will enormously increase and become more dangerous.

Yet, DEIR's Transportation Study claims "Less than Significant Impact." and "No mitigation measures are required." [DEIR Table 3.16-3]

The Micheltorena WEPA, long time residents who live with all the noise that travels as far away as the train that runs through Glendale, Marshall High School athletic field activities and the sirens from fire engines and ambulances traveling from and through our neighborhoods disagree with the DEIR completely regarding the amount of added noise, and would like further research and scientific study of how noise will affect the wildlife of Silver Lake.

C-21 Adam Sieff / Silver Lake Forward

COMMENT

RESPONSE



December 2, 2022

VIA ELECTRONIC MAIL ONLY

Dr. Jan Green Rebstock
Environmental Affairs Officer
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213
E-Mail: Jan.Green.Rebstock@lacity.org

Re: Public Comment on Draft Environmental Impact Report for the Silver Lake Reservoir Complex Master Plan Project (SCH No. 2022010055)

Dear Dr. Rebstock:

Please accept the following letter from Silver Lake Forward ("SLF") as public comment on the Draft Environmental Impact Report ("Draft EIR") for the Silver Lake Reservoir Complex Master Plan Project ("Project" or "Master Plan"), released on October 6, 2022 by the City of Los Angeles' ("City") Bureau of Engineering ("BOE"). This letter expresses SLF's support for the Project, includes background on SLF, details our previous efforts related to the Master Plan, and provides some minor comments on the Draft EIR.

We applaud the City for making substantive progress, and are thrilled the Master Plan is now moving through environmental review. We hope the City will follow the thousands of supportive voices from the Silver Lake community who helped shape the scope of the Master Plan after several years of public engagement and organizing efforts. As BOE knows, SLF was a critical stakeholder in these efforts and key participant in the Stakeholder Working Group meetings. More than **8,400** Silver Lake residents and community members participated in surveys, and more than **3,000** attended planning meetings, to develop the Master Plan. Through compromise and following a review of community input, the resulting Project reflects a consensus approach designed to meet the community's identified project objectives for accessibility, open space, wildlife, and conservation.

The Master Plan is the only project proposal that achieves these objectives. Although Alternative 2 incorporates many of the Master Plan's elements, including removal of the perimeter fence, it excludes important features and improvements—such as enhanced embankments, shade structures, nature trails, wetland footpaths, seating, and the public environmental education center for LA schoolchildren¹—that the community identified as necessary to achieve project goals for access to nature and passive recreation. Alternative 3 is even worse and functionally a "no project" alternative. It would abandon virtually all of the community-endorsed improvements

¹ Draft EIR, pp. 5-4 – 5-5.

- C-21-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-21-2 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-21-3 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-21-4 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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C-21-4
cont.

identified in the Master Plan, construct a new eight-foot perimeter fence, and forgo wildlife habitat and wetland enhancements for migratory birds and aquatic life.² By its terms, Alternative 3 aims to "preserve" a rejected status quo that fails to serve the Silver Lake community, wildlife, or the environment.³

No alternative would achieve the project objectives to the same extent as the Project or meet the clear expressed expectations of the community. To that end, we strongly urge the City to adopt the Project as proposed.

1. Background

C-21-5

SLF is a 501(c)(3) non-profit organization founded by Silver Lake neighbors and environmentalists in 2015 to reimagine a sustainable future for the decommissioned Silver Lake Reservoir Complex ("SLRC"). Three values guide SLF's vision for the Silver Lake and Ivanhoe Reservoirs: access, conservation, and beauty. Carrying this message to neighbors, parkgoers, local educators, and community businesses, SLF built a network of **more than 2,200 stakeholders** eager to make this shared vision a reality.

To that end, SLF led efforts to have the City fund and hold a participatory master planning process for the reservoir complex. Those efforts were successful, and the result was a multiyear review period led by BOE to collect community input and identify goals for the facility. Organized by outreach from SLF, the City, and other neighborhood groups, the broader Silver Lake community came together in auditoriums, gymnasiums, and Zoom rooms five times between 2019 and 2020 for community workshops to develop project features and consider alternatives. More than **1,500 people** attended the first four in-person workshops, and an **additional 1,500 people** attended the fifth workshop virtually. The City and project planners also collected **more than 8,400 individual questionnaire responses**.

C-21-6

Environmental science magnet students from the Los Angeles Unified School District's nearby Thomas Starr King Middle School comprised a critical source of input. SLF targeted outreach to these **502 students**, who represent a vibrant cross-section of our community's diversity and future, and they responded with eager and thoughtful contributions, especially to secure the planned environmental public education center. In recognition of SLF's work to organize the community, the City selected SLF to participate alongside four other neighborhood groups in eight bimonthly Stakeholder Working Group meetings.

The Master Plan developed through this multifaceted and broad-reaching participatory process reflects the consensus views of the Silver Lake community. Indeed, the exclusion of numerous proposals that did not garner community support—such as paddle boating operations, swimming and diving facilities, and a café—testifies to the careful consideration of the community's desires that shaped the resulting Project.

² *Ibid*, p. 5-10 – 5-11.

³ *Ibid*.

C-21-5

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-21-6

This comment describes the community engagement process and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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COMMENT

RESPONSE

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2. Comments on Draft EIR

C-21-7

We have prepared the following minor comments based on our review of the Draft EIR and accompanying appendices. Overall, the Draft EIR appears robust and includes the substantial evidence required to support the City's assumptions, analysis, and conclusions. However, we hope that the City will consider the following comments and look forward to the City's clarifying responses in the Final EIR.

Vehicle Miles Traveled Analysis

C-21-8

The City concludes that the Project would not substantively increase vehicle miles traveled ("VMT") and that VMT impacts would be less than significant.⁴ The Draft EIR recognizes that the Los Angeles Department of Transportation's ("LADOT") VMT Calculator does not include "park and recreational uses" as a land use since it is intended for evaluation of residential and office projects.⁵ To support the less-than-significant conclusion, the City concludes (and LADOT concurs) that the SLRC does not have any regionally-attracting amenities and that there are many other existing parks and recreational facilities within a two-mile radius of the SLRC.⁶

C-21-9

While we agree with this approach in concept, we question whether these assumptions fully capture the uniqueness of the SLRC or the likely reality of future park users. For example, the VMT analysis does not address the fact that special events at the SLRC (should they be permitted) would likely be regionally-attracting amenities that generate greater VMT than a typical local-serving park. While the Draft EIR recognizes the regional draw of special events in several places,⁷ the VMT analyses in Section 3.16 Transportation and the Transportation Study do not appear to address this. Figure 7B in the Transportation Study also may not accurately capture all of the proposed uses that the Project would have, like Community Center, Parking, Cultural Landmark,⁸ Habitat, or Performance. The analysis may also benefit from consideration of the fact that the SLRC is the only park identified in the two-mile radius that includes a dog park and that there are very few comparable parks and recreational facilities nearby that include a reservoir or large water feature.

C-21-10

Additionally, the City utilized polling data from attendees at community outreach meetings to make assumptions about where future park users would live and how they would access the park.⁹ Specifically, the City estimates that 80 to 90 percent of current park attendees live within two miles of the SLRC and that 70 percent of current park attendees walk to the SLRC.¹⁰ In other words, the City assumes that approximately 70 percent of future park users will walk or come to the SLRC by "other non-vehicle means." This assumption supports the City's conclusion that the Project would be local serving, not regional serving. We are concerned that this approach results in skewed data because it does not take into consideration current park users who did not attend

C-21-11

⁴ *Ibid*, p. 3.16-15.

⁵ *Ibid*.

⁶ Appendix K, Transportation Impact Assessment ("Transportation Study"), pp. 33 – 36.

⁷ "The proposed Project is anticipated to be a local serving recreational Project. However, the proposed Project could have a regional draw during special events." See Draft EIR, pp. 2-54, 3.3-38, and 3.8-34.

⁸ The SLRC is a designated historic cultural landmark in the City.

⁹ Transportation Study, p. 36.

¹⁰ *Ibid*.

C-21-7

This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-21-8

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-21-9

As mentioned in Section 3.16-15, although the Project would support periodic special events within the SLRC such as concerts or movie nights that would have a larger draw, these events would be subject to PDF-TRA-5. This would ensure that information on parking, circulation, and transit options are available for event attendees to minimize congestion and vehicle miles traveled.

Please also see Master Response - Traffic/Transportation.

C-21-10

The comment suggests that the traffic study may have underestimated the uses that attract visitors. The TIA included as Appendix K of the Draft EIR presents an estimate of visitors to the new facilities in Section 4.2.3.3. The analysis outlines the trip generation methodology based on an increase from existing visitor data and provides a more conservative assessment than the standard ITE trip generation rates (972 trips vs 228 trips when using industry standard ITE rates). The study concludes, "Therefore, the trip generation methodology based on current SLRC park attendance is a more conservative approach than using ITE trip generation rates."

C-21-11

The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its

C-21 Adam Sieff / Silver Lake Forward

COMMENT

RESPONSE

unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. The proposed Project would use the reservoirs as part of a park to benefit area residents.

Please also see Master Response - Community Engagement Process for details on outreach efforts undertaken for the Project.

C-21 Adam Sieff / Silver Lake Forward

COMMENT

RESPONSE

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December 2, 2022
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C-21-12

the community outreach meetings. Additionally, it may not address the fact that the attendees at these meetings are more likely to live in the area than current park users who do not live within two miles of the SLRC. This data may also miss the fact that future users of the SLRC may utilize the Project in a different manner than its current use. Especially because the Project is envisioned as a public resource for the broader community, we believe additional study of these issues may be warranted to further support the Draft EIR's conclusions.

C-21-13

In sum, although we believe the Draft EIR's findings are sufficiently supported, we believe the transportation analysis could even more fully assess the likely VMT impacts of the Project with additional study. Accordingly, we respectfully request the City to update Figure 7B and supplement the transportation analysis to (1) address the uniqueness of the SLRC in comparison to other park and recreational facilities nearby, including the anticipated special events; and (2) further substantiate the use of data from community outreach meetings to support anticipated locations and behaviors of future users of the Project.

C-21-14

Number of Anticipated Park Users

The City used the number of anticipated park users to assess future trip generation of the Project.¹¹ To determine the number of anticipated park users, the City surveyed existing park attendance within five park zones at the SLRC and applied a percent increase on top to capture the anticipated growth in park users.¹² These figures were then used to assess the estimated trip generation of the Project.¹³ For example, the City identified 78 to 109 people in the Meadow during the "peak hour" and applied a 50 percent increase to 100 people for this area during the weekend to determine the net peak vehicle trips for this park zone.¹⁴

C-21-15

This approach seems reasonable and supported by sufficient evidence. However, we would like to better understand the methodology that the City used to determine the precise percent increase that was selected. Neither the Transportation Study nor Section 3.16 Transportation explain why the City selected the percent increases that it did. The same park user assumptions were factored into the operational noise analysis for the Project as well as the Parking Demand Study.¹⁵

Given the importance of these assumptions, we want to ensure the accuracy of the anticipated park users included in the Draft EIR. As such, we respectfully request the City to provide additional evidence to support the assumptions made related to future park users of the Project.

Parking Demand Analysis

C-21-16

As stated previously, the parking demand analysis relies in part on the same assumptions used for the trip generation rates in the Transportation Study, including the number of anticipated park users at the SLRC. Although we believe these conclusions are also supported by sufficient evidence, for the same reasons addressed above, we request the City to provide additional

¹¹ *Ibid* at pp. 73 – 76.

¹² *Ibid*.

¹³ *Ibid* at pp. 76 – 77.

¹⁴ *Ibid* at pp. 73 – 76.

¹⁵ Draft EIR, Table 3.12-9, p. 3.12-28; Transportation Study, pp. 134 – 144.

C-21-12 Please see response to Comment C-21-11.

Additionally, please see Section 4.4 of the Draft EIR for details on growth-inducing impacts. Additionally, each section within the Draft EIR contains an analysis of cumulative impacts, which assesses the effects of past projects, the effects of other current projects, and the effects of probable future projects.

C-21-13 The Draft EIR evaluated impacts to traffic including VMT in Section 3.16.5. The analysis was based on a Transportation Impact Assessment (TIA) Study included as Appendix K of the Draft EIR. The TIA provides a detailed description of the VMT analysis methodology and results. The TIA recommended a conservative VMT assessment that assumed greater VMT than recommended by the ITE Trip Generation Manual.

C-21-14 See response to comment C-21-13. The TIA assumed a conservative VMT based on an increase from the current visitorship at the SLRC. As a result, the assessment is already uniquely associated with the SLRC and its importance to the community.

C-21-15 The comment questions the methodology used to determine the percent increase in visitors that would be caused by the proposed Project. The Draft EIR includes a detailed assessment of trip generation estimates in Appendix K, Section 4.2.3.3 (page 73). Beginning on page 73, the study identifies present increases associated with each area of the SLRC, taking into consideration the proposed new features. The study assumes a 50-60 percent increase in weekend visitors for each of the park areas. This estimated increase was based on the assumptions that the park already attracted likely visitors and the nature of the new facilities would increase visitorship substantially, but would not greatly increase the significance of the park to the greater community. It would not place a new facility where one had not already been, nor would it construct a new type of facility that would substantially increase the park's importance to the greater Los Angeles community. With these assumptions, a 50-60 percent increase in visitorship was seen as a reasonable and conservative estimate to support impact analysis.

C-21 Adam Sieff / Silver Lake Forward

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- C-21-16 The comment questions the methodology used to determine the percent increase in visitors that would be caused by the proposed Project. The Draft EIR includes a detailed assessment of trip generation estimates in Appendix K, Section 4.2.3.3 (page 73). Beginning on page 73, the study identifies present increases associated with each area of the SLRC, taking into consideration the proposed new features. The study assumes a 50-60 percent increase in weekend visitors for each of the park areas. This estimated increase was based on the assumptions that the park already attracted likely visitors and the nature of the new facilities would increase visitorship substantially, but would not greatly increase the significance of the park to the greater community. It would not place a new facility where one had not already been, nor would it construct a new type of facility that would substantially increase the park's importance to the greater Los Angeles community. With these assumptions, a 50-60% increase in visitorship was seen as a reasonable and conservative estimate to support impact analysis.

C-21 Adam Sieff / Silver Lake Forward

COMMENT

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Dr. Jan Green Rebstock
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support justifying the percent increase assumptions utilized.

Water Supply Analysis

The Draft EIR concludes that local groundwater supplies at Pollock Wellfield will be adequate to fill the SLRC reservoirs in the short, medium and long term, including in periods of drought, subject to operational constraints that require temporary reductions to water levels corresponding to overall system needs.¹⁶ Although we believe this conclusion to be well-reasoned based on our understanding of the relevant aquifers, we request that the City provide more information clarifying what it means by "operational constraints" that may affect water supply, and encourage the City to consider whether additional water supplies (such as stormwater runoff) might also support maintaining water levels sufficient to support wetlands and habitat at the reservoirs.

* * *

With thanks for your consideration, we ask that this letter be placed in the administrative record for this Project. We also request to be added to the list of interested parties to receive future notices and updates on the Project.

Very truly,

SILVER LAKE FORWARD

Adam Sieff, Board Chair
Jocelyn Hayes Simpson, Board Vice Chair
Robert Soderstrom, Treasurer & Board Chair Emeritus
Craig Collins, Board Member
Rick Corsini, Board Member
Tracy Fleischman, Board Member
Rachel Fox, Board Member
Catherine Gearuracos, Board Member
Elaine Harris Roark, Board Member
Helen Munro-Uziel, Board Member
Schuyler Senft-Grupp, Board Member
Gary Ventimiglia, Board Member

¹⁶ Draft EIR, pp. 3.18-22 – 3.18.23; see also *ibid* at Section 2.7.4.

C-21-17 Please see Master Response – Drought Conditions. Also, Hydrology and Water Quality, Section 3.10 of the Draft EIR states that stormwater tends to have more impaired water quality due to picking up sediments and pollutants. This is further supported later in the chapter through indication that the Water Quality Model found that implementation of the Stormwater Capture Projects under both the Master Plan Proposed Scenario and the LADWP Project Baseline Scenario would contribute runoff and increase the pollutants within the SLRC reservoirs. As such, Chapter 3.18.4 of the Draft EIR (Project Design Features), specifies PDF-UTIL-3 which would prevent untreated surface runoff from entering the reservoir waters, proposed Project will implement decentralized drainage facilities to capture and filter or infiltrate stormwater runoff from the developed portions of the Project site. The proposed Project has already considered water systems in the Draft EIR - see Chapter 2, Section 2.7.3 Horticulture Maintenance and Water Management; Chapter 3.10 (Hydrology and Water Quality) and Chapter 3.18 (Utilities and Service Systems) of the Draft EIR for details.

C-21-18 Comment noted. This comment is conclusory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-22 Doranne Jung

COMMENT

RESPONSE

We believe that most people agree that increased noise and light created by humans affects wild birds negatively. Scientific research has proven this fact.

According to the National Science Foundation article, "Noise and light pollution affect breeding habits in birds", (Nov. 24, 2020, <https://beta.nsf.gov/news/noise-light-pollution-affect-breeding-habits-birds#:~:text=Wh>

"Noise and light alter bird nesting habits and success."

"Although birds live in the same world we do, they experience it in a profoundly different way -- they see and hear better than humans, and are more sensitive to increased light and noise," said Doug Levey, a program director in NSF's Division of Environmental Biology.

How Does Noise Pollution Affect Birds? (Jan 17, 2018 Pollution Solutions, <https://www.pollutionsolutions-online.com/news/air-clean-up/16/breaking-news/how-doe>

"Alarming, the study shows that noise pollution significantly affects the birds nesting closer to the compressors. So much so, that they were demonstrating Post Traumatic Stress Disorder-like (PTSD) symptoms."

How can birds show PTSD symptoms?

With the birds, noise pollution triggered health defects such as stunted growth, issues with their reproduction and fewer feathers on the birds. Their ability to hear predators also seemed to be jeopardized due to the noisy surroundings. "Wildlife, whether that's birds or plants, choose their habitat through risk assessment. Uncertain conditions lead to excessive amounts of stress. And this could eventually affect heavily populated areas of wildlife." The most visible large population that regularly inhabits the water and landscape surroundings of the Silver Lake are a variety of wild birds. This is their home.

Based on what has been scientifically proven, the Micheltorena WEPA oppose the Master Plan and urge the adoption of Alternative 1 and if not then Alternative 3 elements that protect birds and all wildlife and certain elements of Alternative 2 pertaining to the South Valley that reduce noise, protect human intrusion and unnecessary noise pollution. There is no guarantee that after the projected 5 years of construction noise that the birds will return to after being driven away by the noise to find new homes, perhaps miles away from Silver Lake. Who cares? We, Micheltorena WEPA, do.

C-22-1

This comment expresses concern regarding impacts to wildlife and noise. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.

The comment expresses support for Alternative 1, or if needed, Alternative 3 with components of Alternative 2. Please see Master Response - Alternatives Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-22-1

C-23 Doranne Jung

COMMENT

RESPONSE

C-23-1

We, the Micheltorena WEPA, are concerned for the well-being of the children who live in Silver Lake and those who attend the pre-school as well as Ivanhoe Elementary School. We question how the exposure to 5 years of noise from continuous construction and the predicted noise from the increased traffic and hundreds of new additional visitors per day can be limited or reduced altogether to protect children's brainpower.

Please consider the findings of this article, "Limit Noise to Boost Your Child's Brainpower" Medically Reviewed by Neurosurgery, January 14, 2022: "The World Health Organization defines noise as "unwanted sound" and it's everywhere — from road traffic to air conditioning units to iPads, toys, and other devices. Noise pollution refers to excessive community noise, which has been shown to have negative effects on children's brains. A study by the Centers for Disease Control and Prevention (CDC) of U.S. children between the ages of 6 and 19 showed that 14.9% had impaired hearing in at least one ear. Continuous environmental noise can also affect the emotional and physical well-being of children."

Shouldn't the teachers and parents be notified about the possible effects of increased noise pollution to these young children? Shouldn't there be soundproofing added to the construction budget for this school facility as well as the other recreational facility located near the basketball courts? We feel that the possible effects of noise pollution need to be made know to all who would/could be adversely affected for a lifetime.

C-23-1

As discussed in Section 3.12.5 and included in Table 3.12-11, Table 3.12-12, Table 3.12-14, and Table 3.12-15 of the Draft EIR, daytime construction noise levels from simultaneous operation of multiple pieces of equipment could result in occasional unmitigated noise levels of up to 89 dBA and mitigated noise levels of up to 79 dBA, *Leq* at the nearby receptors over several months of activity. However, construction would be restricted to only occur during daytime hours per Los Angeles Municipal Code (LAMC) Section 41.40 and health effects associated with the potential for nighttime awakenings would be avoided.

Short-term noise levels constituting the thresholds of pain and hearing damage are 120 dB and 140 dB, respectively (Kinsler, 1982). Table 3.12-14 and Table 3.12-15 shows average daytime mitigated construction noise levels at each of the studied receptors; the predicted levels are substantially below the thresholds of pain and hearing damage. The Occupational Safety and Health Administration require hearing conservation plans when noise levels continuously exceed 85 dBA over an 8-hour period; The predicted noise levels at the nearest receptors would not exceed 85 dBA with the exception of occasional use of concrete saws, operation of individual pieces of construction equipment. Consequently, the significant and unavoidable noise impact is not generated by virtue of noise levels that would be considered harmful but, rather, as a result of the magnitude of the increase over existing ambient noise levels without construction at certain receptor locations. Therefore, Project construction noise would not result in adverse health effects related to pain, the onset of hearing loss or other significant health effects.

Further, as shown in Figure 3.12-1, the highest construction noise level reported in Table 3.12-14 of 79 dBA would be approximately the same as a noisy urban daytime environment and would not pose a risk of unhealthy noise exposure. Ivanhoe Elementary School is approximately 1,400 feet from the Project site. At this distance, the noise levels of 79 dBA at 45 feet would attenuate to 48.6 dBA and would be less than the ambient noise levels in the area.

It is important to note that the construction noise levels disclosed in Section 3.12 of the DEIR represent a worst-case scenario assuming that all construction equipment is operating concurrently throughout the workday for each phase of construction. In reality, construction equipment may not be operating simultaneously or for the entire workday. Therefore, noise levels during construction would likely be less than those disclosed.

C-24 Doranne Jung

COMMENT

RESPONSE

C-24-1

We agree with the statement from the Jane Goodall Institute, "We are part of, and not separate from, the natural world. We depend upon it for our very existence." "...enhancements should include innovations that protect species through: Adaptive management to improve conservation decision-making over time in the fact of the climate crisis."

Fossil fuel and fumes from increased traffic are a health hazard to residents, visitors and wildlife according to "Climate change is rapidly accelerating in California, state report says"
By Hayley Smith, Nov. 1, 2022, Los Angeles Times,
<https://www.latimes.com/california/story/2022-11-01/climate-change-rapidly-accelerati>

"Wildfires, drought, extreme heat and other effects of climate change are rapidly accelerating and compounding in California, according to a report from state scientists. The fourth edition of "Indicators of Climate Change in California," released 11/01/2022, paints a stark picture of the escalating climate crisis and documents how global reliance on fossil fuels has had wide-ranging effects on the state's weather, water and residents. Also troubling are the secondary consequences of the state's climate changes, such as declining populations of birds and mammals due to hotter, drier conditions."

"California's biodiversity is threatened as alterations to habitat conditions brought about by a changing climate are occurring at a pace that could overwhelm the ability of plant and animal species to adapt," the report says.

We, the Micheltorena WEPA, question the "long term" effects of the Master Plan that do not look at the longest term effects of "climate change" on all inhabitants of our environment. We would like to see the EIR address the effects of the Master Plan on humans and wildlife over the next 3 decades in which scientists warn of the dire effects of our warming planet. We question the addition of even one blade of new grass and the additional water and care it will need to grow for the pleasure of children whose world may become one without birds and other wildlife when they, hopefully reach adulthood by 2050 and look back at what, we, the adults of 2023 could have done to save these species.

C-24-1

The commentor introduces information that discuss the effects of climate change cited from the Jane Goodall Institute, a community conservation organization, and a Los Angeles Times news article that references a California Environmental Protection Agency, Office of Environmental Health Hazard Assessment report, *Indicators of Climate Change in California, Fourth Edition* (November 2022). Similar information that discusses the effects of climate change is provided in section 3.8.1, *Environmental Setting*, of Chapter 3.8, *Greenhouse Gas Emissions*, of the Draft EIR, which provides information on the effects of climate change related to water supply, public health, increased risk of forest fires, and loss of habitat and ecosystems, and weather and temperature impacts.

The commentor requests that the EIR analyze the effects of the Master Plan on climate change. As explained on pages 3.8-32 and 3.8-33 of Section 3.8, *Greenhouse Gas Emissions*, of the Draft EIR, the Office of Planning and Research (OPR) released a technical advisory on CEQA and climate change that provided guidance on assessing the significance of GHG emissions for individual projects. The OPR technical advisory states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment." In addition, as stated on page 3.8-24 of the Draft EIR, the effects of GHG emissions are cumulative and should be analyzed in the context of a cumulative impact analysis. Consistent with state guidelines, the EIR analyzes the effects of the Master Plan on climate change in a cumulative context. CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions. CARB's 2017 Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, City's Green New Deal, and the Los Angeles Green Building Code all apply to the Project and are all intended to reduce GHG emissions to meet the Statewide targets set forth in AB 32 and amended by SB 32. As discussed on pages 3.8-50 through 3.8-62 in Section 3.8, *Greenhouse Gas Emissions*, of the Draft EIR, and as shown in detailed consistency tables 4, 5, and 6 in the *Air Quality and Greenhouse Gas Technical Appendix* for the Project, which is provided in Appendix C of the Draft EIR, the Project would be consistent with the applicable provisions of these plans. Therefore, the Draft EIR properly concludes, based on substantial evidence, that the Project's GHG impacts are less than significant and mitigation measures are not required.

C-24 Doranne Jung

COMMENT

RESPONSE

Regarding GHG impacts into future years through 2050 (i.e., approximately the next three decades), CARB adopted the 2017 Climate Change Scoping Plan Update to ensure that California meets its 2030 GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The Scoping Plan also demonstrates that various combinations of policies, regulations, and advancing technologies would allow the Statewide emissions level to remain very low into future years to enable the State to meet the 2050 targets. Based on the above, the Project would not conflict with CARB’s Scoping Plan, and there would be an anticipated decline in Project emissions once fully constructed and operational; the Project would not conflict with the State’s GHG reduction targets for 2030 and 2050.

With respect to the Project’s additional water usage, as described on page 3.8-44 of the Draft EIR, GHG emissions associated with the Project’s water usage, were considered within the Project’s operational GHG emissions and presented in Table 3.8-6. As discussed in Chapter 2.0, *Project Description*, of the Draft EIR, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and California Green Building Standards (CALGreen) Code, which would include, but not limited to, the installation of low-flow toilets, low-flow faucets, low-flow showers, and other water conservation measures. In addition, as described in Section 3.18, *Utilities and Service Systems*, of the Draft EIR, the Project would include strategies to reduce irrigation water demand. The Project would include ornamental garden areas consisting of a combination of native and drought-tolerant species appropriate to the Los Angeles region to provide a plant palette adapted to climate change. Transition habitat zones would be irrigated with reservoir water on a separate cycle appropriate for the drought-tolerant, coastal scrub planting palette proposed under the proposed Project. This irrigation strategy would be validated by reservoir water quality testing and soil analysis under proposed operations. Remaining upland habitat, lawn areas, and ornamental gardens would be irrigated via a potable water supply available from the LADWP distribution system which would require a dedicated meter. If recycled water is available in the future, it could be used to irrigate ornamental planting (see Chapter 2.0, *Project Description*, and Section 3.18, *Utilities and Service Systems*, of the Draft EIR, for additional details).

C-25 Doranne Jung

COMMENT

RESPONSE

C-25-1

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

C-25-1

We, the Micheltorena WEPA, are speaking for all of the wildlife and every species the right to live and flourish in their own serene habitat, that we humans call the Silver Lake. We agree with the philosophy regarding this justice by Martha Nussbaum, a philosopher, in her Op-Ed: Embracing a new philosophy that demands dignity and justice for animals , (Martha C. Nussbaum , Dec. 4, 2022, Los Angeles Times, <https://www.latimes.com/opinion/story/2022-12-04/animal-rights-welfare-citizenship-doi>

“Animals suffer injustice at our hands. We need a powerful theoretical strategy to diagnose injustice and suggest remedies. As a philosopher, I recommend a version of the theory of political justice known as the “Capabilities Approach” which focuses on meaningful activities and on the conditions that make it possible for a creature to pursue those activities without damage or blockage. In other words, to lead a flourishing life and giving striving creatures a chance to flourish. This emphasis on flourishing and on a wide plurality of key opportunities is what makes it so suitable as a basis for a theory of animal justice, as well as human justice.”

“The approach does not single out human moral powers as more crucial for political choice than other aspects of animal living, and it sees all human powers as parts of the equipment of a mortal and vulnerable animal who deserves a fair shake in life — as do all sentient animals. Just like humans, animals live amid a staggering number of dangers and obstacles. They too have an inherent dignity that inspires respect and wonder.”

“Humans will have to take the lead in making the laws and establishing the institutions of government, but there is no reason why humans should do this only for and about other humans. Furthermore, there is no good reason to say that only some sentient creatures matter. Sentience — the ability to feel, to have a subjective perspective on the world — is a necessary and sufficient basis for being a subject of justice.”

“Animals do not speak human language, but they have a wide range of language-like ways of communicating about their situation, and if we humans happen to be in the driver’s seat politically, it should be our responsibility to attend to those voices, to figure out how animals are doing and what obstacles they face. They actively express themselves in many ways, and it is our responsibility to translate that into political action.”

C-25 Doranne Jung

COMMENT

RESPONSE

C-25-1
cont.

“The ideal outcome would be for all the nations of the world (listening astutely to the demands of animals and those experts who most knowledgeably represent them) to agree to a legally enforceable constitution for the various animal species, each with its own list of capabilities to be protected, and each supplied with a threshold level beneath which non-protection becomes injustice. Animals would then be protected no matter where they are. There is no nation in which animals are citizens, though they should be seen as citizens with rights whose non-fulfillment is injustice.”

Let us, the Silver Lake human community be the beginning of a political journey toward justice for animals. The SLRC is not just for humans; it is largely inhabited by a variety of species of wildlife who have no control over how their homes are treated and developed. They are citizens of this area but have no rights to vote, to post comments, and to have any say on how we, humans, treat them. So we are speaking out for their rights to life, liberty to flourish and existence as nature intended.

C-26 Doranne Jung

COMMENT

RESPONSE

We, the Micheltorena WEPA, who are homeowners who live within walking distance of the Silver Lake, agree with the basis of this Times Editorial Board in this Editorial: If we want wildlife to thrive in L.A., we have to share our neighborhoods with them, published on Nov. 7, 2022 (<https://www.latimes.com/opinion/story/2022-11-07/los-angeles-wildlife-district-ordinance>)

“Los Angeles abounds with wildlife, and now the city is creating its first wildlife ordinance that would regulate development to protect wildlife and biodiversity unique to Southern California. Above, a deer stands on the edge of a field near a row of residences. (Citizens for Los Angeles Wildlife). For decades, development has encroached upon open space and hillside habitats, endangering the existence of Southern California mountain lions and other animals and species of plants. Now, the city is creating its first wildlife ordinance that would comprehensively regulate development to protect the biodiversity of Los Angeles.”

C-26-1

“The goal is to maintain and enhance habitat so that animals can travel through these areas easily without getting blocked or hurt, and to have plantings that are fire-resistant and native to the environment as well as provide food for animals. The ordinance would apply only to new construction, extensive remodeling of the existing structures or an addition 500 square feet or more. The wildlife district could be expanded in the future to include other areas of the city with wildlife and plant populations that should be protected. A wildlife ordinance is a necessary tool for maintaining the biodiversity in hillsides where it’s dwindling. The only way to do that is to make sure these habitats don’t get overbuilt. Animals need to be able to live among us and cross through our neighborhoods and spaces, without them endangering us and without us endangering them.”

C-26-2

We want the essence of this ordinance to be considered when it comes to the Master Plan of why we need to do everything possible to protect biodiversity wherever we live. Thus, we oppose the building any new structures such as the proposed, “approximately 3,760-square-foot, Education Center that would accommodate 100 people”. This structure is more than 7 times the limit of new structures regulated by the Ordinance on privately property. We would rather see natural growth that would accommodate 100 birds and mammals of wildlife. We are opposed to a “floating dock” for humans and would rather see no humans near or in the water so that wildlife and continue to live as naturally as possible.

C-26-1

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

C-26-2

The comment expresses opposition to the building of new structures and the floating dock. As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.

This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-27 Stephanie Bartron / Silver Lake Reservoirs Conservancy

	COMMENT	RESPONSE
C-27-1	<p>We, the Silver Lake Reservoirs Conservancy, approve of and support the Silver Lake Reservoir Complex Master Plan project and the associated draft Environmental Impact Report (EIR). We find that the EIR accurately assessed most impacts and proposed appropriate mitigation measures. However, some potential impacts were insufficiently assessed or mitigated, as we explain in the attached letter.</p>	<p>C-27-1 This comment provides general support for the project and does not specifically address issues with Draft EIR, no response required.</p>

C-27 Stephanie Bartron / Silver Lake Reservoirs Conservancy

COMMENT

RESPONSE



December 14, 2022

We, the Silver Lake Reservoirs Conservancy, approve of and support the Silver Lake Reservoir Complex Master Plan project and the associated draft Environmental Impact Report (EIR). We find that the EIR accurately assessed most impacts and proposed appropriate mitigation measures. However, some potential impacts were insufficiently assessed or mitigated, as we explain below.

Generally, we are happy to support most elements of the new Master Plan. This will include 43 acres of new useable space, including 10 acres of active and passive recreation and approximately 5.5 miles of walking paths and trails (Appendix C, Table 6, p.32), and the following general improvements:

- More access to natural spaces and safe immersion in nature
- Bathrooms accessible from the Meadow, in the new education center
- Dog park and Recreation Center improvements south of the South Dam
- Reservoir edge treatments
- Increased habitat and wetlands to support local wildlife

These are some of the specific sustainability features that we support:

2.5.7 Sustainability Design Features:

- Local Water: 12,000 sf demonstration rain gardens + 1 acre stormwater infiltration planters to protect water quality. (2-32)
 - Clean and Healthy Buildings (2-33)
 - Zero Waste: recycling and compost receptacles throughout the park (2-33)
 - Ecosystem Resilience: Creating a cooler city (2-33)
 - Mobility and Public Transit: bike lanes, EV charging, public transit service (2-33)
- "Additionally, the Reservoirs are located within a walkable area of Silver Lake with access to public transit and will provide on-site bicycle parking spaces and improve existing bike lanes along Silver Lake Boulevard." (Appendix C, p. 32)*

PROJECT BENEFITS THAT WE SPECIFICALLY SUPPORT (EIR Section-Page number)

- 500 new trees (Urban Ecosystems and Resilience, 2-33)
- 50% increase in tree canopy coverage (Urban Ecosystems and Resilience, 2-33)
- Improved maintenance and security (2-5, 2.7.1 p. 2-49)
- Native plants (2.5.5)
- Rain gardens and 1 acre of new wetland planting (2.3.2)

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The Silver Lake Reservoirs Conservancy is a registered 501(c)(3) non-profit organization with Federal Tax ID #95-4199639.

- C-27-2 The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.
- C-27-3 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-27-4 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-27 Stephanie Bartron / Silver Lake Reservoirs Conservancy

COMMENT

RESPONSE



2

- C-27-5 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-27-6 The Project is no longer considering amplified speakers during special events. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels without amplified speakers would be less than significant.

C-27-5

- 5.5 miles of new walking paths and trails, increasing neighborhood connectivity and improving circulation (2.5.6, p. 2-30)
- Protected bike lines, Option #1 (2.5.2, p. 2-25)
- New pedestrian-activated crossings (2.5.2, p. 2-25)
- 15 Additional parking spaces by Rec Center (2.5.2, p. 2-25)
- EV charging stations added to parking areas (2-33)
- Floating habitat islands placed to ensure open water views and access to helicopters for fire suppression locally (2.55, p. 2-22, 23)
- Lighting Plan (2.5.3, p. 2-29)
- Exposed Reservoir Edge Treatment (2.5.4, p. 2-29 + Figure 2-10)
- Planting (2.5.5, p. 2-30). "All habitat communities would be composed of native species"
- Habitat Islands. Adds 3.5 acres of floating islands to provide undisturbed nesting and foraging for birds (2.5.1, p. 2-22)
- Fish species stocked to provide food supply for wading birds (2.5.1, p. 2-22)
- Maintenance to include regular removal of invasive species and prohibit the use of neonicotinoid and other pesticides that damage pollinator populations. (2.7.3, 2-55)
- Nesting birds protected during construction and annually from tree pruning and limited public access if needed. (2.5.8, p. 34)
- Construction grading to minimize soil import and off-haul (2.6.2, p. 2-43)
- Wildlife Management Plan, created to protect wildlife. (2.7.1, p. 2-49,50)
- Wetlands Management Plan, maintenance of plants, water, and debris. (2.7.1, p. 2-50)
- Tree Succession Plan, preserving healthy trees and replanting to replace failing, dangerous and invasive trees, to attain 75% canopy coverage over 20 years. (2.7.1, p. 2-50)
- Routine Operations and Maintenance (2.7.1, p. 49)
- Irrigation Water System. Irrigation water to be pumped from reservoirs to wetland habitat, transition habitat. Other areas to be irrigated with recycled water when/if available. (2.7.3, p. 2-57)
- Surface Stormwater Drainage, runoff to be treated by various landscape features before draining into the Reservoirs. (2.7.3, p. 2-57)

C-27-6

PROJECT AREAS OF IMPACT AND INSUFFICIENT MITIGATION AS CURRENTLY OUTLINED IN THE DRAFT EIR

1. The unavoidable and significant operational noise impacts should be further mitigated by prohibiting large public events, especially amplified music, or sound. Public events should require city permitting and be limited to fun runs, maintenance/volunteer days, citizen science events, quiet group exercise, and similar community building and supporting events (2.7.2 Routine Operations and Maintenance, p. 2-54)

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C-27 Stephanie Bartron / Silver Lake Reservoirs Conservancy

COMMENT

RESPONSE



3

C-27-7

2. Also related to the mitigation of noise impacts, we propose, under Project Construction, Construction Schedule (2.6.1, p. 2-40.41), that the South Valley (18 months proposed construction) be separated from the other zones, creating a third construction phase that could, however, occur simultaneously with other zones.

C-27-8

3. The draft EIR found less than significant impact for wildlife corridors (3.4-4) However, the SLRCMP proposes construction that would impact wildlife movement and water access of local species within the property, which is not addressed or analyzed. Specifically, local species need direct access to water from Knoll habitat areas, through park, not LADWP, land. Could access under walking paths be provided for, by adding tunnels/tubes for small animals under paths? Will wetland terraces include ramps for flightless juvenile birds? To mitigate the impact of the proposal on wildlife corridors, we propose moving the Education Center towards the Meadow, away from the water, and integrating it into the proposed seating terrace area. This change also better serves the community, improving access to the new bathrooms included in the Education Center.

C-27-9

4. The proposed planting plan in the SLRCMP may also adversely impact habitat and biodiversity goals (Biological Resources, 3.4) if non-native species are chosen over native species. To mitigate these adverse effects, we propose that only native plants and tree species should be planted in habitat areas and "Ornamental Gardens." This mitigation measure will also align plan section 2.5.5 Planting (2-30) with PDF-UTIL-1: Drought-Tolerant Landscaping (2-39).

Currently, the latter section states that a mix of native and drought-tolerant plants will be planted to provide a palette adapted to climate change. We support this, but propose changing the plan to read, "only *locally* native plants will be selected for all landscaped areas, including tree planting, throughout the project area, except when no locally native plant species is determined appropriate or available."

C-27-10

Additionally, the suggested planting of a "single tree species" along the Promenade should be further reviewed. Given recent invasive insect infestations, climate change, and improved scientific understanding of forest resilience, planting a variety of Riparian and Oak Woodland tree species would be more beneficial. Further, we reject the list of non-native species proposed in the Master Plan (5.6.1 p. 182) when several locally native species would provide significantly better habitat function and climate resilience.

C-27-7

The comment suggests that a third construction phase should be identified to better understand overlapping noise impacts. The Draft EIR provides a worse-case scenario with respect to construction noise and concludes that the temporary noise impacts could be significant and unavoidable (Section 3.12.6). Actual construction phasing is yet to be determined.

C-27-8

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

Please see Master Response – Biological Resources (Wildlife Corridors).

Regarding the comment's recommendations for project design, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-27-9

The comment makes recommendations regarding the proposed planting plan. The proposed Project is currently only at the conceptual design phase and an appropriate native plant species palette will be developed taking into consideration habitat goals and site appropriateness. Additionally, non-native invasive plant species will be removed and actively controlled.

C-27-10

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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The Silver Lake Reservoirs Conservancy is a registered 501(c)(3) non-profit organization with Federal Tax ID #95-4199639.

C-27 Stephanie Bartron / Silver Lake Reservoirs Conservancy

COMMENT

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4

C-27-11

We instead propose Coast Live Oak (*Quercus agrifolia*, and variety *agrifolia*), California Laurel (*Umbellularia californica*), and California Walnut (*Juglans californica*). Yellow Willow (*Salix lasiandra* var. *lasiandra*) and Red Willow (*Salix laevigata*) are both fast growing (to 50' within 10 years) and can be planted along the permeable banks, in conjunction with stormwater infiltration. Smaller, understory trees should also be mixed into this planting and can include Hollyleaf Cherry (*Prunus illicifolia* ssp. *illicifolia*), Black & Blue Elderberry (*Sambucus nigra*, *Sambucus nigra* ssp. *caerulea*) and Toyon (*Heteromeles arbutifolia*).

C-27-12

5. Walnut habitat assessment (4.3, p. 22). We strongly disagree with the statement that "the BSA does not support black walnut woodland" and the subsequent decision to "not consider Southern California Black Walnut a special-status species for the project site." As black walnut woodlands are found in the nearby neighborhood and extensively in both Mount Washington and Griffith Park, we agree with horticultural assessment that establishing a black walnut plant community on the Knoll would benefit and help to maintain this most endangered local tree species, allowing wind pollination to connect separate communities and preserve genetic diversity of wild populations, while also offering significant habitat value.

C-27-13

6. Further, the Hydrology impacts (3.10) were not sufficiently assessed in the dEIR. We strongly encourage the LADWP to reconsider its decision to halt plans to implement the Stormwater Capture Projects (3.10-20, 2.7.4). These plans will qualify for many stormwater-related funding grants, and the costs associated with their implementation could be greatly reduced if undertaken in conjunction with the various stormwater capture and wetland remediation elements proposed herein. Specifically relevant are the Rain Gardens, Reservoir Edge Treatments, Meadow, and Ivanhoe Reservoir projects proposed for phase 1 construction. Robust stormwater capture will allow for a more stable, if variable, source of water given Emergency Drought Contingencies and curtailed ground water pumping to replace annual evaporative and seepage loss (3.10-2)

C-27-14

7. Another impact of the SLRCMP that was not sufficiently addressed is the installation of synthetic turf in the South Valley, Dog Park (p. 2-22). We support the expansion of space allocated for the well-used dog parks, including the grading and other improvements, but the proposed synthetic turf presents significant health dangers from plastic and microplastic particles (environmental, watershed, human, and canine) that are not discussed in the EIR. Further, this material requires complete removal and replacement as often as every 10 years, creating significant land-fill debris (as it cannot be recycled), and further, a significant maintenance cost burden to the city. We request that other, plastic-free alternatives be

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C-27-11 The comment recommends species for planting. The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies and to minimize impacts to habitat values. The Tree Succession Plan would include the incorporation of native plants into the understory thus providing food sources and habitat for native wildlife including native sages (*Salvia* sp.) and milkweeds (*Asclepias* sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly respectively. The native plant species planting palette would take into account the surrounding habitat quality and site appropriateness. Also, please see Master Response - Biological Resources.

C-27-12 The comment states that the Draft EIR is deficient in its analysis of Southern California black walnut woodland. The Draft EIR Section 3.4, Biological Resources, states that Southern California black walnuts and coast live oaks observed onsite are not likely naturally occurring. As stated in Section 3.4, the entire Knoll and Silver Lake Meadow Park is overlaid with Urban land-Dapplegray-Soper complex soils resulting from human-transported material. Additionally, remnants of an irrigation system were observed adjacent the Southern California black walnut and coast live oak trees. These two tree species need to be dominant or co-dominant in the tree canopy and attaining 30% to 50% relative cover (Keeler-Wolf and Evens 2006). As stated in the Section 3.4, neither of these species acquire that level of dominance or co-dominance as all woodlands present within the project site are dominated by non-native species (see Impact 3.4-2). The occurrences of these two species are not related to a remnant stand of native woodlands but rather likely planted trees in an urban ruderal landscape. Additionally, the City's Protected Areas for Wildlife & Wildlife Movement Report found that the no documented sensitive natural plant communities were found within SLRC.

C-27-13 The comment recommends stormwater capture be integrated into the project. As noted on page 3.10-27 of the Draft EIR, "Stormwater BMPs such as bioswales and the proposed wetlands would assist in maintaining stormwater quality entering the reservoirs. As described in Section 2.7, *Project Operations and Maintenance*, and PDF-UTIL-3, decentralized drainage strategies would be incorporated into the design of the proposed Project. Areas adjacent to the reservoir, such as the great lawn and seating terraces, would be designed for surface runoff to move thorough the proposed habitat island areas before entering the reservoirs. The natural bioremediation

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processes present in the wetland plants and soils would filter out contaminants in water, and are a treatment control BMP as described in the LACDPW LID Standards Manual. In other areas, stormwater runoff would be treated by infiltration gardens located throughout the SLRC. Stormwater falling on the outer boundary of the SLRC would drain southwest to the Ballona Creek watershed similar to existing conditions and routed into the municipal stormwater system, and would be required to comply with the standards of the MS4 permit and LADPW Hydrology Manual discussed in Section 3.10.2, *Regulatory Framework*. With implementation of the decentralized drainage strategy and compliance with MS4 and LADPW requirements, the water quality impacts of the proposed Project related to stormwater runoff would remain less than significant.” The comment does not address the adequacy of the Draft EIR.

- C-27-14 Synthetic turf proposed for the dog park area is a common building material that reduces erosion and provides a more accommodating surface than the dusty, hard dirt or pavement. Installation of this material does not pose a significant environmental or public health impact. The Project would include an Operations and Maintenance Plan, which would prescribe routine maintenance and upkeep of the artificial turf to help prevent the migration of artificial turf material such as crumb rubber and plastic grass blades into the reservoir, streets, and storm drains. Proper installation and use of artificial turf would minimize the potential for any impact to human health or the environment from release of micro plastics. RAP would manage and dispose of the building materials in accordance with applicable solid waste disposal laws.

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C-27-15

analyzed and proposed, including natural materials and annual regrading/surface maintenance.

C-27-16

8. A regulatory impact that was not sufficiently considered was access to fitness facilities (3.16). The Fitness Circuit, proposed for the East and West Narrows (2-20) should be enhanced by the addition of Elder Playground equipment that supports balance and exercise specifically for our elderly population.

C-27-17

9. Green House Gas emissions are analyzed in this Appendix C, including the potential GHG emissions from construction, park visit/automobile traffic, and future park maintenance. However, the mitigation effects of project features themselves should be calculated to determine the project's future net GHG emissions. With the addition of 500 new trees, new wetlands, and property-wide planting and maintenance, future GHG drawdown and carbon sequestration potential should be estimated, including both permanent soil and long-term biomass sequestration.

C-27-18

10. The proposed new 90-degree angle parking on West Silver Lake Drive may have a safety impact. Drivers who park in these spots would have to back into oncoming traffic when they leave. While we support additional parking near the Recreation Center, the current plan may not be a safe option and may require additional mitigation (seed humps, caution signal, etc.) to slow passing traffic. (2.5.2, p. 2-25)

C-27-19

11. Increased use of the Reservoirs complex could pose sanitation hazards not noted in the EIR. Appropriate mitigation of sanitation hazards would be to install restrooms on both the West and East sides of the property. New automated "self-cleaning" restrooms should also be considered. Examples of public restrooms in parks with these features have already been sent to Hargreaves.

C-27-20

12. While construction impacts are calculated, the amount of grading called for in the expanded sloping Meadow is substantial and disruptive (impacts in terms of Soils, GHG, and Noise) and could be avoided. A more modest slope, starting at the current fence, would require less soil removal, while still offering the ramped lawn down to the water, and the associated stormwater mitigations. This was not proposed or analyzed in either Alternative 2 or 3, but this design change would affect the amount of heavy construction equipment, and the associated cost, noise and GHG emissions required by the extensive grading proposed. Further, this would reduce destruction of the existing native tree and shrub planting along the North Edge of the existing Meadow, reducing existing and established habitat disruption.

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C-27-15 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. No response is required.

C-27-16 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-27-17 As discussed in Chapter 2, Project Description, of the Draft EIR, the proposed Project would plant approximately 500 trees. The Project would include a Tree Succession Plan that would provide guidance for the gradual removal of mature trees to avoid temporary elimination of habitat value within the SLRC and replant areas primarily vegetated with non-native trees with native trees and understory. The plan would be prepared by a qualified arborist. The Tree Succession Plan would identify trees to be removed in the initial year of construction giving priority to trees that are dead, in poor health, and/or pose a safety risk to the public, including those with fungal and/or pest infestations. The plan would identify a sequence of phased removals for selected trees on a schedule throughout the 15-year period. Additionally, it would include the replacement of 80 percent of existing non-native trees over a 15-year timeline. Also, please see Master Response - Biological Resources.

According to the California Emissions Estimator Model (CalEEMod) User's Guide, Appendix A, "planting trees will sequester CO₂ and is considered to result in a one-time carbon-stock change. Trees sequester CO₂ while they are actively growing." Modeling was conducted in CalEEMod to estimate sequestered CO₂ for the Project's 500 new trees, based on the Intergovernmental Panel on Climate Change (IPCC) assumed active growing period of 20 years and annual CO₂ accumulation factors for miscellaneous trees, which is the average of all broad species classes and should be used if the specific tree types are not known. The results of the modeling indicate a total sequestration of approximately 354 metric tons of CO₂ (or approximately 17.7 metric tons of CO₂ per year during the 20-year growing period). Modeling results are provided in Appendix X of the Final EIR.

As provided in Table 3.8-6 of Section 3.8, Greenhouse Gas Emissions, of the Draft EIR, the Project would result in approximately 1,486 metric tons of carbon dioxide equivalents (MTCO₂e) per year without account for sequestration. Accounting for sequestration, the Project would result in approximately 1,468 metric tons of carbon dioxide equivalents (MTCO₂e) per

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year during the 20-year growing period. Project GHG emissions impacts would be less than significant as was determined in the Draft EIR.

- C-27-18 Any new parking would be required to meet City DOT safety standards. DOT would approve the geometry and relationships to traffic based on TAG requirements.
- C-27-19 Public restrooms would be upgraded or included within the proposed new facilities. As noted on page 2-51, the Operations and Maintenance Plan to be prepared by the City with the guidance of RAP would identify restroom access.
- C-27-20 The comment expresses support for an alternative that would include a reduction in grading. Please see Master Response - Alternatives Analysis.

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C-27-21 This comment raises concerns for removal of established trees. The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies and to minimize impacts to habitat values. The Tree Succession Plan as outlined in Draft EIR Chapter 2, Project Description, calls for the phased removal of trees over 15 years to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. As the new tree plantings mature, new habitat would be established over time. The successional tree removal practice would ensure that nesting and foraging habitat would not be eliminated during implementation. The Tree Succession Plan would include the incorporation of native plants into the understory. Also, please see Master Response - Biological Resources.

C-27-21

13. Related to biological impacts, we are concerned about the removal of established trees and large shrubs already planted in and around the Meadow and as street trees around the property. We hope that any native or significant trees that cannot be preserved in place will be moved to another location in the park, despite the additional expense this may entail. Overall, we appreciate that all efforts will be taken to preserve existing established, healthy trees and shrubs throughout the project areas.

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C-28 Amy Minter / Chatten-Brown Carstens & Minter LLP

COMMENT

RESPONSE

C-28-1 | Attached is a letter from Amy Minter regarding Comments on Draft Environmental Impact Report for Silver Lake Reservoir Complex Master Plan Project, SCH #2022010055

C-28-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-28 Amy Minter / Silver Lake Wildlife Sanctuary

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- C-28-2
- This is an introductory comment for which no specific reference to the adequacy of the Draft EIR is provided. It is noted that the Silver Lake Wildlife Sanctuary is an organization of community members and is not a reference to a preserve for biological resources.
- C-28-3
- This comment is introductory and raises concern about the adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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December 15, 2022

Via Email (eng.slrcmp@lacity.org, jan.green.rebstock@lacity.org)

Dr. Jan Green Rebstock
City of Los Angeles
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

Re: Comments on Draft Environmental Impact Report for Silver Lake
Reservoir Complex Master Plan Project, SCH #2022010055

Dear Dr. Rebstock:

C-28-2

On behalf of our client Silver Lake Wildlife Sanctuary (SLWS), we provide the following comments on the draft environmental impact report (DEIR) for the proposed Silver Lake Reservoir Complex Master Plan Project ("Project"). SLWS consists of more than 800 members in the community surrounding the proposed the Project site as well as over 7,000 petitioners from the community-at-large. The mission of SLWS is to preserve the open waters of the Silver Lake Reservoirs and their surrounding acreage as a sanctuary to create a protected habitat for migratory birds and urban wildlife that can be enjoyed by all.

C-28-3

The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project's significant environmental effects so that decision-makers and the public are informed of these consequences before the project is approved to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The environmental impact report process is the "heart of CEQA" and is the chief mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.) SLWS is concerned the DEIR fails to adequately disclose, analyze, and mitigate the Project's significant adverse environmental impacts.

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C-28-4	The Project's main flaw, and source of the inadequately analyzed impacts, is its attempt to cram as many new uses and features as possible on this site. The Project currently includes features that were roundly rejected by the community, such as water-based human activities, particularly kayaking. Despite the community's directive that there should not be kayaking on the Reservoir, the Project proposes a kayak launch and tours. Instead of listening to the community's urging that any changes to the site be slow and carefully considered, using feedback from each incremental change to determine whether future changes are advisable, the City proposes a significant amount of construction spread throughout the Reservoir site.	C-28-4	Please see Master Response - Community Engagement Process for a discussion on how the proposed Project and individual features were developed. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR and is noted for the record.
C-28-5	The DEIR fails to adequately disclose, analyze and mitigate the impacts these massive changes to the site would result in. Of particular concern to SLWS is the inadequacy of DEIR's biological analysis, which fails to provide accurate baseline biological conditions on the site, fails to adequately analyze species that use the site, and fails to support claims that habitat changes on the site will provide wildlife benefits. Any changes to this site need to be scientific data driven, to ensure this site can provide enhance wildlife habitat.	C-28-5	As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR. Impacts associated with construction activities of the proposed Project area discussed throughout Chapter 3 of the Draft EIR.
C-28-6	The DEIR also fails to properly address the historic impacts to this site as a City-designated Historic Cultural Monument. The site also derives scenic value through its current quiet, unclutter, nature-focused condition. The aesthetic impacts of changing this focus are not disclosed in the DEIR. As proposed, the Project and its substantial amount of new development, would be inconsistent with a number of existing and planned land use plans and regulations, including the General Plan Open Space Element, the Silver Lake-Echo Park-Elysian Valley Community Plan, zoning regulations, and the site's designation as a Protection Area for Wildlife. The excessive development include on the site would also result in significant construction and operational noise impacts that should be mitigated through reduction in intensity of development. The DEIR further fails to adequately analyze and disclose the Project's hydrological, public safety and traffic impacts.		This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-28-7	The DEIR's analysis is so thoroughly inadequate that a revised DEIR must be recirculated. The new analysis contained in the revised DEIR should be used to ensure the Project's objectives provide environmental benefits and do not require adverse impacts. The new analysis should also be used in evaluating alternatives to the Project. SLWS notes that Alternatives 2 and 3 presented in the DEIR are both feasible alternatives that would reduce the Project's significant impacts that are acknowledge by the DEIR and some that are not. However, after reviewing comments from biological experts, and reconfirming the importance of the Silver Lake Reservoir Complex as wildlife habitat for migratory birds, raptors, herons, bats, terrestrial mammals and more, we have provided in this comment letter an Alternative Hybrid 3+2 that relies on biological data to assess the appropriate development for this site, ensuring it will be able to remain the important wildlife habitat and preserve it currently serves as. Without data and community support	C-28-6	The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. Section 3.4, Biological Resources of the Draft EIR is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using the industry standards for biological analysis. The Draft EIR includes a Biological Technical Report included as Appendix D. The Biological Technical Report provides a detailed characterization of the existing biological resources within the SLRC, including special status species, and outlines Project impacts and mitigation strategies to minimize impacts.
C-28-8		C-28-7	Project Description Section 2.3 acknowledges that the SLRC is a designated Historic Cultural Monument. Please see Section 2.5, Cultural Resources of the Draft EIR for a discussion on historic resources. In addition, please refer to Appendix F of the Draft EIR for additional historic resources studies conducted for the proposed Project.
C-28-9		C-28-8	The Draft EIR characterizes the existing scenic values at SLRC in Section 3.1 Aesthetics. The Draft EIR evaluates the changes proposed by the Project both during and after construction

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of the Project components. Visual simulations are provided to provide a view of how the Project components will fit within the context of the existing reservoirs and urban residential setting. The Draft EIR notes that the maintenance of scenic values within the SLRC is a key objective of the Silver Lake-Echo Park-Elysian valley Community Plan.

- C-28-9 The Draft EIR provides a detailed land use plan consistency analysis in Table 3-11.1. The analysis includes a consistency assessment of relevant City of Los Angeles General Plan elements related to open space, the Silver Lake-Echo Park-Elysian Valley Community Plan, Mobility Plan 2035, the City's Framework Element of the General Plan, SCAG's Regional Transportation Plan 2020-2045, and LA's Green New Deal. A detailed summary of the rationale used to determine consistency with these plans is included in the Table. The Draft EIR concludes that the proposed Project would be consistent with all the relevant policies of these plans.
- C-28-10 The Project considers a reduced development option under Alternative 2 which can be found in Chapter 5 of the Draft EIR. Table 5-7, *Alternatives Comparison to Project Objectives*, compares the reduced development alternative (Alternative 2) against the Project's objectives and the proposed Project's development plan. As shown in Table 5-7, Alternative 2 would not only reduce development as compared to the proposed Project, but would also partially meet the Project objectives as described Chapter 2.0, Project Description.
- C-28-11 This comment expresses concern regarding hydrology, public safety, and traffic impacts. Impacts related to hydrology are analyzed in Section 3.10, Hydrology and Water Quality, of the Draft EIR. All impacts were concluded to be less than significant. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Public Safety for a discussion on public safety features.
- C-28-12 The comment requests recirculation of the Draft EIR. The Draft EIR provides detailed impact analysis of the proposed Project and three Project Alternatives. The comments provided in this letter outline suggest that additional analysis is needed to evaluate impacts to various environmental topics. Responses to each of the comments in this letter describe the adequacy of the existing baseline characterization, impact analysis, and Project objectives.

No new significant impacts have been identified, nor has the severity of impacts been substantially increased. A hybrid Alternative would not alter the significance of any impact assessment in the Draft EIR. See Master Response – Alternatives Analysis. Finally,

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the Draft EIR provides substantial evidence supporting the baseline characterization and impact analysis. As a result, recirculation of the Draft EIR is not required. See Master Response - EIR Recirculation Requirements.

- C-28-13 The comment states that a new Alternative 3+2 should be considered as the proposed Project. The Draft EIR evaluates three feasible alternatives including Alternative 3. In response to comments received on the Draft EIR, a detailed hybrid alternative is considered, Alternative 3+2. The attributes of this alternative reflect the requested additions mentioned in this comment. Section 5.5.4 previously analyzed hybrids to the alternatives considered in the Draft EIR and concluded that any such hybrid alternative would not result in a substantially different conclusion when comparing environmental impacts to the proposed Project. The consideration of Alternative 3+2, as further provided below, confirms the conclusions of Section 5.5.4. See Master Response - Alternatives Analysis.

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C-28-14 for changes to the Reservoir, the substantial funds necessary for the numerous proposed features should not be expended.

I. The EIR Fails to Provide an Accurate, Finite, and Stable Project Description.

C-28-15 Every EIR must set forth a project description that is sufficient to allow an adequate evaluation and review of the project's environmental impacts. (CEQA Guidelines § 15124.) "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-93; accord *San Joaquin Raptor/Wildlife Reserve Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730.) "[O]nly through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives." (*City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454.)

As a whole, the DEIR's project description provides inadequate detail to allow for a reasoned assessment of the Project's potential impacts. Several aspects of the Project as proposed in the DEIR are particularly unstable and vague, leading to an inadequate project description under CEQA. These aspects include:

C-28-16 **Project Features:** The DEIR proposes a set of park uses, activities, and features, yet fails to specify defined parameters for some of these features. For example, the DEIR does not clearly specify what activities will operate out of the proposed Education Center and Multi-Use Facility. Further, the DEIR's project description provides only a conceptual scenario regarding the fencing plan. (DEIR, p. 2-7.) Without this information, the DEIR cannot adequately and accurately assess the Project's impacts.

C-28-17 **Construction Timeline:** The DEIR admits that the Project's construction schedule is unknown. This is too vague and unstable to be compliant with CEQA. The DEIR states that construction of the proposed park zones "may occur simultaneously or sequentially." (DEIR, p. 2-40.) It proceeds to group park zones into two distinct groups for the purposes of analysis, assuming that one group of park zones would be constructed prior to the other, to avoid potential damage to any of the new facilities. (DEIR, p. 2-40.) But the project description offers no definite commitment to construction of the park zones in this sequence. The Project could be constructed in any possible sequence. Further, the DEIR is silent on the sequence of construction of park zones within each grouping. The order and schedule of construction is important because it will help determine which impacts will occur and when they will occur. For example,

C-28-14 The comment states that the funds for the proposed Project components should not be expended. CEQA analysis focuses on potential environmental impacts of a proposed Project and does not consider the cost of implementing a project unless the expense itself would result in environmental impacts. As a result, the concern for the expense of the Project is appropriately not considered in the Draft EIR. Also, please see Master Response - Funding and Operations.

C-28-15 The comment states that the Project Description provides inadequate detail. Under CEQA, the project description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact." CEQA Guidelines 15124. Instead, it should provide a "general description" of a project's characteristics that would describe the main features of a project, rather than all of the details. See *Dry Creek Citizens Coalition County of Tulare* (1999) 70 Cal.App.4th 20, 26 (upholding, among other things, conceptual description of project elements rather than final designs).

Please see Chapter 2 of Draft EIR, for the 60-page project description of the proposed Project, including pp. 2-11 to 2-15 for a detailed discussion of activities at the Education Center; pp. 2-21 to 2-22 for a detailed description of activities at the Multi-Purposed Facility; pp. 2-40 to 2-41 for the worst-case construction scenarios assumed used for the Draft EIR analysis, which includes the Park Zones; pp. 2-14 (Figure 2-8) and p. 2-29 for a detailed discussion of lighting for the proposed Project and pp. 3.1-25 to 3.1-26 and 3.4-30 to 3.-31 for a detailed discussion of how the proposed Project would not result in significant spillover lighting with the implementation of mitigation measures and would not affect special-status (or, in any case, non-special status) species due to lighting; and pp. 2-18 (Figure 2-10) and 2-29 for detailed information regarding the Exposed Reservoir Edge Treatment.

In addition, it is permissible under CEQA to present more than one option in an EIR if those options are analyzed in the EIR on a defined project site and are sufficiently detailed, such as including site renderings and layouts. See *Southwest Regional Council of Carpenters v. City of Los Angeles* (2022) 76 Cal.App.5th 1154, 1179-1181 and *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 333. Please see pp. 2-25 to 2-29 for detailed description, rendering, and layouts for the potential offsite improvements, as well as pp. 3.16-14 and 17 for the analysis of the potential environmental impacts from the two offsite improvement options.

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C-28-16 The comment states that the Project Description fails to provide specific parameters for some features. The Draft EIR provides a detailed project description in Chapter 2. New structures and plantings are described for each distinct sub-area within the SLRC. Activities proposed to occur within each area of the project are outlined in Table 2-1 of the Draft EIR. Figures 2-6 through 2-18 in the Draft EIR provide specific locations and proposed uses of project features. The Draft EIR describes on page 2-11 that "the proposed Education Center would include small indoor and outdoor teaching and assembly spaces, including two interior classrooms." Any further assessment of the types of classes to be held at the Education Center is speculative. With respect to the perimeter fencing, the Draft EIR describes in Section 2.5 that portions of the existing perimeter fencing would be removed. The Draft EIR also describes habitat fencing as being 3-feet tall with gates to discourage public access in areas designated for habitat values. The visual simulations provided in the Draft EIR provide conceptual renderings of the proposed new structures and their conceived uses within the context of the greater SLRC and residential community. The Draft EIR adequately describes the proposed project including the proposed fencing plan and analyzes impacts based on that description.

C-28-17 The comment states that the construction schedule is too vague. As discussed in the Project Description, Section 2.6 of the Draft EIR, and as noted in the comment, construction of the proposed park zones may occur simultaneously or sequentially.

Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available. The project is still in the conceptual design phase and funding has not been secured. Once funding is determined and design is finalized, a final construction schedule will be determined. If needed, further CEQA analysis would occur to determine if impacts would exceed those analyzed in the Project's Draft EIR.

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- C-28-18 simultaneous construction of park zones could increase impacts, such as noise, air quality, biological resources, and others. Additionally, simultaneous construction could eliminate existing habitat relied upon by wildlife before new habitat is created. As discussed in Section III.A below, and in comments provided by biological experts, this would have a significant adverse biological impact that the DEIR fails to address.
- C-28-19 **Lighting Plan:** New lighting at the Silver Lake Reservoir Complex has the potential to adversely impact wildlife currently using the Project site and wildlife the Project claims it is intended to attract. The DEIR's project description provides minimal information regarding the new lighting, failing to disclose the increase in magnitude such lighting would impose on the site, or the type of lighting that would be used, including the spectrum of lighting proposed. Without this project information, the DEIR is inadequate to assess impacts of the lighting plan on biological resources.
- C-28-20 **Reservoir Edge Improvements:** The DEIR states that embankments will be improved, but offers virtually no properly defined details as to how the reservoir edges will be improved. Instead, the DEIR states that improvements include resurfacing, and installation of green edges, riprap, and people terraces. Each of these methods would have differing impacts, and the impacts would depend on where in the reservoir complex they were installed. The Master Plan contains a diagram purporting to show where each of the improvements will be located (DEIR App. B, p. 201), but the DEIR does not present this diagram in the project description, nor does it rely upon it to analyze the impacts associated with reservoir edge improvements. The locations of these improvement must be defined and set in the DEIR's project description in order for it to be adequately stable and defined for purposes of CEQA. As discussed in the Section III.A.2 below, and in comments provided by biological experts, the reservoir edge improvements could have adverse impacts on waterbirds that were not analyzed.
- C-28-21 The DEIR states that consideration in the new reservoir edge treatment "would be given for emergency egress elements to provide ways to exit the water." (DEIR, p. 2-29.) This is far too vague—the DEIR should define emergency egress elements in the project description. Without such detail, the DEIR cannot analyze the impacts of reservoir edge treatments on biological resources, water quality, and public safety.
- C-28-22 The DEIR also states that "no public access to water activities would be allowed," except through guided educational tours. (DEIR, p. 2-29.) Nowhere in the project description is there a disclosure of the frequency, length, capacity, and availability of such tours. This information is necessary to understand the intensity of the Project's use of the reservoir for tours, and the impacts of such use.
- C-28-23 The DEIR states that a 5-foot planted buffer with integrated seating would be maintained between the path and the edge of the slope "wherever possible." (DEIR, p. 2-29.) The existence and location of the buffer must be well-defined in the EIR.

- C-28-18 Please refer to Comment C-28-17 for a discussion on simultaneous construction analyzed in the Draft EIR. The Draft EIR analyzed the project's worst-case scenario, which includes the most construction that could occur at one time (simultaneous construction). Chapter 3 of the Draft EIR analyzes the Project's impacts due to simultaneous construction as described in the Project Description of the Draft EIR. Habitat will be temporarily impacted during construction activities as discussed in Chapter 3.4, Biological Resources.
- C-28-19 The proposed lighting plan is described in the Project Description, Section 2.5.3 and Figure 2-8, Proposed Lighting Diagram, of the Draft EIR. The description and figure clearly outline where high-level lighting (2 foot-candle [fc]), medium-level lighting (0.5 fc), and low-level lighting (0.25 - 0.5fc) would be located. Foot-candle is a measurement of light intensity in an area, it measures the brightness of the space being lit, instead of measuring the light at the source. One foot-candle is equal to one lumen of brightness per square foot, measured at a foot from the light source. The Draft EIR concludes that the proposed lighting plan is compatible with existing land uses that support both wildlife values and dense urban residential and park uses. The proposed lighting provides important safety and public access values necessary for an urban park, while minimizing impacts to urban wildlife. In addition, Figure 2-8 also delineates wildlife habitat areas that will be closed at night.
- C-28-20 The Project Description, Section 2.5.4 of the Draft EIR describes the edge treatments proposed as part of the proposed Project. The Draft EIR also includes Figure 2-10, Proposed Embankment Edge Diagram, which depicts the location of each of the proposed edge treatments around both the Silver Lake and Ivanhoe Reservoirs. The impacts associated with the construction and operation of the reservoir edge treatments are analyzed in Chapter 3 of the Draft EIR based on the Project Description.
- C-28-21 As discussed in the Project Description, Section 2.5.4 of the Draft EIR, and noted in this comment, consideration would be given for emergency egress elements to provide ways to exit the water. As noted under the resurfacing description, embankment areas with that treatment type would be resurfaced with smooth concrete with a slip-resistant finish. In addition, during final design of the Project, other considerations would be outlined, such as placement of rock for the riprap section, etc. The analysis contained in Chapter 3 of the Draft EIR, including Sections 3.4, Biological Resources, 3.10, Hydrology and Water Quality, address and analyze impacts associated with biological resources and water quality of the proposed Project. Furthermore, the Project has been designed to address public safety through these edge treatment considerations and other project design features such as (described in Section 2.5.4 of the Draft EIR): new signage stating public access restrictions, including no swimming; the addition of a consistent 6-

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to 12-inch curb around the edge of the reservoir to provide a barrier between the walking path and edge of slope; and wherever possible, an approximate 5-foot planted buffer with integrated seating maintained between the path and the edge of slope.

- C-28-22 As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included an Education Center that would be connected directly to the Silver Lake Reservoir via an accessible pathway leading down to a floating dock. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. The revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.
- C-28-23 As noted in the comment, the Draft EIR Project Description describes that a buffer would be maintained between the seating and edge of the slope. The 5-foot buffer around the reservoir is limited to areas where 5-feet exist between the reservoir and the walking path. Some areas where space may be more limited, such as the East and West Narrows, buffers would be adjusted as needed to accommodate the path. No additional detail is needed to evaluate impacts of the proposed Project.

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- C-28-24 **Offsite Improvements on Silver Lake Boulevard:** The Project includes two options for offsite improvements, both of which are vaguely defined. (DEIR, pp. 2-25 and Figure 2-16.) The first option includes an improved southbound bike lane on the west side of the road, and relocates an existing northbound bike lane to the west side of the road. It also includes a sidewalk buffering the bike lane from the road, and parallel parking. The second option includes improvements, restriping and relocation of the existing bike lane, with no sidewalk or additional parking. The project description needs to clearly define which project option will move forward, because each configuration may have different impacts, such as traffic safety impacts. Conceptual development scenarios do not meet CEQA's requirements for an adequate project description. (*Stophthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 18.)
- C-28-25 **II. The DEIR Improperly Relies Upon Project Design Features Without Disclosing Impacts.**
- The DEIR improperly relies upon so-called project design features (PDFs) and claims that conditions will be placed on the Project in an attempt to reduce many of the Project's impact without the required analysis of the impacts or the measures relied upon to mitigate them. (See DEIR, pp. 2-34 to 2-40.) The majority of these PDFs appear to be mitigation measures that the City has failed to incorporate into the Project's Mitigation Monitoring and Reporting Program (MMRP). When a Project incorporates mitigation measures, CEQA requires that those mitigation measures be "fully enforceable through permit conditions, agreements, or other measures." (Pub. Resources Code § 21081.6(b).)
- C-28-26 As mere PDFs that will not necessarily be incorporated into Project approvals, conditions, and the MMRP, the PDFs are not properly enforceable by the City or third parties and cannot be relied upon for any reductions in Project impacts. CEQA's mitigation requirements exist for a reason. "The purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." (*Federation of Hillside & Canyon v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261; *Katzeff v. California Dept. of Forestry and Fire Protection* (2010) 181 Cal.App.4th 601, 612; *Lincoln Place Tenants Assn v. City of Los Angeles* (2005) 130 Cal.App.4th 1491.)
- C-28-27 The heavy reliance on Project PDFs and the future imposition of conditions also improperly compresses the DEIR's disclosure and analysis functions. (*Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 655-656.) A "mitigation measure cannot be used as a device to avoid disclosing project impacts." (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 663-664.) Here, the DEIR claims that the PDFs are part of the Project itself and fail to assess the impacts of the Project without these PDFs. But, a *mitigation measure is not part of the project*. (*Lotus, supra*, 223 Cal.App.4th 645, 656 & fn. 8.) An EIR cannot incorporate "the

- C-28-24 Based on comments received during the Draft EIR comment period, the City has decided to choose Option 2 as the proposed Project. Please see Master Response - Parking/Bike Option.
- C-28-25 The comment expresses an opinion that the reliance on PDFs reduces the disclosure of impacts. The Draft EIR is consistent with the requirements of CEQA, which directs that the analysis of a project's potentially significant adverse environmental impacts be based on the project as proposed, including mandatory project components or design features. In particular, it is appropriate for the Draft EIR in its analysis to rely on compliance with existing federal and state regulations in the PDFs (Public Resources Code § 21081.6(b); CEQA Guidelines § 15097(b)), as well as the standard conditions that are typical in City projects and are also included in the PDFs. Please see Section 2.5.8 of the Draft EIR for the proposed Project's PDFs, which as stated are either typical regulatory compliance measures, standard conditions in City projects, or specific project feature commitments.

Each of the PDFs identified in Section 2.5.8 are listed below including their respective regulatory association, city policy association, or project design commitment:

Project Design Features (PDFs) Regulatory Framework	
PDF	Reference
Biological Resources	
PDF-BIO-1: Ornamental Native Plants.	Project feature
PDF-BIO-2: Nesting Birds.	Migratory Bird Treaty Act
PDF-BIO-3: Wildlife Fencing Signage.	Project feature
PDF-BIO-4: Tree Protection Fencing.	BSS Application for Tree Removal Permit (LAMC Section 17.02)
PDF-BIO-5: Grading/Trenching in TPZ.	BSS Application for Tree Removal Permit (LAMC Section 17.02) RAP Tree Policy
PDF-BIO-6: Avoiding Root Damage.	BSS Application for Tree Removal Permit (LAMC Section 17.02) RAP Tree Policy
PDF-BIO-7: Soil Grade.	BSS Application for Tree Removal Permit (LAMC Section 17.02)
PDF-BIO-8: Irrigation.	BSS Application for Tree Removal Permit (LAMC Section 17.02)
PDF-BIO-9: Landscaping Around Native Trees.	BSS Application for Tree Removal Permit (LAMC Section 17.02)

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PDF-BIO-10: Tree Pest Inspection.	BSS Application for Tree Removal Permit (LAMC Section 17.02)
PDF-BIO-11: Development of Pest Management Plan.	BSS Application for Tree Removal Permit (LAMC Section 17.02)
PDF-BIO-12: Prevention of Pathogen Spread.	BSS Application for Tree Removal Permit (LAMC Section 17.02)
PDF-BIO-13: City Tree Ordinance.	LAMC Section 17.02
PDF-BIO-14: RAP Tree Policy.	RAP Tree Policy
Cultural Resources	
PDF-CR-1: Archaeological Resource Discovery During Construction.	CA PRC Section 21083.2 CA PRC Section 21082 CEQA Section 15064.5f
PDF-CR-2: Human Remains Discovery During Construction.	CA Health and Safety Code Section 7050.5 CA PRC Section 5097.98 CEQA CCR Section 15064.5 PRC Section 5097.98
Noise	
PDF-NOISE-1: Haul Route.	Project feature
PDF-NOISE-2: Construction Noticing and Community Liaison.	Project feature
Public Services	
PDF-PS-1: Construction Security Measures.	BMP
PDF-PS-2: Operational Security Measures.	BMP
Transportation	
PDF-TRA-1: Construction Traffic Management Plan.	City of Los Angeles Department of Transportation – Construction Management Plan
PDF-TRA-2: Construction Staging Plan.	City of Los Angeles Department of Transportation – Construction Management Plan
PDF-TRA-3: Construction Traffic.	City of Los Angeles Department of Transportation – Construction Management Plan
PDF-TRA-4: Access to Parcels.	City of Los Angeles Department of Transportation – Construction Management Plan

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PDF-TRA-5: Site-Specific Traffic Control and Transit Plan for Large Events.	City of Los Angeles Department of Transportation – Traffic Control Plan
PDF-TRA-6: Expand Public Transit Connections.	Project feature
Utilities and Service Systems	
PDF-UTIL-1: Drought-Tolerant Landscaping.	Project feature
PDF-UTIL-2: Water-Efficient Irrigation.	Project feature
PDF-UTIL-3: Decentralized Drainage Strategy.	Project feature
Wildfire	
PDF-WF-1: Fire Code.	LAMC Sections 57.4908.1.1 through 57.4908.1.3
PDF-WF-2: Open Flame.	LAMC Section 57.4908.5
PDF-WF-3: Smoking Prohibited.	California Fire Code Section 310.2 LAMC Section 57.4908.6
PDF-WF-4: Signage.	LAMC Section 57.4908.9.1
PDF-WF-5: Brush Clearance Activities.	City of LA Ordinance No. 185789

- C-28-26 The comment states that the PDFs are not enforceable by the City. As described in response to comment C-28-25, each of the PDFs is associated with a regulatory requirement, City policy, or project feature commitment that ensures its incorporation as a matter of regulatory compliance. The PDFs are included in the project description as project features resulting from existing requirements and policies and integral to the project implementation.
- C-28-27 The comment states that the identification of PDFs improperly compresses the EIR's analysis. As described in response to comment C-28-25, each of the PDFs is associated with a regulatory requirement, City policy, or project feature commitment that ensures its incorporation as a matter of regulatory or management plan compliance. The PDFs are included in the project description as project features resulting from existing requirements and policies and integral to the project implementation. As a result, the PDFs do not reduce that impact of potential impacts since compliance with regulatory and plan requirements is compulsory.

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cont.

proposed mitigation measures into its description of the project and then conclude [] that any potential impacts from the project will be less than significant.” (*Id.* at 655-657.) The DEIR’s shortcut is “not merely a harmless procedural failing...[it] subverts the purposes of CEQA by omitting material necessary to informed decisionmaking and informed public participation.” (*Id.* at 658.)

III. The DEIR Fails to Adequately Analyze the Project’s Impacts.

A. The DEIR’s Disclosure, Analysis and Mitigation of Biological Impacts is Woefully Inadequate.

C-28-28

SLWS provides a summary of the DEIR’s inadequate assessment of biological impacts based on the much more detailed expert comments prepared by: Daniel Cooper at the Resource Conservation District (Attachment 1); Associate Professor Amanda J. Zellmer (Attachment 2); Jodhan Fine (Attachment 3); and the Los Angeles Audubon Society. These experts reveal flaws in the DEIR’s biological resources assessment that are so fundamental and pervasive that new analysis must be prepared and the DEIR must be recirculated. The DEIR fails to include much of the required analysis identified for this Project by the California Department of Fish and Wildlife (“CDFW”). (Attachment 4, CDFW Scoping Comments.)

C-28-29

The DEIR fails to disclose baseline biological conditions, resulting in an inability for the DEIR to assess the Project’s impacts on those conditions.

C-28-30

Experts have also advanced the need for any changes at the Reservoir site to be gradual, with assessment of the wildlife impacts after each small change at the site to allow further changes to be halted if the Project begins to adversely impact wildlife.

1. The DEIR Fails to Provide a Complete and Adequate Disclosure of Baseline Biological Conditions

C-28-31

Under CEQA, a project’s environmental impacts are determined by comparing the environmental baseline, the without-project conditions, to with-project conditions. (CEQA Guidelines §15125, subd. (a).) Without an accurate baseline, an EIR cannot accurately disclose a project’s likely environmental impacts, or determine whether those impacts can be fully mitigated. (*Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310, 322.) Here, the DEIR fails to provide the required accurate baseline. It also improperly fails to “clearly identify the baseline assumptions” and support those assumptions with substantial evidence. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 659.)

Expert biological comments reveal a multitude of baseline conditions that are not disclosed or supported. Of great significance is the DEIR’s failure to address the fact that

C-28-28 This comment references a SLWS summary of inadequate biological assessment without specific reference in this comment. It is assumed that the subsequent comments to which the summary refers, each of which are responded to below. For responses to Attachment 1 Daniel Cooper, see responses to comment letter L-1. For responses to Attachment 2 Associate Professor Amanda J. Zellmer, see responses to comment letter C-17. For responses to Attachment 3 Jodhan Fine, see responses to comment letter I-543. For the Los Angeles Audubon Society Comment Letter, see responses to comment letter C-39. For Attachment 4 California Department of Fish and Wildlife Scoping Comments, the recommendations were incorporated into Section 3.4 Biological Resources.

C-28-29 This comment provides no specific details of where biological baseline conditions were not disclosed. In Section 3.4.1, Environmental Setting, the existing baseline conditions for biological resources are described. No further response is required for this comment. Appendix D includes a detailed Biological Technical Report. The Draft EIR provides the baseline condition of biological resources on site consistent with CEQA statutes and the State CEQA Guidelines. Section 3.4, Biological Resources of the Draft EIR is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using the industry standards for biological analysis. The comment does not identify what is lacking from the baseline assessment provided in the Draft EIR.

C-28-30 The comment recommends periodic assessment of the Master Plan implementation with which the lead agency concurs. The Draft EIR Section 2.7, Project Operations and Maintenance, describes the preparation of Wildlife Management Plan. The Wildlife Management Plan will incorporate the assessment of wildlife impacts during implementation of the Master Plan. In addition, Draft EIR Section 3.4.4 Project Design Features and 3.4.5 Impacts and Mitigation Measures, includes preconstruction surveys for nesting birds and other special-status wildlife in PDF-BIO-2 and Mitigation Measures BIO-2 and BIO-3 which offer additional opportunities for wildlife protection.

C-28-31 This comment purports to the inadequate disclosure of baseline biological conditions. The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. Section 3.4, Biological Resources of the Draft EIR is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using the industry standards for biological analysis. The comment does not state what the purported inadequacies of the Draft EIR analysis are. The Draft EIR describes the baseline condition and evaluates impacts from construction and operation.

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C-28-32 the baseline conditions provide minimal human disturbance of wildlife and their habitat. Disclosure and assessment of this is lack of human disturbance, and its importance to wildlife species is essential to evaluating the impacts associated with the Project as it would exponentially increase human interference with wildlife and their habitat. Without that foundational assessment of existing conditions, the impacts of increased human disturbance cannot be evaluated or mitigated.

C-28-33 The DEIR also fails to accurately and adequately disclose the existing value of the Silver Lake Reservoir Complex for migrating birds and as nesting territory. (Attachment 1.) No count or sighting data is provided for waterbirds. The DEIR fails to disclose the use of the Reservoir site for raptor species. The DEIR completely fails to identify the long-term Great Blue Heron rookeries on the site. The DEIR also fails to disclose the importance of the site as an international stopover on the Pacific Flyway Corridor. This importance was identified as one of the reasons for designating the site as a Protected Area for Wildlife. (See Section III.C.5.)

C-28-34 The DEIR similarly fails to identify the existing importance of the site as stepping stone habitat connectivity between Griffith Park and Elysian Park for terrestrial mammal and other species. (Attachment 2.) Surveys for terrestrial mammal, bat, reptile and amphibian species are completely inadequate. Without assessment of the existing species use of the Reservoir, the DEIR cannot accurately assess the Project's impacts on those species. This is particularly problematic as the DEIR claims that the Project will serve as a benefit to wildlife. Without knowledge of the existing species, it is impossible to assess whether substantial changes to the site will benefit or harm those species.

C-28-35 The DEIR also includes a blatant inaccuracy in claiming that Southern California black walnut woodland is not present on the Project site. (Attachment 1.) Numerous black walnut trees are present on the site and this is the typical habitat range for this rare species. The DEIR also fails to acknowledge that the CDFW has repeatedly found black walnuts meet CEQA's definition of endangered, rare or threatened species. (CEQA Guidelines, § 15380, subd. (d); Attachment 5, Consultation Letters from CDFW to City re Black Walnut Trees.) All natural vegetation communities that include Southern California black walnut are identified as Sensitive Natural Communities by CDFW.

2. The DEIR Fails to Adequately Analyze Project Components.

C-28-36 The Project proposes to "create" several types of new habitat on the site, but the DEIR fails to provide an assessment necessary to support the inclusion of this habitat. Additionally, the DEIR does not identify what specific ecosystems or communities would be "restored." Initially, as noted by experts, the Project would not create new habitat, but instead convert the existing habitat to a different kind of habitat. To do so, the DEIR needs to have assessed the baseline conditions, including wildlife presence and reliance

C-28-32 The comment states that the baseline condition provides minimal human disturbance. On the contrary, the SLRC located in the center of a dense urban environment accommodates existing human impact including on site for recreational uses. The Draft EIR Section 3.4, Biological Resources, describes the existing biological resources under the current intensity of recreational use, with inference to existing use by visitors. Draft EIR Section 3.4.5, Impacts and Mitigation Measures, analyzes the probable increase visitation of the SLRC to special-status species. The Draft EIR evaluates the potential for increases to recreational uses in certain areas, identifies potentially significant impacts, and establishes appropriate mitigations to minimize effects to biological values.

C-28-33 This comment states that the Draft EIR does not characterize the importance of the SLRC for migratory birds, waterbirds, great blue heron and raptors. On the contrary, a list of wildlife species observed at the SLRC is included in Appendix D of the Draft EIR and includes each of the species mentioned in the comment including migratory birds, waterbirds, great blue heron, and raptors. The Draft EIR identifies the Migratory Bird Treaty Act as an important regulation for the site on page 11 of Appendix D. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Mitigation measures and project design features specific to blue herons include Mitigation Measure BIO-1 and PDF-BIO-2.

C-28-34 The Draft EIR Appendix D and Impact 3.4-4 highlight the importance of wildlife movement in the urban environment on page 33, including both terrestrial and avian wildlife movement and habitat connectivity. The SLRC is acknowledged as contributing to the connectivity of habitat areas in an urban environment and notes that the SLRC does not provide uninterrupted habitat corridors to surrounding open space.

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis. The comment describes that the Draft EIR fails to identify the existing importance of the site as a steppingstone habitat connectivity between Griffith Park and Elysian park. Master Response – Biological Resources (Wildlife Corridors).

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C-28-35 The comment states that the Draft EIR is inaccurate in its analysis of Southern California black walnut woodland. The Draft EIR Section 3.4, Biological Resources, acknowledges the presence of Southern California black walnuts and coast live oaks onsite, but determined that they are not likely naturally occurring. As stated in Section 3.4, the entire Knoll and Silver Lake Meadow Park is overlaid with Urban land-Dapplegray-Soper complex soils resulting from human-transported material. Additionally, remnants of an irrigation system were observed adjacent to the Southern California black walnut and coast live oak trees. These two tree species need to be dominant or co-dominant in the tree canopy and attain 30% to 50% relative cover (Keeler-Wolf and Evens 2006). As stated in Section 3.4, neither of these species acquire that level of dominance or co-dominance as all woodlands present within the Project site are dominated by non-native species (see Impact 3.4-2). The occurrences of these two species are not related to a remnant stand of native woodlands but rather likely planted trees in an urban ruderal landscape. Additionally, the City's Protected Areas for Wildlife & Wildlife Movement Report found that no documented sensitive natural plant communities were found within SLRC. Nonetheless, the Draft EIR provides an assessment of impacts to the species and requires that mitigation be conducted consistent with the Protected Tree Ordinance.

CNPS currently considers southern California black walnut (*Juglans californica*) a List 4 plant (CRPR 4.2). CRPR 4 species do not per se meet the definition under CEQA Section 15380(b) as an Endangered, Rare or Threatened Species ("special-status"). Information for these species is often limited due to the difficulty in obtaining current data on the number and condition of the occurrences and few if any of these CRPR 4 species are eligible for state listing (CNPS 2023). CDFW does not include southern California black walnut in their State and Federally Listed Endangered, Threatened, and Rare Plants of California (CDFW 2023). Therefore, according to both CNPS and CDFW, southern California black walnut does not meet their criteria as List 1 or 2 species or as Endangered, Threatened, and Rare Plants of California, respectively.

In contrast to individual California black walnut trees, the CDFW considers California black walnut vegetation communities (e.g., California black walnut woodland) a sensitive natural community (CDFW 2022). According to CNPS: "Walnut forest is a much fragmented, rare, and declining vegetation community. Threatened by urbanization, grazing, non-native plants, and possibly by lack of natural reproduction. Possibly threatened by hybridization with horticultural varieties of walnut." (CNPS 2023). These black walnut vegetation communities, which do not exist in the Project site (see p. 3.4-5 of the Draft EIR), are what CDFW refers to in Attachment 5 of the comment letter (on a separate project with different circumstances) as "some plants with a CRPR of 4" qualifying as special-status species where a project would result in "habitat modification."

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C-28-36	<p>The comment states that the Draft EIR fails to provide an assessment necessary to support the creation of new habitat. The comment is not specific in what type of assessment would be required to support their claimed deficiency in the Draft EIR analysis. The comment states that the Draft EIR does not identify what specific ecosystems or communities that would be restored. The Draft EIR, Section 3.4.5, Impacts and Mitigation Measures, discusses the creation of 23-acres of native habitat including upland and wetland habitats. This creation of native habitat replaces non-native landscape and developed areas and is not considered restoration. The Draft EIR baseline conditions were analyzed and summarized consistent with the CEQA statutes and the State CEQA Guidelines. Additionally, the Draft EIR Section 3.4, Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources.</p>

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C-28-36 cont. on the Reservoir site, before it can conclude the impacts of this habitat conversion and the types of habitats that would be beneficial.

C-28-37 The DEIR makes a number of unsupported assumptions regarding habitat conversion at the Reservoir. The DEIR assumes the creation of floating island will provide beneficial habitat, but fails to provide substantial evidence in support of this assumption. Similarly, the DEIR touts “wetland restoration” again without support for the benefits of providing the proposed habitat at this location. Similar habitat has been provided at other areas of the City and has served as a draw for nuisance species.

C-28-38 The DEIR also claims the Project includes habitat restoration for the Knoll area of the site, but again, without necessary baseline information, it is impossible to assess the adverse or beneficial impacts of this restoration. (Attachment 2.) The DEIR does not identify the target species for the habitat restoration in the Knoll, preventing an assessment of whether it would serve a beneficial purpose. An understanding which species reside in and use the Reservoir is essential to evaluating impacts to those species.

3. The DEIR Fails to Analyze Impact from Significant Increase in Human Interference with Wildlife.

C-28-39 Experts Cooper and Zellmer identified the DEIR’s lack of analysis of impacts associated with the Project providing significant increases in human interference with wildlife and their habitat. (Attachments 1 and 2.) The CDFW concurred in with these experts’ concerns, stating in scoping comments that: “CDFW is concerned that the Project’s proposal to increase public access and create recreation opportunities that currently do not exist may result in disturbances to habitat and wildlife.”

C-28-40 Removal of existing fencing preventing access to habitat by humans and their pets would be a significant change from current baseline conditions that could adversely impact wildlife. The proposed habitat restoration could be hindered by human use of those restored areas. The DEIR fails to disclose, analyze and mitigate these impacts.

C-28-41 The DEIR also fails to analyze and mitigate invasive species impacts, an impact that is increased by increased human intrusion into the Reservoir site. Humans could directly and indirectly introduce new invasive species to the Reservoir. There is no assessment of exotic pest species that have been found in other parks in LA that this project appears to attempt to emulate, like Echo Park Lake and MacArthur Park, where invasive and pest species have had significant impacts on biodiversity. Humans can inadvertently track invasive species into the site on their shoes and clothing. It is also common for humans to purposefully release pets at urban parks and these species can significantly damage the habitat and wildlife diversity.

C-28-37 The comment states that the Draft EIR fails to provide substantial evidence that the floating islands will provide habitat. The Draft EIR, Section 3.4.5, Impacts and Mitigation Measures discusses the creation of 23-acres of native habitat including upland and wetland habitats. This creation of native habitat replaces non-native landscape and developed areas and is not considered restoration. The Draft EIR baseline conditions were analyzed and summarized consistent with the CEQA statutes and the State CEQA Guidelines. Additionally, the Draft EIR Section 3.4, Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources.

C-28-38 The comment states that it is impossible to assess impacts of restoration. The Draft EIR describes in detail the impacts of constructing the proposed Project, including installation of vegetation and habitat features. The intention of the revegetation would be to increase native vegetation compared to existing conditions. See Master Response – Biological Resources.

C-28-39 The comment asserts there will be a significant increase in human interference with wildlife. The Draft EIR acknowledges that the SLRC accommodates existing human utilization for recreational uses as a component of baseline conditions. The Draft EIR includes dual objectives (p. 2-6) to:

- Expand existing active recreational uses and increase passive recreational uses; and to
- Enhance and expand wildlife habitat by introducing wetland and aquatic ecologies and improving upland habitat."

Draft EIR Section 3.4, Biological Resources, describes the existing biological resources under the current intensity of recreational use, with inference to existing use by visitors. Draft EIR Section 3.4.5, Impacts and Mitigation Measures, analyzes the probable increase visitation of the SLRC to special-status species and concludes that impacts to wildlife will be less than significant.

C-28-40 The comment asserts that the removal of existing fencing preventing access to habitat by humans and pets would be a significant change from current baseline conditions, adversely impacting wildlife, and that the Draft EIR failed to disclose, analyze and mitigate these impacts. In the Draft EIR, the perimeter fence will be removed in phases as different park zones are constructed. The Draft EIR concludes on page 3.4-31 that the removal of the perimeter fence would eliminate barriers to wildlife and provide access for large wildlife to access the water and created wetlands. Areas with the most habitat value will have low-level habitat fencing to demarcate access restricted areas (see Figure 2-4 in the DIR). Additionally, these areas will be closed at night and off limits entirely to the public (see Master Response - Public Safety). The Draft EIR concludes that Impacts to existing wildlife resulting from the removal of the perimeter fence would be less than significant.

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C-28-41	<p>The comment asserts that the Draft EIR failed to analyze and mitigate invasive species impacts due to increased human intrusion. The Draft EIR notes on page 3.4-30 that the Project would increase human activities throughout the SLRC. The SLRC is currently an urban park which currently has high levels of public access and anthropogenic influence on the majority of the site. The Draft EIR acknowledges that some areas previously off limits to the public will be made available. In these areas native plantings will replace non-native vegetation currently on the property. The Draft EIR concludes that the addition of native plants will reduce invasive species on site compared to existing conditions. The increase in public access would not elevate the SLRC exposure above the existing high levels of exposure to invasive species or the potential release of pets. Additionally, in the Draft EIR, Section 3.4.5, PDF-BIOs -7 through -9 have standards for managing invasive pests found in trees. Specifically, PDF-BIO-8 requires the City to work with a certified arborist to prepare an Infectious Disease Management Plan.</p>

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C-28-42 The DEIR further fails to address the impacts of humans being allowed up to the edge of the reservoirs and to actually kayak on the water. Waterbirds need buffers from human interference and as proposed, the Project eliminates the existing buffers. Thus, the Project could have significant impacts on waterbirds use of the site, but the DEIR fails to analyze these impacts.

4. The DEIR Fails to Assess the Impacts of the Significant Increase in Nighttime Lighting.

C-28-43 As addressed in detail by the Los Angeles Audubon Society, the Project would significantly increase in night lighting at the Project site. Scholarly assessments have repeatedly found that increases in night lighting, even at the levels proposed for the Project in the DEIR, would have significant adverse impacts on wildlife, limiting the ability of the Reservoir to provide the expanses in useable wildlife habitat that it claims. This lack of analysis also results in a failure to assess mitigation.

5. The DEIR Fails to Analyze the Project's Impacts on Wildlife Connectivity.

C-28-44 Expert Zellmer provides detail on the importance of the Silver Lake Reservoir Complex as an important stepping stone habitat connecting Griffith Park and Elysian Park, in an area that was recently designated as of the City's "Protected Areas for Wildlife." She identifies a flaw in the DEIR's assessment in only considering the wildlife connectivity provided by contiguous parcels. She also provides recommendations for necessary evaluations to determine the existing functionality of the Reservoir as providing wildlife connections, and assessment of the species intended to use the site to allow for an evaluation of the Project's impacts, whether beneficial or adverse, to the use of the site for wildlife movement.

6. The DEIR Fails to Analyze the Potential for Bird Strikes at the Education Center.

C-28-45 Expert Fine has identified that there are high counts of birds at the Reservoir and that they could be impacted by the addition of the proposed Education Center to the site. (Attachment 3.) He identifies that common occurrence of bird deaths resulting from window strikes and collisions and notes that: "A building with windows erected in the middle of the meadow, a popular area for many birds, could be a death trap for the species that use the reservoir as a migration stop over, as a wintering ground, or a breeding ground." The DEIR fails to acknowledge or mitigate this impact.

7. The DEIR Fails to Assess the Habitat Impacts of Fuel Management Requirements Around New Structures.

C-28-46 While the DEIR acknowledges that fuel modification will be required around the proposed new structures on the Project site, it fails to analyze the impacts of this fuel

C-28-42 The comment asserts that the Draft EIR fails to analyze and address impacts of human access to the water edges and that it would have significant impacts to waterbirds. As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. Additionally, the comment asserts that buffers for waterbirds would be eliminated. However, the access to the shoreline is a relatively small area when considered in the context of the larger size of the reservoirs. The majority of the reservoirs would be still inaccessible to the public and would provide similar conditions for waterbird use that currently exists.

C-28-43 The comment asserts that the Draft EIR fails to assess impacts of the significant increase in nighttime lighting and that the lack of analysis results in a failure to assess mitigation. On the contrary, the Draft EIR Section 3.1, Impact 3.1-4 does evaluate the effects of nighttime lighting on wildlife and states that lighting would not be included along secondary pathways within habitat areas. Additional Mitigation Measures AES-1 requires that all new permanent exterior lighting shall be shielded and directed downward to avoid light spill onto surrounding land uses including natural habitat areas, open water, residential areas, or into the night skies. The SLRC currently provides recreational opportunities within a dense urban area where surrounding streetlights illuminate the area during the nighttime. The new lighting would be needed for public safety. The Draft EIR concludes that habitat areas including planted areas of native vegetation and open water would not be significantly impacted by proposed lighting and the SLRC would continue to function as usable wildlife habitat.

C-28-44 The comment states that the Draft EIR failed to analyze Project impacts to wildlife connectivity and states that the SLRC was recently designated as of the City's "Protected Areas of Wildlife". Please see Master Response – Biological Resources (Movement Corridors).

C-28-45 The comment asserts that the Draft EIR fails to analyze and mitigate the potential for window bird strikes at the Education Center. The Draft EIR Section 3.1, Impact 3.1-4, Mitigation Measure AES-2 requires that all new structures and buildings shall be designed to include non-glare exterior materials and coatings to minimize glare or reflection. The use of these non-glare materials would result in less than significant impacts to birds.

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C-28-46	<p>The comment asserts the Draft EIR fails to analyze the impacts due to fuel modification. The location of the proposed new structure is located in an area currently vegetated with non-native vegetation primarily consisting of mature eucalyptus and pine trees and generally open understory dominated by Chilean pepper trees and invasive grasses. The proposed native plantings and fuel modification of habitat up to 200-feet from the proposed Education Center would increase the habitat value of this area. The Draft EIR evaluates wildfire impacts in Section 3.19. The Draft EIR concludes that the proposed Project would not increase the risk of wildfire compared with exiting conditions.</p> <p>Additionally, the comment states that irrigation would introduce invasive species. However, as described in the existing conditions section of the Draft EIR, the Project area is currently vegetated with non-native vegetation and the addition of irrigation would not increase the occurrence of invasive species beyond current baseline conditions. As included in the project design features, irrigation would be conducted under the oversight of a qualified arborist.</p>

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modification to wildlife habitat. For new buildings proposed near areas of habitat restoration, such as the Education Center, this could significantly reduce the habitat value of the area. Fuel management requirements such as irrigation could also introduce invasive species, resulting in further adverse impacts.

8. Recirculation of the DEIR is Required to Address the Fundamental Flaws of the Biological Analysis.

C-28-47

As set forth above and in the referenced expert comments, the DEIR is fundamentally inadequate in its assessment of biological impacts due to a lack of accurate baseline conditions and failure to disclose, analyze or mitigate many of the Project's biological impacts. These inadequacies are systemic necessitating significant revision of the DEIR. The DEIR is "(so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." (CEQA Guidelines § 15088.5, subd. (a)(4); citation to *Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043.) Thus, CEQA requires the City to recirculate a revised DEIR for further public comment.

B. The DEIR's Analysis of Historic Resources Is Inadequate.

C-28-48

The Silver Lake Reservoir Complex has been listed as a City Historic-Cultural Monument (HCM #422) since 1989. This designation was approved and adopted by the City as the vision for this open space of land and waters in order to provide protection against demolition or inappropriate alterations, and to encourage long-term stewardship.

The Legislature passed CEQA to enable "all action necessary to provide the people of this state with...enjoyment of aesthetic, natural, scenic, and *historic* environmental qualities." (Pub. Resources Code, §21001, subd. (b), emphasis added.) The statute explicitly defines "environment" to include "objects of historic or aesthetic significance." (Pub. Resources Code, § 21060.5.) Public Resources Code section 21084.1 categorizes historic resources as "mandatory, presumptive, or discretionary," according to whether and where the resource has been identified as historic. (*League for Protection of Oakland's etc. Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896, 906-07.)

"Presumptive" historic resources are those resources included in a local register of historical resources or identified on a qualified historic resources survey. (CEQA Guidelines §15064.5, subd. (a)(2).) The lead agency must treat a presumptive resource as a historic resource unless there is a preponderance of evidence that the resource is no longer historic. Here, the Silver Lake Reservoir Complex's listing as City HCM #422 makes it a presumptive historic resource, requiring analysis of any potential impacts to this resource. The DEIR's analysis of impacts to this historic resource is inadequate on several basis.

C-28-47 This comment asserts the need for the Draft EIR to be recirculated for having an inadequate analysis of biological resource impacts. No specific reference is provided; therefore, no further response is required. The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. Section 3.4, Biological Resources of the Draft EIR is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using the industry standards for biological analysis. Please see Master Response – EIR Recirculation Requirements.

C-28-48 Project Description Section 2.3 acknowledges that the SLRC is a designated Historic Cultural Monument. Please see Section 2.5, Cultural Resources of the Draft EIR for a discussion on historic resources. In addition, please refer to Appendix F of the Draft EIR for additional historic resources studies conducted for the proposed Project.

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1. The DEIR Relies on an Impermissibly Lax Threshold of Significance.

In assessing impacts to historic resources, the DEIR fails to apply the threshold of significance required by CEQA. The CEQA Guidelines also establish the specific threshold of significance for a significant adverse impact to a historic resource. This limits the City from setting its own more lenient threshold. CEQA Guidelines section 15064.5, subdivision (b)(1) provides that a project would have a significant adverse impact on historic resources if it materially impairs the resource's historic significance. This section also establishes that a project materially impairs the resource's historic significance by demolishing or materially altering physical characteristics of a resource that "convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources." (CEQA Guidelines §15064.5, subd. (b)(2).) Thus, a project that would demolish or material alter any character defining features of an historic resource would have a significant impact under CEQA, requiring mitigation or the adoption of a less impactful alternative.

Instead of relying upon the CEQA mandated threshold of significance, the DEIR considers impacts to be significant only if the resource would no longer be eligible as a designated resource. (DEIR pp. 3.5-30-32, 3.5-35.) This threshold is impermissibly lenient because it does not consider impacts significant that would materially alter a character defining feature of the Silver Lake Reservoir Complex if the resource remains eligible for listing as an HCM. As discussed below, several character defining features of this resource would be materially altered or demolished, requiring the DEIR to find a significant impact to historic resources.

2. The Silver Lake Reservoir Complex is an Historic Cultural Landscape and Must Be Assessed as Such.

As defined by The Cultural Landscape Foundation, which was founded by the author of the *Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, *Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes*, cultural landscapes are defined as follows:

Cultural landscapes are landscapes that have been affected, influenced, or shaped by human involvement. A cultural landscape can be associated with a person or event. It can be thousands of acres or a tiny homestead. It can be a grand estate, industrial site, park, garden, cemetery, campus, and more. Collectively, cultural landscapes are works of art, narratives of culture, and expressions of regional identity.

Based on this definition, the historic Silver Lake Reservoir Complex clearly qualifies as a cultural landscape. Despite this, the City's historic resources consultants

C-28-49 As stated in Section 3.5.3 of the Draft EIR and contrary to the comment's suggestions, the significance threshold used for historical resources was, consistent with CEQA, whether the project would "[c]ause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. (Refer to Impact 3.5-1)." The analysis of impacts to historical resources in Impact 3.5-1 was consistent with this threshold, and was not limited, as suggested in the comment, to only whether the project impacts would result in the SLRC not being a designated resource. Please also refer to Appendix F of the Draft EIR for a description of changes within the Project Site during the period of significance. Changes and modifications have altered the original design, setting, materials, workmanship, feeling and association of the SLRC to some extent, yet the reservoir remains eligible for listing as both a LAHCM and in the California Register. Character-defining features have not been changed to the extent that its integrity is no longer intact or by extension, its eligibility is threatened. Despite these changes, the SLRC is still able to successfully convey its historical significance and justify its inclusion in the California Register of Historic Places. The implementation of the Master Plan will similarly alter aspects of the reservoir that are components of its integrity, as defined by the National Register, but not to the extent that the resource will be unable to convey its historical significance or justify its inclusion in the California Register of Historic Places.

More importantly, the SLRC has had changes and alterations since its designation as an LAHCM in 1989. Please see Section 2.5, Cultural Resources of the Draft EIR and Appendix F of the Draft EIR for a discussion of alterations within the SLRC. While alterations to the SLRC have likely been considered "impacts" under CEQA, they do not reach the threshold of a "significant impact." The SLRC is not a static resource that has remained frozen in place since its original construction, or its designation as an LAHCM. The changes proposed would not be considered significant because potential impacts would not result in a substantial adverse change that would materially alter in an adverse manner those physical characteristics of the historical resource that convey its historical significance and justify its eligibility per 15064.5 (b)(2). After Project completion, the building would remain eligible as a historical resource pursuant to 15064.5 (a).

C-28-50 As described in Section 3.5.1, Cultural Resources, the SLRC itself is a Los Angeles Historic Cultural Monument (#422). Further analysis of historical resources and impacts analysis is based on the Silver Lake Reservoir Complex Master Plan: Supplemental Historical Report and Impacts Analysis (2022) (Historical Report) provided within Appendix F of the Draft EIR.

The Draft EIR is the most extensive description, analysis, and catalog of the features and history of the SLRC written to date. While the SLRC was evaluated as a district, rather than a Historic Cultural Landscape, that is merely a difference in terminology and organizational tools. The characterization of the SLRC as a "district" versus a "landscape" did not originate

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with the Draft EIR; it dates to its listing as a LAHCM and therefore predates the Draft EIR. The Draft EIR confirms that the SLRC is a historical resource for the purposes of CEQA and includes numerous character-defining features that are landscape features. The original HCM nomination form is short and limited on details and does not contain an inventory or description of what the contributing and/or non-contributing resources are contained within the district, let alone inventory, categorize, and analyze its character-defining features. The Draft EIR contains an extensive history of the SLRC, including categorizing and prioritizing the character-defining features of the SLRC, which previously had not been analyzed, including landscape features that previously had not been identified and/or included in analysis. In addition to the ESA report and analysis, consultant GPA clearly states on page 11 of their 2020 memorandum that “The Complex is a historic designated landscape.” Their 2019 report provided a description of the Site, a summary of its development and history, an illustrated inventory of landscape characteristics and character defining features of the SLRC, and an analysis of its status as a historical resource. Per *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (National Park Service, 1996), organizational elements of a historic cultural landscape can include spatial organization, topography, vegetation, circulation, and water features; all of these are included and addressed within the Draft EIR.

Additionally, with the number of buildings, structures and physical infrastructure associated with the SLRC, a district is not an inappropriate organizational tool. Landscape features can and are considered character defining features in historic districts, including the SLRC, and do not necessarily require separate evaluation as “cultural landscape.” More importantly, the landscape features of the SLRC that would be defined, inventoried, and evaluated for impacts in a cultural landscape evaluation are all defined, inventoried and evaluated within the Draft EIR, including various landscaping and landscape areas, the knoll, and the meadow. The resulting analysis of impacts more than adequately addresses the potential impacts of the Project, and an analysis of impacts under the auspices of a “cultural landscape” would be no different. More importantly, the Draft EIR acknowledges that the Master Plan will have an impact on the historic features of the SLRC; it simply states that these impacts do not reach the level of a “substantial adverse change.”

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did not evaluate the Silver Lake Reservoir Complex as a cultural landscape, or use the specific guidelines for cultural landscapes referenced above to assess impacts to this resource. Consultant GPA specifically stated that they were not re-evaluating as a cultural landscape, but did not identify a reason for that lack of analysis. (DEIR App. F, 2019 GPA Consulting Historic Resource Report, p. 14.)

C-28-50
cont.

The *Secretary of Interior's Standards for Cultural Landscapes* identify that the "character of a cultural landscape is defined by its spatial organization and land patterns; features such as topography, vegetation, and circulation; and materials, such as an embedded aggregate pavement." These *Standards* also emphasizes new additions to cultural landscapes should be avoided if possible and if not, only non-character-defining features should be altered. Here, as discussed below, the Project would alter character-defining features such as the Knoll and the Ivanhoe Reservoir embankment.

While the site was not evaluated as a cultural landscape, the "landscape characteristics" of the Silver Lake Reservoir Complex were identified in the appendix C to the 2019 GPA Consulting Historic Resource Report. This appendix also identifies the Knoll as a landscape characteristic of the site, as open space.

3. The Project Would Materially Alter Character Defining Features of the Historic Silver Lake Reservoir Complex.

Table 1 in the 2019 GPA Consulting Historic Resources Report identifies character-defining features of the historic Silver Lake Reservoir Complex. These include, but are not limited to: the Ivanhoe Reservoir, Ivanhoe Reservoir Perimeter Path, the Knoll, the Concrete Perimeter Wall, the Silver Lake Reservoir Perimeter Path, the Silver Lake Reservoir, the Grassy Patch, East Landscaped area and more. The Project would materially alter several of these character defining features, but the DEIR fails to disclose that such alterations would result in a significant impact.

C-28-51

Appendix F identifies that: "Because the existing embankments are a primary character-defining feature of the Silver Lake and Ivanhoe Reservoirs, providing increased access to the water by substantially altering the existing embankments would not comply with the Standards and may result in a significant impact under CEQA." The Ivanhoe Reservoir embankment would be materially altered by the addition of a new observation deck, wetland terraces and footpaths. (DEIR 2-16.)

The DEIR fails to disclose this material alteration of the embankment would be a significant impact to an historic resource under the threshold of significance set forth by the CEQA Guidelines. (See Section III.B.1 above.) Instead, the DEIR merely claims changes to the embankment "would not affect the overall eligibility of the Reservoir." (DEIR p. 3.5-31.) This is inadequate to disclose and provide mitigation for the Project's impacts to historic resources.

C-28-51 The proposed Project will similarly alter aspects of the reservoir that are components of its historic integrity, as defined by the National Register, but not to the extent that the resource will be unable to convey its historical significance or justify its inclusion in the California Register of Historic Places. Please refer to Appendix F of the Draft EIR for a description of the proposed changes as they relate to impacts to the character of the Project site.

While the planned changes may slightly alter the materials, features and spatial relationships of the Reservoir, they do not destroy them. Additionally, the SOIS say:

New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

As described in Cultural Resources, Section 3.5.5 of the Draft EIR, the proposed Project includes development of an Environmental Education Center located at the base of the Knoll landscape. This building would be one-story, an appropriate scale for the surrounding residential neighborhood, and it would be built into the topography of the Knoll. It would be designed to fit into the neighborhood. Its roof would be an extension of the habitat of the Knoll and there would be outdoor classrooms. The Environmental Education Center is designed to be integrated into the Knoll's landscape and would not result in a substantial visual change to the historic Knoll landscape. All of the planned changes could be removed in the future and the essential form and integrity of the Reservoir would not be impaired. While the plan includes work where a "small portion of the Knoll on its southern face is regraded," it also states that "the design intent is to balance the cut and fill earthworks such that execution of these elements requires no off-haul or import of soil." This balance of cut and fill is specifically designed to avoid an impact that would result in permanent impairment.

While the Knoll is currently enclosed by a fence that runs along Armstrong Avenue and only accessible from the north/west (LADWP entrance and compound), it has historically been accessible to the public, and a nature trail currently exists through the Knoll. As described in Project Description Section 2.5, no lighting would be proposed within the habitat areas of the Knoll and habitat fences would be installed along all nature trails. The education center has been designed in a discrete manner that will make its modern construction evident, while not dominating the surrounding landscape. The Reservoir and its associated landscape will remain the focus, with these changes implemented to highlight this unique resource and provide additional enjoyment for visitors.

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The Project would also materially alter the Knoll, another character-defining feature of the Silver Lake Reservoir Complex. The historic resources report's description of the Knoll identifies the importance of the unchanged and natural condition of this feature:

Topographic maps from 1896 to 2018 were examined to ascertain the elevation of the Knoll to identify potential changes in grade over time. This analysis shows that the Knoll appears to be a naturally occurring feature visible on maps as early as 1896, with a consistent grade that does not change in almost 120 years. While there are minor changes to the foliage that populates the Knoll, it is consistent with the evolution of a natural landscape *with minimal human intervention*, i.e. the coverage becomes more substantial with time. The Knoll appears to retain its original character throughout the development of the SLRC.

(Appendix F, ESA Report p. 24, emphasis added.)

The Project would result in significant physical additions to this character-defining feature as well as a change in use from an area with minimal human intervention, to an area with significant human interaction. The Project would add nature trails to the Knoll, increasing human interactions. (DEIR p. 2-15.) A 1,200 square foot pavilion and seating area would also be constructed in the Knoll, and lighting would be added to this currently natural area. (*Ibid.*)

The most significant addition to the Knoll is the construction an Education Center at the base of the Knoll. This new addition would materially alter the natural condition of the Knoll by adding in a created new habitat on the roof of the Education Center. This would be a materially alteration of a character-defining feature of the HCM and of a landscape feature of this cultural landscape. Construction of the Education Center would also be inconsistent with *Secretary of Interior's Standard 10*, which requires that "[n]ew additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." (36 C.F.R. 67.7.) The Education Center would require significant grading and changes to the site, which will leave the Knoll impaired if the building was removed in the future.

The DEIR fails to identify these alterations of the Knoll as a significant impact of the Project.

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C-28-52	<p>C. The DEIR Fails to Analyze and Disclose All the Project's Inconsistencies with Applicable Land Use Plans and Land Use Plans, Policies, and Regulations Adopted to Avoid/Mitigate Environmental Impacts.</p> <p>Under CEQA, an EIR is required to analyze <i>any</i> inconsistencies with applicable land use plans. (CEQA Guidelines § 15125, subd. (d).) Additionally, a project would result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (DEIR, p. 3.11-11.) The DEIR fails to analyze all such inconsistencies and fails to disclose significant land use impacts.</p>
C-28-53	<p>1. The DEIR Fails to Address the Project's Inconsistency with SB 1425 Requirements for Open Space Elements.</p> <p>Government Code section 65560 et seq. provides for the protection of open-space land and discourages conversion of such land to non-open-space uses. (Gov. Code § 65561.) The EIR must analyze the Project's consistency with the forthcoming updates to the General Plan Open Space Element, pursuant to the recently passed Senate Bill ("SB") 1425. SB 1425 requires the City to review and update its open space element, including preparing plans and an action program to address specified objectives, by January 1, 2026. (See https://leginfo.ca.gov/faces/billCompareClient.xhtml?bill_id=202120220SB1425.)</p>
C-28-54	<p>One of these objectives requires that the open space element address rewilding opportunities, defined as (1) opportunities to preserve, enhance, and expand an integrated network of open space to support beneficial uses, such as habitat, recreation, natural resources, historic and tribal resources, water management, and aesthetics; or (2) establishing a natural communities conservation plan to provide for coordinated mitigation of the impacts of new development. This provision emphasizes the need for localities' open space elements to protect natural open space that provides multiple environmental benefits, such as preserving wildlife corridors and connectivity.</p> <p>The DEIR does not address these new requirements, which will have to be in place prior to the completion of the Project. These requirements are relevant to the Project, which proposes to develop an area that is important for wildlife connectivity. (Attachment 2, Zellmer Assessment.) The Project could eliminate one of very few rewilding opportunities in the City's urban environment. The DEIR must analyze the Project's inconsistency with the SB 1425 requirements.</p>

C-28-52	<p>As described in Land Use Section 3.11.4 of the Draft EIR, the proposed Project would be subject to various land use plans and policies as well as development standards in the LAMC's Planning and Zoning Code. Proposed Project consistency with the applicable plans, policies, guidance, and regulations discussed in Section 3.11.2 and Table 3.11-1 of the Draft EIR. The proposed Project would be consistent with the adopted land use designation for the site in the Community Plan; the General Plan; and adopted environmental goals or policies contained in other applicable plans.</p>
C-28-53	<p>The comment states that the Draft EIR fails to assess the open space policies. Table 3-11-1 includes an assessment of consistency with open space policies. The Draft EIR concludes with substantial evidence that the proposed project is consistent with applicable land use policies. Furthermore, the comment presents legal issues and/or conclusions that do not pertain to the adequacy of the analysis of the proposed Project under CEQA in this EIR and require no further response.</p>
C-28-54	<p>The comment states that the Draft EIR fails to assess the open space policies. Table 3-11-1 includes an assessment of consistency with open space policies. The Draft EIR concludes with substantial evidence that the proposed project is consistent with applicable land use policies. The proposed project includes the modernization of a recreational facility within a densely populated district of Los Angeles with the express objective of enhancing biological values. The Draft EIR concludes that continuing the use of the site as a recreational facility is an appropriate land use for the site. For a discussion on wildlife corridors, see Master Response – Biological Resources. Furthermore, the comment presents legal issues and/or conclusions that do not pertain to the adequacy of the analysis of the proposed Project under CEQA in this EIR and require no further response; notwithstanding, nothing in SB 1425 (2022) requires specific analysis under CEQA, and the comment does not present any substantial evidence that the Draft EIR's open space analysis is in conflict with any provisions of SB 1425 and/or that any such alleged conflicts would result in significant impacts.</p>

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2. The DEIR Fails to Disclose the Project's Inconsistency with the General Plan Framework Element Open Space and Conservation Goals.

In addition to its failure to analyze the Project's inconsistency with the required open space updates, the DEIR also fails to disclose that the Project is inconsistent with Objective 6.1 of the Framework Element Open Space and Conservation Goals:

Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.

As discussed further by biological expert Dr. Amanda J. Zellmer, the Project is inconsistent with this Objective because multiple aspects of the proposed plan will degrade rather than enhance the natural resources of the City. Expert Zellmer stated:

First, removal of fencing will allow for increased human presence within natural areas such as the Knoll and within the Eucalyptus Grove. Human activity in these areas will reduce the quality of these habitats for use by wildlife (Kowarik 2011). Second, proposed added structures throughout the Silver Lake Reservoir will add to increased encroachment of urban development within existing natural areas. Finally, the creation of a Promenade and walking paths that cross through the Knoll and the Eucalyptus Grove will fragment existing habitat, both physically and because of the increase of human activity along these trails. While walking trails may not be a deterrent to larger-bodied wildlife species, smaller species and ground-dwelling species such as snakes will experience habitat fragmentation as a result of added trails.

(Attachment 2, Zellmer Assessment.)

The DEIR's rationale for consistency, on the other hand, was conclusory and failed to address the Project's impacts on wildlife connectivity, lacking the required substantial evidence to support its claim. (DEIR p. 3.11-12.) Thus, the DEIR failed to analyze and disclose this inconsistency in contravention of CEQA's requirements.

3. The DEIR Fails to Disclose the Project's Inconsistency with All Relevant Community Plan Policies.

The Silver Lake-Echo Park-Elysian Valley Community Plan (Community Plan) applies to the Project site. (See <https://planning.lacity.org/plans-policies/community->

C-28-55 As described in Land Use Section 3.11.5, Table 3.11-1 of the Draft EIR, the proposed Project was analyzed for consistency with Objective 6.1 of the Framework Element Open Space and Conservation Goals. The Draft EIR concluded that the proposed Project would include improvements to habitat within the SLRC. The proposed Project would not convert the existing land use and zoning designation of the site. The Project site would remain open space and would include the addition of new passive and active recreational spaces for use by the public, and enhancement of habitat areas. The proposed Project would not conflict with policies that protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region. Furthermore, the comment does not provide any substantial evidence that any alleged conflict with land use policies would result in a significant impact.

The commenter is also referred to Master Response - Biological Resources regarding the baseline conditions of the Project site and associated impacts to wildlife.

C-28-56 As described in Land Use Section 3.11.4 of the Draft EIR, the proposed Project would be subject to various land use plans and policies as well as development standards in the LAMC's Planning and Zoning Code. Proposed Project consistency with the applicable plans, policies, guidance, and regulations discussed in Section 3.11.2 and Table 3.11-1 of the Draft EIR. The Draft EIR concluded the proposed Project would be consistent with applicable policies identified in the Silver Lake- Elysian Valley Community Plan including Objectives 1-3; 1-5; 4-1; 5-1; 5-2 and the Silver Lake Reservoir Master Plan Design Guidelines.

The comment states the proposed Project is inconsistent with Objective 5-1 of the Silver Lake-Echo Park-Elysian Valley Community Plan. As described in Table 3.11-1 of the Draft EIR, the proposed Project would expand the existing recreation and public park space within the SLRC and would, thus, meet this objective as it not only preserves the existing open space, but expands passive recreational opportunities. The proposed Project objectives aim to conserve, maintain and better utilize existing recreation and park facilities.

Furthermore, the comment does not provide any substantial evidence that any alleged conflict with land use policies would result in a significant impact.

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[plan-area/silver-lake-echo-park-elysian-valley](#), incorporated by reference.) This Community Plan includes a number of policies relating to Open Space and the EIR must evaluate whether there are any inconsistencies with these policies.

The Project site has a land use designation of Open Space under the Community Plan and meets the Community Plan's definition of open space as "land that is essentially free of structures and serves to provide recreational opportunities" (Attachment 6, Community Plan Excerpts, p. 58; <https://planning.lacity.org/odocument/3cea417c-87a0-41af-bcdf-187b9b0bade9/SLKplanmap.pdf>, incorporated by reference.)

Objective 5-1 requires the City to "Preserve *existing* and develop new open space resources." (Attachment 6, Community Plan Excerpts, p. III-39, emphasis added.) Policy 5-1.1 requires the City to "Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan area." (*Ibid.*) The Community Plan relies on the Plan Map to effectuate Objective 5-1 and Policy 5-1.1, implementing the Plan Map to "designate[] areas for open space, thus protecting them from encroachment by more intense uses." (*Ibid.*)

As proposed, the Project would be inconsistent with this policy because it would allow for the encroachment of more intensive use of the Reservoirs and would remove existing open space and wildlife habitat. This inconsistency is made all the more significant by the increasing density of urban development in the Community Plan area. The Project would construct several large buildings on the Project site, as well as install walking paths, eliminating significant amounts of open space. Despite this, the DEIR ignores the Project's encroachment on open space, concludes that the Project is consistent with Objective 5-1, and is silent about Policy 5-1.1. The DEIR must analyze this inconsistency and disclose it as a conflict with the Community Plan.

4. The DEIR Fails to Disclose the Project's Inconsistency with the Los Angeles Zoning Code.

The Project site has a zoning designation of Open Space. Under the Los Angeles Zoning Code, there are limited uses allowed in the Open Space zone and no building or structure is allowed except for the following:

Parks and recreation facilities, including: bicycle trails, equestrian trails, walking trails, nature trails, park land/lawn areas, children's play areas, child care facilities, picnic facilities, and athletic fields (not to exceed 200 seats in park) used for park and recreation purposes.

Natural resource preserves for the managed production of resources, including, but not limited to, forest lands, waterways and watersheds used for commercial fisheries; agricultural lands used for food and plant

C-28-57 The comment states the proposed Project was not analyzed for consistency with the Los Angeles Zoning Code. As described in Land Use Section 3.11.5 of the Draft EIR, the proposed Project would be consistent with applicable provisions of the LAMC – which include Open Space Zoning. The entirety of the proposed Project area is zoned as Open Space (OS), which allows for the following applicable uses of the SLRC; parks and recreation facilities, including: bicycle trails, walking trails, nature trails, park land/lawn areas, children's play areas, child care facilities, picnic facilities, and athletic fields, public water supply reservoirs (uncovered) and accessory uses which are incidental to the operation and continued maintenance of such reservoirs, water conservation and flood plain areas. The proposed Project would redesign existing park facilities. The zoning designation of the entire proposed Project area will not change with proposed Project implementation. The proposed uses would continue to be consistent with existing uses described above, which are permitted under the LAMC. Therefore, the Draft EIR concluded the proposed Project would not result in significant environmental impacts related to inconsistency with the LAMC's land use regulations and impacts with respect to the land use provisions of the LAMC would be less than significant.

Furthermore, the comment does not provide any substantial evidence that any alleged conflict with land use policies would result in a significant impact.

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C-28-57
cont.

production; areas containing major mineral deposits ("G" Surface Mining Districts) and other similar uses.

Marine and ecological preserves, sanctuaries and habitat protection sites.

Sanitary landfill sites which have received certificates of closure in compliance with federal and state regulations.

Public water supply reservoirs (uncovered) and accessory uses which are incidental to the operation and continued maintenance of such reservoirs.

Water conservation areas, including percolation basins and flood plain areas.

(Attachment 7, Los Angeles Municipal Code §12.04.05.)

While some of the Project elements are allowed in the Open Space zone, others do not appear to be. The EIR must evaluate whether all of the buildings and structures proposed as part of the Project comply with the City's zoning regulations. For example, the proposed multi-purpose building and proposed Education Center do not appear to fall within the allowable uses pursuant to Los Angeles Municipal Code §12.04.05. The DEIR relies on a conclusory and unsupported statement that these structures "would continue to be consistent with existing uses." (DEIR, p. 3.11-19.) That fails to address the inconsistency of this development with the zoning regulations for this Open Space site. The EIR must analyze this inconsistency.

C-28-58

Additionally, as discussed above, the Silver Lake Reservoir Complex is a designated Historic Cultural Monument. As such, development on this Open Space requires approval of a conditional use permit. (Los Angeles Municipal Code §12.04.05(B)(1)(b).)

5. The DEIR Fails to Analyze and Disclose the Project's Inconsistency with Wildlife Corridor Protections.

C-28-59

The Project site is designed by the City as a Protection Area for Wildlife (PAW). PAWs are designated "to protect biologically important areas that are crucial for maintaining and preserving the existing level of biological diversity found within the City." (Attachment 8, Excerpts of Protected Areas For Wildlife & Wildlife Movement Pathways Final Report ("PAW Report"), available at https://planning.lacity.org/odocument/13de48cd-2fae-4ce7-ab4b-3ae213020b87/2021-02-26_ESA_PAW-WMP_Final_Report.pdf, p. 6.) PAWs are meant to protect wildlife corridors within the City, and maintain habitat connectivity for species.

C-28-58 The comment asserts that the Project requires approval of a conditional use permit under the Los Angeles Municipal Code. To the extent a conditional use permit is required for implementation of any of the Project elements, this does not pertain to the adequacy of the analysis of the proposed Project under CEQA, and in any event Section 2.8 of the Draft EIR already provides that Planning entitlements, such as a conditional use permit, may be needed for the Project.

C-28-59 The comment asserts that the Draft EIR fails to analyze and disclose the Project's inconsistency with Wildlife Corridors Protections. Please see Master Response – Biological Resources (Wildlife Corridors).

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C-28-60 The Silver Lake Reservoir was designated as a PAW because it is "Habitat that at some point in the life cycle of a species or suite of species serves as concentrated breeding, feeding, resting, or migrating grounds and is limited in availability within Southern California or within the City of Los Angeles. This includes areas that provide for the conservation of relatively undisturbed examples of the original natural biotic communities (i.e., biodiversity) within the City of Los Angeles." (Attachment 8, Excerpts of PAW Report, p. 9.) As the City itself identified, the Reservoir "supports a variety of bird species, and is important for preserving biodiversity." (p. 77.)

C-28-61 The DEIR fails to discuss the importance of the PAWs designation for the Reservoir, or the Project's potential to conflict with objectives of this designation. As discussed further in the expert report from Dr. Amanda J. Zellmer, the Project clearly conflicts with the goal of the PAWs designation to maintain and preserve biological diversity and wildlife connectivity in the City. (Attachment 2, Zellmer Assessment.)

C-28-62 Additionally, a new Wildlife District Ordinance, based upon the PAW Report, is currently pending before the City. (https://planning.lacity.org/plndoc/Staff_Reports/2022/12-08-2022/CPC_2022_3413_and_CPC_2022_3712_2_.pdf, incorporated by reference.) This Ordinance would set development limits for the newly created Wildlife District, which includes the Reservoir. Sites such as this are key to creating the wildlife connectivity the Wildlife District Ordinance is intended to create. As discussed in Section III.A.5 and the comments from Expert Zellmer, the DEIR fails to provide adequate analysis of the existing wildlife connectivity provided by the Project site or the impacts the Project may have on wildlife corridors. The DEIR should further analyze whether the development proposed as part of the Project would be consistent with the development regulations in the draft Wildlife District Ordinance.

D. The DEIR Fails to Disclose, Analyze and Mitigate Significant Impacts Relating to Noise and Vibration.

1. Effects of Noise Pollution on Health Are Extensive.

C-28-63 "[T]hrough CEQA, the public has a statutorily protected interest in quieter noise environments." (*Berkeley Keep Jets Over the Bay Committee v. Board of Port Com'rs* (2001) 91 Cal.App.4th 1344, 1380.) Despite this clear mandate to analyze noise impacts, the DEIR omits a discussion of the extensive health impacts of noise exposure, as required by CEQA (Cf. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 521).

Excess noise pollution can cause hearing damage and loss. Loud noise, either experienced as a single event or continuously over time, can damage cells in the inner ear that detect sound and help transmit information on sound to the brain. (https://www.ecde.gov/nceh/hearing_loss/how_does_loud_noise_cause_hearing_loss.html,

C-28-60 Please see Master Response – Biological Resources (Wildlife Corridors). The comment does not specifically address the Draft EIR and therefore no further response is required.

C-28-61 Please see Master Response – Biological Resources (Wildlife Corridors).

C-28-62 This comment refers to the pending and yet to be adopted Wildlife District Ordinance and asserts that SLRC is contained within the proposed Wildlife District. Additionally, the comment claims that the Draft EIR analysis of impacts to wildlife connectivity is inadequate.

The proposed Wildlife District applies to Santa Monica Mountains between the Interstate 405 freeway and State Route 101. The SLRC is not located within this geographical area and provisions of the pending Wildlife District Ordinance would not be applicable. Consistent with the PAWS Report for the SLRC, the SLRC PAW is isolated and surrounded by development, such that movement of wildlife species is limited to within the PAW, except for insect and avian species that can fly in and urban-adapted terrestrial species that may be in the area. This agrees with the Draft EIR discussion concerning wildlife movement, in which Section 3.4.5 Biological Resources states "The proposed Project site is not a designated wildlife movement corridor, would be isolated within a residential neighborhood, and would not function as a wildlife movement corridor within the region." Please see Master Response – Biological Resources (Wildlife Corridors).

Notwithstanding, the proposed Project is consistent with development standards of the pending Wildlife District Ordinance in which the use of native plant species are prominently emphasized in the SLRC Master Plan, non-security fencing will be designed to preserve access to habitat and to facilitate wildlife movement, lighting will be minimized, shielded and of low intensity, and building materials would emphasize non-reflective surfaces, including windows.

C-28-63 As discussed in Section 3.12.5 and included in Table 3.12-11, Table 3.12-12, Table 3.12-14, and Table 3.12-15 of the Draft EIR, daytime construction noise levels from simultaneous operation of multiple pieces of equipment could result in occasional unmitigated noise levels of up to 89 dBA and mitigated noise levels of up to 79 dBA, *Leq* at the nearby receptors over several months of activity. However, construction would be restricted to only occur during daytime hours per Los Angeles Municipal Code (LAMC) Section 41.40 and health effects associated with the potential for nighttime awakenings would be avoided.

Short-term noise levels constituting the thresholds of pain and hearing damage are 120 dB and 140 dB, respectively (Kinsler, 1982). Table 3.12-14 and Table 3.12-15 shows average daytime mitigated construction noise levels at each of the studied receptors; the predicted levels are substantially below the thresholds of pain and hearing damage. The Occupational

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Safety and Health Administration require hearing conservation plans when noise levels continuously exceed 85 dBA over an 8-hour period; The predicted noise levels at the nearest receptors would not exceed 85 dBA with the exception of occasional use of concrete saws, operation of individual pieces of construction equipment. Consequently, the significant and unavoidable noise impact is not generated by virtue of noise levels that would be considered harmful but, rather, as a result of the magnitude of the increase over existing ambient noise levels without construction at certain receptor locations. Therefore, Project construction noise would not result in adverse health effects related to pain, the onset of hearing loss or other significant health effects.

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incorporated by reference.) Damage to these receptor cells is permanent and cannot be repaired. (*Ibid*) Such damage can make it difficult to hear, including causing difficulties in understanding speech. (*Ibid*)

Sound level is measured in dBA.

(<https://www.noise.org/library/suter/suter.htm#physical>, incorporated by reference.) In 1974 the EPA recommended that the equivalent A-weighted sound level over 24 hours (Leq(24)) be no greater than 70 dBA to ensure an adequate margin of safety to prevent hearing loss and damage. (<https://noise.org/library/levels74/levels74.htm>, incorporated by reference.) To prevent interference with activities and annoyance, the EPA recommended a day-night average sound level no greater than 45 dBA for indoors and 55 dBA for outdoors.

The Project would result in significant and unavoidable construction and operational noise impacts. The DEIR must relate these health impacts of excessive noise exposure to the Project's significant noise impacts.

2. The DEIR Fails to Adequately Disclose Construction Noise Impacts

In describing the receptors that would be impacted by the Project, the DEIR divides the hundreds of households surrounding the Silver Lake Reservoir Complex into eight receptor areas. (DEIR p. 3.12-8, Fig. 3.12-2.) The DEIR must clearly disclose that there are numerous sensitive receptors within each of the receptor areas. The DEIR acknowledges that construction noise levels in all 8 receptor areas would exceed thresholds of significance, but fails to disclose the number of households this would impact. By failing to do so, the DEIR fails to disclose the full magnitude of the Project's significant construction impacts on sensitive receptors.

Additionally, while the DEIR claims a Project construction timeline of less than 5 years, construction is fully dependent on funding availability. (DEIR 2-41.) The DEIR fails to disclose the estimated cost for this Project is **\$286 million** and there is currently no funding allocated for the Project. There is also no disclosure of where this funding would come from, when it might be available and how much would be available at a time. All of these factors impact the length of the highly impactful construction period, likely making it much longer than disclosed in the DEIR.

3. The DEIR Fails to Adequately Mitigate Construction Noise Impacts.

The DEIR relies on several PDFs to partially mitigate construction noise impacts. As discussed in Section II above, this violates the requirements and purpose of CEQA because it fails to fully disclose impacts and then assess the efficacy of the mitigating PDFs.

C-28-64 Comments were raised on the Draft EIR questioning the adequacy of the ambient noise level measurements, whether they represent the ambient noise level for the area, and the dates and duration of the measurements. The predominant existing noise source surrounding the Project Site is traffic noise from major roadways, such as Silver Lake Boulevard to the east and West Silver Lake Drive to the west. Secondary noise sources include local roadway traffic, landscaping equipment, and other typical urban noise from residences. Other noise sources include general residential and commercial-related activities associated with trash collection activities, loading and unloading activities, and surface parking lots.

As discussed above, eight off-site noise-sensitive receptor locations were identified to represent noise-sensitive uses within the Project area. The locations of the noise-sensitive receptors are listed in Table 1, Summary of Ambient Noise Measurements at Noise Sensitive Receptors, as Receptor Locations 1 through 8 with the approximate distances to the Project Site. Ambient noise levels were measured at all eight locations (R1 through R8). The measured environmental noise levels at R1 through R8 represent the current ambient noise levels in the vicinity of the Project Site and are used to establish the existing ambient noise level at the noise-sensitive receptors within the Project area.

As indicated in Table 3.12-2 of the Draft EIR, the existing ambient noise levels at the receptor locations ranged from 50.6 dBA Leq (at measurement location M5) to 65.6 dBA Leq (at measurement location M4) during daytime hours and ranged from 49.4 dBA Leq (at measurement location M7) to 60.7 dBA Leq (at measurement location M4) during nighttime hours. Based on field observation and measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on local roadways, commercial uses, and other typical urban noise. The existing ambient noise environment at all measurement locations currently exceed the City's presumed daytime ambient noise standard of 50 dBA (Leq) for residential use and the nighttime standard of 45 dBA (Leq) for residential use as established in the Los Angeles Municipal Code (LAMC) Section 111.01(a) and 111.03 and other conditions in Section 111.02.

- LAMC Sections 111.01(a) and 111.03 define the ambient noise as the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. The actual ambient noise level is the measured noise level averaged over a period of at least 15 minutes L eq at a location and time of day comparable to that during which the measurement is taken of the particular noise source being measured.
- LAMC Section 111.02 provides procedures and criteria for the measurement of the sound level of "offending" noise sources. In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-

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duration noise events, the Noise Regulation provides a 5-dBA allowance for noise occurring more than five but less than fifteen minutes in any 1-hour period and an additional 5-dBA allowance (total of 10 dBA) for noise occurring five minutes or less in any 1-hour period.

Therefore, consistent with LAMC procedures, the measured existing ambient noise levels were used in the Draft EIR as the baseline conditions for the purposes of determining Project impacts.

The ambient noise measurement locations were selected because they are representative of the noise environment of the existing off-site noise-sensitive receptors. As previously mentioned, the predominant existing noise source surrounding the Project Site is traffic noise. All ambient noise measurement locations near the Project Site were placed along the nearby streets and the nearby noise-sensitive receptors; therefore, these locations were representative of the ambient noise levels surrounding the Project Site. Thus, the locations and time period for the ambient noise level measurements comply with the LAMC specifications and provide adequate and representative ambient noise data measured in the Project area.

C-28-65 Some land uses are considered more sensitive to noise than others due to the types of activities typically involved at the receptor location and the effect that noise can have on those activities and the persons engaged in them. The 2006 L.A. CEQA Thresholds Guide states that residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks are generally more sensitive to noise than commercial and industrial land uses. Only pre-school, elementary, middle, and high schools are considered to be noise-sensitive receptors. Eight off-site locations were selected as representative noise-sensitive receptors for the purpose of evaluating Project impacts:

- Measurement Location M1: Represents the noise environment at single-family residential uses to the north, west, and northwest of the Project site near the corner of West Silver Lake Drive and Tesla Avenue (Receptor Location R1).
- Measurement Location M2: Represents the noise environment at single-family residential uses to the north, east, and northeast of the Project site and Neighborhood Nursery School at the corner of Armstrong Avenue and Tesla Avenue (Receptor Location R2).
- Measurement Location M3: Represents the noise environment at single-family residential uses to the east of the Project site along Silver Lake Boulevard (Receptor Location R3).
- Measurement Location M4: Represents the noise environment at single-family residential uses to the southeast of the Project site along Silver Lake Boulevard (Receptor Location R4).

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- Measurement Location M5: Represents the noise environment at single- and multi-family residential uses to the southeast of the Project site along Duane Street (Receptor Location R5). M5 captures noise at residences that are further from the Project but at a higher elevation and have a direct line of sight to the Project site.
- Measurement Location M6: Represents the noise environment at single-family residential uses to the south of the Project site along Silver Lake Boulevard (Receptor Location R6).
- Measurement Location M7: Represents the noise environment at single-family residential uses to the west of the Project site along Kenilworth Avenue (Receptor Location R7). M7 captures noise at residences that are further from the Project but at a higher elevation and have a direct line of sight to the Project site.
- Measurement Location M8: Represents the noise environment at single-family residential uses to the west of the Project site along West Silver Lake Drive (Receptor Location R8).

These measurement locations are meant to be representative of the noise environment of the area, including the residential uses surrounding the Project Site. Figure 3.12-2 of the Draft EIR clearly discloses all of the noise sensitive receptors and receptor areas considered for the Project. Additionally, under the 2006 L.A. CEQA Thresholds Guide screening criteria require a project to consider noise sensitive receptors within 500 feet. The Project considers receptors at even further distances than recommended by the 2006 L.A. CEQA Thresholds Guide in an effort to provide a conservative assessment of potential noise impacts to sensitive receptors in the Project area.

C-28-66 The Project is not required to disclose funding sources under CEQA nor is the Project required to consider funding sources when developing the estimated Project length and construction schedule. See Master Response – Funding and Operations. The Project construction schedule is based on estimates provided by the Bureau of Engineering. Under CEQA, the Project is assumed to be implemented as proposed (see, e.g., *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1119–1120).

C-28-67 The comment states that the PDFs do not mitigate construction noise impacts. Project Design Features (PDFs) are actions associated with existing regulations and land use plans that are incorporated into the project description. PDF NOI-1 establishes a pre-approved haul route so as to avoid or minimize unnecessary truck travel on local roadways through residential neighborhoods or adjacent to schools, and prioritize travel on collector and arterial streets, as typically required as standard conditions by the City in its review of haul routes. PDF NOI-2 establishes a noticing program and community liaison in order to notify in writing adjacent residents and businesses along the Project route or worksite of proposed construction activities and the tentative schedule. The City shall require the construction contractor to designate a community liaison to respond to any issues and/or concerns related to

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construction activities, including any noise or vibration complaints. The community liaison shall maintain a log of communications and resolutions of issues or concerns and share the log with the City. Notices and construction signs will include a hotline and website address which will be updated quarterly and will include Project-related information.

These PDFs do not interfere with mitigation measures, nor do they affect the outcome of the construction noise analysis. Established haul routes (PDF NOI-1) are required by the city prior to commencement of construction and designating a noticing program and community liaison (PDF NOI-2) is included so affected residents are aware of construction activity taking place and can express any concerns or complaints they may have. Neither result in a quantifiable change in construction impacts disclosed within the EIR.

Construction impacts are discussed in Section 3.12.5 of the Draft EIR and mitigation measures NOISE-1 through NOISE-3 are prescribed and their effectiveness and efficacy are discussed on pages 3.12-36 through 3.12-39 of the Draft EIR.

See Response to Comment C-28-25.

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C-28-68 Mitigation measures Noise-1 and Noise-2 are also volitive of CEQA due to a lack of full enforceability. These measures, Noise-1 requiring noise enclosures for equipment and Noise-2 requiring temporary noise barriers, both include caveats that eliminate their full enforceability. They are not required if the enclosure or barrier would “pose a safety risk or unreasonably prevent access to the construction equipment [or area] as deemed by the on-site construction manager.” (DEIR 3.12-36.) “Safety risk” and “unreasonably prevent” are not defined by the DEIR. Instead, a determination regarding whether these conditions exist is left to a later conclusion by the construction manager for the project proponent. CEQA does not allow this deferred determination, particularly by an individual with a clear bias towards continuing the construction. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 794.)

C-28-69 Mitigation Measure Noise-5 is also inadequate because it fails to include performance standards. This measure requires specified setbacks for “[t]he operation of construction equipment that generates high levels of vibration,” but fails to define what would be considered high levels of vibrations. The lack of certainty for the measure makes it inadequate under CEQA. (CEQA Guidelines § 15126.4.)

4. Operational Noise Impacts May Be More Significant Than Disclosed

C-28-70 The DEIR claims the increase in daily visitors to the significantly expanded public spaces for all park uses at the Silver Lake Reservoir Complex would only be 383 people. This estimate seems exceedingly low, given the significant expansion of uses and public spaces, as well as the large population of the City. The DEIR fails to provide adequate evidence to support this visitor increase number. This may result in the DEIR underestimating the impacts associated with Project operations, including but not limited to noise and traffic impacts. Without further information, the DEIR’s analysis of operational noise impacts is inadequate.

C-28-71 Additionally, in analyzing operational noise impacts the DEIR claims “is not anticipated” that there would be any nighttime use of the Project site by people. (DEIR pp. 3.12-43, 45.) However, there are no physical measures included in the Project to prevent nighttime access to and use of the site. Thus, the DEIR’s assumption lacks evidentiary support. Noise generated by nighttime use would likely result in significant adverse impacts to the surrounding quiet residential community.

5. Amplified Sound Must Be Prohibited to Mitigate Significant Noise Impacts.

C-28-72 The Project proposes to allow an unlimited number of large special events to occur in The Meadow area of the site, with events every weekend in the summer months. (DEIR p. 2-54.) These events would take place from noon to 10 p.m. and include

C-28-68 Mitigation Measures NOISE-1 and NOISE-2 are available on page 3.12-36 of the Draft EIR and provide enforceable provisions for limiting construction noise as a result of the Project. NOISE-1 requires equipment whose location is flexible (e.g., compressors and generators) to be located at least 100 feet from noise-sensitive land uses. If 100 feet is not feasible, due to site space constraints, a noise enclosure must be installed around the piece of equipment to screen noise propagating towards sensitive receptors. Similarly, NOISE-2 requires noise barriers capable of achieving a 10 dBA reduction at off-site sensitive receptors and should allow for repositioning in order to block noise as the construction moves along the Project site boundary. The Draft EIR thus adequately provides enforceable mitigation measures with defined performance standards. There was no improper deferral of mitigation as there are adequate provisions to ensure construction is carried out in a manner that would reduce potential impacts due to noise. The procedures and requirements in Mitigation Measures NOISE-1 and NOISE-2 are not uncommon for development in dense urban areas of the City, and represent feasible engineering practices, and it is not feasible prior to Project approval and approval of final plans to complete the various complex investigations needed to establish every threshold or standard needed to carry out the clear intent of the measure. This includes any issues related to both worker and off-site receptor safety concerns. Nevertheless, the City has committed to mitigating these significant impacts through the measures discussed above.

C-28-69 Mitigation Measure NOISE-5 includes provisions for minimum setback distances for specific pieces of equipment with the intent to mitigate vibration levels to less than significant levels. The minimum setback distances were chosen with specific performance standards in mind and result in less than significant impacts once the setbacks are implemented. Section 3.12-3 of the Draft EIR clearly defines the significance thresholds for groundborne vibration which are based on FTA’s *Transit Noise and Vibration Impact Assessment Manual*. The threshold used for vibration receptor V8 is 0.12 inches per second (in/sec) as stated on page 3.12-52 of the Draft EIR. The setback distances in Mitigation Measure NOISE-5 assumes that the Project must meet these performance standards to be less than significant and implements a setback of 21 feet for large bulldozers, 19 feet for loaded trucks, 12 feet for jackhammers, and 3 feet for small bulldozers based on a performance standard/significance threshold of 0.12 in/sec. As stated on page 3.12-55 of the Draft EIR, these setbacks would result in a less than significant impact and the mitigation measure takes into account the performance standard set forth in the Draft EIR analysis.

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C-28-70 The increase in park attendance estimates is taken from the Project's transportation impact assessment (TIA) prepared by Jano Baghdanian & Associates. The park attendance increases are based on a detailed methodology that estimates park attendance based on the number of daily trips to the Project site and the number of passengers per vehicle. Table 19 of the TIA breaks down the increase in park attendance by park zone. The noise analysis uses the same set of assumptions as the TIA to model the increase in park noise levels by park zone and, thus is consistent with the TIA, traffic analysis, air quality analysis, and greenhouse gas analysis. A table detailing the park attendance by park zone is included in the noise section as Table 3.12-9, in Tables 2-7 through 2-9 of the Project Description, and the TIA is included as Appendix K of the Draft EIR.

The Draft EIR analyzes the noise levels from peak park attendance which, according to the TIA, is 7:00 p.m. on weekdays and 12:00 p.m. on weekends. LAMC Section 111.03 defines nighttime hours as 10:00 p.m. to 7:00 a.m., thus the peak hour for park attendance would fall within daytime hours and is analyzed as such. Noise levels from increased park attendance would be less than those during the daytime given lower park attendance during nighttime hours and the already less than significant impacts shown in Table 3.12-19 of the Draft EIR would be lower than disclosed.

C-28-71 The Draft EIR analyzes the noise levels from peak park attendance which, according to the TIA, is 7:00 p.m. on weekdays and 12:00 p.m. on weekends. LAMC Section 111.03 defines nighttime hours as 10:00 p.m. to 7:00 a.m., thus the peak hour for park attendance would fall within daytime hours and is analyzed as such. Noise levels from increased park attendance would be less than those during the daytime given lower park attendance during nighttime hours and the already less than significant impacts shown in Table 3.12-19 of the Draft EIR would be lower than disclosed.

C-28-72 The comment requests that amplified noise be eliminated as a means of avoiding significant impacts. Please see Master Response – Noise.

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C-28-72 cont. activities such as outdoor concerts, movies and luncheons. (*Ibid.*) The DEIR claims these events would have up to 600 daily attendees, although as discussed above, the DEIR's estimate of visitors is unsupported and likely too low.

C-28-73 Many of the events would include amplified sounds, which would be allowed until 10 p.m. The DEIR acknowledges that the amplified sound would have significant adverse impacts on the surrounding residents (and the wildlife in the Reservoir), but fails to include any restrictions for amplified sound that would reduce it below a level of significance, merely claiming it is an unavoidable impact. (DEIR p. 3.12-51.) Even with the requirement that sound amplification speakers be located in certain locations "if feasible," the DEIR acknowledges impacts would remain significant.

C-28-74 Projects with significant environmental impacts *may not* be approved "if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects . . ." (Pub. Resources Code § 21002.) Here, a mitigation measure prohibiting the use of sound amplification equipment at the Silver Lake Reservoir Complex would substantially lessen the significant adverse operational noise impacts associated with special events. The DEIR provides no reasoning why such a mitigating condition would be infeasible. Thus, the Project cannot be approved without such provision.

E. The EIR Fails to Adequately Analyze and Disclose the Project's Hydrological and Water Quality Impacts.

C-28-75 The DEIR fails to disclose all the Project's hydrological and water quality impacts, specifically with regards to groundwater recharge. Threshold 3.10-2 states: "Would the proposed Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?" (DEIR p. 3.10-28.) The EIR concludes that there will be no such impacts, despite the fact that, by the DEIR's own admission, the Project would require "approximately 11.5 acres of asphalt paving that would *impact* the site's capacity for groundwater recharge." (DEIR p. 3.10-28.) The DEIR also states that "The addition of the paving would reduce recharge within the footprint of the new pavement." (*Ibid.*)

C-28-76 Despite the conversion of 11.5 acres from pervious to impervious surface, the DEIR concludes that the Project "would implement a decentralized drainage strategy to redirect that stormwater into the reservoirs." (DEIR, p. 3.10-28.) The DEIR does not explain or present any plans for such a strategy; instead, it states, in a separate section of the DEIR, an extremely vague Project Design Feature purporting to implement such a strategy:

C-28-73 Please see Master Response – Noise.

C-28-74 Please see Master Response – Noise.

C-28-75 The comment states that the Draft EIR fails to disclose impacts to groundwater recharge. The Draft EIR evaluates impacts to groundwater recharge on page 3.10-28. The Draft EIR acknowledges that the Project would increase impervious surfaces by up to 11.5 acres but concludes that compliance with the MS4 stormwater retention requirements would ensure that the initial 3/4 inches of a storm event would be retained on site (see Draft EIR page 3.10-15). The area currently does not contribute substantially to groundwater recharge since the reservoir is lined and surrounded by city streets that are drained by the storm drain system. The Draft EIR concludes that reduction in groundwater recharge would be negligible if any.

C-28-76 The comment suggests that the planned stormwater diversion into the reservoir is vague. The Draft EIR includes PDF-UTIL-3 requiring a stormwater drainage system that would capture and treat stormwater runoff prior to it entering the reservoir. The precise designs of this infrastructure improvement are not completed but would primarily consist of decentralized filtration systems designed to collect trash and reduce sediment and pathogen contamination into the reservoirs.

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PDF-UTIL-3: Decentralized Drainage Strategy. To prevent untreated surface runoff from entering the reservoir waters, proposed Project will implement decentralized drainage facilities to capture and filter or infiltrate stormwater runoff from the developed portions of the Project site.

(DEIR, p. 3.18-19 [Utilities and Service Systems].)

C-28-77

PDF-UTIL-3 functions as a mitigation measure, because it is implemented to mitigate the impact of the Project's increase in impervious surface. As discussed in Section II, Project Design Features such as PDF-UTIL-3, which are applied to reduce or avoid Project impacts, are improper under CEQA because they compress the analysis of mitigation and impacts into a single issue. (*Lotus, supra*, 223 Cal.App.4th 645, 656.) Thus, the DEIR cannot conclude the Project will have no significant impacts on groundwater recharge under Threshold 3.10-2 when it relies on the implementation of PDF-UTIL-3 to make that determination.

C-28-78

Further, PDF-UTIL-3 is impermissibly deferred mitigation. Deferred mitigation violates CEQA. (*Endangered Habitats League v County of Orange* (2005) 131 Cal. App. 4th 777, 793-94; CEQA Guidelines § 15126.4(a)(1)(B).) Deferral is permitted when a mitigation measure commits to specific performance standards, but no such standards are included here. Instead, the DEIR states simply that the Project "will implement decentralized drainage facilities," but provides no details regarding such facilities, nor any performance criteria for such facilities. (DEIR p. 3.18-19.)

C-28-79

The DEIR relies on this completely unformed "decentralized drainage strategy" to make an unsupported conclusion that the Project would redirect stormwater runoff arising from the increase in impervious surfaces to the Reservoir. Moreover, the DEIR offers no explanation or support for the conclusion that redirecting runoff to the Reservoir for groundwater recharge and infiltration is analytically similar enough to the recharge and infiltration that would have occurred over 11.5 acres of impervious surface without the Project, such that there would be no impact. Because an EIR cannot rely on unsupported conclusions, the hydrology analysis is deficient.

C-28-80

Even if the DEIR's reliance on an undefined decentralized drainage strategy were valid, which it is not, the DEIR does not demonstrate that the Reservoir could handle such redirected stormwater without overflowing. The DEIR, in analyzing Impact 3.10-3,¹ found no significant impact. But the DEIR provides no calculations or quantitative

¹ Impact 3.10-3 asks, "Would the proposed Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which

C-28-77 The comment states that PDFs are mitigation measures. On the contrary, the Draft EIR provides a list of Project design features that are proposed as part of the project description that will be implemented as part of the Project. With these features implemented, the Draft EIR concludes that significant impacts would not occur as a result of Project implementation.

See Response to Comment C-28-25.

C-28-78 The comments states that PDFs are deferred mitigation. The Draft EIR provides a list of Project design features that are proposed as part of the project description that will be implemented as part of the Project. With these features implemented, the Draft EIR concludes that significant impacts would not occur as a result of Project implementation.

See Response to Comment C-28-25.

C-28-79 The comment states that the Draft EIR offers no explanation about how a decentralized drainage system would divert water to the reservoir or increase groundwater recharge. The Draft EIR analyzes impacts to groundwater recharge on page 3.10-28 and concludes that the increased impervious surfaces would not substantially reduce recharge or impact groundwater levels. PDF UTIL-3 would not affect groundwater recharge or infiltration volumes. Rather, PDF UTIL-3 provides for water quality protection in the reservoirs by implementing a method to protect water quality since the sanitary wall would be removed in places. As part of the Project design, stormwater runoff would receive treatment to remove trash, reduce turbidity, and minimize pathogens into the reservoirs.

C-28-80 The comment states that the Draft EIR does not assess whether the reservoir can handle redirected stormwater. As noted in the comment, the Draft EIR assesses drainage impacts on page 3.10-30. The Draft EIR concludes that LADWP would operate the reservoir levels to avoid overtopping as is currently the case. If greater inflows from stormwater would occur, LADWP would increase outflows commensurately.

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C-28-81

analysis to support its assertions. Instead, the DEIR states that “in the unlikely event of discharge due to increases in water levels, the spillway has capacity to convey 74 cubic feet per second.” (DEIR, p. 3.10-31.) Merely stating the rate of conveyance from the spillway does not provide the public or decisionmakers with the necessary information to understand whether the Reservoir could withstand increased capacity. Thus, the DEIR’s analysis is deficient and its conclusions are not supported by the required substantial evidence.

C-28-82

Finally, the DEIR relies on compliance with MS4, NPDES, and LADPW regulations, including the City’s LID regulations. (DEIR, p. 3.18-18.) Yet the DEIR lacks any LID Plan. At a minimum, the DEIR must include the Infiltration Feasibility Screening to determine what sort of infiltration is available for the Project. (See LID Manual, available at https://www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/-edisp/cnt017152.pdf, pp. 22-23.)

C-28-83

F. The EIR Fails to Adequately Analyze and Disclose the Project’s Public Services and Public Safety Impacts.

The Los Angeles Fire Department (LAFD) utilizes water from the Silver Lake Reservoir Complex for firefighting operations. (DEIR p. 3.14-3.) However, the Project proposes recreational uses of the Reservoir Complex as well, such as guided kayak tours, which are not adequately defined in the DEIR. (DEIR, p. 2-29; see Section I.) The DEIR does not in any way analyze whether such activities would impact performance objectives for firefighting activities that rely on the Reservoir Complex. The DEIR must analyze these impacts.

C-28-84

Additionally, while swimming will be prohibited in the Reservoir Complex, such recreational activities and the removal of fencing around the Reservoir may precipitate increases in the need for rescue efforts by the LAFD or other emergency services. This is especially important given the DEIR’s inadequate description of reservoir edge enhancements (see Section I), that lack a clear description of emergency egress from the reservoirs. That this may happen is not speculative; even with the fencing in place, there were at least twice in 2019 that people required rescue out of the Reservoir after climbing the fence. (See the following articles regarding the rescues, incorporated by reference https://www.theeastsiderla.com/archives/woman-rescued-from-silver-lake-reservoir/article_5f5f025a-07ea-5f84-8f01-dae2c29ea3d7.html#comment-6239668; https://www.theeastsiderla.com/neighborhoods/silver_lake/man-suffers-hypothermia-after-swimming-in-the-silver-lake-reservoir/article_ad974356-871d-11e9-8dda-633855a5dffa.html; <https://www.lamag.com/citythinkblog/swimming-in-silver-lake>

would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?”

C-28-81

The comment states that the Draft EIR fails to analyze impacts of increased runoff into the reservoir. The reservoir capacity would not change as a result of the proposed Project. The Draft EIR assesses drainage impacts on page 3.10-30. The Draft EIR concludes that LADWP would operate the reservoir levels to avoid overtopping as is currently the case. With greater inflows from stormwater, LADWP would increase outflows commensurately.

C-28-82

The comment states that the Draft EIR must include an Infiltration Feasibility Screening to conform with the LID manual. The Draft EIR accommodates PDF-UTIL-3 similar to MS4 requirements that provide for stormwater retention to protect water quality. Best management practices associated with achieving the water quality objectives are subject to post construction monitoring to ensure their effectiveness. The proposed decentralized filtration systems would be installed at key drainage points to collect trash and reduce pollution. Final designs of these systems have not been finalized, but are assumed to be minimally intrusive, low-profile infrastructure components integrated into the trails and landscape areas.

C-28-83

The comment states that the Draft EIR fails to adequately analyze public safety impacts. As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.

Please see Section 3.14.5, pp. 3.14-11 to 3.14-12, of the Draft EIR for the analysis of the proposed Project’s fire protection impacts, including from operations such as recreational activities, which concluded that impacts would be less than significant because the proposed Project would not result in adverse physical impacts in new or altered government fire facilities. Comments regarding illegal trespass activity and legal liability do not present a CEQA issue that requires a response. See *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1451; *Eureka Citizens for Responsible Gov’t v. City of Eureka* (2007) 147 Cal.App.4th 357, 371.

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C-28-84 The comment states that the Project presents public safety hazards. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.

With respect to open water hazards and public access, no swimming would be allowed, and the slope of the reservoir edges allows for egress from the water. Visitors would be responsible for complying with posted signage prohibiting water contact. As described in Chapter 2, Project Description, an Operations and Maintenance Plan, including a Security Plan, would be prepared prior to Project construction and implemented during operation of the Project for public protection. The Operations and Maintenance Plan will include park security personnel that would engage emergency services as needed comparable to other parks with water features in the City.

See Master Response - Public Safety.

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hypothermia.) By removing a barrier to the Reservoirs, the City is making these purposefully occurrences, as well as accidental entry to the water by visiting public, including children, significantly more likely and increasing the City's legal liabilities.

The DEIR must analyze these impacts on public safety and on public services that may be required for rescues.

G. The DEIR Fails to Support Assumptions Relied Upon for Traffic Assessment.

C-28-85

The DEIR concludes the Project would not have significant traffic impacts, but as set forth in Section II, this conclusion improperly relies upon PDFs as mitigation. This provides inadequate disclosure of impacts and lack of enforceability of the mitigation. (DEIR p. 3.16-11.)

C-28-86

The DEIR's traffic analysis also relies on several unsupported assumptions. As discussed in Sections III.D.4 and 5, the DEIR lacks adequate evidentiary support for its claims regarding the number of new visitors to the Project site. This assumption regarding the number of visitors serves as the basis for the increase in traffic resulting from the Project, meaning that determination also lacks adequate support. Additionally, in assessing traffic increases, the DEIR assumes 70 percent of site visitors would walk, bike or take public transit to the site, significantly reducing the assumed number of new vehicle trips to the site. The DEIR lacks support for the assumption regarding how attendees would access the site as well.

C-28-87

The DEIR also fails to provide an adequate analysis of the proposed changes to Silver Lake Boulevard, which includes narrowing vehicle lanes and converting to diagonal parking to provide 135 new parking spaces. The DEIR does not assess the traffic congestion that would result for vehicles entering or exiting these spaces on a narrowed roadway. This is particularly concerning for its impacts to emergency vehicles accessing the Project site and the surrounding community.

H. The DEIR Fails to Analyze Impacts to Scenic Quality of the Site.

C-28-88

As a matter of law, the EIR must comprehensively address the significant aesthetic effect of the Project. (*See Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597.) Here, the Project site has little human interference or development, providing views that focus on nature, not the built environment. The Project proposes to wedge as much development as possible onto this site, completely converting the scenic quality of the site. Instead of acknowledging this impact, the DEIR improperly assumes that the construction and site changes will have beneficial visual impacts. This is contrary to the values for the site that the surrounding community has identified as most important: serenity, peace and tranquility. Drastically changing the

C-28-85

The comment states that the inclusion of PDFs provides inadequate disclosure of impacts. The Draft EIR provides an extensive assessment of impacts to traffic and transportation, supported by the Transportation Impact Assessment included as Appendix K.

Furthermore, the PDFs related to transportation are standard conditions typically included in projects such as the proposed Project. See Response to Comment C-28-25.

C-28-86

The comment states that the traffic analysis relies on unsupported assumptions. The Draft EIR assesses impacts to traffic in Section 3.16 Transportation consistent with the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG). The analysis in the Draft EIR is supported by a Transportation Impact Assessment (TIA) included as Appendix K. As noted on page 33 of the TIA, the TAG does not include parks as a land use category for traffic generation calculation. As a result, the TIA calculated Project-related trip generation based on Institute of Transportation Engineers (ITE) Trip Generation Manual ranges for park land uses. The trip generation methodology included in Attachment 2 of the TIA uses the highest values of the ITE trip generation range recommendations for parks. In addition, the TIA includes a second methodology for trip generation based on current park attendance. The results of this methodology summarized on page 92 of the TIA provide a more conservative assessment of potential trips generated by the proposed Project. This second method of calculating trips generated by the Project results in the assumption of more trips than if the ITE method is used. The TIA notes on page 92, "The estimated weekday daily trips using methodology based on current park attendance are more than double the trips using ITE trip generation rates (722 trips vs 340 trips), while the estimated weekend daily trips are more than quadruple the trips using ITE trip generation rates (972 trips vs 228 trips)." Therefore, the Draft EIR analysis of impacts from trip generation utilizes a well-substantiated, conservative approach.

C-28-87

The comment states that the Draft EIR fails to provide adequate analysis of the proposed changes to Silver Lake Boulevard. The Draft EIR describes two options for off-site modifications to Silver Lake Boulevard on page 2-25. Detailed schematics are provided to show the bike lane improvement options. The traffic impact analysis complies with CEQA requirements for analyzing vehicle miles traveled and increased hazards for both in-street traffic and emergency access route impact. The Draft EIR concludes on page 3.16-17 that the new parking on Silver Lake Boulevard as proposed and with the incorporation of PDF-TRA- 5 would not result in significant traffic hazards since the lane configurations would comply with LADOT requirements. Similarly, the Draft EIR concludes on page 3.16-18 that impacts to emergency vehicle access would be less than significant.

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C-28-88 The comment states that the Draft EIR fails to analyze impacts to scenic quality. The Draft EIR in Section 3.1, Impact 3.1-3, consistent with the State's updates in 2018 to Appendix G, extensively analyzes the proposed Projects' consistency with regulations governing scenic quality and visual character/quality and concluded impacts would be less than significant.

Furthermore, the Draft EIR provides a detailed analysis of impacts to scenic vistas in Section 3.1, Impact 3.1-1, including several visual simulations (Figures 3.1-3 through 3.1-9). The Draft EIR acknowledges on page 3.1-19 the importance of the SLRC scenic values: "the objective of the Project would be to enhance views with nature-based themes and design." The Draft EIR notes that "the Project would modify the existing views by creating more park space and natural vegetation as well as provide for greater public access to the reservoir shorelines." The views of the open water from the neighboring streets and walkways establish the distinctive character of the SLRC and this principal element would remain following the Project implementation.

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C-28-89 Please see Master Response – Alternatives Analysis regarding Alternatives on CEQA’s requirements for alternatives analysis, project objectives, “Hybrid 3+2,” Alternative 2, and Alternative 3.

C-28-90 This comment outlines CEQA requirements for Alternatives analysis. The comment is noted for the record.

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visual character of the Reservoir site will have adverse impacts on the feel provided by the current views of the site.

IV. The DEIR Alternatives Analysis Is Inadequate.

The City has a duty under CEQA to evaluate a reasonable range of alternatives to the environmentally damaging proposed Project. (*Laurel Heights I, supra*, 47 Cal.3d at 400.) As the California Supreme Court has stated:

Under CEQA, the public agency bears the burden of affirmatively demonstrating that . . . the agency’s approval of the proposed project followed meaningful consideration of alternatives and mitigation measures.

(*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134, emphasis added; accord *Village Laguna of Laguna Beach v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1035.) As the Court has said, while an EIR is “the heart of CEQA”, the “core of an EIR is the mitigation and alternatives sections.” (*Citizens of Goleta Valley v. Bd. Of Supervisors* (1990) 52 Cal.3d 553, 564.) Preparation of an adequate EIR with analysis of a reasonable range of alternatives is crucial to CEQA’s substantive mandate to “prevent significant avoidable damage to the environment” when alternatives or mitigation measures are feasible. (CEQA Guidelines § 15002(a)(3).)

A. CEQA’s Substantive Mandate Requires Adoption of Feasible Alternatives and Mitigation Measures.

Projects with significant environmental impacts *may not* be approved “if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects . . .” (Pub. Resources Code § 21002.) More specifically, CEQA states:

Pursuant to the policy stated in Sections 21002 and 21002.1, no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless . . .

(a) . . . (3) Specific economic, legal, social, technological, or other considerations . . . make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(Pub. Resources Code § 21081.) It is settled law that:

CEQA contains *substantive* provisions with which agencies must comply. The most important . . . is the provision requiring agencies to deny approval

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C-28-91 This comment describes the requirements of CEQA. The Draft EIR provides Project Objectives in Section 2.4 in compliance with CEQA requirements. The comment is noted for the record.

C-28-92 See Master Response – Alternatives Analysis.

of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.

(*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added.)

C-28-90
cont.

“Feasible” is defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (Pub. Resources Code § 21061.1.) The definition *does not* require the agreement of the project applicant. “Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves *whenever* it is feasible to do so.” (*Lincoln Place Tenants Ass’n v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508, emphasis added.)

B. The DEIR Cannot Narrowly Define Project Objectives.

An EIR is required to identify project objectives, are a “clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.” (CEQA Guidelines § 15124.) However, reliance on unduly narrow project objectives, or giving “a project’s purpose an artificially narrow definition” violates CEQA (*In Re Bay Delta Coordinated Environmental Impact Report Proceedings* (2008) 43 Cal. 4th 1143, 1166.)

C-28-91

CEQA prohibits defining or interpreting the project objectives in such a way as to only allow for the proposed project. (*We Advocate Through Environmental Review v. County of Siskiyou* (2022) 78 Cal.App.5th 683, 692.) Narrowly defining objectives and using that to dismiss consideration of potential alternatives prejudicially prevents informed decision making and public participation. (*North Coast Rivers Alliance v. Kawanura* (2015) 243 Cal.App.4th 647, 668, 671.)

Here, the DEIR includes a broad overarching project purpose, a purpose that Alternatives 2 and 3, as well as the Alternative Hybrid 3+2 we propose below, all meet:

C-28-92

Create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

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(DEIR pp. 5-1 to 5-2.)

The DEIR also identifies additional objectives and goals of the Silver Lake Reservoir Master Plan Complex. As an initial matter, the objectives and goals, as well as the City's interpretation of those objectives and goals, must be guided by biological data and not unsupported assumptions. Science and facts need to be the basis for any proposed changes to the Reservoir. Biological experts have provided extensive comments on the significant lack of data to support the City's claims of benefits from the Project. (See Section III.A.) As part of the revisions to the DEIR, followed by recirculation, the project objectives must be reevaluated in light of accurate and complete scientific data. SLWS has proposed Alternative Hybrid 3+2 specifically to allow for a scientific data driven plan for the Reservoir.

Additionally, Alternatives 2, 3 and Hybrid 3+2 provide the benefits identified by the objectives, especially when these alternatives are properly defined as discussed below. In several instances, such as preserving the Reservoir's unique character and enhancing and expanding habitat, the alternatives would better meet these objectives than the proposed Project.

- Preserve and enhance the unique character of the SLRC with increased points of access, improved internal circulation and access to the water's edge, and increased spaces for community and family gatherings.
- Expand existing active recreational uses and increase passive recreational uses.
- Enhance and expand wildlife habitat by introducing wetland and aquatic ecologies and improving upland habitat.
- Provide opportunities for the public to connect with nature and provide facilities for onsite environmental education and stewardship while limiting human/wildlife interactions through design and operations to protect habitat.
- Allow for continued underlying LADWP operations, access, and future use of designated areas of the site, thereby allowing continued use of the reservoirs and adjacent facilities that are intended to remain for proprietary use by LADWP.

(DEIR p. 5-2.) However, as discussed below, in addition to failing to rely on biological data to define the Project, the DEIR also too narrowly interprets several of these objectives as only being fully met if the specific components included in the proposed Project are included, failing to recognize these objectives can be met in a number of different ways. This narrow interpretation violates CEQA.

C-28-93 The comment requests consideration of the suggested Alternative 3+2. The City's evaluation of the alternatives and Project objectives is fully set forth in Section 5.6.2 of the Draft EIR and substantial evidence in the record. To clarify the commenter's statements, as noted in Table 5-7 and Section 5.6.2, Alternative 1 would only meet one of the Project objectives; Alternative 2 would meet all of the Project objectives but less so than the proposed Project for two of the Project objectives; and Alternative 3 would not meet two Project objectives, while only partially meeting two other Project objectives. Alternative 1, Alternative 2, and Alternative 3 were carried forward and fully analyzed in Section 5.5 of the Draft EIR. Alternative 3+2 incorporates components of both Draft EIR Alternatives 2 and 3, which were evaluated in Section 5.5 of the Draft EIR. Alternative 3+2 falls within a reasonable Hybrid of existing alternatives for which impacts were analyzed and discussed in Section 5.5. See also, hybrid alternatives discussion in Master Response- Alternatives Analysis.

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C. The Revised DEIR Must Consider Alternative Hybrid 3+2.

The City has a duty under CEQA to evaluate a reasonable range of alternatives to the proposed Project. (*Laurel Heights I*, *supra*, 47 Cal.3d at 400.) As the California Supreme Court has stated:

Under CEQA, the public agency bears the burden of affirmatively demonstrating that . . . the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures.

(*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134, emphasis added; accord *Village Laguna of Laguna Beach v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1035.) As the Court has said, while an EIR is "the heart of CEQA", the "core of an EIR is the mitigation and alternatives sections." (*Citizens of Goleta Valley v. Bd. Of Supervisors* (1990) 52 Cal.3d 553, 564.) Preparation of an adequate EIR with analysis of a reasonable range of alternatives is crucial to CEQA's substantive mandate to "prevent significant avoidable damage to the environment" when alternatives or mitigation measures are feasible. (CEQA Guidelines § 15002(a)(3).)

As discussed above, the DEIR is substantially deficient as an informational document. As part of rectifying those inadequacies in a revised and recirculated DEIR, an additional biological data driven alternative must be considered. SLWS proposes Alternative Hybrid 3+2 as that alternative. This proposed alternative takes into consideration the critiques of the Project by biological experts and seeks to provide an alternative that limits expansions of use and new construction to that which has evidentiary support for its benefits and lack of adverse impacts.

Alternative Hybrid 3+2 focuses on providing a serene, wildlife experience at the Silver Lake Reservoir Complex. The Reservoir is located in a park-rich area of the City, where standard public parks are readily available, but not areas that can provide residents with a true wildlife connection by using data and research to determine the best ways to preserve, enhance, expand and maintain habitat for wildlife. (See Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment, Appendix A, incorporated by reference and accessible here: <https://lacountyparkneeds.org/final-report/>.) This alternative proposes only those additions that are shown by data to benefit wildlife. By doing so, the site will be able to provide the best wildlife experience and education for the public. Moreover, limited funding for developments in parks should not be focused on a park-rich area; funding for those facilities should be distributed more evenly to park-poor areas of the City.

The basics of Hybrid 3+2 are as follows:

C-28-94 The comment describes CEQA requirements. The comment is noted for the record. See Master Response – Alternatives Analysis.

C-28-95 The comment describes Alternative Hybrid 3+2. Based on this comment, further analysis was conducted to review hybrid Alternative 3+2 and compare it to the proposed Project. The hybrid Alternative 3+2 components were generally considered as part of either Alternative 2 or 3. As a result, hybrid Alternative 3+2 would result in similar impacts as those described for Alternative 2 in the Draft EIR, when compared to the proposed Project. Please see Master Response - Alternatives Analysis.

Also, please see Master Response - Funding and Operations for a discussion on how funding may be obtained for the Project.

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C-28-95
cont.

- Any changes on the site should occur gradual over time, with requirements to reevaluation of wildlife use of the site after each change to ensure it is providing the benefits intended.
- Further design and implementation of any changes to the Project site must be done in collaboration with a qualified ecologically or environmentally-focused entity (such as Urban Wildlands, LA Audubon or Land IQ) to ensure the biological data drives the design.
- There should be no kayaking or other boating use other than that required by DWP for maintenance purposes allowed in the Reservoirs. This should not have been included in any of the alternatives or the proposed Project because there has been a clear consensus by the public that this is not an appropriate use of the site. Moreover, biological experts have identified that this increase in human interference in the water would adversely impact waterbirds use of the site.
- There would be limits on public access to the site.
 - No nature trails carved into the hillside and wildlife habitat, which expert evidence shows would adversely impact wildlife ability to use the site.
 - If an assessment shows it would not have adverse impacts, an elevated ADA-compliant wooden walkway with viewing platforms could be included from the top of the Armstrong perimeter path to the top of the Knoll. The walkway should be elevated to allow terrestrial wildlife to pass below. This would provide an excellent educational opportunity for the public to view wildlife and the entire Reservoir while limiting interference.
 - The walkway and viewing platforms should also be fenced for human safety, with access limited to dawn to dusk.
 - Access should also first be limited to docent lead walks until it can be assessed whether expanding beyond these walks would adversely impact the wildlife.
- The site should include wildlife friendly perimeter fencing of equal height to the existing fence with gates that limit nighttime access, and potentially daytime access during specific wildlife-sensitive times such as nesting seasons for raptors and herons.
- Additional land-based viewing platforms, away from the water's edge, could be included if added in a manner that would not impacts species. They could provide educational opportunities, such as telescopes to view waterbirds, and signage regarding migrations and bird identities.

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cont.

- Wetland habitat and terraces, as well as habitat islands would not be included unless it is shown, through collaboration with ecological or environmental entities as identified above to be beneficial for wildlife the City seeks to attract to the site. Additionally, new aquatic wildlife, including fish, should not be introduced to the site. As biological experts have identified, the DEIR fails to provide evidentiary support for the inclusion of these features.
- No ornamental or rain gardens should be included in the Meadow due to drought conditions and to allow this area to serve as open space for people and wildlife instead of being cut into pieces.
- The expansion and protection of a wildlife experience at the site would provide for educational opportunities that are incredibly rare in the City, and especially important for those unable to travel to our National Parks or go on commercial wildlife tours such as those provided by National Geographic or Alaskan cruises. It could also provide for guided tours by and about the Gabrielino Tongva Indian Tribe. Construction of an Education Center is not required to provide these opportunities.
- Public restrooms could still be provided if designed in an ecologically-friendly manner. The City should consider a design similar to the Recreation and Parks Department's self-cleaning restrooms at the North Hollywood Recreation Center, which were recently found to be a finalist for public restroom of the year: <https://www.bestrestroom.com/other-finalist/?finalist=3307&byear=2022>
- Updates should still be included for the Recreation Center to enhance recreational and community gathering opportunities. Minor updates to the Dog Park should also be provided.
- Additional aspects of Hybrid 3+2:
 - No special events;
 - No new lighting;
 - Only damaged or dying trees should be removed from the site, conditional upon consultation, approval and oversight of a Certified Wildlife Protector arborist (See <https://wildlifetraining.org/about-our-program/>);
 - Promenade to be moved away from the water's edge and limited to areas that would not impact waterbirds and other wildlife species;
 - No overlook or seating terraces;
 - No picnic tables or BBQ facilities to be added;
 - No relocation or re-sizing of the South Valley playfield or basketball court;

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- No new entry plaza or seating in the South Valley;
- No new Multi-Purpose Facility in the South Valley;
- No fitness circuit;
- Bike improvements should be provided, but no new parking;
- Any other features from the proposed Project not explicitly addressed here is assumed to be eliminated from this alternative.

Alternative Hybrid 3+2 would repurpose the Reservoir into a wildlife park preserve, while still retaining and enhancing the unique character of this site. It would allow for an increase in public access, tempered by data demonstrating such access would not be harmful to wildlife use of the habitat portions of the site. It would increase recreational activities by updating the Recreational Center and Dog Park. It would also provide new recreational and educational opportunities through birdwatching and use of new walkways. Hybrid 3+2 would significantly increase the ability of the public to connect with nature at the site by focusing on the preservation of wildlife habitat. Thus, this is a feasible and less-impactful alternative.

Further, this alternative, unlike the proposed Project, is a more innovative concept for a public park, based on forward-thinking ideals regarding the environment, wildlife biodiversity and climate issues. As with other developments, business-as-usual should not be the focus for public open space. Finding creative ways for the public to visually access the wildlife, the habitat improvements and protections Hybrid 3+2 would provide through viewing platforms and 24-hour online trail cameras can meet the objectives without damaging an existing important resource for numerous species.

For all of these reasons, Alternative Hybrid 3+2 is feasible and less impactful, preventing the City's approval of the proposed Project with its significant and unavoidable impacts.

D. Alternative 2 in a Less Impactful, Feasible Alternative.

1. The DEIR Includes an Improperly Narrow Description of Alternative 2.

SLWS was pleased to see that the City has included the two alternatives we proposed as alternatives to be analyzed in the DEIR. However, the DEIR has narrowly defined Alternative 2, failing to include features proposed by SLWS for this alternative. The DEIR also fails to expand consideration of any potential feature for the site beyond those specifically included in the proposed Project. Unfortunately, it appears the DEIR's limited inclusion of features for Alternative 2 may be based on an attempt to manufacture a claim this alternative would not meet project objectives. SLWS proposed this alternative in a manner specifically intended to meet project objectives and the DEIR must be revised to consider it as such.

C-28-96 Alternative 2 was created in order to analyze a Project with fewer impacts. Alternative 2 includes less built structures and less construction. Alternative 2 as described in the Draft EIR is a less intensive Project than the one proposed by the commenter, but still meets the Project objectives. Please see Maser Response - Alternatives Analysis for a discussion on the Alternative 2 analysis.

C-28-95
cont.

C-28-96

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C-28-97 The comment expresses preference to eliminate the Education Center. The City's evaluation of the alternatives and Project objectives is fully set forth in Section 5.6.2 of the Draft EIR and substantial evidence in the record. The Draft EIR evaluates two alternatives (Alternative 2 and 3) that do not include the Education Center.

Please see Master Response – Alternatives Analysis regarding Alternatives on CEQA's requirements for alternatives analysis, Project objectives, "Hybrid 3+2," Alternative 2, and Alternative 3.

C-28-98 The comment expresses preference for Alternative 2 and states that the Draft EIR underestimates impacts to biological resources, noise, historic resources, and land use. The comment provides no evidence for this claim. The Draft EIR evaluates each of these resources in detail and compares the significance conclusions for each alternative. The Draft EIR finds Alternative 2 to be the environmentally superior alternative. See Master Response - Alternatives Analysis.

SLWS identified a Reduced Intensity Alternative in its scoping comments, which is the basis for Alternative 2. SLWS set a focus for this alternative as a reduction in new development at the Reservoir Complex. The DEIR has misinterpreted reduction in new development to be no new construction, which was not a parameter proposed by SLWS.

C-28-96
cont.

For example, the Reduced Intensity Alternative was not intended to eliminate all features proposed for the South Valley portion of the Reservoir Complex. The Recreation Center and the Dog Park should be expanded under this alternative, providing additional recreational opportunities. Additionally, SLWS did not propose no outdoor pavilion, only that it be moved from the Knoll hillside to the flat area of the Meadow to reduce required grading. SLWS also did not define the Reduced Intensity Alternative to eliminate any special events. However, as discussed in the noise impacts section, amplified noise should not be allowed at special events and the number and hours of operation of these events should be limited to reduce impacts to the community.

C-28-97

Further, the DEIR appears to claim the only way to provide educational opportunities at the Silver Lake Reservoir Complex is through the construction of an indoor educational center. As discussed above, this is an overly narrow interpretation of the objective to provide educational opportunities. SLWS specifically stated the Reservoir should instead be used as an open space outdoor educational area. The entire purpose of education at this site is for the education to be related to the wildlife found on this site. A building is not required for this education. If public facilities, such as restrooms, would facilitate outdoor education on the site, those facilities could be included in Alternative 2 with a significantly smaller footprint and impact. (See the North Hollywood Recreation Center <https://www.bestrestroom.com/other-finalist/?finalist=3307&bryear=2022>, incorporated by reference.)

SLWS advocates for more creative thinking from the City in this regard. Raised platforms adjacent to the Reservoir with public telescopes could be used for outdoor education, allowing observation of the birds and other wildlife on the site. These birds and wildlife will also be in more abundant numbers if less of their habitat is destroyed by construction. Guided nature walks would also provide outdoor educational opportunities. These educational opportunities do not require an enclosed building and classroom. Those type of facilities can be built elsewhere, where they would not remove the very nature the site is intended to educate about.

C-28-98

2. Alternative 2 is Environmentally Superior.

The DEIR discloses that Alternative 2 would substantially lessen the disclosed significant adverse construction impacts associated with the Project. Without amplified sound, it would eliminate the significant adverse operational noise impact disclosed by

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the DEIR. Alternative 2 would also reduce other impacts the DEIR did not consider significant. (DEIR p. 5-28.)

C-28-98
cont.

Additionally, as discussed throughout these comments, the DEIR is informationally deficient and those informational deficiencies have led to an underestimation of the significance of a number of Project impacts. Once the DEIR is revised to properly analyze the impacts, there will be additional significant adverse impacts of the Project disclosed such as biological, additional operational noise impacts, impacts to the historic Silver Lake Reservoir Complex, land use impacts and more. Alternative 2 would substantially lessen these impacts, further solidifying its status as environmentally superior to the proposed Project.

3. Alternative 2 is Feasible.

C-28-99

To be deemed feasible under CEQA, an alternative need to accomplish the basic project purpose. It is well settled that "[i]f there are feasible alternatives ... that would accomplish *most of the objectives* of a project and substantially lessen the significant environmental effects of a project subject to CEQA, the project may not be approved without incorporating those measures." (*Center for Biological Diversity, Inc. v. FPL Group, Inc.* (2008) 166 Cal.App.4th 1349, 1370, fn 19, citation to Pub. Resources Code §§ 21000(g), 21002, Guidelines § 15091.) Alternatives are not required to meet all project objectives, and in reality, it "is virtually a given that the alternatives to a project will not attain *all* of the project's objectives." (*Watsonville Pilots Ass'n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1087.)

C-28-100

Here, the DEIR admits that even as narrowly proposed, Alternative 2 would meet all project objectives, even if to a lesser degree than the proposed Project. (DEIR pp. 5-29 to 5-31.) Moreover, once Alternative 2 is revised as discussed above, it would meet these objectives even better. The DEIR claims Alternative 2 does not expand existing active recreational activities, but this claim is based on the Alternative 2 not including any expansion of uses in the South Valley. As discussed above, this will expand and enhance of recreational uses in the South Valley.

Additionally, the DEIR claims Alternative 2 reduces educational opportunities, but fails to assess this alternative's ability to provide outdoor, as opposed to indoor, environmental education.

For all of these reasons, Alternative 2 is a less impactful, feasible alternative.

C-28-99 The comment states that Alternative 2 is feasible and expresses preference for this Alternative. The Draft EIR evaluates three feasible alternatives including Alternative 2. The Draft EIR finds that Alternative 2 is the environmentally superior project. As noted on page 5-28 of the Draft EIR, Alternative 2 meets all of the Project objectives but to a lesser degree than the proposed Project. See Master Response - Alternatives Analysis.

C-28-100 The comment states that Alternative 2 is feasible and expresses preference for this Alternative. The Draft EIR evaluates three feasible alternatives including Alternative 2. The Draft EIR finds that Alternative 2 is the environmentally superior project. As noted on page 5-28 of the Draft EIR, Alternative 2 meets all of the Project objectives but to a lesser degree than the proposed Project. See Master Response - Alternatives Analysis.

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E. Alternative 3 is a Less Impactful, Feasible Alternative.

1. The DEIR Includes an Improperly Narrow Description of Alternative 3.

C-28-101 SLWS is also pleased the City has included its proposed Natural Lands and Open Space Preserve as Alternative 3, but as with Alternative 2, the DEIR has provided an overly restrictive description of Alternative 3, eliminating features that were intended to be included in this alternative and failing to consider features other than those proposed for the Project.

First, the DEIR misstates the overarching intent for Alternative 3 (DEIR 5-22) set by SLWS of maintaining and expanding public, wildlife and bird access to the Knoll, Eucalyptus Grove and the water's edge. The purpose identified by SLWS for this alternative is prioritizing natural areas and enhancing habitats, as well as improving water quality and water recharge.

C-28-102 The DEIR has defined Alternative 3 to eliminate inclusion of wetland terraces, but this elimination was not specifically proposed or intended when SLWS identified the Natural Lands and Open Space Alternative. SLWS proposed provision of an expanded range of habitats, including open water, marsh, riparian and upland. Thus, Alternative 3 could include wetland terraces, if those would not result in biologically adverse impacts. As biological experts have identified, the DEIR lacks evidentiary support for claims of benefits from these wetland terraces, and without that evidence, they should not be included in any alternative or the proposed Project.

C-28-103 Further, as with Alternative 2, Alternative 3 could and should provide outdoor educational opportunities, taking advantage of the habitat enhancements and provision of a wildlife corridor that this alternative would provide.

2. Alternative 3 is Environmentally Superior.

C-28-104 The DEIR discloses that Alternative 3 would substantially lessen the disclosed significant adverse construction impacts associated with the Project. Without amplified sound, it would eliminate the significant adverse operational noise impact disclosed by the DEIR. Alternative 3 would also reduce other impacts the DEIR did not consider significant. (DEIR p. 5-28.)

C-28-105 Additionally, as discussed throughout these comments, the DEIR is informationally deficient and those informational deficiencies have led to an underestimation of the significance of a number of Project impacts. Once the DEIR is revised to properly analyze the impacts, there will be additional significant adverse impacts of the Project disclosed such as biological, additional operational noise impacts, impacts to the historic Silver Lake Reservoir Complex, land use impacts, public safety

- C-28-101 The comment states that Alternative 3 is feasible and less impactful than the proposed Project. The Draft EIR evaluates three feasible alternatives including Alternative 3. As noted on page 5-28 of the Draft EIR, Alternative 3 meets some but not all of the Project objectives. See Master Response - Alternatives Analysis.
- C-28-102 The comment states that Alternative 3 does not reflect all of the attributes that the commentor had suggested for this Alternative during scoping. The Draft EIR evaluates three feasible alternatives including Alternative 3. As noted on page 5-28 of the Draft EIR, Alternative 3 meets some but not all of the Project objectives. As analyzed in the Draft EIR, Alternative 3 does not include wetland terraces. The proposed Alternative 3+2 reflects the requested additions mentioned in this comment. The alternative is considered a hybrid of the two alternatives evaluated in the Draft EIR and as a result results in no additional impacts. See Master Response - Alternatives Analysis.
- C-28-103 The comment states that Alternative 3 does not reflect all of the attributes that the commentor had suggested for this Alternative during scoping. The Draft EIR evaluates three feasible alternatives including Alternative 3. As noted on page 5-28 of the Draft EIR, Alternative 3 meets some but not all of the Project objectives. As analyzed in the Draft EIR, Alternative 3 does not include outdoor educational opportunities. The proposed Alternative 3+2 reflects the requested additions mentioned in this comment. The alternative is considered a hybrid of the two alternatives evaluated in the Draft EIR and as a result results in no additional impacts. See Master Response - Alternatives Analysis.
- C-28-104 The comment states that Alternative 3 should be considered the environmentally superior alternative. As noted on page 5-31 of the Draft EIR, Alternative 2 is the environmentally superior alternative when comparing all impacts as shown in Table 5-6 of the Draft EIR. The proposed Alternative 3+2 reflects the requested additions mentioned in this comment. The alternative is considered a hybrid of the two alternatives evaluated in the Master Response - Alternatives Analysis.
- C-28-105 The comment states that the Draft EIR is informationally deficient, claiming that additional noise, land use, public safety, historic, and biological impacts should be considered significant, and advocating for Alternative 3 as the environmentally superior alternative. The Draft EIR provides a detailed analysis of the impacts identified in the comment. The Draft EIR identifies unavoidable significant impacts to noise and recreation and parks. No additional analysis is required. See Master Response - EIR Recirculation Requirements.

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C-28-105 cont.	and more. Alternative 3 would substantially lessen these impacts, adding to its environmental superiority over the proposed Project.
	3. Alternative 3 is Feasible.
	The DEIR acknowledges that even as narrowly proposed, Alternative 3 would meet the majority of the project objectives, even if to a lesser degree than the proposed Project. (DEIR pp. 5-29 to 5-31.) Moreover, once Alternative 3 is revised as discussed above, it would meet these objectives even better.
C-28-106	The DEIR claims confusingly Alternative 3 would not meet the objective to "Preserve and enhance the unique character of the SLRC with increased points of access, improved internal circulation and access to the water's edge, and increased spaces for community and family gatherings." Alternative 3 would clearly preserve and enhance the unique character of the Reservoir. It would also increase space for community and family gatherings with leaving the Meadow structure-free for all free form gatherings, including pickup sports.
C-28-107	Additionally, contrary to the statements in the DEIR, Alternative 3 would expand recreation through the expansion of uses in the South Valley, with remodeling and renovation of the current Recreation Center, as well as upgrading of the dog park and providing dog owner proposed fencing for guided access walks. That there would be fencing limiting the hours of use from dawn to dusk would still increase access to the Reservoir Complex, particularly since this site is not intended for nighttime use. The fencing would also protect wildlife and gates could be closed to shield wildlife during sensitive times.
C-28-108	While there would be fewer trails, Alternative 3 would still increase circulation at the site; the DEIR shows promenades in the East and West Narrows. (Fig 5-2.) Further the Silver Lake Lawn and Great Lawn would still be available as public gathering locations. There is no requirement to eliminate all special events under this alternative, only to eliminate amplified sound and restrict the number and hours of operation of special events. Special events would be curated for suitability, time and target audience, further providing protections for wildlife while enhancing public access. Thus, Alternative 3 meets this objective.
C-28-109	The DEIR also claims Alternative 3 would not meet the objective of expanding wildlife habitat by introducing wetland and aquatic ecologies. Open water habitat would be restored, achieving this objective. Further, as discussed above, the wetland terraces and addition of fish to the Reservoir have not been shown to benefit wildlife, so their inclusion is not necessary to meet the stated objective.

- C-28-106 The comment states that Alternative 3 is feasible and less impactful than the proposed Project. The Draft EIR evaluates three feasible alternatives including Alternative 3. As noted on page 5-28 of the Draft EIR, Alternative 3 meets some but not all of the Project objectives, since Alternative 3 would not provide access to the water's edge. See Master Response - Alternatives Analysis.
- C-28-107 The comment states that Alternative 3 would expand recreation at the SLRC. The Draft EIR recognizes in Chapter 5 that Alternative 3 would increase access, compared with exiting conditions, but less so than the proposed Project due to the retention of the fence. See Master Response - Alternatives Analysis.
- C-28-108 The comment states that Alternative 3 would expand recreation at the SLRC. The Draft EIR recognizes in Chapter 5 that Alternative 3 would increase access, compared with exiting conditions, but less so than the proposed Project due to the retention of the fence. See Master Response - Alternatives Analysis.
- C-28-109 The comment states that Alternative 3 would maintain open water to achieve the objective of improved aquatic ecologies and expand recreation at the SLRC. The Draft EIR recognizes in Chapter 5 that Alternative 3 would maintain existing open water but would not introduce habitat complexities associated with the floating islands. Therefore, Alternative 3 meets the objective but less so than the proposed Project. See Master Response - Alternatives Analysis.

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C-28-110 Additionally, the DEIR claims Alternative 3 reduces educational opportunities, but fails to assess this alternative's ability to provide outdoor, as opposed to indoor, environmental education. Instead of destroying existing habitat as the Project would do, this alternative would provide a unique outdoor space for education. The ability to provide this benefit that cannot be found in most other open space within the City should be given higher priority than the construction of buildings that could be built elsewhere.

F. Alternatives 2 and 3, as well as Newly Proposed Alternative Hybrid 3+2, Are Feasible, Less Impactful Alternatives, Prohibiting Approval of the Proposed Project.

C-28-111 The DEIR admits that that the Project would have significant construction noise impacts and operational noise impacts from special events. Throughout this comment letter, we establish that the Project would have numerous other significant adverse impacts that the DEIR fails to disclose.

Alternatives 2 and 3 are feasible alternatives that would substantially lessen and/or eliminate significant adverse impacts resulting from the Project. Alternative Hybrid 3+2 would also eliminate this significant impact, as well as other impacts the DEIR has failed to disclose. Thus, under CEQA's substantive mandate, the City cannot approve the Project as proposed.

Conclusion

C-28-112 For all of the reasons set forth herein, SLWS find the DEIR to be wholly inadequate. Before the Silver Lake Reservoir Complex Master Plan can move forward, a revised DEIR must be recirculated to address the many failings. The analysis included in the revised DEIR must be used to provide project objectives that are environmentally protective and to evaluate alternatives that would reduce the many impacts that could result from implementation of some components of the proposed Project.

C-28-113 Additionally, we ask that you inform us of any future Project notices pursuant to Public Resources Code section 21092.2 and applicable Municipal Code requirements. We further request that you retain all Project related documents including correspondence and email communications as required by CEQA. (*Golden Door Properties, LLC v. Superior Court of San Diego County* (2020) 52 Cal.App.5th 837 [agency "must retain writings"].)


C-28-110 The comment states that Alternative 3 would expand outdoor educational opportunities. The Draft EIR concludes that eliminating the Educational Center would reduce educational opportunities at the SLRC, notwithstanding the opportunity for outdoor gatherings. The opportunity for outdoor learning is available for all Alternatives. See Master Response - Alternatives Analysis.

C-28-111 The comment states that Alternatives 2 and 3 as well as a newly proposed hybrid Alternative 3+2 are feasible and less impactful than the proposed Project. The comment suggests that additional significant impacts have been identified. As noted in responses to each of the comments in this letter, no additional significant impacts have been identified. The Draft EIR provides a thorough assessment of baseline conditions and impacts for each Alternative. The proposed Alternative 3+2 is a hybrid of the other alternatives and as such, no additional components are added not already evaluated in the Draft EIR. See Master Response - Alternatives Analysis.

C-28-112 The comment requests recirculation of the Draft EIR. As described in this response to comments (response to comment C-30-12), no new information has been provided that would substantially alter the impact analysis requiring recirculation of the Draft EIR. The suggested triggers for recirculating an EIR outlined in CEQA Guidelines Section 15088.5 have not been met. See Master Response - EIR Recirculation Requirements. Recirculation of the Draft EIR is not required.

C-28-113 Comment noted.

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	COMMENT	RESPONSE
		C-28-114 The comment is conclusory and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record.
		C-28-115 The comment lists attachments of the letter and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record.
C-28-114	<p>Dr. Jan Green Rebstock December 15, 2022 Page 37 of 37</p> <p>Thank you for your time and consideration in this matter.</p> <p>Sincerely,  Amy Minter Sunjana Supekar</p> <p>cc: Councilmember Nithya Raman CD4: nithya.raman@lacity.org CD4 Planning Deputy Mashael Majid: mashael.majid@lacity.org CD4 Senior Deputy, Transportation, Infrastructure, and Public Space Mehmet Berker: mehmet.berker@lacity.org</p>	
C-28-115	<p>Councilmember Hugo Soto-Martinez CD13 (Via U.S. Mail)</p> <p>Mary Nemick, Dir of Communications, Bureau of Engineering: mary.nemick@lacity.org</p> <p>Attachments:</p> <ol style="list-style-type: none">1) Expert Comments from Daniel Cooper at Resource Conservation District2) Expert Comments from Dr. Amanda Zellmer3) Expert Comments from Johdan Fine4) CDFW Scoping Comments5) Consultation Letters from CDFW to City re Black Walnut Trees6) Community Plan Excerpts7) Los Angeles Municipal Code §12.04.058) Excerpts of PAW Report	

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C-29-1

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C-29-1 Attachments to Comment C-28 noted. Also, please refer to responses to Comment L-1, Comment C-16, and Comment I-543.

ATTACHMENT 1

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COMMENT

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C-29-1
cont.



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November 28, 2022

Prepared by Daniel S. Cooper, Ph.D.
Senior Conservation Biologist

Thank you for the opportunity to comment on the “Draft Environmental Impact Report (DEIR), Silver Lake Reservoir Complex Master Plan Project”.

I am restricting my comments to the “Biological Technical Report”, which underpins the analysis of the site’s biota and recommendations to enhance this biota, which should inform evaluation of the “Analysis of Alternatives”, which lays out different configurations of habitat restoration/enhancement based on management priorities.

Overall, I found the Biological Technical Report to be **lacking in both rigor and specificity**, particularly for such a large, visible site as Silver Lake Reservoir.

As one of just a handful of water bodies in the city, and one with a circular walking path that is very heavily-used by residents and visitors (including birders and other naturalists), Silver Lake Reservoir would seem to warrant a technical report similar to that of a multi-acre site proposed for a large development such as a housing tract or new recreation facility on undeveloped land.

Instead, I found this technical report very spare, and more of a cursory review one would expect to read in a mitigated negative declaration, as for a single-family home on a lot with no significant natural resources.

I would urge the city to afford this site the scrutiny it deserves, as it represents/supports:

- A major waterbird stopover habitat, with copious, long-term data available;
- Multiple nesting territories (physical nests documented) for all four of the four focal raptor species tracked by the Los Angeles Raptor Study (Red-tailed Hawk, Red-shouldered Hawk, Cooper’s Hawk and Great Horned Owl);
- An opportunity to transform, and hopefully restore, a large patch of upland open space, currently disturbed from decades of afforestation, into native habitat; and

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- An opportunity to introduce native riparian and wetland habitats back into the central city for the benefit of wildlife, and the enjoyment of human observers.

Without current, accurate, and credible data on the biological resources of the site/surrounding area, efforts at restoration will either fall short, or could actually result in further degradation of the site.

I have summarized what I consider four main weaknesses of the Biological Technical Report, which stem from either an incomplete assessment of the local resources on the part of the preparers, or a failure by them to recognize local natural communities for what they are.

1. Silver Lake Represents a major (local) migratory waterbird stopover habitat.

In the city's own report (ESA 2021), Silver Lake Reservoir has been designated a "Protected Area for Wildlife" (PAW) based on the criterion that it "Supports Breeding/Feeding/Resting/Migrating Grounds with Limited Availability in Southern California/Los Angeles".

The Biological Technical Report very briefly discusses waterfowl on p. 59, but provides no specific detail on numbers, seasonality, or habitat use:

"Ivanhoe and Silver Lake Reservoirs do serve as foraging habitat for migratory avian species including waterfowl and shoreline species...The floating islands and shoreline wetland habitat will create habitat underneath them within their below-the-water root zone which is a highly ecologically productive area that attracts fish (which will be introduced as a local prey source) and other aquatic species. These wetlands will provide a net gain in habitat values within the SLRC by increasing habitat diversity, providing predator protection, and providing increased foraging opportunities. Regionally, the created wetlands and the SLRC as a whole will serve as a great attractant and resource for migratory avian species (GPA 2020)."

While probably true, the preparers offer no specific information on a) what avian species such islands would attract, nor b) how these would be different from species already present.

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There is the assertion that fish “will be introduced as a local prey source”, but the report offers no detail on what species these might be (many species of introduced fish are considered highly-invasive, and introduction may be illegal!). Importantly, several local fish species are documented predators on amphibian eggs and larvae, so the goals of creating a robust novel wetland ecosystem would need to be carefully considered in light of which species are to be introduced. The introduction of non-native fish into a reservoir would be something that requires permits and follow-up monitoring, which local agencies would need to weigh-in on; there is no indication that CDFW or other agencies commented on such plans. By contrast, a recent memo by CDFW (dated Feb. 4, 2022) outlines major concerns about future management of wetland habitat and their associated species at the site, particularly in light of the proposed increase in human/pet activity here.

Surprisingly, the Biological Technical Report contains no counts of waterbirds and no data on sightings, other than a list of **five waterfowl species** (with no status or seasonal information) as part of a “Faunal Compendium” at the report’s end. Was any local source consulted to create this list? Was it based on the observations of the project biologist(s)? It is unclear, despite the abundance of readily-available bird data from the site, including from eBird, whether any sources at all (published or otherwise) were used to prepare this report.

From eBird, a quick search (conducted Nov. 11, 2022) of local bird species recorded at Silver Lake Reservoir (<https://ebird.org/barchart?r=L621817&yr=all&m=>) reveals **25 waterfowl species** documented at the site, not five. Several of the most frequently-recorded waterfowl were not among the five species in the report’s faunal compendium, namely Northern Shoveler, American Wigeon, Ring-necked Duck, Lesser Scaup, and Bufflehead (oddly, one relatively rare waterfowl species, Cinnamon Teal, *is* listed in the faunal compendium, without details!).

Many other waterbirds known from, and frequently seen, at Silver Lake Reservoir were also omitted from the faunal compendium, despite the fact that they are presumably among the targets of the proposed habitat enhancement there. A partial list of high counts of common waterbirds (including waterfowl, grebes and gulls) from Silver Lake Reservoir (per eBird), below.

- Ruddy Duck: 3500 (<https://ebird.org/checklist/S9323607>)
- California Gull: 2200 (<https://ebird.org/checklist/S63186362>)
- American Coot: 1400 (<https://ebird.org/checklist/S121073188>)
- Northern Shoveler: 250 (<https://ebird.org/checklist/S62676005>)
- American Wigeon: 150 (<https://ebird.org/checklist/S50126591>)

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- Ring-necked Duck: 170 (<https://ebird.org/checklist/S61909252>)
- Eared Grebe: 100 (<https://ebird.org/checklist/S75498472>)

In addition, counts of swallows include 200-700 individuals during spring and fall migration (Northern Rough-winged, Cliff, Barn, and Violet-green; eBird).

Figure 1 below gives an idea of just how important Silver Lake Reservoir currently is to local wintering waterfowl, in comparison to other reservoir/wetland habitats in the Los Angeles area (see Table 1, below, for values used).

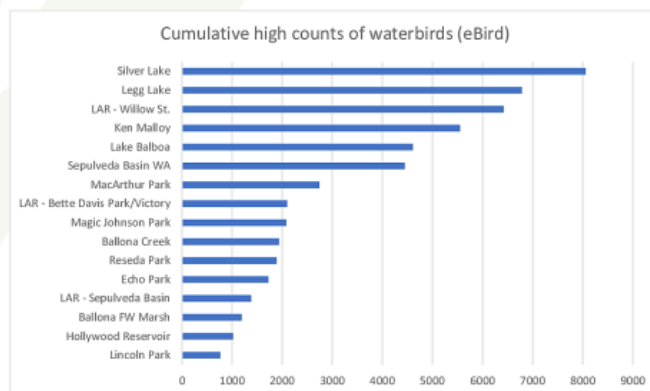


Figure 1. Comparison of highest counts (pooled/cumulative) of the most abundant waterfowl (>100 individuals in any single-visit count, 2000-present) at Silver Lake Reservoir. Data compiled from thousands of individual observer checklists submitted eBird as of Nov. 9, 2022.

In addition, the waterbird species *diversity* at Silver Lake Reservoir is similarly high compared to other sites in the region, as shown in Figure 2; only two sites examined, Legg Lake near South El Monte, and the Los Angeles River estuary at Willow St. in

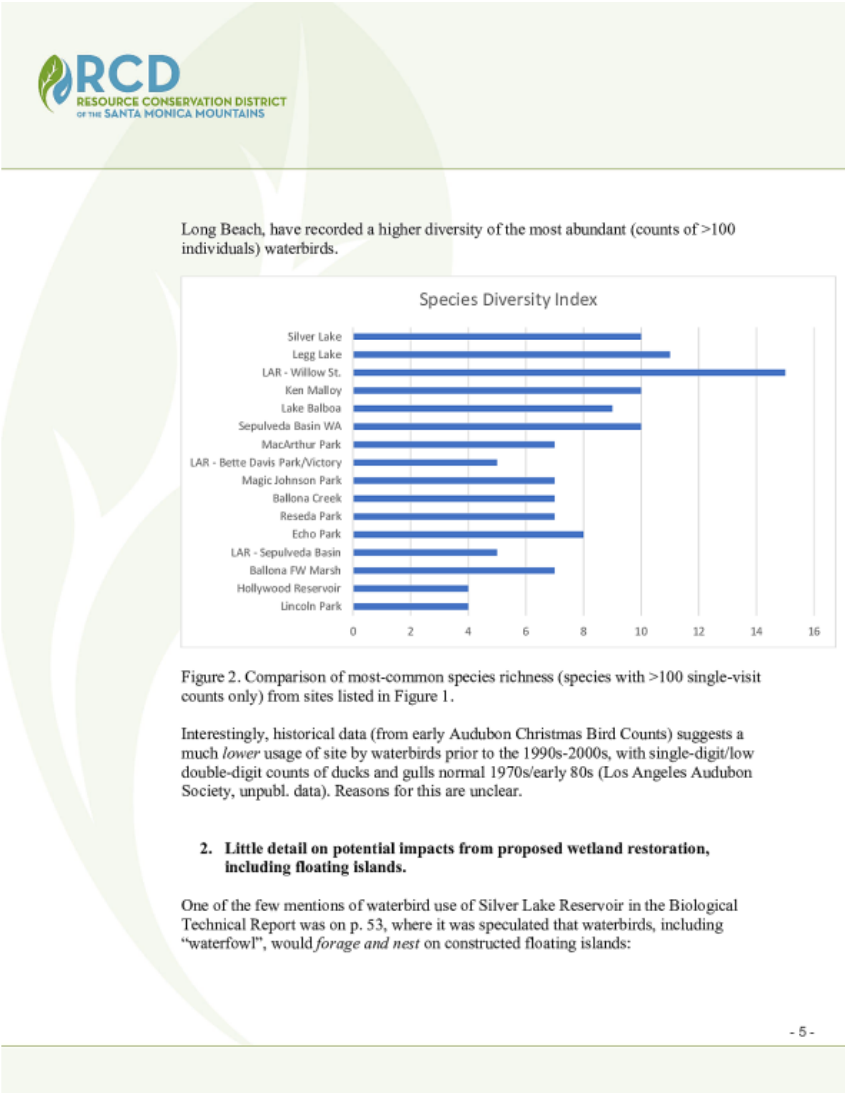
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"The creation of 23-acres of native habitat including coastal scrub (4-acres) and wetlands (7-acres) will result in a net gain of avian-supporting vegetation. The proposed diverse native habitat including floating islands, will particularly serve as a supportive habitat for many species of wading birds which often nest in woody vegetation that is either submerged or surrounded by water. The habitat islands would be varied in size and set-back from the shoreline approximately 50 feet or more, to offer a variety of protected foraging and nesting spaces for waterfowl and other aquatic species."

Yet, because the report presented no data on either floating islands elsewhere, or on *existing* waterbird use of the site, it is simply impossible to determine if the proposed habitat transformation would result in a "net gain of avian-supporting vegetation". Other area reservoirs in the Los Angeles area have floating islands, including lakes at Echo Park and Reseda Park – were these assessed by the preparers for use by aquatic birds? And, how would these islands – which require constant attention to ensure that plants are alive and that the remain structurally sound – be maintained into the future?

In general, Los Angeles urban parks support very low numbers of nesting freshwater marsh bird species, mainly because they have almost no freshwater marsh or aquatic nesting habitat, but also because people are generally allowed around the entire perimeter of park lakes, affording no areas for wildlife to feel safe and undisturbed in what little habitat is present.

A review of sightings uploaded to eBird (www.ebird.org) suggest that counts of local freshwater wetland bird species known from Silver Lake Reservoir that maintain nesting populations in the region (e.g., Great Egret, Snowy Egret, Green Heron, Pied-billed Grebe, Gadwall, etc.) are currently almost identical to counts from other urban reservoirs in parks around Los Angeles (e.g., Echo Park, Reseda Park, Lincoln Park), with just 1-2 individuals of each species counted during most visits. These other sites already have a combination of floating islands and "traditional" islands which have been planted with vegetation; and yet, their avifauna is not substantially different from that of Silver Lake Reservoir's.

Based on my own (DSC) observations, floating islands at Echo Park and Reseda Park support very few waterbirds, and fewer nesting birds, other than widespread/pest species such as domestic waterfowl. The one iconic nesting waterbird currently using the site, the Great Blue Heron, wouldn't nest on a floating island (they nest in tall trees). Based on their current condition elsewhere (structurally degrading, attracting invasive/non-native plants, collecting trash, etc.), floating islands seem difficult to maintain and

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perhaps inappropriate for a long-term feature at Silver Lake Reservoir. And notably, no nesting waterbirds were observed using floating islands as nest sites during countywide surveys in either 2010 and 2019 (Cooper and Hamilton 2010, Cooper and Hamilton 2019). Thus, the assertion that “floating islands” will support wading birds “which often nest in woody vegetation that is either submerged or surrounded by water” is not only unsupported by specifics in the report, it does not appear to be the case anywhere else in the region. It is unclear which species the preparers are referring to, as nesting wading birds – of any species – all highly localized in the region, were simply not analyzed in the report.

The effectiveness of proposed wetland creation along the borders of the reservoir also sounds like a positive, but it is similarly difficult to assess without bird data from the site or surrounding region. No detail was provided by the Technical Report on how these wetlands would be constructed, maintained or protected, what plant species would be used, or which target bird species that might use them. Therefore, it is not possible to comment on their anticipated effectiveness at the site.

Finally, the Technical Report fails to describe potential impacts from increased human usage on the reservoir and its shoreline to these created wetlands, including from proposed watercraft, pets, or from increased human intrusion into the shoreline (as depicted in artistic renderings in the DEIR). Given that the majority of the site – including the entirety of both Silver Lake and Ivanhoe reservoirs – has been securely fenced from the public for many decades, it seems reasonable to assume to that an increase in human presence would have a major detrimental effect on the wetland avifauna and other wildlife therein.

3. Little information was provided on existing nesting waterbirds at the site, notably the long-term Great Blue Heron rookeries.

Silver Lake Reservoir currently supports one of the few nesting waterbird colonies in the Los Angeles area (Shuford et al., 2020), and sightings from this location have been exhaustively documented since 2009 in eBird (www.ebird.org); yet these sightings went unmentioned in the Biological Technical Report.

A single figure in the Technical Report (Figure 5) shows three separate locations for “Great blue heron rookery”, with no detail on these sites, such as number of nests, tree species/structures supporting the nests, foraging habitats used by adults or young, dates active, etc. Thus, because of this omission of data, it is very difficult to determine whether proposed “improvements” – such as widening of walking paths, the

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construction of observation decks, increases in night-time/special event use, and changes in fencing – will have positive or negative impacts to what appears to be the site's only nesting waterbirds.

Based on information gathered by local biologists, birders local residents (including notes and photos uploaded to eBird and provided by Silver Lake Wildlife Sanctuary), the following is a summary of Great Blue Heron nesting at Silver Lake Reservoir:

Three separate rookery sites have been used in different years by up to 14 nesting pairs of Great Blue Herons in and around the northwestern corner of Silver Lake Reservoir/Ivanhoe Reservoir, with sites and numbers variable from year to year.

While we found an unsupported reference to nesting as early as 2005 (see below), the first confirmed nesting record came in 2011, when at least one pair was present at a nest in the eucalyptus grove at the northwestern corner of Silver Lake Reservoir, within a fenced-off area (hereafter referred to as the "eucalyptus grove") in February-March 2011 (<https://ebird.org/checklist/S7609469>; <https://ebird.org/checklist/S7934475>). However, with nine birds reported on 23 Feb. 2011, more nests may actually have been present that year than observed (high fencing precludes good visual access to this rookery area, which may in part be why herons selected it).

During a statewide survey of nesting waterbirds in 2012 (Shuford et al., 2020), three active nests (with at least one young observed) were observed in the eucalyptus grove on 6 June 2012. The following year, a report of 10 birds "all up in the trees" on 16 Feb. 2013 (<https://ebird.org/gbbc/checklist/S13100553>) again suggests this colony was larger than the 1-3 nests estimated in 2011 and 2012.

In 2020, an Initial Study/Mitigated Negative Declaration for a proposed Aeration and Recirculation system (part of a prior Master Plan process ongoing in 2020) reported that:

"a great blue heron rookery has been present within the Eucalyptus grove on the west side of the Silver Lake Reservoir since at least 2005...approximately 14 nests in the rookery [were observed] during regular surveys and monitoring in 2015".

¹ Text excerpted from a letter submitted by California Dept. of Fish and Wildlife (https://files.cdnet.opr.ca.gov/261648-2/attachment/HDA3Rk_eWQYP2Dmf-cEJsIrWHskoghYnDl77gPZ91DqRC9JRqoPeyMX0HqHwU0u2ywoNlmcjZamc6-Q0). We have not located evidence for heron nesting in 2005 (nor prior to 2011), though it is possible it was occurring then, since this year marked a surge in nesting heron activity elsewhere in the county, in Marina del Rey. Still, in a regional assessment of nesting waterbirds in 2009, Cooper and Hamilton (2010) found no evidence of

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This 2015 estimate would have been the same sighting uploaded to eBird, of “14 nests” (<https://ebird.org/checklist/S61858966>), with the (eucalyptus grove) rookery apparently split into a northern and southern portion (see: <https://ebird.org/checklist/S61879541> for photos).

Three nests were again noted in the eucalyptus grove in 2016 (<https://ebird.org/checklist/S29018357>), yet by spring 2017, the colony appeared to have abandoned the eucalyptus grove, and relocated to a deodar (*Cedrus deodorus*) in the yard of a house at Tesla Ave. and Rokeby St. (northwest of Ivanhoe Reservoir), with a single nest present here that year (e.g., <https://ebird.org/checklist/S36426695>).

The following year (spring 2018) three Great Blue Heron pairs were apparently using the Tesla rookery, and not the eucalyptus grove (<https://ebird.org/checklist/S43180319>), and did so again in both 2019 (e.g., <https://ebird.org/checklist/S55632193>; <https://ebird.org/checklist/S58238102>) and 2020 (<https://ebird.org/checklist/S69946234>).

A county-wide assessment of nesting waterbirds (Cooper and Hamilton 2019) noted not only the three active nests of Great Blue Herons at the Tesla Ave. rookery, it also found five inactive nests (presumably from 2016 or prior) in the eucalyptus grove on the northwestern corner of the reservoir (<https://ebird.org/checklist/S55632193>), suggesting this rookery was indeed inactive, with all birds shifting to the Tesla Ave. site.

In spring 2021, up to three nests were discovered in a third rookery site, a row of large Aleppo pines (*Pinus halepensis*) above the walking path on the northwestern edge of Ivanhoe Reservoir (photos/video; Silver Lake Wildlife Sanctuary). This new rookery was also documented in eBird (<https://ebird.org/checklist/S87145501>), with two active nests in “in tall Aleppo Pines along the west side of IR (and bordering W. Silver Lake Drive, within about 75m of Tesla.)” (<https://ebird.org/checklist/S86744014>)².

nesting herons at Silver Lake Reservoir that year. However, we note that the earliest sighting of Great Blue Heron at Silver Lake Reservoir in the popular online platform eBird was not until 2009, despite numerous records of the species here – albeit not nesting – dating back to at least the late 1960s (Los Angeles Audubon Christmas Bird Count, unpubl. data). This is more an illustration of the relative recent use of eBird than an indication of the species’ status here prior to the 2010s.

² That same year, a fledgling from this rookery was captured on the ground below the nest, “rescued”, and transported to a rehab facility in San Pedro. It was later released at Dominguez Gap wetlands near Carson, Los Angeles Co. (Silver Lake Wildlife Sanctuary, via email). This rookery was possibly also active in 2020 (single nest?), and possibly again in 2022, based on sightings uploaded to eBird.

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In 2021, the Tesla nest tree was *also* active (at least one nest), and while heron counts in spring 2022 reached nine individuals (eBird), no direct evidence of nesting was submitted to eBird this past season.

Reasons for the loss of the eucalyptus grove colony (which now supports an active nesting territory of Red-tailed Hawk) are unclear. It seems possible that construction activity and de-watering of the reservoir during 2015-2017 played a role. However, we should also note that Great Blue Herons frequently shift rookeries every few years even without obvious reasons, and that a Red-tailed Hawk – a species typically sensitive to disturbance under the nest – found the eucalyptus grove suitable for a nesting site during this same time. Either way, the history of each of these nesting species should have been thoroughly presented and analyzed in the Technical Report, but was not. Additionally, any proposed changes to features at the northwestern portion of the reservoir area should be analyzed with this history in mind.

4. Silver Lake Represents an important (local) hotspot of nesting raptors, yet these nesting species – and their documented nests – were left out of the DEIR.

In 2017, Friends of Griffith Park launched the “Los Angeles Raptor Study”, an effort to map and monitor nesting hawks and owls across Los Angeles (<https://friendsofgriffithpark.org/raptor-study/>). This project has been advertised through numerous local and regional media outlets, including articles, interviews, podcasts, and websites. Yet, the preparers of the DEIR did not mention this study, nor did they address the specific presence of *any* nesting raptors in the Silverlake area. This project has documented more than 400 active and suspected territories of raptors around Los Angeles, several of which occur in the vicinity of Silver Lake Reservoir. These are mapped in Figure 3.

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 An aerial photograph of the Silver Lake Reservoir area in Los Angeles. The reservoir is a large, dark blue body of water in the center. Surrounding it is a dense urban landscape with buildings, roads, and parking lots. Several yellow pins are placed on the map, each with a text label indicating a raptor nest. The labels include:

- Red-tailed Hawk (#200)
- Great Horned Owl (#038)
- Red-shouldered Hawk (#104)
- Cooper's Hawk (#038)
- Other Red-tailed Hawk
- Other Red-shouldered Hawk
- Other Great Horned Owl
- Other Red-shouldered Hawk
- Other Red-tailed Hawk
- Other Great Horned Owl

 The map also shows major roads like the 10 Freeway and the 60 Freeway.

Figure 3. Raptor nests in the vicinity of Silver Lake Reservoir. Note: several other nests are present in the area shown in the map (i.e., farther away from the reservoir area), but have not been depicted here to protect their locations (Los Angeles Raptor Study, unpubl. data).

No fewer than three nests active since 2017 are located directly *within* the Silver Lake Reservoir study area boundary used in the DEIR (Red-tailed Hawk territory #200, including two alternate nest sites; and Great Horned Owl territory #038). Each of these nests is well-known to the public using the reservoir's perimeter walking path, based on conversations with Raptor Study volunteers and local residents. These went unmentioned in the Technical Report.

Other raptor territories are located in the neighborhoods surrounding the reservoir, each with individual raptors that doubtless forage widely during the nesting season, including those of Cooper's Hawk (not mentioned in the Technical Report), Red-shouldered Hawk (not listed in the faunal compendium of the Technical Report), and other Red-tailed Hawk territories.

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Red-tailed Hawks in particular can remain in the same territories for decades – even using the same nests year after year. In fact, Los Angeles Audubon Christmas Bird Count data documented a report of a “screaming” pair of Red-tailed Hawks in “pines and eucalyptus” around the reservoir from field notes in December 1974, indicating that the territory here (which is still active today) may be up to 50 years old, if not older.

Nesting raptors – including Red-tailed Hawks and Great Horned Owls – are frequently sensitive to human disturbance, and we note that both species have been nesting in fenced-off areas, including the eucalyptus grove along the western edge of the reservoir, and the fenced-off portion of the knoll north of the “meadow”. *Both of these areas are slated for opening-up to increased human use, and fence removal, and yet the impact of these changes was not addressed anywhere in the DEIR.*

5. Habitat restoration at “the knoll” failed to include ecological-function goals for existing or future upland habitat, including oak/walnut woodland already present.

The Technical Report’s proposed habitat restoration vision for “the knoll” area on the northeastern end of the lake did not include habitat goals, aside from listing the number of acres targeted. It did not include target wildlife species that would benefit from this habitat, nor did it include impacts to species currently present (such as nesting Red-tailed Hawk and Great Horned Owl). Puzzlingly, it recommended leaving in place highly-invasive trees such as Chilean pepper (*Schinus polygama*)!

I suggest the following steps for effective habitat restoration:

1. Re-do bird and wildlife surveys in the targeted area (“the knoll”), including visits at different times of year with competent local biologists;
2. Pay close attention to special-status species, several of which were either missed by surveyors for the DEIR, and/or were not addressed;
3. Develop a list of species currently using the site, and assess their approximate abundance/relative abundance;
4. Develop a list of indicator species that might be encouraged to colonize the site following habitat restoration;
5. Propose specific planting/weeding/restoration goals that match the needs of the indicator species, and which do not harm populations of existing special-status species (or mitigate appropriately).

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Since none of these steps was followed, I have included a table of special-status species (Table 2, below) to help identify target species. I recommend that the applicants discuss and analyze each of these species appropriately, and ensure that habitat improvements and mitigation accommodate each.

In addition, I recommend treating all nests of colonial waterbirds (including Great Blue Heron) and raptors (four species; see above) as “special elements” to address in any proposed design alternative. In particular, bringing additional pedestrian traffic, and increased human activity in general, into areas currently occupied by nesting raptors is of great concern, and should be addressed thoroughly in the DEIR.

Turning to plants, southern California black walnut woodland, a CNPS-Ranked species is mischaracterized as “not present”, yet multiple walnuts were observed. In the Biological Technical Report (ES-2, Executive Summary), the preparers state:

“The BSA does not support black walnut woodland and its occurrence onsite is not within typical habitat.”

Not only do they not provide a definition of this habitat, they apparently fail to recognize that oak, walnut and oak-walnut woodland *are dominant plant communities across northeast Los Angeles*. In the Technical Report’s Figure 5, numerous individual black walnuts are mapped, and shown to co-occur with other native woodland elements, such as coast live oak and blue elderberry (as stated on p. 22). Yet this apparent oak-walnut community was not considered present. Helpfully, Keeler-Wolf and Evens (2006) provide a definition the preparers could have used: “*Juglans californica* (black walnut) >50% relative cover in the tree canopy, or >30% relative cover with *Quercus agrifolia* (coast live oak) present.”

Based on the mapped trees on the site (see Figure 5, Figure 7a), both black walnut and southern California black walnut *are present*, and *do form* a cohesive woodland (albeit one with other species interplanted and naturalizing due to a century of afforestation by the city).

This downplaying of sensitive resources is pervasive in the entire report, and contributes to the confusion over, and obfuscation of, what is actually present – and worth preserving – on the site. It also precludes a serious evaluation of impacts from the proposed project.

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Table 1. Comparison of high counts of selected waterfowl (those with >100 individuals in any single visit), Los Angeles-area reservoirs (prepared by DSC).

Species	Lincoln Park	Hollywood Reservoir	Bolton Park	LAR - Sepulveda Basin	Echo Park	Reseda Park	Bolton Creek	Magic Johnson Park	LAR - Betty Davis Park/Victory	Sepulveda Basin WA	Lake Balboa	Ken Mather	LAR - Willow St	Lagg Lake	Silver Lake
American Coot	300	100	400	500	500	300	500	500	800	1300	2100	780	2000	1222	1400
California Gull	-	300	250	-	100	150	210	270	150	520	140	1500	2000	1300	2200
Ruddy Duck	-	-	-	-	118	-	-	-	-	245	140	300	250	250	3500
Canada Goose	200	-	145	300	250	108	150	300	-	770	751	211	100	718	100
American Wigeon	-	-	128	280	-	100	-	360	600	300	300	-	600	420	120
Western Gull	-	500	-	200	250	150	250	350	150	427	150	700	400	-	220
Mallard	150	-	110	101	150	250	-	-	400	225	400	200	300	555	-
Ring-billed Gull	-	-	300	-	-	200	225	100	-	295	200	-	500	250	100
Northern Shoveler	115	-	250	-	-	-	-	200	-	-	-	500	100	200	150
Double-crested Cormorant	-	-	-	-	250	-	-	-	-	235	360	-	120	303	-
Bonaparte's Gull	-	-	-	-	-	-	500	-	-	-	-	700	-	-	-
Ring-necked Duck	-	-	-	-	105	-	-	-	-	-	-	500	-	220	170
Northern Pintail	-	-	-	-	-	-	-	-	-	-	-	-	170	350	-
American White Pelican	-	-	-	-	-	-	-	-	-	190	-	140	100	-	-
Green-winged Teal	-	-	-	-	-	-	-	-	-	-	-	-	375	-	-
Cinnamon Teal	-	-	-	-	-	-	-	-	-	-	-	-	290	-	-
Brown-winged Teal	-	-	-	-	-	-	-	-	-	-	-	-	120	-	-
Osprey	-	-	-	-	-	-	104	-	-	-	-	-	-	-	-
Least Grebe	-	119	-	-	-	-	-	-	-	-	-	-	-	-	100
TOTAL	765	1019	1195	1301	172	1886	1939	2800	2300	4448	4611	5503	6425	6708	8060
# Sp >100	6	6	7	5	8	7	7	7	5	10	9	10	15	11	10

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Table 2. Special-status species known from or potentially occurring at Silver Lake Reservoir (prepared by DSC).
LACBSSC – Los Angeles County Bird Species of Concern (Allen et al., 2009).

Scientific Name	Common Name	Federal Status	State Status	CDFW Status	Other Status	Regional Status	Potential for Occurrence/ Status at SLR
<i>Accipiter cooperii</i>	Cooper's hawk (nesting)	None	None	WL	-	Common breeding resident throughout region, to be expected in virtually any habitat, at least seasonally. Favours tall trees in residential areas, or, in woodland territories, riparian and mature woodland habitats. Nests March-July, with young dispersing more widely during July into fall.	PRESENT: Multiple breeding territories documented by LA Reservoir Study (2017-2022). These local birds are resident on territories (DSC, unpubl. data). See figure.
<i>Aimophila ruficeps canescens</i>	southern California Rufous-crowned sparrow	None	None	WL	-	Common resident in local hills in large areas of grassy, low scrub, often in burned-over areas. Favours habitat with boulders and scattered shrubs for perch sites, and frequently found on slopes invaded by non-native fountain grass (<i>Cenchrus</i> sp.). Extremely sedentary, with virtually no seasonal movement. Nests placed on the ground, usually at the base of small shrubs.	MODERATE: Unlikely today (single record of a presumed dispersing bird, Sept. 16, 2021, dBird). However, with extensive habitat restoration of coastal sage scrub community (e.g., at the Kasoli), this species may colonize the site, and would be an ideal indicator species for this process. Nearest populations occur in Griffith Park and Debs Park.

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							States in Elysian Park unclear, but may also occur there.
Ardea herodias	great blue heron (nesting colony)	None	-	-		Nests in tall trees near permanent water bodies. Forages widely when nesting, including in adjacent water bodies and fields. Not "listed" as protected by ESA/CESA, but nonetheless included in California Special Animal List (CDFW 2022).	PRESENT; small but long-standing colony along western edge of reservoir moved to residential area just north of Ivanhoe Reservoir in recent years.
Colaptes cafer	Costa's hummingbird (nesting)	None	-	-	USFWS: BCC	Arid scrub, most commonly in the interior portions of the region, away from the immediate coast.	LOW: As with Rufous-crowned Sparrow, occurs in larger areas of open space (coastal sage scrub/low chaparral) in region, but localized near urbanized portions of city. Could be used as an indicator species with future restoration attempts.
Cathartes aura	turkey vulture (breeding)	None	None	-	LACBSC	Rock outcrops and steep, cliff-like areas, usually very far from roads/habitation.	LOW: Turkey Vultures frequently fly overhead, and may occasionally feed, but would not be expected to breed here.
Catharus ustulatus	Swainson's thrush (breeding)	None	None	-	LACBSC	Riparian woodland and mesic oak woodland, though widely extirpated as a breeder, and may not nest in the area every year, or in recent years.	LOW: Swainson's Thrush would be expected as a (scarce) migrant, but would not breed.

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							Formerly more widespread and a localized breeding resident in Los Angeles Basin; now best considered a rare transient through most of the region, with a handful of pairs remaining at the far periphery of the Los Angeles area. Transients (esp. in fall) occur over a variety of habitats, but may remain in overwinter only during periods of higher precipitation, when prey levels are high. Historically nested in riparian trees near extensive grassland, and generally requires multiple habitat types to persist as a breeding species.	
<i>Elanus leucurus</i>	white-tailed kite (nesting)	None	None	FP	-			LOW: White-tailed Kite could occur as a scarce transient (though records in the central city area are few), but would not breed, and would not overwinter.
<i>Empidonax traillii</i>	willow flycatcher (nesting)	None	Endangered	-	-		Nests far to the north of Los Angeles Co. (the rare <i>extimus</i> race was formerly present as a breeder, but has been extirpated for many decades). Migrants still occur commonly through region.	LOW: A handful of records of fall migrants (all birds), but no indication of over-summering or nesting.
<i>Falco columbarius</i>	merlin (wintering)	None	WL	-			Regular in small numbers in various habitats, including urbanized areas.	PRESENT: Annual winter visitor (singly), perched. Favors areas with scattered tall trees for perching. Forages on small birds.
<i>Falco peregrinus anatum</i>	American peregrine falcon (nesting)	Delisted	Delisted	FP	-		Uncommon winter visitor and transient nearly year-round. Urban-nesting pairs wander widely from civic sites in downtown Los Angeles and elsewhere. A handful of pairs also nest in remote rock outcrops/hedges on peaks (e.g., San Gabriel Mtn., Santa Monica Mtn.).	Recorded (1-2 birds) annually, but not a full-time resident of the site. Visits from urban-nesting pairs are likely during the nesting season (spring, summer).


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							Localized breeder, present April - August (with occasional transients possible later in fall). Ideal breeding habitat includes several components, including extensive, dense riparian scrub-low woodland, fresh water (either running or ponded), and mesic, weedy habitat for foraging. Would not be expected far from permanent drainages, but also occurs in areas where anthropogenic water has produced dense riparian and even weedy habitat.	MODERATE: Single record of a fall transient (9/15-23/2021, eBird). This species would not occur as a breeder (or in summer) without extensive riparian restoration/landscaping. However, if this is done, it could occur (it has overwintered along the L.A. River, and in Rio de Los Angeles SP) and could serve as an indicator species here.
Icteria virens	yellow-breasted chat (nesting)	None	None	SSC	-			
Lanius ludovicianus	loggerhead shrike	None	None	SSC	-		More widespread and common historically (pre-2000), now a localized transient and rare winter visitor, nesting outside the region. Favors highly-disturbed (generally by grazing/farming) areas, where bare soil provides foraging opportunities, and where high perches such as utility wires and bare trees allow for hunting. Generally absent from higher grassland (where not grazed), and rarely encountered in natural habitat, but occurs in recent burns, where fire has removed most of the vegetation; declines as scrub grows back.	LOW: Rare transient in area, individuals would be expected occasionally, but would likely not overwinter due to (current) rarity in area today.
Nannopterum auritum	double-crested cormorant (nesting colony)	None	WL	-			Nests in tall trees near permanent water bodies with food source (fish). Forages widely when nesting, including in adjacent water bodies, but also (coastal colonies) in offshore waters.	LOW: Occurs in small numbers (<5 birds) in winter and migration, with no nesting documented. The lack of fish likely limits the abundance of this species here (in other urban lakes their numbers can approach pest status).

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<i>Podiceps nigricollis</i>	oared grebe (breeding)	None	None	-	LACBSC	Open water, of lakes, large ponds and rivers, and inshore marine/estuarine areas	LOW: Small numbers (max. c. 20 birds) occur in migration and winter on the reservoir, but breeding requires extensive freshwater marsh vegetation, and would not be expected.
<i>Pooecetes gramineus</i>	vesper sparrow	None	None	-	LACBSC	Extensive grassland	LOW: Rare migrant with two recent records, both in Sept. (eBird). Unlikely to occur with regularity due to the lack of extensive grassland habitat.
<i>Pyrocephalus rubinus</i>	vermillion flycatcher (nesting)	None	None	SSC		Rare but increasing resident (mainly winter/non-breeding) in urbanized/disturbed habitats. Most typical habitat includes extensive irrigated lawn with small scattered trees for perching and nest-placement.	LOW: Rare migrant with two recent records (eBird). May become more common in area, though Los Angeles lies outside the current regular range of this species, which only has a handful of local outposts on the coastal slope in the county.
<i>Rallus limicola</i>	Virginia rail	None	None	-	LACBSC	Resident locally in permanent freshwater marsh habitat, with small populations in the Whittier Narrows and Ballona area. Probably occurred much more widely historically, but not in the past 100+ years.	LOW: No records, and unlikely to occur without extensive (wetland) habitat restoration. Even so, this species does not occur in many local areas of freshwater marsh habitat (e.g., Los Angeles River), so habitat needs are likely highly-specific, perhaps related to stability of wetland structure and hydrology (the river floods throughout the year).


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							MODERATE: Only a single (recent) record at Silver Lake Res. for June-July, likely a late migrant (#6/122; eBird). While a very common breeding species along the nearby Los Angeles River (Glendale Narrows, Elysian Valley), this species is essentially absent as a breeder north of the river (e.g., Griffith Park, Elysian Park). Thus, it is likely that extensive riparian habitat restoration, using willows, would be necessary for this species to occur in the future.
<i>Sceloporus penicillatus</i>	yellow warbler (nesting)	None	None	SSC	-		Localized breeding resident (March - August) in a variety of riparian habitats, usually with at least a few tall trees (oak-ycamones and willows). Does not occur in pure oak woodland, but will accept non-native trees of sufficient size, in areas of permanent (fresh) water. Very common and widespread transient, in both spring and fall.
							Various habitats, mainly in arid/interior areas (rare on immediate coast). Prefers some combination of trees and fields with seed-producing wildflowers, often near waterways or irrigated areas. Generally found far from intensively-urbanized areas, but occurs in large parks within urban zones (e.g., Balboa Park).
<i>Spizus lawrencei</i>	Lawrence's goldfinch	None	-	-	USFWs: BCC		LOW: Rare visitor, with most records from a single (invasion?) year (2021; eBird). Unlikely to occur, next, since this area is outside the species' normal range in interior portions of the region. PRESENT: Uncommon fall migrant, with records of 1-2 birds in recent years.
<i>Sturnella neglecta</i>	western meadowlark	None	None	-	LACBSC		Excessive grassland; athletic fields and other large lawn areas in winter.


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cont.


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EDUCATION

University of California, Los Angeles, Ph.D. 2020 (Biology)
University of California, Riverside, M.Sc. 1999 (Biogeography)
Harvard University, A.B. 1995 (Biology)

EXPERIENCE

Resource Conservation District – Santa Monica Mountains, Topanga, CA. 2022 – present
Senior Conservation Biologist: Coordinating and developing the long-term research program of the RCD, focused on sensitive species and habitat protection in the Los Angeles area.

Cooper Ecological Monitoring, Inc. Los Angeles, CA. 2005 – present
President: An independent ecological consulting firm specializing in land use, wildlife and biodiversity issues, we provide expertise in study design & analysis, ecological assessment, and management recommendations.

- Manage projects in the \$7,000 - \$100,000 range for up to 20 clients per year in the Los Angeles area.
- Past clients include municipalities (Los Angeles, Torrance), non-profit groups (The Nature Conservancy, Trust for Public Land), agencies (U.S. Fish and Wildlife Service, California Coastal Conservancy), and various private firms and individuals.
- Hire and supervise up to five subcontractors per year.

National Audubon Society Los Angeles, CA. 2001 – 2005
Director of Bird Conservation, Audubon California
Member of senior management team for Audubon California, worked with national staff and partner organizations to shape bird conservation agendas in California; organized donor cultivation activities, and assisted development staff in grant writing; wrote and published a landmark reference guide (*Imagined Bird Areas of California*, findings later incorporated into state legislation); helped draft Audubon California's strategic plan; visited and evaluated sites for new Audubon nature centers; wrote staff training manuals for existing centers and programs.

Biologist, Audubon Center at Doheny Park 1999 – 2001
Member of core team charged with developing an urban nature education center at a large city park in urban Los Angeles (Doheny Park); drafted and implemented habitat management plan; organized neighborhood focus groups for parents and teachers in northeast Los Angeles to assess public perception of nature and conservation organizations; initiated baseline natural history research in surrounding region for development of educational materials and programs for new Audubon Center.

APPOINTMENTS/BOARDS

Research Associate, Dept. of Ornithology, Natural History Museum of Los Angeles County, 2000 – present.
RCCN World Protected Areas, 2017 – present
Associate Editor, Western Birds 2014 – present
Oak Park – Park and Recreation Planning Committee (Elected member, 2010 – present)
Southern California Academy of Sciences 2013 – 2015
SCLATAC (Los Angeles Co. Dept. of Regional Planning) 2009 – 2013
Los Angeles Dept. of Recreation and Parks – Griffith Park Postfire Recovery Team, 2007 – 2008
California Dept. of Water Resources – Salton Sea Restoration Advisory Committee 2003 – 2005
Central Valley Habitat Joint Venture – Management Board 2002 – 2005
California Partners-in-Flight – Executive Steering Committee 2003 – 2005
Los Angeles and San Gabriel Rivers and Mountains Conservancy – Technical Advisory Board 2002 – 2005
Friends of the Los Angeles River – Technical Advisory Board 1989 – 2001

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ATTACHMENT 2

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BIOLOGY DEPARTMENT
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November 24, 2022

Prepared by Amanda J. Zellmer
Associate Professor, Occidental College

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Silver Lake Reservoir Revisioning Project. I have focused my review on the Biological Technical Report and the Land Use Chapter, with the intention of evaluating the impacts of the proposed project on wildlife connectivity and habitat restoration.

I am an Associate Professor of Biology at Occidental College and I have been studying wildlife connectivity in urban areas for nearly 20 years and have studied urban wildlife in Los Angeles specifically for the past 10 years. I have experience modeling and assessing wildlife connectivity, leading monitoring programs of urban mammal populations, and modeling the impacts of habitat fragmentation on wildlife populations.

The Silver Lake Reservoir is a uniquely situated open space within the City that currently protects habitat for multiple species of wildlife. The area was recently designated as one of the City's "Protected Areas for Wildlife" (PAWs) based on the criterion that it "Supports Breeding/Feeding/Resting/Migrating Grounds with Limited Availability in Southern California/Los Angeles."

While I think there is much potential for a revisioning of the Silver Lake Reservoir, I found the plans for habitat restoration, assessment of the current biological resources, and the evaluation of impacts to wildlife connectivity to be lacking in the DEIR. Below I detail how and where these plans fall short and provide recommendations for addressing these concerns.

1. The DEIR disregarded the role of stepping-stone habitat as an important source of connectivity between significant open habitat spaces within Los Angeles.

The Silver Lake Reservoir is conveniently located between two significant preserved open habitat spaces within Los Angeles – Griffith Park and Elysian Park. These two parks provide some of the only open space for wildlife near downtown Los Angeles. Wildlife that live within these parks, as well as wildlife that live within the Silver Lake Reservoir, rely on habitat connectivity for movement to access resources, find mates, and escape threats. As the only significant stopover between these two parks, the Silver Lake Reservoir is a crucial piece to the puzzle of maintaining

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connectivity for wildlife in Los Angeles. In fact, Omniscape connectivity models for the Greater Los Angeles Area indicate potential connectivity through the Silver Lake Reservoir (Figure 1). Recent sightings of the well-known mountain lion P-22 in Silver Lake further support the potential role of the Silver Lake Reservoir in aiding connectivity for mammals in Los Angeles. Maintenance and enhancement of connectivity through the Silver Lake Reservoir would help the City achieve stated goals of LA’s Green New Deal and the Draft Wildlife Ordinance.

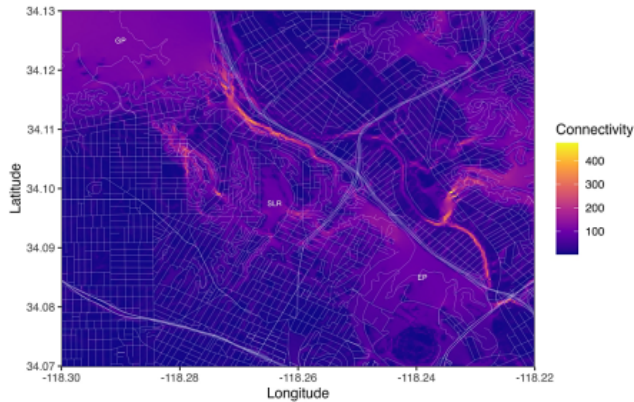


Figure 1. Omniscape connectivity model for the Silver Lake Reservoir (SLR; middle) showing potential connectivity with Griffith Park (GP; upper left corner) and Elysian Park (EP; lower right corner). The model assumes that costs to wildlife movement increase with increasing urban development. Warmer colors indicate higher flow potential.

The potential for wildlife connectivity through the Silver Lake Reservoir is addressed in Appendix D, Section 4.8, which after recognizing the importance of connectivity states that “the BSA does not serve as a contiguous regional corridor between two larger stands of habitat.” Yet, in the proposed plan (Table 3.11-1), the removal of fencing is touted as being a move to improve wildlife connectivity “Removal of the perimeter fence would also expand connectivity and wildlife access to the water” that would support the objectives of LA’s Green New Deal. While the Silver Lake Reservoir is clearly not part of a continuous corridor between Griffith Park and Elysian Park, it does provide a stepping-stone between the two parks. However, no attempts were made to evaluate the potential Silver Lake Reservoir holds to provide connectivity to other habitats. Moreover, as I detail below, the lack of assessment of the non-avian faunal diversity at the Silver Lake Reservoir significantly limits the ability to evaluate the impacts of the proposed plan on wildlife connectivity.

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Yet, our previous research suggests that numerous wildlife species continue to be observed throughout urban wildlife corridors in Los Angeles (Zellmer & Goto 2022).

To mediate these limitations in the DEIR, I recommend explicitly evaluating the potential for wildlife movement by conducting connectivity models to evaluate functional connectivity through the Silver Lake Reservoir for key species. In addition, there needs to be a clear assessment of wildlife movement in and around the reservoir, for example with camera traps, radio collars, or citizen science observations. Multiple aspects of the proposed project have the potential to impact wildlife connectivity, including the removal/modification of fencing, increased presence and activity of humans, and added presence of buildings. Habitat connectivity assessments could help inform where to avoid fencing and where fencing could be used in a way to keep humans out of natural areas while guiding wildlife to safe passageways, reducing human-wildlife conflict.

2. Biological surveys were insufficient for most terrestrial mammal, bat, reptile, and amphibian species.

The Faunal Compendium has a surprising lack of terrestrial mammals, bats, reptiles, and amphibians. Only two terrestrial mammal species were noted in the Faunal Compendium, coyote and desert cottontail, both of which were simply observed during surveys. Yet, numerous mammal species have been observed on and within 1 mile of the Silver Lake Reservoir (Figure 2) that were not listed, including Botta's Pocket Gopher, Bobcat, and Mountain Lion (although this observation was noted in the report). There are no bats listed in the Faunal Compendium, and the report makes no indication that bat specific surveys were done. Neglecting to survey the area's bat species would be problematic considering that three special-status species are known to occur within a 5 mi radius of Silver Lake Reservoir. Finally, no reptiles or amphibians were observed during the surveys, yet at least 8 species of lizard, snake, and turtle¹ and 4 species of salamanders and frogs² have been recorded in and around the Silver Lake Reservoir by community scientists. Western fence lizards for instance are ubiquitous throughout Los Angeles and near impossible to miss while at Silver Lake Reservoir.

The lack of terrestrial mammals, bats, reptiles, and amphibians listed in the Faunal Compendium indicates that sampling efforts were not sufficient for documenting diversity of these species present at the Silver Lake Reservoir. The report indicates that biological surveys were only done on two days, once in the fall and once in the spring, but does not note any methodological approaches aside from visual inspection and is lacking important details such as the time of day that surveys were completed. Such methodological details are essential since survey methods will highly influence which species are observed. For instance, bird activity is highest in the early morning and late evening, while lizards are most abundant in late morning. Because no times of day were listed for when observations were completed it's impossible to know if surveys were conducted during optimal parts of the day. If done during peak heat, many species could have gone unnoted during the survey. Similarly, many species require more intentional survey approaches

¹ https://www.inaturalist.org/observations?place_id=185136&subview=map&taxon_id=26036

² https://www.inaturalist.org/observations?place_id=185136&subview=map&taxon_id=20978

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because they are not readily observed with visual surveys. Mammals, especially any species with special-status, are unlikely to be observed during field surveys.

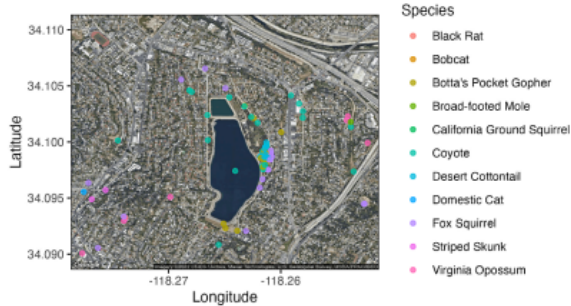


Figure 2. Community science mammal observations from the Silver Lake Reservoir and surrounding areas. Observations were downloaded from iNaturalist.

In order to evaluate the impact of the proposed project on wildlife at the Silver Lake Reservoir, more intensive biological surveys are necessary. Accurate assessment of medium- to large-sized mammal occupancy requires a sample size of over 20 camera traps for approximately one month (Kays et al. 2020). Remote detection is necessary since many of these species are avoidant of humans. Small mammal surveys should include Sherman traps. Bat species would require night time call surveys. Reptile and amphibian surveys require approaches such as cover boards, snake traps, and/or pitfall traps, since many of these species are not readily observed by simple visual surveys.

Understanding which species currently reside in our utilize the Silver Lake Reservoir is essential for evaluating the impact of the proposed changes. For instance, opening access to the reservoir by removing fencing will attract more people for recreation. Recreational activities are known to impact numerous wildlife species (Larson et al. 2016). Furthermore, some of the proposed work has the potential to degrade habitat for some species. For example, grading will compact soil and eliminate habitat for ground dwelling species and walking paths with fragment existing habitat. However, without knowing which species are present it will be difficult to determine the impact of these activities.

3. The proposed plans for habitat restoration are undermined by development for human use.

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As noted in the DEIR, there is high potential for habitat within the Silver Lake Reservoir to be restored in such a way that it helps the City achieve multiple goals for conservation of natural resources within the City. However, as described, the plans for habitat restoration are underwhelming and in multiple cases, the plans for development within the proposal undermine actions taken to restore habitat.

In Chapter 3.1 on Land Use, Table 3.11-1, the DEIR lists the proposed plan for the Silver Lake Reservoir as consistent with the City's Open Space and Conservation Goals: "Objective 6.1: Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region." Specifically, the DEIR states that the proposed work is not at odds with this objective because "The proposed Project would include improvements to habitat within the SLRC. The proposed Project would not convert the existing land use and zoning designation of the site. The Project site would remain open space and would include the addition of new passive and active recreational spaces for use by the public, and enhancement of habitat areas. The proposed Project would not conflict with policies that protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region."

However, there are multiple aspects of the proposed plan that will degrade rather than enhance the natural resources of the City. First, removal of fencing will allow for increased human presence within natural areas such as the Knoll and within the Eucalyptus Grove. Human activity in these areas will reduce the quality of these habitats for use by wildlife (Kowarik 2011). Second, proposed added structures throughout the Silver Lake Reservoir will add to increased encroachment of urban development within existing natural areas. Finally, the creation of a Promenade and walking paths that cross through the Knoll and the Eucalyptus Grove will fragment existing habitat, both physically and because of the increase of human activity along these trails. While walking trails may not be a deterrent to larger-bodied wildlife species, smaller species and ground-dwelling species such as snakes will experience habitat fragmentation as a result of added trails.

To mediate the impacts of the proposed work on the quality of existing habitat within the Silver Lake Reservoir, the following steps should be taken:

1. Maintain areas that are accessible to wildlife and inaccessible to humans through the use of wildlife friendly fencing that does not impede movement of wildlife but at the same time detracts humans from entering the habitat.
2. Reduce nighttime lighting throughout the Silver Lake Reservoir. Lights that remain should be directed toward the ground.
3. In addition to staff horticulturists, staff biologists should be hired to monitor biodiversity of animals within the Silver Lake Reservoir.
4. Reduce the number of buildings, paths, and structures to be built as part of the proposed project. The project's proposed development would reduce and degrade habitat and would increase urban encroachment on natural areas.
5. Properly assess the Silver Lake Reservoir's wildlife biodiversity and work with a biologist to determine habitat restoration needs specific to wildlife.

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Kowarik, I. (2011). Novel urban ecosystems, biodiversity, and conservation. *Environ. Pollut.* 159, 1974–1983. doi: 10.1016/j.envpol.2011.02.022.

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ATTACHMENT 3

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November 29th, 2022

Prepared by Jodhan Fine
Undergraduate Biology Student, Occidental College

Thank you for the opportunity to review and voice concerns regarding the Silver Lake Reservoir
Draft Environmental Impact Report (DEIR).

I am an undergraduate at Occidental College with relevant experience in avian behavior and biology. Beyond many years of experience as an avid birder observing and studying birds, I've published articles in *North American Birds Magazine*, *Birding Magazine*, and *Western Birds* and volunteer for the Cornell Lab of Ornithology reviewing rare bird records and ensuring quality data on the citizen science database eBird (<https://ebird.org/home>). Additionally, I'm on the board of my local Audubon Chapter, have experience in museum-based science at the Moore Lab of Zoology, and receiving funding from the National Science Foundation, studied Bell's Vireo populations in southern New Mexico.

With 204 recorded species on eBird, Silver Lake Reservoir is ranked 54th in Los Angeles County for number of species per location. This is an impressive ranking in a county with 17.5 thousand eBird users, 478 thousand user submitted checklists, and 541 recorded species. Beyond high numbers of taxa, like 25 different waterfowl species, the Silver Lake Reservoir hosts extremely high numbers of individual birds. During winter, thousands of ducks, gulls, and coots can be found on the reservoir and hundreds of wintering songbirds can be found throughout surrounding terrestrial habitat. During spring and fall migration, hundreds of swifts and swallows can be found flying overhead, and on the right day almost a hundred individual migratory warblers can be seen.¹ In the summer months, several raptor nests have been denoted by the Los Angeles Raptor Study in trees surrounding the reservoir.

With an undeniably high counts of birds, I have several concerns regarding the lack of attention avifauna received in several elements of the DEIR. First, the proposal to add an education center brings the potential for window caused bird deaths. In the United States, up to one billion birds die because of window strikes and collisions.² A building with windows erected in the middle of the meadow, a popular area for many birds, could be a death trap for the species that use the reservoir as a migration stop over, as a wintering ground, or a breeding ground. The plan proposes restoration and habitat that could bring in even more birds at risk of fatal collisions with the proposed building. With such an inherent danger, I hoped to see mention of mitigation efforts that would make the windows safe for birds, however I saw no acknowledgment of this risk, and certainly no possible solutions in the DEIR.

Regarding bird numbers, the Biological Technical Report neglected to mention many waterbirds present at the reservoir, only listing with five of the 25 waterfowl species and ignoring the gull, coot, grebe, and heron species present. The aforementioned raptor nests found by the Los Angeles Raptor Study also were never brought up in the DEIR. Raptors like the Red-tailed Hawks nesting around Silver Lake Reservoir are susceptible to abandoning their territories when

¹ <https://ebird.org/checklist/561891522>

² <https://www.allaboutbirds.org/news/why-birds-hit-windows-and-how-you-can-help-prevent-it/>

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in the presence of human disturbance.³ The DEIR does not acknowledge this risk even though the proposed plans would likely drastically increase disturbance.

To prevent raptors from abandoning their nests project Alternative 1 (no project) and project Alternative 3 (open space preserve) would be most ideal as they are the least likely to attract high recreational traffic to the park. To prevent window strikes, the three alternatives suffice, as none include the construction of an education center. In the event the proposed park plan is implemented, bird safe windows must be adopted and the plan for these windows should be added to the DEIR. Furthermore, I believe the DEIR should make an effort to include better data on the bird density and species diversity at Silver Lake Reservoir, and to acknowledge the posed risks to the nesting population of Red-tailed Hawks.

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³ <https://extension.unh.edu/goodforestry/html/6-10.htm>

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Via Electronic Mail Only

February 4, 2022

Shilpa Gupta
City of Los Angeles
1149 S. Broadway, Suite 600
Los Angeles, CA 90015
Shilpa.Gupta@lacity.org

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Silver Lake Reservoir Complex Master Plan Project, SCH #2022010055, City of Los Angeles, Los Angeles County

Dear Shilpa Gupta:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of Draft Environmental Impact Report (DEIR) from the City of Los Angeles (City) for the Silver Lake Reservoir Complex Master Plan Project (Project). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Conserving California's Wildlife Since 1870

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Project Description and Summary

Objective: The Project would redesign 116 acres of the 127-acre Silver Lake Reservoir Complex (Project area), which includes the existing out of service Silver Lake Reservoir and Ivanhoe Reservoir. The Project envisions a new park as a hybrid infrastructure that blends urban wilderness with human uses. The Project's themes are to provide a place for nature, wellness, community, children play, education, and water access. The Project would consist of seven park zones connected by a 2.5-mile tree-lined promenade. The seven park zones would consist of the following:

- 1) Ivanhoe Overlook: habitat terraces, wetland habitat islands in the Ivanhoe Reservoir, observation platforms, shade pavilion, sloped walk to water, and embankment enhancements;
- 2) Eucalyptus Grove: habitat terraces, overlook, seating terraces, and restored upland habitat;
- 3) Habitat Islands: wetland habitat islands in the Silver Lake Reservoir, fish introduction.
- 4) East and West Narrows: promenade, embankment enhancements, seating terraces, adult fitness circuit, and overlook;
- 5) South Valley: picnic area, expanded recreation center, new multi-purpose room, outdoor plaza and seating, basketball court, soccer field, and an expanded and renovated dog park;
- 6) Meadow: lawns, seating terraces, habitat terraces, kayak launch, walking paths, ornamental gardens, picnic grove, informal play, promenade, observation platforms, floating dock, and restrooms; and
- 7) Knoll: restored upland habitat, picnic grove, ornamental gardens, play area, environmental education center, and walking paths.

Location: The Project is located at the Silver Lake Reservoir Complex at 2300 Silver Lake Boulevard Los Angeles, CA 90039. The Project is in the Silver Lake neighborhood, which consists primarily of residential uses with some commercial areas, and some existing public access in and around the Silver Lake Reservoir Complex that allow park uses.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The DEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. CDFW looks forward to commenting on the DEIR when it is available.

Specific Comments

- 1) Impacts of Recreation on Wildlife. The Project proposes to restore, create, and maximize habitat for wildlife (woodlands, scrublands, and wetlands), as well as provide public access and recreation opportunities throughout the Project area. The Project area currently provides nesting and breeding habitat for birds and raptors (see Comment #3). The Project area may support more wildlife after the Project is complete. CDFW supports the Project's goal to maximize habitat for wildlife, particularly wetland and aquatic habitat, which is

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extremely rare within the City. However, CDFW is concerned that the Project's proposal to increase public access and create recreation opportunities that currently do not exist may result in disturbances to habitat and wildlife. The Project proposes new footpaths, trails, terraces, play areas, picnic areas, floating docks, and opportunities for fishing and kayaking. These opportunities could result in the following:

- Increased numbers of people and dogs;
- Increased area of influence;
- Increased noise levels;
- Increased lighting;
- Increased trash or pet waste;
- Increased wildlife injury and mortality through harassment and entanglement (e.g., fishing line, encroachment, approach);
- Introduction of unnatural food sources via trash and trash receptacles;
- Habitat encroachment and disturbance; and,
- Loss of habitat due to erosion from non-official footpaths.

Recreation and increased human activities can have the following effects on wildlife:

- Non-consumptive recreation can lead to detrimental changes in animal behavior, reproduction, growth, and immune system function (Lucas 2020).
- Blue tit (*Cyanistes caeruleus*) nestlings near recreation facilities develop slower and fledge with low body mass and poor body condition (Remacha et al. 2016).
- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*) is sensitive to pedestrian and vehicle traffic. An approaching distance of 3 meters and 2.8 meters during the pre-nesting and nesting season, respectively, alert Belding's savannah sparrows to take flight (Fernandez-Juricic et al. 2009).
- Being approached by a person may trigger a change in the behavior or physiological processes in a bird (e.g., flight responses or increased heart rate). Although these responses tend to be short in duration, they can have longer term effects as is the case of breeding birds being flushed from nests leaving eggs or chicks vulnerable to predation (Steven et al. 2011).
- Relatively 'low' impact activities such as walking or hiking can still have negative effects on birds (Steven et al. 2011).
- Increased noise may alter or mask the auditory signals required for information exchange in birds (Hillman et al. 2015).

The Project could result in energetic costs to wildlife, nest abandonment, reduced reproductive success, and reduced fitness. For example, Figure 5-2 in the Chapter 5 of the Master Plan depicts the 2.5-mile promenade going through the eucalyptus grove where red-tailed hawks (*Buteo jamaicensis*) have been documented to nest.

As such, CDFW recommends the City thoroughly analyze how the Project through increases in human activity, lighting, noise, and other anthropogenic effects may impact habitat, wildlife use of the Project area, and wildlife behavior (e.g., foraging, nesting). The assessment should include a study measuring and comparing pre- and post-Project activity types (e.g., fishing, kayaking), visitor use frequency, assess points, area of influence, level of lighting, ambient noise levels, trail routes, and trail width. The DEIR should discuss how

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the Project would avoid and/or mitigate for the effects/impacts of recreation on habitat and wildlife. The DEIR should explain how proposed Project designs (e.g., fences, trail alignment, operation hours, lighting, access restriction, restriction of certain activities) would effectively avoid and/or mitigate for those effects/impacts. If the Project would have significant impacts on wildlife as a result of increased recreation, CDFW recommends the City provide measures to mitigate for those impacts below a level of significance. Mitigation may include avoiding known breeding and nursery sites for sensitive and special status species by restricting or modifying trails (e.g., dimensions, number of trails, spatial arrangement), access points, activity types (e.g., dog walking), and structures. CDFW also recommends appropriate setbacks from known breeding and nursery sites. An appropriate setback should consider the species (e.g., alert and flight initiation distances) and type and intensity of recreational use proposed.

2) Potential Impacts on Monarch Butterfly. According to the NOP and the Biological Resources Report for the Silver Lake Reservoir Complex Master Plan (GPA Consulting 2019), approximately 14 acres of eucalyptus woodland is located in the Project area. Eucalyptus trees could provide habitat for overwintering monarch butterfly (*Danaus plexippus* population 1 – California overwintering population; monarch).

a) Protection Status: The western migratory monarch population that overwinters along the California coast has declined by more than 99 percent from an estimated four million butterflies just twenty years ago (CDFW 2022a; Marcum and Darst 2021). Habitat loss and fragmentation, including grove senescence, are among the primary threats to the population (Thogmartin et al. 2017). Given the precipitous decline, the monarch is currently slated to be listed in 2024 under the Endangered Species Act (CDFW 2022a). The monarch is included on CDFW's [Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) list and identified as a Species of Greatest Conservation Need in California's [State Wildlife Action Plan](#) (CDFW 2017; CDFW 2015). The monarch meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on monarchs may require a mandatory finding of significance because the Project may threaten to eliminate an animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, § 15065).

b) Surveys. CDFW recommends the City retain a qualified biologist to assess the Project area for monarchs and overwintering habitat. A qualified biologist should survey the eucalyptus groves and other trees within the Project area that are suitable for overwintering monarchs. A qualified biologist should conduct multiple surveys for overwintering monarchs where potential overwintering habitat has been identified. Monitoring should be done as frequently as possible during the overwintering season (typically September 15 through March 1¹) to capture changing distributions through the season and in response to storm events.

c) Analysis and Disclosure. The DEIR should evaluate the Project's potential impact and cumulative impact on monarchs. The DEIR should assess impacts on monarchs as a result of the following: loss and reduction of overwintering habitat; loss or reduction of

¹ The overwintering period is the estimated timeframe when monarchs are likely present. The overwintering period could vary by location and should be determined in coordination with a qualified biologist.

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nectar plants; altering overwintering habitat climatic conditions such as temperature, humidity, and wind; and use of pesticides to maintain the Project's proposed lawns, landscaping, and ornamental gardens. The DEIR should assess potential impacts on monarchs during Project construction and activities. In addition, the DEIR should assess potential impacts on monarchs under proposed Project conditions. New trails and overlooks could result increased anthropogenic disturbances that may alter overwintering habitat climatic conditions for monarchs (see Comment #1).

- d) Mitigation. If the Project would have impacts on monarchs, the DEIR should include measures to first avoid and minimize impacts on monarchs and overwintering habitat. If the Project would result in loss of overwintering habitat, CDFW recommends the City provide compensatory mitigation so that there is no net loss of overwintering habitat. CDFW also recommends the City explore Project design alternatives (e.g., alignment of trails/promenade) that would avoid, reduce, or restrict disturbances to overwintering habitat (see Comment #1 and General Comment #5).

Mitigation for monarchs should be developed in consultation with a qualified biologist. CDFW recommends the City also consult the following resources to develop appropriate measures to mitigate for the Project's potential impacts on monarchs.

- [Western Monarch Butterfly Conservation Plan](#) (WAFWA 2019);
- [Overwintering Site Management and Protection](#) (Western Monarch Count 2022);
- [Protecting California's Butterfly Groves](#) (Xerces Society 2017);
- [Managing Monarch Habitat in the West](#) (Xerces Society 2021a);
- [Pollinator-Friendly Native Plant Lists](#) (Xerces Society 2021b);
- [Monarch Butterfly Nectar Plant Lists for Conservation Plantings](#) (Xerces Society 2018);
- [Tropical Milkweed](#) (Wheeler 2018); and,
- CDFW's [Monarch Butterfly](#) webpage (CDFW 2022a).

- 3) Nesting Birds. According to the Biological Resources Report for the Silver Lake Reservoir Complex Master Plan (GPA Consulting 2019), the Project area provides an important year-round resource for wildlife, especially for birds. The Project area provides nesting and breeding habitat for birds including great blue heron (*Ardea Herodias*), great horned owl (*Bubo virginianus*), northern mockingbird (*Mimus polyglottos*), and red-tailed hawk (*Buteo jamaicensis*).

- a) Protection Status. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
- b) Analysis and Disclosure. The Biological Resources Report for the Silver Lake Reservoir Complex Master Plan relies on bird surveys conducted in 2004, 2015, and 2018. In preparation of the DEIR, CDFW recommends the City retain a qualified biologist to conduct a recent nesting bird survey within the Project area (see General Comment #3f).

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The DEIR should disclose species of nesting birds and raptors on site and location of nests based on a more recent survey in addition to survey results from 2004, 2015, and 2018. The DEIR should discuss the Project's potential impact on nesting birds and raptors. A discussion of potential impacts should include impacts that may occur during Project construction, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating), and vegetation removal. In addition, the DEIR should discuss impacts that may occur under proposed Project conditions (see Comment #1). The DEIR should disclose whether the Project would remove any trees that have been documented to support nesting birds and raptors.

- c) Avoidance. CDFW recommends that the DEIR include measures to fully avoid impacts on nesting birds and raptors. To the extent feasible, no Project-related construction, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating), and vegetation removal should occur during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs. CDFW recommends that the City protect trees where great blue herons, red-tailed hawks, and owls nest.
- d) Minimizing Potential Impacts. If impacts on nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures to minimize impacts on nesting birds and raptors. Prior to starting ground-disturbing activities and vegetation removal, CDFW recommends a qualified biologist conduct nesting bird and raptor surveys to identify nests. The qualified biologist should establish no-disturbance buffers to minimize impacts on those nests. CDFW recommends a minimum 300-foot no-disturbance buffer around active bird nests. For raptors, the no-disturbance buffer should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, should be instructed on the presence of nesting birds, area sensitivity, and adherence to no-disturbance buffers. Reductions in the buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors determined by a qualified biologist.
- 4) Bats. According to Appendix D in the Biological Resources Report for the Silver Lake Reservoir Complex Master Plan, the following species of bats may occur in the Project area: pallid bat (*Antrozous pallidus*); western mastiff bat (*Eumops perotis californicus*); hoary bat (*Lasiurus cinereus*); and big free-tailed bat (*Nyctinomops macrotis*). These four species of bats are designated as California Species of Special Concern (SSC).
- a) Protection Status. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). In addition, some bats are considered SSC. CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).
- b) Survey. In preparation of the DEIR, CDFW recommends the City retain a qualified bat specialist identify potential daytime, nighttime, wintering, and hibernation roost sites and conduct bat surveys within these areas (plus a 100-foot buffer as access allows) to

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identify roosting bats and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats.

- c) Analysis and Disclosure. The DEIR should discuss the Project's potential impact on bats and habitat supporting roosting bats. A discussion of potential impacts should include impacts that may occur during Project construction, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating), and vegetation removal. In addition, a discussion should include impacts that may occur under proposed Project conditions (see Comment #1).
- d) Avoidance and Minimization. If the Project would impact bats, CDFW recommends the DEIR include measures to avoid/minimize impacts on bats, roosts, and maternity roosts. The DEIR should incorporate mitigation measures in accordance with [California Bat Mitigation Measures](#) (Johnston et al. 2004).
- 5) Stream Delineation and Impact Assessment. CDFW recommends the DEIR include a stream delineation and analysis of impacts on any river, stream, or lake². The delineation should be conducted pursuant to the USFWS wetland definition adopted by CDFW (Cowardin et al. 1979). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification. The DEIR should disclose the linear feet and acres of streams and associated plant communities impacted by the Project. Impacts may include channelizing or diverting streams, impairing a watercourse, erosion, and removing and degrading vegetation through habitat modification (e.g., loss of water source, encroachment, and edge effects leading to introduction of non-native plants). In addition, the DEIR should discuss whether the Project would require water diversion or dewatering during Project construction and for the Project's lifetime.
- a) Mitigation. If the Project would impact streams, the City should provide measures to mitigate the Project's potential impacts on streams and associated plant communities. Mitigation may include avoiding impacts by establishing effective unobstructed vegetated buffers and setbacks adjoining streams and associated plant communities. If the City proposes buffers and setbacks as mitigation, the DEIR should include justification for the effectiveness of chosen buffer and setback distances to avoid impacts on the stream and associated plant communities. If avoidance is not feasible, the City should provide compensatory mitigation for impacts on streams and associated plant communities at no less than 2:1. The City should provide higher mitigation for impacts on sensitive plant communities (see General Comment #3a) and presence of rare, sensitive, or special status flora and fauna.
- b) Fish and Game Code section 1602. CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources

² "Any river, stream, or lake" includes those that are dry for periods of time (ephemeral/episodic) as well as those that flow year-round (perennial). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a water body.

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which includes rivers, streams, or lakes and associated natural communities. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the project applicant (or "entity") must notify CDFW³. Accordingly, if the Project would impact streams, the DEIR should include a measure whereby the City would notify CDFW pursuant to Fish and Game Code section 1602 prior to starting activities that may impact streams. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2022b).

- 6) Use of Rodenticides. The Project proposes a planting design that incorporates ornamental gardens and lawns. Ornamental gardens and lawns may need to be managed via chemical methods. Herbicides, pesticides, and rodenticides may impact wildlife. Second generation anticoagulant rodenticides are known to have harmful effects on the ecosystem and wildlife. [Assembly Bill 1788](#) prohibits the use of any second-generation anticoagulant rodenticides because second generation anticoagulant rodenticides have a higher toxicity and are more dangerous to nontarget wildlife such as mountain lions, bobcats, foxes, and coyotes (California Legislative Information 2020). CDFW recommends the DEIR include a discussion as to the Project's use of herbicides, pesticides, and second-generation anticoagulant rodenticides to maintain the Project's grounds in perpetuity. The DEIR should discuss when and where these chemicals would be used and what impacts those chemicals may have on habitat and wildlife. CDFW recommends the City prohibit the use of any second-generation anticoagulant rodenticides during Project implementation and for maintenance of the Silver Lake Reservoir Complex in perpetuity.
- 7) Wildlife Friendly Fencing. CDFW supports the use of wildlife-friendly fences for the Project. Wildlife-friendly fences should replace chain-link fencing to the maximum extent feasible because chain-link fencing could result in wildlife injury or mortality due to impalement and entanglement. Wildlife-friendly fences should be used and strategically placed in areas of high biological resources value to protect biological resources and habitat. For information wildlife-friendly fences, CDFW recommends [A Landowner's Guide to Wildlife Friendly Fences](#) (MFWP 2012).
- 8) Use of Native Plants and Trees. CDFW supports the use of native plants for the Project. CDFW strongly recommends avoiding non-native, invasive plants for landscaping and restoration, particularly any species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2022). CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project area. In addition, CDFW supports planting species of trees, such as oaks (*Quercus* genus), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and

³ CDFW's issuance of a LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (lead agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

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raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.

- 9) Prohibit the Use of Drones. To protect wildlife and habitat when the Project is fully built-out, CDFW recommends the City prohibit the use of drones in the Silver Lake Reservoir Complex. Drones disrupt wildlife and could affect bird breeding and nesting behavior, potentially resulting in loss of fertile eggs and nestlings. CDFW recommends the City install educational materials and signage prohibiting the use of drones and educating the public about the impacts drones can have on wildlife and habitats.

General Comments

- 1) Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document "shall describe feasible measures which could mitigate for impacts below a significant level under CEQA."
 - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency "shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures" (Pub. Resources Code, § 21081.6). CDFW recommends the City provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).
 - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DEIR should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened,

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- [and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2022d). Acceptable species-specific survey procedures may be developed in consultation with CDFW and USFWS; and,
- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation build out could occur over a protracted time frame or in phases.
- 4) Biological Direct, Indirect, and Cumulative Impacts. The DEIR should provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources with specific measures to offset such impacts. The DEIR should address the following:
- a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DEIR;
 - b) A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted [CEQA Guidelines, § 15126.2(a)];
 - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
 - d) A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat (if any) supported by the groundwater. Measures to mitigate such impacts should be included;
 - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation 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 DEIR; and,
 - f) A cumulative effects analysis as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and natural communities. If the City determines that the Project would not have a cumulative impact, the DEIR should indicate why the cumulative impact is not significant. The City's determination should be supported by facts and analyses [CEQA Guidelines,

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§ 15130(a)(2)].

- 5) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the DEIR:
- a) A complete discussion of the purpose and need for, and description of the proposed Project;
 - b) Pursuant to CEQA Guidelines section 15126.6(a), an environmental document "shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project." CEQA Guidelines section 15126.6(f)(2) states if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion; and,
 - c) A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends the City select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.
- Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The DEIR "shall" include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).
- d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the watercourse to alter its course of flow.
- 6) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDB Field Survey Forms](#) (CDFW 2022e). To submit information on special status native plant populations and sensitive natural communities, the [Combined](#)

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[Rapid Assessment and Releve Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2022f). The City should ensure data collected for the preparation of the DEIR be properly submitted, with all data fields applicable filled out.

- 7) [Translocation/Salvage of Plants and Animal Species](#). Translocation and transplantation is the process of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.
- 8) [Compensatory Mitigation](#). The DEIR should include compensatory mitigation measures for the Project's significant direct and indirect impacts to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 9) [Long-term Management of Mitigation Lands](#). For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.
- 10) [CESA](#). CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from a project is prohibited, except as authorized by State law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if a project and any project-related activity during the life of a project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a Consistency Determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game

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Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project's CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.

11) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The Wetlands Resources policy the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California" (CFG 2020). Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."

- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DEIR and these measures should compensate for the loss of function and value.
- b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

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
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We appreciate the opportunity to comment on the NOP for the Silver Lake Reservoir Complex Master Plan Project to assist the City of Los Angeles in preparing the Project's environmental document and identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at Ruby.Kwan-Davis@wildlife.ca.gov or (562) 619-2230.

Sincerely,


DocuSigned by:
Victoria Tang signing for

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

cc: CDFW
Erinn Wilson-Olgin, Los Alamitos – Erinn.Wilson-Olgin@wildlife.ca.gov
Victoria Tang, Los Alamitos – Victoria.Tang@wildlife.ca.gov
Ruby Kwan-Davis, Los Alamitos – Ruby.Kwan-Davis@wildlife.ca.gov
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Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov
CEQA Program Coordinator, Sacramento – CEQACCommentLetters@wildlife.ca.gov
State Clearinghouse, Office of Planning and Research – State.Clearinghouse@opr.ca.gov

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ATTACHMENT 5


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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

APR 17 2020

STATE CLEARINGHOUSE

April 17, 2020

Jane Choi
City of Los Angeles
City Planning
200 N. Spring St. Room 621
Los Angeles, CA 90012
jane.choi@lacity.org

Subject: Onyx32 – 32 Small Lot Homes, Mitigated Negative Declaration (MND), SCH #2020039066, Los Angeles County

Dear Ms. Choi:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Onyx32 – 32 Small Lot Homes Project (Project). The Initial Study's supporting documentation includes a *Biological Assessment* (Assessment) and a *Protected Tree Report* (Tree Report). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

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Project Description and Summary

Objective: The proposed Project would consist of the subdivision of the existing 186,956 square foot vacant site (four parcels) into 32 parcels that range in area from 1,673 square feet to 15,381 square feet. The development of 32 small lot residences (one per parcel) would also include the construction of related improvements (new public roads, curb and gutters, retaining walls, driveways, common access areas (public access staircases and private pocket parks), and utilities). Earthwork for the proposed Project would result in approximately 22,474 cubic yards of cut, 4,960 cubic yards of fill, and 17,514 cubic yards of soil export. Project construction would also require removal of 31 Protected Trees (California Black walnut trees), which would be replaced, with review and approval by the Board of Public Works.

Location: The subject property is located at 4103 E. Supreme Court, 4108 E. Superior Court, 4102 E. Supreme Court, and 2730 N. Onyx Drive, Los Angeles, California, 90032. The Project site occupies an east-southeast-facing slope within the watershed of the Los Angeles River. Elevation on the property ranges from approximately 965 feet at the northeastern corner of the property to 1,160 feet at the western tip. Forest Park Drive runs roughly north/south through the western part of the property.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City of Los Angeles (City) in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

Comment #1: Impacts to Sensitive Plant Species

Issue: The Initial Study recognizes the need for mitigation for the Southern California black walnut trees due to the required removal of numerous individuals to conduct Project activities. However, Mitigation Measures IV-01 and IV-80 in the Initial Study do not determine a specific replacement ratio for each of the individual Southern California black walnut (*Juglans californica*) trees that will be removed during Project activities.

Specific impacts: Mitigation Measure IV-01 states, "California black walnut trees covered under the City's Protected Tree Ordinance and that would be removed, replace them on a 1:1 basis with the same species trees." However, Mitigation Measure IV-80 states, "A minimum of four trees (tree size to be determined by the City) shall be planted for each protected tree that is removed." If the replacement ratio is 1:1, this may not be sufficient when accounting for the temporal loss of mature Southern California black walnut trees. CDFW considers walnut woodlands distinct biological communities, consisting of trees, shrubs, vines, and herbaceous understory vegetation. The MND only considers the value of the trees and does not appear to characterize the value of these unique communities in a biological setting. Removal or thinning of an understory in walnut woodland directly impacts the functions and values of the entire walnut woodland.

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Why impact would occur: Project implementation includes grading, vegetation clearing, building construction, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive plant species.

Evidence impact would be significant: Southern California black walnut is a sensitive and declining habitat type, is difficult to restore, and takes many years before habitat functions and values in restoration areas are equivalent to impacted areas. The Southern California black walnut is also designated S-3, which is considered vulnerable in the state due to a restricted range with relative few populations. An S-3 ranking indicates there are 21 to 80 occurrences of this community in existence in California, S-2 has 6 to 20 occurrences, and S-1 has less than 6 occurrences. CDFW considers plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). In addition, the Southern California black walnut tree (*Juglans californica*) is covered under the City of Los Angeles Protected Tree Ordinance. Given that these species meet the CEQA definition of Endangered, Rare or Threatened Species that may qualify for listing (CEQA Guidelines, § 15380(d)), impacts to these locally rare resources and adequate mitigation measures that reduce the impacts to less than significant should be described and incorporated into the final environmental document (CEQA Guidelines, § 15125(c)).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: The Tree Report, which is to be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, City of Los Angeles, should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.

For example, larger southern California black walnut trees may be over 100 years old and are not readily replaced, which would be considered significant under CEQA. CDFW recommends the Tree Report clarify the size and number of individuals anticipated to be permanently impacted, analyze the significance of impact within the Project footprint, and provide adequate mitigation, if necessary, to reduce impacts to less than significant. Feasible mitigation could include long-term protection in place; on-site nuts/seed collection for an on- or off-site mitigation enhancement/restoration area suitable to the species; and/or off-site land acquisition of similar or better habitat, all to be preserved in perpetuity with the necessary management and endowment funds.

Mitigation Measure #2: CDFW also recommends avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, mitigating at a ratio of no less than 5:1 for impacts to S-3 ranked communities and 7:1 for S-2 communities should be implemented. This ratio is for the acreage and the individual plants that comprise each unique community. CDFW also recommends 'tree removal' be mitigated at a community-level that has been impacted. This mitigation should include a combination of native trees and/or appropriate understory and lower canopy plantings.

All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by U.S. Fish and Wildlife Service and CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term

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COMMENT

RESPONSE

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management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands pursuant to Assembly Bill (AB) 1094 (2012), which amended Government Code sections 65965-65968.

Recommendation #3: Please note, in 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance- and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at <http://vegetation.cnps.org/>. To determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.

Comment #2: Impacts to Bat Species

Issue: The Project includes activities that will result in the removal of Southern California black walnut trees and surrounding environment that may provide roosting or foraging habitat for bat species. A review of California Natural Diversity Database (CNDDB) indicates occurrences of bat species within five (5) miles east of the Project site. In addition, Table A (Special-Status Species) identifies two bat species, both of which are California Species of Special Concern (including pallid bat (*Antrozous pallidus*) and western mastiff bat (*Eumops perotis* ssp. *californicus*)) as possible likelihood to occur on site.

Specific impacts: Project activities include the removal of trees, vegetation, and/or structures that may provide maternity roost (e.g., in cavities or under loose bark) or foraging habitat, and therefore has the potential for the direct loss of bats.

Why impacts would occur: The removal of trees and conversion of open space to a residential area will potentially result in the loss of habitat for bats.

Evidence impacts would be significant: Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs. § 251.1). Bat species, such as the western yellow bat, can be found year-round in urban areas throughout the south coast region (Miner & Stokes, 2005). Several bat species are considered California Species of Special Concern and meet the CEQA definition of rare, threatened or endangered species (CEQA Guidelines, § 15065). Take of California Species of Special Concern could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To the extent feasible, tree removal or relocation should be scheduled between October 1 and February 28, outside of the maternity roosting season. Maternity season lasts from March 1 to September 30. Trees and/or structures determined to be maternity roosts should be left in place until the end of the maternity season.

C-29-1
cont.

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COMMENT


RESPONSE

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Jane Choi
City of Los Angeles
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Sincerely,


Designated by:
Signing for Erin Wilson
Environmental Program Manager I

cc: CDFW
Victoria Tang – Los Alamitos
Felicia Silva – Los Alamitos
Andrew Valand – Los Alamitos
Malinda Santonil – Los Alamitos
Susan Howell – San Diego
CEQA Program Coordinator - Sacramento

State Clearinghouse

References:

Miner, Karen L. & Stokes, Drew C. 2005. Bats in the South Coast Ecoregion: Status, Conservation Issues, and Research Needs. USDA Forest Service General Technical Report PSW-GTR-195.
https://www.fs.fed.us/psw/publications/documents/psw_gtr195/psw_gtr195_2_13_Miner.pdf

Sawyer, J.O., Keeler Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed. ISBN 978 0 943460 49 9.

USDA Forest Service. 2019. Invasive Plants. (see <https://www.fs.fed.us/wildflowers/invasives/index.shtml>).

USDA Forest Service. 2019. Pacific Northwest Research Station. (see <https://www.fs.fed.us/pnw/invasives/index.shtml>).

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COMMENT

RESPONSE

C-29-1
cont.

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COMMENT

RESPONSE

C-29-1
cont.

Protected Areas for Wildlife & Wildlife Movement Pathways		
Criteria	Criterion Satisfied?	Qualifying Evidence
Criterion 5: Supports Breeding/Feeding/Resting/Migrating Grounds with Limited Availability in Southern California/Los Angeles	X	Supports a variety of bird species, and is important for preserving biodiversity.
Criterion 6: Restoration Foreseeable		

3.4.5.3 Echo Park PAW

The Echo Park PAW consists of a man-made lake and surrounding landscaped areas within a densely developed residential and commercial area of Echo Park (Figure 9). Although this PAW does not support native vegetation, it provides an island of landscaped habitat in a highly urbanized area. This PAW is located southwest of Interstate 5 and northwest of State Route 110 within the western portion of the East Los Angeles APC. The Echo Park PAW is approximately 23.7 acres.

Vegetation

This PAW contains landscaped areas with non-native trees, aquatic plants, and manicured lawns.

Wildlife

This PAW has a moderate potential to support medium mammals and a low potential to support large mammals. There is a high potential to support birds and a moderate potential for other wildlife species (e.g., insects and small mammals).

Wildlife Movement

Because this PAW is isolated and surrounded by development, movement of wildlife species is limited to within the PAW, except for insect and avian species that can fly in and urban-adapted terrestrial species that may be in the area.

Sensitive Biological Resources

Sensitive Natural Plant Communities

No documented sensitive natural plant communities were found within this PAW.

Special-Status Plant Species

No documented special-status plant species were found within this PAW.

Special-Status Wildlife Species

No documented special-status wildlife species were found within this PAW.

Protected Areas for Wildlife & Wildlife Movement Pathways
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COMMENT

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[illegible]

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COMMENT

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cont.

Pages Intentionally Omitted

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COMMENT

RESPONSE

Appendix F. Potential for Medium and Large Mammal Species to Occur within Potential PAW

Area Planning Consideration	Potential PAW*	Wildlife Species Potential										Notes
		Large Mammals					Medium Mammals					
		Black Bear	Bobcat	Coyote	Mountain Lion	Wolverine	Gray Fox	Long-Tailed Weasel	Badger	Skunk	Opossum	
D. Central	San Joaquin Hills State	L	H	H	M	H	L	M	L	H	H	Moderate to high potential to support medium and large mammals.
	Griffith Park and Hollywood Blvd.	L	H	H	H	H	L	H	L	H	H	High potential to support medium and large mammals.
	Los Angeles River	L	M/L	H	M/L	M/L	L	M/L	L	H	M	Moderate potential to support medium and large mammals.
E. East Los Angeles	Los Angeles River	L	M/L	H	M/L	M/L	L	M/L	L	H	M	Moderate potential to support medium and large mammals.
	Valley Lake Reservoir	L	H	H	L	L	L	L	H	H	H	Moderate potential to support medium mammals and a low potential to support large mammals.
	Elmer Park	L	L	L	L	L	L	L	H	M/L	H	Moderate potential to support medium mammals and a low potential to support large mammals.
	Wynnton Park	L	H	H	L	L	L	H	L	H	M/L	High potential to support medium and large mammals.
	Wynnton Canyon Park	L	L	H	L	L	L	L	H	M/L	H	High potential to support medium and large mammals.
	Woodward Park Regional Park	L	H	H	L	L	L	L	L	H	M/L	High potential to support medium and large mammals.
	Wynnton Canyon and Woodbury Park	L	L	H	L	L	L	L	L	H	L	High potential to support medium and large mammals.
	Elmer Park	L	H	H	L	H	L	L	L	M	M	High potential to support medium and large mammals.
F. South Los Angeles	Wynnton Park	L	H	H	L	L	L	L	L	H	H	High potential to support medium and large mammals.
	South Los Angeles Wetlands Park	L	L	L	L	L	L	L	L	M/L	L	Low potential to support medium and large mammals.
G. Harbor	Harbor Lake Regional Park	L	L	H	L	L	L	L	L	H	M	High potential to support medium and large mammals.
	South Harbor Lake	L	L	H	L	L	L	L	L	H	M	High potential to support medium and large mammals.
	Harbor Park	L	L	L	L	L	L	L	L	M	L	Low potential to support medium and large mammals.
	Wynnton Park	L	L	H	L	L	L	L	L	M	M/L	High potential to support medium and large mammals.
	Pier Park	L	L	H	L	L	L	L	L	M	M/L	Moderate potential to support medium mammals and a low potential to support large mammals.
	Pier Park	L	L	H	L	L	L	L	L	M	M/L	Moderate potential to support medium mammals and a low potential to support large mammals.
	California Beach	L	L	H	L	L	L	L	L	H	L	Moderate potential to support medium mammals and a low potential to support large mammals.
Pyramid Point (Pier 400)	L	L	L	L	L	L	L	L	M/L	L	Low potential to support medium and large mammals.	

*Notes in bold are verified through observations within the PAW and/or immediate vicinity.

Page 3

C-29-1
cont.

C-30 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-30-1	<p>Re: South Valley, Recreation Center (for example)</p> <p>The expansion of the Rec Center in the South Valley, with the construction of the Multi-Purpose structure containing an indoor basketball court, the moving of the soccer field and outdoor basketball court, as well as adding event spaces, will bring in more visitors and vehicles to an already crowded area.</p> <p>Presumably, this is one of the "attractions" of the Master Plan. Organized teams will use it, as this is how these facilities are used and paid for. How greatly will the need for parking increase as players and parents crowd in for competitions? The DEIR offers no numbers.</p>	C-30-1	Please see Master Response - Traffic/Transportation and Master Response - Funding and Operations.
C-30-2	<p>A "mitigation" proposed in the Plan is to convert the 10 parallel parking spaces on W. Silver Lake Drive just to the west of the Recreation Center to 25 spaces of 90 degree parking. (still pitifully inadequate for this overlarge "sports facility") Such a mitigation would only cause increased dangerous congestion.</p> <p>Cars backing out of the Rec Center parking will be at constant risk of collisions, as drivers have a hard time seeing around them with this kind of parking. How many walkers with children and strollers in tow; how many bicyclists will be greatly endangered? This is not considered in the DEIR.</p>	C-30-2	Please see Master Response - Traffic/Transportation.
C-30-3	<p>Other dangerous problems with this "mitigation" remain unresearched by the DEIR. There will be massive congestion on West Silver Lake Drive where three streets turn onto it. It is the major artery linking residents and visitors to Silver Lake Blvd. and thence to the rest of the city. Will this greatly narrowed, clogged street be able to let fire trucks and paramedics safely through?</p> <p>The leafy, pleasant aesthetic of this green picnic area, and its peace that residents and visitors love, would be replaced by a threatening snarl of traffic.</p> <p>No new parking, plus Alternatives 1 or 2 specifying "no new sports facility" are the only good alternatives here if the integrity, safety and peace of the South Valley residents and visitors are to be preserved.</p>	C-30-3	<p>Please see Master Response - Parking/Bike Option.</p> <p>As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. Operations would not require additional fire or hazard services such that substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities would occur. LAFD would be able to serve the proposed Project and would not result in the need for new or altered fire facilities. In addition, the proposed Project was designed in order to allow LAFD to continue to use the reservoir for water for emergency purposes.</p> <p>The comment expresses support for Alternative 1 and 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

C-31 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

- C-31-1 Without Perimeter Fencing - Impact? Analysis? Loss of Wildlife and Safety?
- C-31-1 Comment: Re Public Services Impacts. The DEIR team's omission of in-depth study of possible severe impacts to public safety and wildlife welfare caused by eliminating the 8-12' perimeter fence now protecting the Reservoirs is a serious flaw in this report. Their finding of "Less than Significant Impact; no mitigation proposed" [Table 3.14-4] is wrong, because this DEIR ignores critical security changes that would be brought by fence removal. They also ignore the need for increased policing in urban parks in general, and in large unfenced areas. These dangerous omissions in fact render the DEIR estimations of necessary police presence entirely invalid. The DEIR provides no research comparing crime statistics after drastic changes to urban environments such as opening up 116 acres to easy public access, all night, and all day within residential neighborhoods near two freeways. There is no research at all on the special security needs of public parks.
- C-31-2 The writers of the DEIR appear to have consulted only one LAPD captain, an organization chart, and a general LAPD contacts tally online. This is egregiously insufficient research. The current perimeter fence provides a baseline condition of safety and protection from criminal incursion into the Reservoirs area. All DEIR projected policing needs are derived from this baseline condition. There is no discussion at all of changes in opportunistic criminal activity that certainly will be brought by the alteration of these critical variables: removal of the fence, opening so wide a land area within an urban setting, enabling incursions around the clock. The DEIR provides only an undetailed description with very general statistics about current citywide LAPD numbers and anti-crime activity. They are not specific to the Project area, or of parks as a special public environment. "An increase in visitorship of approximately 390 park visitors daily is anticipated. However, these visitors and the new proposed full-time employees would not reside in or permanently occupy the project site and service demands per person within the area would not increase." [Impact 3.14-13]
- C-31-3 This obtuse statement ignores the fact that crime in parks is often a problem due to the difficulty of policing a wide land area containing many freely-moving people and the ease, for criminal elements, of escape.
- "LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The closest station to the proposed Project area would be LAPD Northeast Community Police Station located approximately 1.3 miles to the northeast, near Tesla Avenue. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. (LAPD Pers comm 2022)." [3.14-11]

C-31-1 Please see Master Response - Public Safety and Master Response - Fence Removal.

As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Police Department. LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.

C-31-2 Please see Master Response - Fence Removal and Master Response - Public Safety.

As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Police Department. LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. Under the purview of CEQA, environmental impacts associated with the construction of new or expanded police facilities would be considered a significant impact. As concluded in the Draft EIR, the Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.

C-31 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

- C-31-3 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
- The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- Please see Master Response - Public Safety, Master Response - Fence Removal, and Master Response - Homelessness.
- This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-31-4 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-31-3
cont.

"Accordingly, new or altered government fire and police facilities would not be needed for the operation of the proposed Project, and impacts would be less than significant." [3.14-12]

Where specified in the SLRCMP, the fencing described is of a kind that has proven entirely ineffective in protecting the area it encloses. "To protect wildlife and keep people out of planted areas, habitat fences would be installed along all nature trails (Figure 2-4). Habitat fencing would be approximately 3 feet high with swing gates where necessary to allow for walkways to be closed at night and as needed seasonally to protect wildlife." [DEIR, 2-15]

Such fencing, with signage posting park hours and rules, is now in use in the Meadow. They are regularly disregarded. Noisy disturbances and trash routinely plague the neighborhood across from it. Fireworks have been set off there, imposing severe fire danger. Along West Silver Lake Drive, low rails and foliage would serve as barriers to entry. Again, these will not provide any security, as they are easily breached. The result would be, the Master Plan's specified public access hours of 5:00 a.m. to 10:30 p.m. (DEIR, 2-51) would be irrelevant; the park would in fact be vulnerable to incursion 24/7. Criminal elements would be able to prey on homes and hide in this large area, near ready escape on the 2 and the 5 freeways.

C-31-4

Examples of the results in urban Los Angeles of lack of secure fencing in wide park areas are Echo Park and McArthur Park. Both were overrun with encampments, with surrounding neighborhoods reporting robberies, break-ins, vagrancy and vandalism. Both had instances of dead people pulled from the lakes. Both had to be closed for expensive and lengthy restorations. Alternative 3 of the Master Plan specifies a perimeter fence of the same height of the present fence, open during daylight hours and closed at night. Hence, the presence of park visitors during the day, and the activity around neighboring homes would deter much illegal incursion. The extent of this deterrence, of course, available in numerous "Neighborhood Watch" statistics, should also be researched far more; this DEIR Team has not even considered it. At night, when criminal elements take advantage of the lack of watching eyes, the Park would be protected by this perimeter fence.

C-32 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

SLWS supports and published this comment:

A Tree's POV

Comment:

If you're on the meadow path and you stop at the water fountain....The one near the crosswalk entrance, you might be aware of the Richard Neutra studio on the other side of Silver Lake Blvd. Well, actually, you would have to take a couple steps further to the west to look at it because there's a magnificent 90 year old Canary Pine and its two companions in that line of sight.

Dion Neutra had a remedy to this. He wrote in his blog:

"To have this view so blocked is unacceptable, much as we would never like to see a tree lost, since we lost 30 other trees further south to create the walkway*, surely a case can be made here, to lose three more in this area."

He petitioned the Neighborhood Council, who reacted with horror and dismissed his appeal but here it is again locked into the Master Plan. We are going to spend our days watching many others of our trees and their habitats destroyed. Hell- OUR habitat is being destroyed.

The fate of our trees is buried in the Environmental Report under the heading, wait for it,Biological Services. This devastation of habitat, is reported as a "less than significant effect"

The Master Planners might, for once, spare us the "We're going to replace them four to one" nonsense like we are little children who don't know that multiplied saplings, if they live, do not equal mature trees and cannot provide the comparable carbon sequestration, habitat and beauty that we need right now.

*Emphasis mine

- Written, submitted and sent by Hugh Kenny, Silver Lake resident

C-32-1

The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please also refer to Master Response – Biological Resources. Please also see Response to Comment C-24-1 on GHG impacts, and Section 3.1 of the Draft EIR on aesthetic impacts, which concluded the impacts would be less than significant.

C-32-1

C-33 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-33-1	<p>SLWS says YES to these restrooms, NO to the Education Center, an event space masquerading as an education space.</p> <p>Award-winning, self-cleaning, stand-alone restrooms - already here at North Hollywood Recreation Center</p> <p>Some have said they want the Education Center built because it'll give them restrooms, which many would like.</p> <p>Instead - how about just the restrooms?</p> <p>These were:</p> <ul style="list-style-type: none"> - voted a FINALIST in 2022's Best Public Restrooms (USA). https://www.bestrestroom.com/other-finalist/?finalist=3307&bryear=2022 - Installed by LA Recreation and Parks with Councilmember Krekorian, - Cost under \$200,000 in 2019, <p>"The self-cleaning restrooms at North Hollywood Recreation Center are holding to its promise in a community with a large homeless population. They cut maintenance cleaning times considerably. The restrooms' interior is sanitized automatically after a set number of flushes. Touchless features include toilet tissue dispenser, soap dispenser, faucet and hand dryer. Exiting the restroom is also touchless. Graffiti is easily removed from the stainless steel and porcelain interior. An alarm will sound off if someone attempts to stay inside for too long and the door will open."</p>	C-33-1	<p>The proposed Project, described in Chapter 2 of the Draft EIR, would include the restrooms and the Education Center. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-33-2	<p>These restrooms will actually be used.</p> <p>proposed Education Center, a building that:</p> <p>They are a far less impactful mitigation for the negative impacts of the</p> <ul style="list-style-type: none"> - Would destroy already scant land habitat for both wildlife and education; 	C-33-2	<p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
C-33-3	<ul style="list-style-type: none"> - Would violate several Historic-Cultural Monument Standards (our Reservoir is HCM #422); 	C-33-3	<p>As described in Section 3.5.1, Cultural Resources, the SLRC itself is a Los Angeles Historic Cultural Monument (#422), designated in 1989. The SLRC has also been previously recorded by SurveyLA with a status code of 5S1, meaning that it is a designated City landmark. Further analysis of historical resources and impacts analysis is based on the Silver Lake Reservoir Complex Master Plan: Supplemental Historical Report and Impacts Analysis (2022) (Historical Report) provided within Appendix F of the Draft EIR.</p>
C-33-4	<ul style="list-style-type: none"> - Is also called an 'event space' or 'community space' which implies the noise, crowds and traffic that come with those; 		<p>The Draft EIR is the most extensive description, analysis, and catalog of the features and history of the SLRC written to date. While the SLRC was evaluated as a district, rather than a Historic Cultural Landscape, that is merely a difference in terminology and organizational tools. The characterization of the SLRC as a "district" versus a "landscape" did not originate with the Draft EIR; it dates to its listing as a LAHCM and therefore predates the DEIR. The Draft EIR confirms that the SLRC is a historical resource for the purposes of CEQA and includes numerous character-defining features that are landscape features. The original HCM nomination form is short and limited on details and does not contain an inventory or description of what the contributing and/or non-contributing resources are contained within the district, let alone inventory, categorize, and analyze its character-defining features. The Draft EIR contains an extensive history of the SLRC, including categorizing and prioritizing the character-defining features of the SLRC, which previously had not been analyzed, including landscape features that previously had not been identified and/or included in analysis. In addition to the ESA report and analysis, consultant GPA clearly states on page 11 of their 2020 memorandum that "The Complex is a historic designated landscape." Their 2019 report provided a description of the Site, a summary of its development and history, an illustrated inventory of landscape characteristics</p>

C-33 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-33-5 - Would propose a bus parking lot along SL Blvd for intended visitors;

C-33-6 - Duplicates other indoor resources already built (Recreation Center);

C-33-7 - Does not comply with the Open Space Zoning directives to preserve open space as a balance to urban density;

- And is promoted by some as necessary because it would provide restrooms.

C-33-8 Really? An entire building just for its restrooms? No need!

Let's get what we need - restrooms - rather than what we don't need - another building.

and character defining features of the SLRC, and an analysis of its status as a historical resource. Per *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (National Park Service, 1996), organizational elements of a historic cultural landscape can include spatial organization, topography, vegetation, circulation, and water features; all of these are included and addressed within the Draft EIR.

Additionally, with the number of buildings, structures and physical infrastructure associated with the SLRC, a district is not an inappropriate organizational tool. Landscape features can and are considered character defining features in historic districts, including the SLRC, and do not necessarily require separate evaluation as "cultural landscape." More importantly, the landscape features of the SLRC that would be defined, inventoried, and evaluated for impacts in a cultural landscape evaluation are all defined, inventoried and evaluated within the Draft EIR, including various landscaping and landscape areas, the knoll, and the meadow. The resulting analysis of impacts more than adequately addresses the potential impacts of the project, and an analysis of impacts under the auspices of a "cultural landscape" would be no different. More importantly, the Draft EIR acknowledges that the Master Plan will have an impact on the historic features of the SLRC; it simply states that these impacts do not reach the level of a "substantial adverse change."

C-33-4 The event and community spaces referred to are analyzed and, as shown in Table 3.12-21 of the Draft EIR, on-site noise levels without amplified speakers would be less than significant. Please see Master Response – Noise.

Please see Master Response - Traffic/Transportation.

C-33-5 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-33 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

- C-33-6 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.
- As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
- C-33-7 The comment states the proposed Project was not analyzed for consistency with the Los Angeles Zoning Code. As described in Land Use Section 3.11.5 of the Draft EIR, the proposed Project would be consistent with applicable provisions of the LAMC – which include Open Space Zoning. The entirety of the proposed Project area is zoned as Open Space (OS), which allows for the following applicable uses of the SLRC; parks and recreation facilities, including: bicycle trails, walking trails, nature trails, park land/lawn areas, children’s’ play areas, child care facilities, picnic facilities, and athletic fields, public water supply reservoirs (uncovered) and accessory uses which are incidental to the operation and continued maintenance of such reservoirs, water conservation and flood plain areas. The proposed Project would redesign existing park facilities. The zoning designation of the entire proposed Project area will not change with proposed Project implementation. The proposed uses would continue to be consistent with existing uses described above, which are permitted under the LACM. Therefore, the Draft EIR concluded the proposed Project would not result in significant environmental impacts related to inconsistency with the LAMC’s land use regulations and impacts with respect to the land use provisions of the LAMC would be less than significant.

C-33 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

- C-33-8 Please see Draft EIR Chapter 2.4 for an explanation of what objectives the Education Center would fulfill besides bathroom access.
- As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

C-34 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-34-1	<p>SLWS supports and published this submitted personal comment from Gerry Hans, President of Friends of Griffith Park:</p> <p>RE: SLRCMP Draft EIR</p> <p>Support for No Project or Alternative 3 Natural Lands/Open Space Preserve</p> <p>I am not a resident of the Silver Lake area, but am a resident of Los Angeles who wants to do everything possible to fend off the precipitous loss of biodiversity in a City striving to retain it for a livable and healthy environment.</p>	<p>C-34-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-34-2	<p>Just as the public comment ends for this proposed Project, California is being represented at the COP15 Conference of Biodiversity in Montreal by members of the California Global Biodiversity Working Group, many from the Los Angeles Area. California is the UN's first and only official state (non-country) observer, as California makes a strong stand for biodiversity, which is inseparably connected to the climate change issue.</p>	<p>C-34-2 This comment expresses opposition to the construction timeline.</p>
C-34-3	<p>Silver Lake's local residents remain divided on the proposed Project. When there is controversy, it is best to err on the side of NOT losing what we have by doing nothing. Why take the risk? Why suffer through a relentless construction period? It seems much of the community is happy with the present condition, short lack of maintenance and a fence that's an eyesore.</p>	<p>As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.</p>
C-34-4	<p>I'm sure some residents are swayed with the far-fetched renderings in an EIR which show lush habitat, birds perching within reach, and children with hip-waders at the water's edge. This is all unrealistic marketing brought to the public by those who will benefit the most: the planners, consultants and construction contractors. Over-selling and over-promising the public will only result in the community's later disappointment and discontent, should the Project proceed.</p>	<p>C-34-3 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-34-5	<p>Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment, Appendix A, clearly shows this area as a "Very Low" needs community. The focus of park improvements should be directed to "Very High" and "High" needs areas, of which there are many. The Assessment recognizes the abundance of nearby parks and recreational facilities. Passive recreation should remain the focus for Silver Lake Reservoir, without building out new</p>	<p>C-34-4 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
		<p>C-34-5 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the</p>

C-34 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-34-6 active sports infrastructure, and certainly not yet another special events venue.

C-34-7 Most importantly, from a biodiversity perspective, fencing is essential in order to preserve the tremendous and important function these waters now serve migratory birds. This should absolutely be the highest priority. Along the same thinking, the addition of any lighting is adverse to bird migration. For these reasons, only No Project (Alternative 1) or Alternative 3 should be on the table for further consideration.

C-34-8 I have a preference for Alternative 3, since the fence would be improved aesthetically. And along with this improvement, enhanced mobility for small wildlife could be addressed.

Gerry Hans
Los Angeles

Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

C-34-6 Please see Master Response - Noise.

C-34-7 Please see Master Response - Fence Removal.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The comment expresses support for Alternative 1 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-34-8 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-35 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-35-1	<p>Remember all those Master Plan Community Workshops? This is what the Silver Lake Community agreed that we wanted.</p> <p>However, The DEIR is failing us.</p> <p>The DEIR Biological Resources section is inaccurate and ill-researched.. The Master Plan's "Floating Islands," the "Wetland Terraces" and "fish stocking" that are supposed to benefit birds, will not do so! The expert opinion of Dan Cooper, Chief Conservation Biologist of the Santa Monica Mountains Conservancy: This DEIR is "lacking in both rigor and specificity... Without current, accurate, and credible data on the biological resources ..., efforts at restoration will either fall short, or could actually result in further degradation of the site."</p> <p>Ironically, the massive excavation, grading and construction of much-touted "nature trails," the "scenic overlooks," and "nature education" structures will instead uproot and destroy Nature.</p> <p>The Knoll's lost natural forest is now vital habitat for an ecosystem of ground-dwelling animals and local birds that will lose nests, burrows and food. Disruption of the open waters drives away migratory flocks we love. The DEIR fails to even mention the loss of these birds and animals.</p>	C-35-1	<p>Please see Master Response - Community Engagement Process.</p> <p>As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.</p> <p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
C-35-2	The Master Plan would remove the Reservoirs' Perimeter Fence. This will have major impacts on wildlife welfare and neighborhood safety. Vandalism, vagrancy and crime have been documented as serious problems in other	C-35-2	Please see Master Response - Fence Removal.
C-35-3	unfenced parks in Los Angeles. There is no Public Safety mitigation for the loss of the Perimeter Fence suggested in this DEIR.	C-35-3	<p>As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.</p>
C-35-4	The horrific noise, vibration, mess and traffic blockages caused by massive construction could last from five to fifteen years. Nevertheless, this Deir calls this, incredibly, a "Less Than Significant Impact." As to noise and vibration mitigations: "None Required." [DEIR 3.16-18]		
C-35-5	The DEIR predicts an "average of 390 additional visitors per day", as well as higher attendance with proposed monthly "Special Events" with amplified sound. Neighborhoods packed with visitors' cars plague the Reservoirs area even now. And with the DEIR's plan to cut down lane widths to add parking spots on these already congested and gridlocked streets, traffic will		
C-35-6			<p>Please refer to Master Response - Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore,</p>

C-35 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-35-6 cont. | enormously increase and become more dangerous.
Yet, DEIR's Transportation Study claims "Less than Significant Impact." and "No mitigation measures are required." [DEIR Table 3.16-3]

The DEIR also claims, "significant irreversible changes to our community have been deemed acceptable." [DEIR 4.3]

They are not!

C-35-7 | The DEIR claims the negative impacts of construction, the years of disturbance, and when finished, the increased daily noise, crowds, traffic, and harm to our wildlife will be worth it.

It is not!

The community's ideals of "Peaceful," of "Nature," and "Wildlife" will be destroyed. It must not.

it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - Fence Removal.

C-35-4 | As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

Please see Master Response – Noise.

C-35-5 | Please see Master Response – Noise.

C-35-6 | Please see Master Response - Parking/Bike Option.

C-35-7 | The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-36 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-36-1	<p>The Draft EIR MUST be Revised and Recirculated</p> <p>The submitted expert comments on the DEIR, are listed below.</p> <p>SLWS is disappointed to find the Draft Environmental Impact Report wholly inadequate. If the Project as proposed is to move forward, a revised DEIR must be recirculated to address the many failings in this first effort.</p>	<p>C-36-1 Please see Master Response – EIR Recirculation Requirements.</p> <p>C-36-2 The comment expresses support for Alternative 3+2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-36-2	<p>Further, as proposed, the Project would have significant and unavoidable negative effects. Because there are environmentally superior Alternatives within this proposal that can be used, we maintain that the City under CEQA cannot approve the Project as proposed.</p> <p>Instead, if the City wants to approve a Master Plan for the Silver Lake Reservoir Complex without a revised Draft, it must choose one of the three less impactful alternatives contained in the DEIR.</p> <p>SLWS has also advocated for another alternative, one that is a hybrid of the alternatives included in the DEIR and importantly, that is science and data driven. We are calling this: Alternative Hybrid 3+2.*</p> <p>The Inadequacy of The DEIR</p> <p>The DEIR fails to comprehensively address the impacts of the proposed Project based upon specific scientific and community data.</p> <p>Of the impacts that it does list, many are not judged by the repeatedly expressed values of the community. Instead, it ignores our values and thereby labels these impacts as "of little significant effect" except for the unmitigable impacts of years of construction under a vague and unsubstantiated timeline.</p> <p>Look at the recently built North Atwater bridge whose City budget quadrupled from a 'gifted' \$4 million to over \$16 million.</p> <p>https://www.latimes.com/local/lanow/la-me-ln-river-bridge-20170525-htmllstory.html</p>	<p>Please see Master Response - Alternatives Analysis.</p> <p>C-36-3 Please see Master Response - Community Engagement Process and Master Response - Funding and Operations.</p> <p>As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.</p> <p>This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.</p>
C-36-3	<p>This bridge ballooned from a simple bridge requested by horseback riders for a safe river crossing to one whose inadequate attention to equestrian safety</p>	

C-36 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

	design caused the death of a horse within the first week. https://www.theeastsiderla.com/neighborhoods/atwater_village/the-death-of-a-horse-sp	C-36-4	Please see Master Response - Fence Removal.
C-36-3 cont.	The North Atwater bridge was a relatively contained and simple project compared with the huge and complex Project proposed for our Silver Lake Reservoir. We must have a far better DEIR than this one which contains “an inadequate level of analysis given the massive amount of changes they are proposing for the site.” (Amy Minter, CBCM CEQA lawyer, 11/17/2022)	C-36-5	The comment states that the Knoll area is treasured by the Gabrieleno/Tongva tribes and that walnut trees should not be removed. The Draft EIR assesses the project's potential effects on Tribal Cultural Resources in Section 3.17. The City has consulted with local tribes with interest in the project area as described in the Draft EIR. The Draft EIR includes a Mitigation Measure TCR-1 resulting from this consultation that would provide for Native American monitoring of excavations conducted as part of the project. Regarding the black walnut trees, the Draft EIR provides an extensive explanation of the potential for mature black walnut trees to be removed and compensated with re-planting at a minimum 4:1 ratio in compliance with local ordinances. Also, please see Master Response - Biological Resources.
	Silver Lake Reservoir is Unique Among LA’s Green Spaces		
C-36-4	Not another Echo Park Lake. Not another MacArthur Park. Not even another Hollywood Reservoir. Unlike the Hollywood Reservoir, this Reservoir is smack in the middle of the City, as shown in the photo added. Like the Hollywood Reservoir, our Reservoir needs perimeter fencing for the wild and the urban to exist side by side.		
C-36-5	Did you know we have an invaluable ecosystem of oak/ walnut/ elderberry on the Knoll, treasured by the Gabrieleno/Tongva tribes? The DEIR didn't either.	C-36-6	The comment expresses opposition to the Project as proposed. Please see also, Master Response - Funding and Operations. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	It inaccurately identifies and devalues this area, proposing instead the destruction of two of the rare CA walnut trees currently holding the hillside in place with their matured 50' deep root systems.		
	Silver Lake Reservoir is a biodiversity stronghold for migratory birds, resident birds, terrestrial mammals and amphibians that is already an unmatched resource not only for Los Angeles, but for the region, as will be seen once the Regionwide Wildlife Habitat Connectivity Plan initiated by Councilmember Raman is mapped out.		The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.
C-36-6	It would take a bare minimum of \$260 million dollars and years of disturbance to turn this biodiversity stronghold into another City Park like Echo Park Lake or MacArthur Park. To do so on the basis of a flawed DEIR, would be a loss of such magnitude that it can properly be called tragic.		
	Don't take our word for it. Read the experts' comments just on the Bioresources and Land Use topics of the DEIR. Even they were surprised at how extraordinary the Reservoir is.		

C-36 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-36-6 cont.	<p>In a time when so much of our world is threatened, we can do something! We have an unparalleled local opportunity for a better future IF we have the foresight to preserve this open space and its wildlife as a permanent part of our City and the world.</p> <p>NOT A LOSS BUT A GAIN</p> <p>With much less money and alterations, we can meet the objectives of this Open Space's future by supporting its unique character and strengths, not by destroying that singularity.</p>	C-36-7 As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
C-36-7	<p>We are a "Very Low" needs community for parks and recreation as evaluated by LA County . The focus of park improvements should be directed to "Very High" and "High" needs areas, of which there are many.</p> <p>Our Alternative Hybrid 3+2* is in harmony with the City's forward thinking on environment, wildlife biodiversity, and climate issues in general rather than going against it.</p> <p>This is why we share the experts' reports with you now, which show how valuable the Reservoir is and how inadequate this DEIR is.</p> <p>Dan_Cooper_RCDSMM_memo_1.2</p> <p>https://3a20fcbb-3beb-4ed8-ada9-b72c8ddddd50f.usrfiles.com/ugd/3a20fc_d6c4bb78ce Amanda_Zellmer_Silver Lake DEIR Comment.pdf</p> <p>https://3a20fcbb-3beb-4ed8-ada9-b72c8ddddd50f.usrfiles.com/ugd/3a20fc_fd844d5e09c Silver_Lake_DEIRcomment_Jodhan_Fine.pdf</p>	C-36-8 The comment expresses support for a hybrid Alternative. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-36-8	<p>https://3a20fcbb-3beb-4ed8-ada9-b72c8ddddd50f.usrfiles.com/ugd/3a20fc_e2f04b291b4 CDFW_Scoping_Comments_Silver_Lake</p> <p>https://3a20fcbb-3beb-4ed8-ada9-b72c8ddddd50f.usrfiles.com/ugd/3a20fc_a74fc8bece7</p> <p>* Alternative Hybrid 3+2 = Most of Alternative 3 except for the South Valley which would instead be</p>	Please see Master Response - Alternatives Analysis.

C-36 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-36-8
cont.

Alternative 2's choices but without any new lighting.
In addition, Alt. Hybrid 3+2 would feature these individual exceptions that would override anything in Alt. 3:
NO ornamental or rain gardens in the Meadow due to drought
NO wetland terraces in the Meadow without reevaluation
NO habitat fences needed in the Knoll without trails
ALL walking paths/ promenades to have an effective buffer zone from the water's edge for safety
NO habitat terraces in the Eucalyptus Grove without reevaluation
NO new lighting anywhere
Bike improvements should be provided but NO new parking

C-36 Anonymous, Silver Lake Wildlife Sanctuary

COMMENT

RESPONSE

C-36-9 The attachment does not contain comments regarding the adequacy of the Draft EIR. The information is noted for the record.

C-36-9



C-37 Doranne Jung

COMMENT

RESPONSE

C-37-1

RE: Gerry Hans' Comment on the SLRCMP Draft EIR

We applaud and agree with Gerry Hans who submitted this comment "Support for No Project or Alternative 3 Natural Lands/Open Space Preserve" because like her, we also want "to do everything possible to fend off the precipitous loss of biodiversity in a City striving to retain it for a livable and healthy environment."

As she points out "When there is controversy, it is best to err on the side of NOT losing what we have by doing nothing. Why take the risk? Why suffer through a relentless construction period? It seems much of the community is happy with the present condition, short lack of maintenance and a fence that's an eyesore."

Most importantly, from a biodiversity perspective, fencing is essential in order to preserve the tremendous and important function these waters now serve migratory birds. This should absolutely be the highest priority. Along the same thinking, the addition of any lighting is adverse to bird migration. For these reasons, only No Project (Alternative 1) or Alternative 3 should be on the table for further consideration.

We have a preference for Alternative 3, and the Alternative 2 South Valley element .

C-37-1 Please see Master Response - Fence Removal.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The comment expresses support for Alternative 1 and 2+3 hybrid. Please see Master Response - Alternatives Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-38 Doranne Jung

COMMENT

RESPONSE

C-38-1

On behalf of the children who live within “ear-shot” of the proposed construction under the Master Plan, we are speaking out LOUDLY regarding how their health and well-being will be affected by the additional 5 years of noise pollution. How will, for example, the hearing of a 5 year old attending kindergarten at Ivanhoe who walks home to a residence within yards of the SLRC area be diminished by the time that child enters 4th grade? Perhaps all children should take a “benchmark” hearing test before the construction begins to determine the lost by comparing it to being tested again when construction ends and at intervals throughout the 5 years to determine any hearing loss, diseases and damage to their well-being and then the City of Los Angeles should bear the cost of healthcare for these children if loss is considered permanent. Many studies such as this are proof of:
 “Noise Pollution and Its Effects on Children: noise-induced hearing loss is just one of them; others include increased blood pressure, insulin resistance, hypertension, and cardiovascular diseases. Noise pollution is too serious to ignore,” is from another scientific researched article, (Noise Pollution and Impact on Children Health by Alok Gupta 1, Anant Gupta 2, Khushbu Jain 3, Sweta Gupta ,, DOI: 10.1007/s12098-017-2579-7, Epub 2018 Jan 9. <https://pubmed.ncbi.nlm.nih.gov/29313308/>):

C-38-2

“Indoor and outdoor environmental noise pollution have been documented as a serious health hazard with increasing adverse effects on fetus, infants, children, adolescents and adults. Noise induced hearing loss and non-auditory adverse effects due to noise pollution, are being increasingly diagnosed in all age groups including the fetus. Outdated motorized vehicles, machinery, increasing traffic, congested residential areas, crowded educational institutions and workplaces, unregulated commercial and industrial noise have become a source of noise pollution with long-term disability. Areas of noise pollution must be identified and corrective measures be taken.” This was recommended by the researchers of this published study for the NIH. “Pregnant women, fetus, newborns, infants and children are most susceptible to noise induced health hazards and should be given utmost protection. Public must be educated repeatedly regarding health hazards of noise. Traffic noise should be regulated to be within safe limits.”

To this end, we who live within walking distance of the SLRC and have neighbors of families, question how many families with young children and/or pregnant women live within “hearing” distance of the added noise pollution that will be caused by first the multiple years of construction and then the future years of increased traffic congestion and additional human activities. What about the children who attend the pre-school located on the Silver Lake property and those children ages 5-12 who walk to and from school around the SLRC daily to attend Ivanhoe?

C-38-1

This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. This 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule.

C-38-2

This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.

C-39 Travis Longcore / Los Angeles Audubon

COMMENT

RESPONSE

Los Angeles Audubon Society
P.O. Box 411301
Los Angeles, California 90041-8301



December 15, 2022

Dr. Jan Green Rebstock
City of Los Angeles
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, California 90015-2213

Re: Silver Lake Reservoir Complex Master Plan Project Draft Environmental Impact Report; California State Clearinghouse #2022010055

Dear Dr. Green Rebstock:

Los Angeles Audubon Society has been a voice for birds and conservation in Los Angeles for over 110 years. Our mission is to promote the study and protection of birds, other wildlife, and their habitats throughout the diverse landscapes of the Los Angeles area. We have over 4,800 members and supporters, most of whom live in the City of Los Angeles.

In 2017, Los Angeles Audubon Society released a statement of priorities (attached) for the reuse of the Silver Lake Reservoir Complex, identifying the major features of value to bird conservation, namely a large body of water that is used extensively by large flocks of migratory waterbirds and a fence controlling human access and thereby protecting birds from disturbance. We noted the importance of the heron rookeries on the site and presence of migratory passerines as well. The Silver Lake Reservoir Complex is well known and enjoyed by local birders.

In 2020, we published an article in our newsletter *The Western Tanager* (attached) highlighting the harmful nature of some of the active recreation proposals emerging from the Silver Lake Reservoir Complex Master Plan (Master Plan) process and these concerns were raised by our members and supporters participating in that process. While some of the most damaging proposals considered in the Master Plan process were not brought forward, the final plan, and the Draft Environmental Impact Report (DEIR), lack a meaningful appreciation of the biological importance of the site as a migratory bird stopover location and fail to show evidence of any careful consideration by conservation biologists in both the formulation of the Master Plan and the analysis in the DEIR. The DEIR relies on the Master Plan, which in turn relies on a woefully inadequate biological assessment that is largely ignored except to repeat platitudes about "habitat" that are divorced from the scientific detail actually necessary to restore, enhance, and manage native ecosystems.

The conclusions in an EIR must be based on substantial evidence, which is discussed in the California Environmental Quality Act as follows (Pub. Res. Code § 21080, subd. (c)):

C-39-1 The comment states that the conclusions of the Draft EIR are not based on substantial evidence. The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis. Draft EIR Section 3.4 provides a detailed characterization of the existing conditions at the SLRC and documents the potential impacts of replacing existing conditions with proposed improvements. The Draft EIR provides substantial evidence of the existing resources on site. The Project objectives include the goal of habitat improvements as the core of the Project vision.

No specific reference within the Draft EIR is provided, therefore no further response is required.

C-39-1

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COMMENT

RESPONSE

C-39-1
cont.

Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

As documented in the comments that follow, many of the conclusions and assertions in the DEIR are not in fact supported by substantial evidence, and significant adverse impacts of the proposed project can be reasonably foreseen but are not considered by the preparers of the Master Plan and DEIR, even though they would be obvious to any professional ecologist or conservation biologist considering the proposal.

Understanding the Ecological Value of the Site

The Silver Lake Reservoir Complex was constructed at the headwaters of a small stream near the eastern end of the Santa Monica Mountains. The location was chosen along a canal that carried water from the Los Angeles River that split off from the river in the San Fernando Valley. The canal wrapped around what would later become Griffith Park and then headed south from the Elysian Valley toward the dammed Echo Lake. It ran parallel to the original stream in the little valley that was dammed to become the Silver Lake Reservoir. The reservoir originally had earthen banks with emergent vegetation at the edge of the shore (visible in historical photographs), which were later replaced with steeper banks and the paved banks currently present. Both Ivanhoe and Silver Lake reservoirs are therefore entirely artificial habitats, while the surrounding uplands include some areas that have never been developed, in particular the Knoll, which the current vegetation cover suggests, despite presence of planted trees, is in fact a remnant of the historical Coast Live Oak-California Walnut Woodland that was prevalent in the eastern Santa Monica Mountains (Ethington et al. 2020, Longcore and Noujdina 2022). The conservation value of the site today arises from a combination of its natural and artificial features in three important ways: as a stopover site for migratory waterbirds, as a nesting site for waterbirds, and as a habitat for migratory passerines.

C-39-2

First, the site is a regionally important stopover site for migratory waterbirds. This value transcends whether any one of the species using the site happens to be identified as rare or special status and needs to be considered as an integrated phenomenon with impacts to it triggering a finding of significance under CEQA guidelines addressing substantial interference with migratory wildlife. Again, this does not depend on any one of the species being rare itself, but rather is necessary to fulfill the intent of CEQA to "prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities" (Pub. Res. Code § 21001(c)).

The value of the reservoirs as a migratory stopover site is that there are large surface areas of water where birds are not disturbed, or are at least less disturbed, by humans. This limited disturbance is the baseline condition from a CEQA perspective. The value as a migratory stopover site does not need to be enhanced by introducing fish, "marine invertebrates," or other elements to the reservoirs. Indeed, these introductions would harm the current habitat conditions. The migratory species that use the reservoirs are in general not piscivores and only a

C-39-2

The comment provides background on the history of the site and values including for migratory and nesting birds. The Draft EIR Section 3.4, Biological Resources, provides an assessment of the existing conditions of the site and recognizes the high values for migratory birds and nesting birds mentioned in the comment. The comment suggests an approach that prefers enhancing these habitat values rather than adding new habitat types such as wetlands. The proposed Project focuses on maintenance and improvement of native habitats including the introduction of water-reliant habitats not already present to provide more habitat diversity. Currently the open water within the asphalt-lined reservoirs provides resting areas for some waterfowl, but the intent of the additional aquatic habitats is to diversify habitats to support other species not currently present.

Please see Master Response - Biological Resources.

C-39 Travis Longcore / Los Angeles Audubon

COMMENT

RESPONSE

C-39-2
cont.

few consume larger invertebrates. For example, the migratory species found in greatest numbers and their diets include Ruddy Duck (seeds, roots, and insects), Canada Goose (plants, insects, sometimes small fish), American Wigeon (plants), Northern Shoveler (seeds, tiny crustaceans), Ring-necked Duck (aquatic plants, insects), Eared Grebe (insects, crustaceans, and sometimes small fish). The species of federal conservation management concern (per the DEIR) are similarly not piscivores: Northern Pintail (seeds, snails, crustaceans, insects), Greater Scaup (snails, insects, crustaceans, plants), and Lesser Scaup (aquatic invertebrates, plants, seeds).

The value to these birds is that they have a place of refuge with limited human disturbance in an otherwise highly disturbed urban landscape. Any project design that reduces that area through habitat conversion or introduction of disturbance should be considered to be an adverse impact and either avoided or mitigated (see review of recreation impacts on wildlife in Larson et al. 2016).

Second, the site contains a rookery for Great Blue Heron and nest sites for raptors, which are vulnerable to disturbance. The heron rookery is located at the northwestern corner of the property, where the Master Plan envisions extensive human access to the Ivanhoe Reservoir, following a period of construction. The DEIR does not describe or analyze the impacts of the project on this rookery, save for a cursory assessment of amplified sound levels. The DEIR does not evaluate the impact of human activity under the nests, nor follow published recommendations for buffers around Great Blue Heron nests (Rodgers and Smith 1995). Ironically, this source is cited in the biological technical memorandum regarding the habitat islands, but its conclusions are not applied to existing biological resources on the site. Rodgers and Smith (1995) recommend that pedestrians be kept 100 m (328 ft) from Great Blue Heron nest sites. Raptor nest sites are similarly sensitive to disturbance, yet the DEIR only proposes mitigations (aka project design features) for impacts during construction (PDF-BIO-2) and no mitigation for park operations that would introduce additional disturbance into areas where nests would be disturbed (Richardson and Miller 1997).

Third, the site is important for migrating passerine birds, which forage as they move through the vegetation around the reservoirs. Again, the value here is from the presence of vegetation suitable for foraging (including native species, but also non-native trees used extensively by many migratory species during migration, such as eucalyptus) and the lack of disturbance by humans and their pets in those habitats. The Master Plan would introduce widespread disturbance into these areas, removing 80% of the trees within a 15-year period and replacing them with other nonnative trees and a few native species, thereby degrading the value of the site for migrating passerines. This assessment is based on knowledge of the literature on impacts of pedestrians and dogs on birds (Miller et al. 2001) and of the value of eucalyptus to migrating warblers. Ornithologists have noted that eucalyptus trees can provide large food resources for foraging birds in the form of redgum lerp psyllids (Garrett 2000, Lockwood and Gilroy 2004). Gradual conversion of eucalyptus to native species would provide benefits over the long term, but only if the human disturbance in these areas is not increased. Unfortunately, the proposed project relies on a project design feature that will not be effective at restricting human access (see below, p. 8).

Rather than focusing the Master Plan around protecting and enhancing these three core habitat values for wildlife (migratory waterfowl, breeding waterfowl, and migrating passerines), the

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C-39-2
cont.

approach, as described in the DEIR, appears to be to try to introduce new habitat types, justified simply by a “more is better” rationale and thoroughly ignoring the many downsides of this approach.

Value of “Habitat Islands”

A prime example of the “more habitat types is better” approach in the DEIR is the proposal to include floating habitat islands in the reservoirs. The introduction of these features is characterized as “creating” wetland habitat. It is not. The habitat islands and shoreline wetlands represent *conversion* of one wetland habitat type (lacustrine) to another (emergent), not habitat creation. The area of the habitat islands comes at the expense of the open water of the reservoirs and needs to be analyzed within the context of the specific location of the proposed islands and how they break up the open water habitat that is currently so attractive to migrating ducks and geese.

The assertion that the islands provide an ecological benefit is not well developed or supported by substantial evidence. Most of the peer-reviewed literature on floating habitat islands documents benefits to water quality (Park et al. 2001, Masters 2012, Lu et al. 2015, Yeh et al. 2015, Chang et al. 2017), not habitat benefits. Assertions of benefits to birds are made in the DEIR, but the Master Plan and DEIR fail to specify what bird species are the target species at Silver Lake and Ivanhoe reservoirs. For example, loons can benefit from floating islands for nesting (Hancock 2000, Piper et al. 2002), and ducks and geese use them. Ruddy Duck (Giroux 1981), Cinnamon Teal, Redhead, and Canada Geese (Getz and Smith 1989) will nest on floating islands although whether they are superior to other habitats is debatable (Getz and Smith 1989). Oddly, the DEIR and Master Plan do not consider what species might use the islands at all, and in fact do not specify a design that would necessarily provide habitat for the species that might conceivably use them. For example, the floating islands in nearby MacArthur Park should be showing signs of benefitting native birds, yet the DEIR is silent on the experience of the City of Los Angeles with those islands and the birds that might nest on them.

Introducing floating islands and concluding that they will benefit local ecology requires far greater detail and analysis than provided in the Master Plan and DEIR. It would be a significant adverse impact if the floating islands were to be used by Canada Geese to nest as a resident population (Conover and Chasko 1985, Gosser et al. 1997, Gorham and Lee 2016). Canada Goose was not historically a breeding species in Los Angeles (Willett 1912) and was only discovered breeding in 1993 (Allen et al. 2016). The introduction of a lawn essentially down to the water’s edge in the project design would increase the attractiveness of the site to Canada Geese. A similar situation of lawn adjacent to a large water body at Earvin “Magic” Johnson Recreation Area in Willowbrook resulted in the need for a redesign of the site to minimize its attractiveness to Canada Geese (pers. obs.).

The proposed design of the floating islands does not include any reference to appropriate native species that might conceivably nest on them. (Any benefit would be predicated on keeping humans a sufficient distance from the islands.) For example, Ruddy Duck was a “tolerably common” species in Los Angeles in the late 1800s (Grinnell 1898) and early 1900s, breeding on “tule-bordered ponds and lakes” that were subsequently drained (Willett 1912). The same story holds true for Cinnamon Teal, which was an “abundant” breeder (Willett 1912) and continues as

C-39-3

The comment provides an opinion that the proposed aquatic habitats would not create beneficial habitat values. The FEIR includes revisions to the statement regarding the floating islands creating habitat and increasing species diversity, to *potentially* increasing diversity. See Chapter 3, 3.2.2. Additionally, the Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis. See Master Response - Biological Resources.

C-39-3

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COMMENT

RESPONSE

C-39-4

The comment asserts the Draft EIR does not provide adequate analysis of impacts resulting from floating islands, public access to the water, invasive aquatic species, and fish stocking. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. Final EIR Section 3.2 discusses changes to the project design which includes removal of kayaking and recreational access to the water. Please see Master Response - Biological Resources (Public Access Impacts).

C-39-3
cont.

a fairly common breeder (Allen et al. 2016). Redhead bred “sparingly” in local freshwater marshes in the late 1800s (Grinnell 1898), but was only a “probable” breeder by the early 1900s (Willett 1933). If disturbance by people were to be kept away from the reservoirs by a perimeter fence (which is not the current proposal), it is conceivable that floating islands could be designed that provided habitat for these once-breeding species of the Los Angeles Basin while not increasing the number of Canada Geese. But for the project as currently proposed, the substantial risk of increasing Canada Goose numbers would need to be considered a significant adverse impact of the project on water quality and ecological function (Conover and Chasko 1985, Gosser et al. 1997, Gorham and Lee 2016).

The Master Plan and DEIR lack a detailed approach as to how the floating islands would be a benefit to birds without introducing the obvious adverse impacts that would be associated with them if they became Canada Goose nesting locations. The DEIR also has not assessed the impacts of converting open water habitat to the floating islands and how that would affect roosting and disturbance of migratory waterfowl. The DEIR does not even follow the advice in its own technical memorandum to place the islands far from human disturbance to maximize their biological value (GPA 2020, cited in the DEIR, which states, “In general, the farther offshore an island is the higher the chances are of successful nesting.”). Nor have project planners implemented the advice in the technical memorandum to size the islands appropriately for the species being targeted. The memorandum states, “The best size for floating wetlands varies according to the species being targeted.” Apparently, no one on the Master Plan or DEIR team has gone through the exercise of contemplating what species are to be benefitted by the floating islands in any detail. If there is one requirement of effective habitat creation and restoration it is that each individual species needs to be considered in detail, lest there be unintended consequences. The floating islands project element is not sufficiently developed to conclude it will have a benefit, and as currently described, risks causing a significant adverse impact to key known beneficial attributes of the site.

Failure to Consider Impacts of Shoreline Access

Just as the Master Plan and DEIR fail to anticipate the possible downsides of the habitat islands, they also ignore adverse impacts of promoting public access to the site down to the water’s edge and into the water in the form of kayak and canoe tours (DEIR, p. 2-11). These project elements would have obvious significant adverse impacts on the environment if not mitigated in at least two areas: 1) introduction of invasive exotic species, and 2) disturbance of migratory bird species.

Invasive Species

The only mention of invasive species in the entire DEIR involves controlling invasive plant species (p. 3.18-26), specifically in the ornamental garden area (p. 2-55) and on vegetated embankments (pp. 2-56, 3.9-17). Although controlling invasive plant species would be an important part of the project, and require a much more sophisticated weed management plan than presented thus far, the more ecologically devastating impact would be the introduction of exotic pest species such as Channeled Apple Snail (*Pomacea canaliculata*; see https://file.lacounty.gov/SDSInter/acwm/215649_Channeledapplesnail.pdf). The City’s own rehabilitation of Echo Park Lake introduced this highly invasive species (see e.g.,

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C-39-4
cont.

<https://www.kpcc.org/2014-01-02/re-opened-echo-park-hosts-uninvited-visitor>). Channeled Apple Snails eat vegetation voraciously and it is entirely foreseeable that they could be moved by visitors from Echo Park Lake and into the reservoirs if people are given access to the shoreline. This snail shifts wetland systems to have turbid waters, increased nutrient concentration, and increased phytoplankton dominance (Carlsson et al. 2004), and is identified as one of the world's worst invasive species (Lowe et al. 2000). Once introduced, they cannot be eradicated save draining the wetland and leaving it dry for an extended period of time. Just last year the City of Los Angeles entered a \$99,000 one-year contract for control of Channeled Apple Snail (incorrectly called Giant Apple Snail) and trash cleanup in Echo Park Lake (<https://boe.lacity.org/docs/dpw/agendas/2021/202101/20210115/bd/20210115%20AFE%20JONCR.pdf>).

Channeled Apple Snails pose a public health risk. They are vectors of rat lungworm, a parasite that afflicts humans and other animals, and is expanding in the United States (Liu et al. 2018). The nematode causes a form of meningitis that can lead to coma, paralysis, and death, or other chronic neurologic sequelae (Cowie et al. 2022). The potential for Channeled Apple Snail to act as a host of this emerging parasite should indicate a strong need to take mitigative steps to prevent the snails from spreading farther within the City of Los Angeles, potentially using Silver Lake and Vanhoose reservoirs as steppingstones to the Los Angeles River less than half a mile away. Snail eggs could be moved inadvertently by a visitor traveling from one site to the other, such as a City parks worker, or introduced with plantings as presumably happened at Echo Park Lake. It is the height of municipal irresponsibility that control of invasive and damaging aquatic invertebrates is not even mentioned in the DEIR, given their potential for significant and irreversible adverse environmental and financial impacts, as evidenced by the City's own current expenditures to control them in a much smaller water body.

The DEIR does not put into place any mitigation measure to avoid the introduction of exotic plants or animals. Water lettuce is an invasive species that has vexed the rehabilitation of Echo Park Lake (https://www.theeastsiderla.com/neighborhoods/echo_park/water-lettuce-turning-echo-park-lake-into-aquatic-salad-bowl/article_121d5ae6-1fb1-11ea-a0a6-ffc3d1675b96.html), yet the prospect of cross-contamination from the wetland just over a mile away does not appear to have been considered by the preparers of the Master Plan and DEIR.

The renderings for the Master Plan indicate that turtles will be introduced (<http://www.hargreaves.com/wp-content/uploads/2021/04/Hargreaves-Jones-Silver-Lake-Reservoir-09.jpg>), described as a "marine reptile," which we assume means "aquatic" reptile since "marine" indicates a saltwater species. The DEIR also indicates introduction of "marine invertebrates," which also probably means "aquatic" invertebrates. Both of these suggestions are problematic. What turtles are suggested to be introduced? Certainly people, if given access to the shore of the reservoirs, will release pet turtles, which will invade the habitat and preclude use by any native species. This has occurred at every other wetland habitat where humans are allowed access, from Kenneth Hahn State Recreation Area, to South Los Angeles Wetlands Park (a City of Los Angeles project), to the Los Angeles River. The many species of exotic turtles that would be released would eliminate habitat value for native species such as the Western Pond Turtle (*Emys marmorata*, a California Species of Special Concern), which might otherwise be introduced if appropriate habitat were created (Spinks et al. 2003), but only if there were a commitment to kill exotic turtles that would inevitably be dumped, an action that would swiftly

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C-39-5

The comment asserts that the Draft EIR fails to analyze and address impacts of human access to the water edges and that it would have significant impacts to waterbirds. As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. Additionally, the comment asserts that buffers for waterbirds would be eliminated. However, the access to the shoreline is a relatively small area when considered in the context of the larger size of the reservoirs. The majority of the reservoirs would be still inaccessible to the public and would provide similar conditions for waterbird use that currently exists.

C-39-4
cont.

be met with public resistance were it to be proposed. Similar concerns arise for the introduction of unnamed and unidentified “marine invertebrates.” This level of detail, with no species named, is inadequate for a competent project description under CEQA.

How would the introduction of invasive and ecologically damaging bullfrogs (*Rana catesbeiana*) be prevented, and the adverse impacts of this species avoided? Is it currently present? (No surveys for amphibians are reported in the DEIR and all the wildlife surveys are wholly inadequate for the purpose of conservation planning.) Bullfrogs are implicated in the decline of Western Pond Turtle (Nicholson et al. 2020) and so would need to be excluded as well to achieve environmental benefits that could conceivably arise from the project.

The Master Plan blithely asserts that both predaceous and planktivorous fish would be introduced to the reservoirs, on the logic that they would provide forage for wading birds (the heron species). None of these fish species would be native to the site (as it is an artificial impoundment) and their presence would have significant impacts on ecological interactions with other species, such as amphibians. Predatory fish have significant impacts on the distribution and persistence of amphibians, with amphibian diversity being significantly lower where predatory fish are present (Hecnar and M'Closkey 1997). The DEIR does not even mention if any amphibians are currently present at the site but claims that supporting amphibians is an objective of the project design (“The project design focuses on increasing habitat diversity and value to support a diverse array of birds, fish, amphibians, invertebrates, and other aquatic species,” p. 2 of Appendix D). If one is to take the DEIR seriously that it intends to restore habitat for amphibians, then the City must grapple with the implications of introducing invasive predators that harm amphibians. It is biological nonsense to claim that both will be done. In fact, in 2010 the City concluded for Echo Park Lake that, “Few amphibians are likely to be present in the Lake due to the presence of predatory fish” (City of Los Angeles, Draft Environmental Impact Report for Echo Park Lake Rehabilitation Project, State Clearinghouse No.: 2009091036). It is entirely likely that no one aware of the ecological interactions between predaceous fish and amphibians was involved in the drafting of the Master Plan, that the preparers of the DEIR simply accepted text from the landscape architects in the Master Plan as having been well-researched, and that the responsible officials at the City relied on the consultants and never bothered to have any biodiversity experts review the document for obvious contradictions or even cross-check it against similar City projects.

Disturbance to Migratory Birds

Another foreseeable adverse impact of allowing unfettered access to the shore of the reservoirs is the disturbance of the large flocks of waterbirds that use the site as a migratory stopover and wintering location. The conclusion in the DEIR that unconstrained access to the shoreline and permitted canoe and kayak tours of the reservoirs would have no impact at all on migratory species is neither reasonable nor based on substantial evidence.

C-39-5

A review of impacts of disturbance on waterbirds by Audubon California (Borgmann 2012) provides some guidance for development of an appropriate buffer around the reservoirs. To accommodate the most sensitive waterbird species, buffers on the order of 100–200 m (328–656 ft) are recommended, based on disturbances that range from personal watercraft to pedestrians (Borgmann 2012). The DEIR should be revised to describe, and then mitigate, the reduction in

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COMMENT

RESPONSE

C-39-6 The comment states that removing fencing would adversely impact wildlife habitats. Please see Master Response – Biological Resources (Public Access Impacts and Perimeter Fencing Removal Impacts).

C-39-5
cont.

effective habitat area corresponding to areas that are 150 m (492 ft) or less from the closest points of human access when moving from baseline to project conditions. Because the reservoirs are only 400 m (1,312 ft) across at their widest, significant additional area relative to the total area would be affected beyond what is already impacted by the existing configuration. It is likely, based on the studies cited in Borgmann (2012), that migratory species such as Greater Scaup (246 m [807 ft] recommended setback), Lesser Scaup (252 m [827 ft] recommended setback), Canvasback (144 m [472 ft] recommended setback), Ruddy Duck (144–209 m [472–868 ft] recommended setback), other diving ducks (103 m [338 ft] recommended setback), and other dabbling ducks (108 m [354 ft] recommended setback) are already influenced in their use of the reservoirs by disturbances along the edges. The DEIR concludes, based on no evidence at all, let alone substantial evidence, that the additional human and pet disturbance along the shore and on the water would cause no significant impact. Reference to the relevant literature, however, shows this conclusion to be false and illustrates significant adverse impacts to migratory species under CEQA that are not disclosed or mitigated.

Reliance on Interpretive Signage to Offset Increased Disturbance from Removal of Perimeter Fence Is Not Supported by Evidence

The DEIR describes interpretive signage as a project design feature that is relied on to conclude that people would be kept out of habitat areas. This project design feature plays the functional role of a mitigation measure and therefore must be feasible and there must be evidence in the record that it will work. The measure, specifically, states that, "Interpretive signage will be installed near all wildlife friendly fencing to educate the public on wildlife and habitat sensitivity, and to encourage the public to not enter the restricted areas." The habitat fencing would be 3 feet tall. With PDF-BIO-3, the DEIR concludes, on the basis of no evidence whatsoever, that, "Overall, the wildlife-friendly fencing would minimize impacts to habitat from human interference" (p. 3.4-31). Elsewhere, it couches the removal of the existing perimeter fence as being beneficial to wildlife:

C-39-6

Removal of the chain-link perimeter fence would eliminate barriers to wildlife and provide access for larger wildlife to access the water and wetlands areas. Areas with the most habitat value for wildlife such as the Knoll, would be closed at night and off limits to the public. No impacts to wildlife are anticipated from the installation of the proposed habitat fencing or the removal of the perimeter fence.

Common sense and the recent history of public use of City of Los Angeles parks contradicts this statement. Since coyotes are already traversing the project site and reported as being observed on site in the DEIR (p. 3.4-8), it makes no sense for the City to claim that the current fence is a barrier and that removing it would allow access for larger wildlife. What larger wildlife would the City like to provide access for? A mountain lion could jump the fence if that were the intent. The simple fact that coyotes are already present with the existing fence is ample evidence to discard the ludicrous assertion that removing the perimeter fence is needed to provide access for wildlife. The removal of the perimeter fence and its replacement with a 3-foot fence and signage would, in contrast, be an adverse impact because it would not be sufficient to eliminate disturbance by humans and pets in areas that the DEIR assumes are off limits. The DEIR presents no evidence that a 3-foot fence would be effective. Evidence of feasibility and

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C-39-6
cont.

effectiveness must be presented for any mitigation measure to be relied upon under CEQA. Furthermore, the City's own experience at its parks provides ample evidence that a 3-foot fence would not be sufficient to eliminate trespassing. A 3-foot fence surrounds the constructed wetland at the South Los Angeles Wetlands Park. Dense vegetation (habitat) was established within the fence. People then hopped the fence and engaged in undesirable activities in the vegetation (according to park staff, pers. comm.), resulting in the habitat created as part of that project being almost entirely removed, completely undermining the intent of the landscape design and its use as wildlife habitat. There is no rational reason to believe that the areas opened up and only protected by a 3-foot fence at the Silver Lake Reservoir complex would not similarly be overrun by trespassers. PDF-BIO-3 cannot be relied upon to mitigate impacts from human access and therefore the project would have a significant adverse impact on the environment.

California Walnut Is Found in "Typical Habitat" and May Constitute a Sensitive Natural Community

The preparers of the DEIR go to great pains to assert that California Walnut (*Juglans californica*) is not a special status species because it is "not within typical habitat" (p. 3.4-13). This is incorrect. The DEIR relies on the City's 2006 CEQA Guidelines as to whether the species is a sensitive species under CEQA. Contrary to the assertions in the DEIR, California Department of Fish and Wildlife (CDFW) considers the California Walnut to be a rare species and one requiring analysis under CEQA. As noted in Longcore and Noujdina (2022), from which we draw in this section, California Walnut must be considered in CEQA review because it meets the criteria listed in Section 15380 of the CEQA Guidelines (14 CCR § 15380 (b)(2)), which defines a species as "rare" if:

(A) Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or (B) The species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered "threatened" as that term is used in the Federal Endangered Species Act.

C-39-7

These conditions are met (Longcore and Noujdina 2022). The City of Los Angeles, and other local jurisdictions, should look to CDFW for guidance on consideration of California Walnut during review. CDFW has a special role as the Trustee Agency for biological resources during CEQA review (Fish and Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act [CEQA] Guidelines § 15386, subdivision (a)). CDFW unequivocally states that California Walnut is a rare species under Section 15380 of the CEQA Guidelines (Letter from California Department of Fish and Wildlife commenting on Mt. San Antonio College 2015 Facilities Master Plan Update (FMPU) Supplemental Environmental Impact Report, dated August 8, 2016):

Southern California black walnut (*Juglans californica*) trees found on the Project site should be considered as a locally and regional rare, unique and/or uncommon (and/or) regionally rare plant species; that is, species that are rare or uncommon in a local or regional context, as such, would meet the CEQA definition of a rare species (CEQA §Sec 15380). CEQA directs that a special emphasis be placed on "environmental resources" that are rare or unique to the region and would be affected by a proposed

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The comment states that the Draft EIR is deficient in its analysis of Southern California black walnut woodland. The Draft EIR Section 3.4, Biological Resources, states that Southern California black walnuts and coast live oaks observed onsite are not likely naturally occurring. As stated in Section 3.4, the entire Knoll and Silver Lake Meadow Park is underlain with Urban land-Dapplegray-Soper complex soils resulting from human-transported material. Additionally, remnants of an irrigation system were observed adjacent the Southern California black walnut and coast live oak trees. These two tree species need to be dominant or co-dominant in the tree canopy and attaining 30% to 50% relative cover (Keeler-Wolf and Evens 2006). As stated in the Section 3.4 of the Draft EIR, neither of these species acquire that level of dominance or co-dominance as all woodlands present within the project site are dominated by non-native species (see Impact 3.4-2).

CNPS currently considers southern California black walnut (*Juglans californica*) a List 4 plant (CRPR 4.2). CRPR 4 species do not per se meet the definition under CEQA Section 15380(b) as an Endangered, Rare or Threatened Species ("special-status"). Information for these species is often limited due to the difficulty in obtaining current data on the number and condition of the occurrences and few if any of these CRPR 4 species are eligible for state listing (CNPS 2023). CDFW does not include southern California black walnut in their State and Federally Listed Endangered, Threatened, and Rare Plants of California (CDFW 2023). Therefore, according to both CNPS and CDFW, southern California black walnut does not meet their criteria as List 1 or 2 species or as Endangered, Threatened, and Rare Plants of California, respectively.

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project [CEQA § 15125 (c)] or is so designated in local or regional plans, policies or ordinances (CEQA Guidelines, Appendix G). Public agencies have a duty under CEQA to avoid or minimize environmental damage and to give major consideration to preventing environmental damage (CEQA § Section 15021). Southern California black walnuts are California Native Plant Society (CNPS) Rank 4.2 and are considered locally sensitive species. In addition, the southern California black walnut is designated S3, which is considered vulnerable in the state due to a restricted range with relative few populations. CDFW would consider loss of on-site populations of southern California black walnut to be potentially significant from a project and cumulative perspective under CEQA. Accordingly, impacts to these locally rare resources and adequate mitigation measures that reduce the impacts to less than significant should be described and incorporated ...

The need to review impacts to California Walnut habitat is further established through the status of the vegetation Associations that have the species as a component part. All natural communities (defined as vegetation Alliances and Associations) that include *Juglans californica* are identified as Sensitive Natural Communities in the California Natural Community List from the California Department of Fish and Wildlife (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398>). Impacts to a Sensitive Natural Community must be considered when conducting review under the California Environmental Quality Act. Sensitive Natural Communities are designated as such by the State of California because they provide habitat for rare species. CDFW requires consideration of impacts to Sensitive Natural Communities in environmental review:

Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents [emphasis added] [https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities](https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#%20sensitive%20natural%20communities).

Furthermore, the project site is not only typical habitat, it is at the heart of the range of the species (Swanson 1967). It is entirely likely that the California Walnuts found on the Knoll are remnants of the historical habitat that stretched across the eastern part of the Santa Monica Mountains through the hills of east Los Angeles to the Puente Hills (Longcore and Noujdina 2022) and that was a critical part of the cultural landscape before European contact as a food source for Native peoples (Anderson 2005).

The vegetation mapping supporting the DEIR does not contain critical information about the minimum mapping unit. The number and concentration of California Walnuts in and surrounding the area mapped as ruderal on the Knoll raise the possibility that it should properly have been mapped as a different vegetation Alliance defined by California Walnut, which would be a Sensitive Natural Community. The other species commonly found with California Walnuts, Coast Live Oak and Blue Elderberry, are also present, lending credence to the interpretation that this area is in fact a remnant walnut or oak-walnut woodland. Given the professed focus in the Master Plan on biodiversity and restoration for native species, recognizing this biological legacy would seem to be consistent with project goals. Instead, the preparers of the DEIR draw the improper conclusion that these California Walnuts are “not within typical habitat” and reject the idea that they might constitute a Sensitive Natural Community (DEIR, p. 3.4-13).

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cont.

The project proposes to remove two California Walnuts for the project. There is no good reason to do this, since the proposed park could easily be designed around the existing trees and use them instead as the basis for an actual upland habitat restoration based on the species native to the site (Coast Live Oak, California Walnut, and Blue Elderberry) and tended over thousands of years by Native American inhabitants.

"Restoration" Areas Have Improper Plant Palettes

The analysis in the DEIR relies on the idea that habitats are being "restored" as a means to assert that the environmentally damaging elements of the project will be offset. As noted already, the installation of the habitat islands is not creation of new habitat, but conversion of one existing wetland habitat type to another. Equally concerning is that the upland areas that are described as being "restoration" areas are not going to be restored at all, but rather would be subject to the planting of a mishmash of plant species that would never be found together as a natural habitat. The first red flag that the "restorations" are not anything of the sort is that the Master Plan does not name the vegetation community that is the goal of the plantings. The planting lists in the Master Plan are for areas referred to as "Upland" and "Transition." The "Upland" plant list is intended to be used for plantings on the Knoll and in the Eucalyptus Grove. The species list, and the renderings of these areas, indicate that the landscape architects think that there will be a combination of tall trees with a quasi-chaparral understory, which is nothing like a native habitat that would have been found here. The species of trees proposed for the "Upland" areas are as follows (Master Plan, p. 186):

- Western Redbud *Cercis* [sic; *Cercis*] *occidentalis* (not native to site)
- Western Hackberry *Celtis reticulata* (not native to county)
- Catalina Ironwood *Lyonothamnus floribundus* ssp. *asplenifolius* (not native to site)
- California Sycamore *Platanus racemosa* (native, but belongs in moister locations)
- Torrey Pine *Pinus torreyana* (not native to county)
- Catalina Cherry *Prunus ilicifolia* ssp. *lyonii* (not native to mainland)
- Coast Live Oak *Quercus agrifolia* (native; the one appropriate species on the list)
- Pasadena Oak *Quercus engelmannii* (not native to site)
- Cork Oak *Quercus suber* (not native to continent)

It is baffling why this "restoration" contains tree species from around the state and the world, and yet omits, and indeed proposes to remove two specimens of, the rare native tree species that is found on the site, California Walnut (DEIR, p. 3.4-5).

The species of "shrubs and groundcover" proposed for the "Upland" areas are:

- Lester Rowntree Manzanita *Arctostaphylos* Lester Rowntree (cultivar, which would never be used in a restoration)
- John Dourley Manzanita *Arctostaphylos* John Dourley (cultivar)
- Coyote Bush *Baccharis pilularis* (native)
- Flannel Bush *Fremontodendron californicum* (not native to site)
- Toyon *Heteromeles arbutifolia* (native, but grows 8–30 feet tall)

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The Final EIR includes revisions to the statement regarding the floating islands creating habitat and increasing species diversity, to *potentially* increasing diversity. See Chapter 3, 3.2.2. Creation of these islands is not considered restoration.

The comment states that the Draft EIR does not identify what specific ecosystems or communities that would be restored. The Draft EIR, Section 3.4.5, Impacts and Mitigation Measures, discusses the creation of 23-acres of native habitat including upland and wetland habitats. This creation of native habitat replaces non-native landscape and developed areas and is not considered restoration. The Draft EIR baseline conditions were analyzed and summarized consistent with the CEQA statutes and the State CEQA Guidelines. Additionally, the Draft EIR Section 3.4, Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. Please also see Master Response - Biological Resources.

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The comment asserts the Draft EIR does not properly cover impacts due to fuel modification. The location of the proposed new structure is within an area currently vegetated with non-native vegetation primarily consisting of mature eucalyptus and pine trees and generally open understory dominated by Chilean pepper trees and invasive grasses. The proposed Project will reduce wildfire hazards at the site compared to existing conditions by imposing fuel modification standards, while at the same time replacing invasive vegetation with native vegetation that will improve habitat values on the site. The proposed native plantings and fuel modification of habitat up to 200-feet from the proposed Education Center would increase the habitat value of this area. Comments regarding additional information as it relates to irrigation and invasive species will be noted for the record and forwarded to the decision-makers.

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- Shrub [=Scrub] Oak *Quercus berberidifolius* [sic; *berberidifolia*] (native, but grows 6–12 feet tall)
- California Coffeeberry *Rhamnus* [=Frangula] *californica* (native but tolerates only partial shade and grows up to 15 feet tall)
- Lemonade Berry *Rhus integrifolia* (native, but grows 10–30 feet tall)
- Hummingbird Sage *Salvia spathacea* (native, the only native groundcover on the list at 1–3 feet tall)
- Blue Elderberry *Sambucus mexicana* (native, but grows 8–30 feet tall)

The understory plants are modestly more appropriate, but taken as a whole, the planting list is incoherent as a plan for restoration because most of the “shrubs and groundcover” species are either cultivars or grow 10–30 feet tall. A proper restoration plan for a California site would name the specific vegetation Alliance as defined in *A Manual of California Vegetation* (Sawyer et al. 2009) that is the target of the restoration and provide a rationale for why that vegetation community is appropriate to the site (see e.g., Brooks et al. 2019).

The plant list for the “Transition” zone between Silver Lake Reservoir and surrounding uplands is not much better (Master Plan, p. 187). It has a few species that could arguably be ecologically appropriate if the edge configuration increased water availability (e.g., White Alder, Fremont Cottonwood, Red Willow), but then proposes species that are out of their ranges (Bigberry Manzanita) or would not be compatible with the moisture level needed to support the trees (e.g., California Sagebrush, White Sage).

The planting plan does not reference the historical ecology of the site or watershed and makes no attempt to discern what plants would be ecologically appropriate, instead choosing a mix of species that allowed the designers to produce renderings that combine taller trees with lower ground cover species that no California naturalist would recognize as being a native habitat type. This is both a lost opportunity — a restoration of a biodiverse Coast Live Oak-California Walnut Woodland could have been proposed — and vitiates the claims in the DEIR that “restoration” will offset the impacts of additional recreational disturbance, noise, lights, and other impacts on local wildlife.

DEIR Lacks Discussion of Impact of New Structures on Fuel Management for Upland Habitats

Although the DEIR acknowledges that the education center and other structures will require fuel management activities to take place within 200 feet of the structure (p. 2-50), it does not quantify or mitigate the adverse impacts arising from fuel management on habitats. These impacts range from the obvious, such as removal of native vegetation, to those invisible to the non-specialist, such as the introduction of invasive exotic insects such as Argentine ants (Longcore 2003). The fuel management zone will preclude any true restoration of habitat within 200 feet of the education center, while the analysis assumes that the “restoration” of those areas will offset the impacts caused by the education center and other active recreation activities to be introduced to the site. The understories of areas subject to fuel management are rapidly dominated by invasive exotic grasses and forbs (Keeley 2003):

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Prefire fuel manipulations such as fuel breaks produce conditions that favor weedy aliens and thus act to increase the alien presence, increase the movement of aliens into wildlands, and increase seed sources capable of invading after fire.

Fuel management usually requires the introduction of a permanent water source in the form of an "irrigated zone" surrounding structures and the project plan introduces a large lawn adjacent to the education center and areas that are planned to be "restored." An irrigated zone, along with the disturbance of clearance, promotes the invasion of alien insect species, such as the Argentine ant, into fuel management zones and adjacent native habitats. The deleterious effect of Argentine ants on native arthropods is well documented, with numerous studies reporting a decrease in arthropod diversity as Argentine ant abundance increases (Erickson 1971, Cole et al. 1992, Human and Gordon 1997, Holway 1998a). Fuel management increases the abundance of Argentine ants by providing two conditions that increase invasion: a water source and increased disturbance (Holway 1998b, Human et al. 1998). Argentine ants invade far beyond the water sources and into surrounding undisturbed habitats, with increased abundance documented to a distance of up to 650 feet (Suarez et al. 1998). Community-level analysis indicates that arthropod species composition will change and overall diversity will decrease when habitats are subjected to fuel management. These changes in arthropod species diversity will have resonating impacts on vertebrates that use arthropods as prey species.

The DEIR does not contain an assessment of the adverse impacts of fuel management that will be required because of the design of the project. The preparers have not done even the basic assessment of the insect communities in the areas that would be disturbed. An assessment of the impacts of the introduction of additional irrigation would need to be informed by knowing if, for example, native harvester ants persist in the upland habitats surrounding the reservoirs, as they do at other locations in Silver Lake (see iNaturalist observations # 23570179, 3509407).

Lighting Analysis Is Absurdly Inadequate

The decision to include additional lighting and illuminated nighttime activities as part of the Master Plan is inconsistent with the project's stated objective of enhancing and expanding wildlife habitat and improving upland habitat. The proposed project would dramatically extend nighttime lighting around the reservoirs and within the project site (DEIR, Figure 2-8). The purpose of the proposed increase in lighting is to allow public use after dark, which use would itself increase disturbance impacts to wildlife species into the nighttime hours, and directly disturb wildlife. Such action would cause significant adverse impacts. The perimeter path would be illuminated at 0.5 fc (~5 lux) which is **50 times brighter** than the illumination of a typical full moon and far exceeds thresholds for environmental impacts on wildlife (Grubisic et al. 2019), including for roosting shorebirds, which can show decreased presence at 0.05 lux (Simons et al. 2022), a hundred times dimmer than the proposed lighting. The lighting along the perimeter path would illuminate the reservoirs, which would be an adverse impact (Grubisic et al. 2017). In general, additional light has to be considered an adverse impact on biodiversity, as documented in extensive published literature (Longcore and Rich 2004, Rich and Longcore 2006, Hölker et al. 2010, Gaston et al. 2013, Longcore and Rich 2016, Kernbach et al. 2019, Owens et al. 2020, Sanders et al. 2021).

C-39-10

C-39-10 The comment overall asserts that the Draft EIR lighting analysis is inadequate and that mitigation measures and design guidelines to minimize impacts of lighting are absent. Draft EIR Section 2.5.3 states that no lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public. The section continues stating that all lighting would be shielded and pointed away from the surrounding neighborhood or wildlife area. Specifically, Draft EIR Section 3.1, Impact 3.1-4 states that lighting would not be included along secondary pathways within habitat areas. Additionally, Mitigation Measures AES-1 requires that all new permanent exterior lighting shall be shielded and directed downward to avoid light spill onto surrounding land uses including natural habitat areas, open water, residential areas, or into the night skies. The habitat areas including planted areas of native vegetation and open water would not be significantly impacted by proposed lighting and the SLRC would continue to function as usable wildlife habitat.

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Mitigation measures and design guidelines to minimize impacts of lighting are absent from the DEIR. Strategies to reduce impacts on biodiversity generally have been published by the National Park Service (Longcore and Rich 2017), and guidance for especially sensitive taxa such as bats are also available (Voigt et al. 2018). Although it is true that this area of Los Angeles has substantial existing light pollution, measurements in nearby Griffith Park place the sky glow (reflected light) at being somewhat higher than the light of a full moon (~0.15 lux). This is still substantially lower than the illumination proposed for the project, so the argument that the site is already degraded at night is not valid. The DEIR indicates that lights would be pointed away from “habitat” (p. 2-29) but does not articulate what areas would be included in that definition (all open water, all vegetated areas?) and its enforcement would need to be incorporated into binding and clearly articulated project conditions to be a valid mitigation measure under CEQA. The DEIR does not even provide guidance on the spectrum (color) of light to be used to reduce impacts on wildlife, even though full-spectrum LED lights typically used for outdoor lighting are more damaging and alternatives are available that could reduce these impacts (Longcore 2018, Longcore et al. 2018).

Conclusion

The adverse impacts of the increased development and activity proposed in the Master Plan would degrade the important value of the Silver Lake Reservoir Complex for birds. Any marginal benefit from converting open water along the edges to emergent wetlands would be small in comparison with the adverse impacts of removing the perimeter fence and promoting extensive human activities, including night lighting and amplified sound. The Master Plan and associated analysis evince little understanding of the biological values of the project site and miss the mark entirely if their intention was, as stated, to be beneficial for native biodiversity.

Sincerely,

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About the Authors

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The comment asserts the Draft EIR did not adequately address the impacts. The SLRC is an urban park which currently has high levels of public access and anthropogenic influence to the majority of the site. The increase in public access would not elevate the SLRC exposure above the existing high levels of exposure to night lighting and amplified sound. For instance, the Draft EIR Section 3.1, Impact 3.1-4 states that lighting would not be included along secondary pathways within habitat areas. Additional Mitigation Measures AES-1 requires that all new permanent exterior lighting shall be shielded and directed downward to avoid light spill onto surrounding land uses including natural habitat areas, open water, residential areas, or into the night skies.

The comment asserts that the removal existing fencing preventing access to habitat by humans and pets would be a significant change from current baseline conditions, adversely impacting wildlife, and that the Draft EIR failed to disclose, analyze and mitigate these impacts. In the Draft EIR, the perimeter fence will be removed in phases as different park zones are constructed. The Draft EIR concludes that the removal of the perimeter fence would eliminate barriers to wildlife and provide access for large wildlife to access the water and created wetlands. Areas with the most habitat value will have low-level habitat fencing to demarcate access restricted areas (see Figure 2-4 in the Draft EIR). Additionally, these areas will be closed at night and off limits entirely to the public (see Master Response – Biological Resources (Public Access)). No impacts to wildlife are anticipated from the removal of the perimeter fence.

Additionally, in the Draft EIR, Section 3.4.5, PDF-BIO-7 through PDF-BIO-9 have standards for removing perimeter fencing and increased human use of the site.

The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA Guidelines. Section 3.4, Biological Resources of the Draft EIR is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using the industry standards for biological analysis.

C-39-12

Comment noted. The references and attached articles written prior to the publication of the Draft EIR do not contain comments regarding the adequacy of the Draft EIR. The information in the articles is noted for the record.

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Management, Frontiers in Ecology and the Environment, Trends in Evolution and Ecology, and Urban Forestry and Urban Greening.

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cont.



Statement on the Future Management of Silver Lake Reservoir

Silver Lake Reservoir will no longer be used to store drinking water by the City of Los Angeles Department of Water and Power. This decision has brought forth many views on the future of the reservoir and its beneficial uses by the people of Los Angeles. The recently announced decision to refill Silver Lake Reservoir is welcome. As the future of the reservoir property continues to be discussed, Los Angeles Audubon Society offers the following recommendations for the conservation of birds and their habitats at this location.

Silver Lake Reservoir is a popular birding site and is important for resident and migratory birds. Birders have recorded observations of over 140 species at the reservoir on the eBird website and have visited it annually for the Christmas Bird Count since the early 1900s. Its importance to birds has been longstanding, as shown by various observations recorded over the years in our newsletter, *The Western Tanager*. For example, in 1936, Sandhill Cranes were reported to have been wintering at the site for several years, White Pelicans wintered in 1946, and Tundra Swans in 1948. Recent nesting observations include the Great Blue Heron rookery that is a visible outpost of this charismatic species. New species continue to be observed, with Peregrine Falcon, American Avocet, Greater Yellowlegs, and Northern Pintail recorded in 2017. It is also the site of local songbird rarities, such as a White-throated Sparrow in April 2016 and a Blackpoll Warbler along with other fall migrants in the Eucalyptus trees in fall 2015. These observations show the persistent use of Silver Lake Reservoir and surrounding grounds as a site for wintering and breeding birds.

The two most important features of Silver Lake Reservoir as a habitat for birds are the presence of water in the reservoir and the presence and maintenance of a fence that limits disturbance within the fenceline. The presence of water is obviously essential to maintain the site as a wintering ground for waterbirds. Allowing for varying depths of water would provide habitat for the greatest diversity of wading, diving, and dabbling birds. The presence and maintenance of the fence, keeping people away from the water and water's edge, maximizes the value of the site as a wildlife refuge. Humans and pets disturb birds, such that birds can abandon a site, and the fence is the single most important conservation management tool at the site after the presence of water.

We therefore recommend that water be maintained in the reservoir and that the fence be kept in place and in good repair. Without the fence, and the resources to maintain it, we fear that the site would quickly be occupied by people and pets throughout the day and night, as has become the case for other natural open spaces in the City. Without the fence, the effective size of the reservoir for birds will be greatly reduced and any species using the uplands and their vegetation would be subject to significantly increased disturbance. We support adding appropriate vegetation to the banks of the reservoir. The early days of the reservoir had soft banks and emergent wetland vegetation; re-establishment of such plants would increase the value of the site for birds significantly, but only if the fenceline is maintained and human disturbance excluded.

March 27, 2017

Contact: Travis Longcore, Ph.D., Conservation Chair, (310) 247-9719

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SILVER LAKE RESERVOIR DEVELOPMENT AND POTENTIAL WATERFOWL HABITAT LOSS

By Andy Birch

Birders have recognized the value of Silver Lake Reservoir for over a century, with the reservoir playing a role in the annual Audubon Christmas Bird Count, dating as far back as 1916 and even rarities such as Tundra Swan being recorded there in 1919.

The reservoir was taken out of service by DWP in 2008 and ever since then, the heated political debate about what to do with the land has not ceased. As the plans for active recreational development of the reservoir has come to the fore in recent years, and with the reservoir being in my SMO (5 Mile Radius), I was curious what sorts of waterfowl numbers that regular watching would yield. Starting in 2018, I made a concerted effort to do regular, detailed counts. The reservoir's size and location, adjacent to the LA River, enveloped by urban development and only a couple of miles from downtown LA, suggested it could be quite a magnet for migrating waterfowl.

Over 170 species have now been recorded at this urban site, including astonishing finds such as Elegant Tern, Bald Eagle and Long-tailed Duck. On peak days during the winter, over 3000 birds use the undisturbed, fresh water of the reservoir to rest and fuel up. This past winter, we had some of the highest counts for LA County for a number of waterfowl species. Most notable, single digit numbers of Ring-necked Duck (170), Lesser Scaup (75), Ruddy Duck (950), Northern Shoveler (150), Redhead and Canvasback. Scarcities this winter included a lingering and confiding Greater Scaup, Mew Gull and our current wintering Gray Flycatcher. Flocks of over 2000 California Gulls can be seen in the late afternoon and among them, Island (Thayer's) and Glaucous-winged Gulls are regularly found. The wintering waterfowl habitat at Silver Lake is reliant on a large body of open water and a lack of human disturbance in the water. To lose this habitat would clearly be a major loss to wintering waterfowl on a county level for species that are already facing habitat pressures throughout their summer, winter and migration ranges.

LA Audubon's statement regarding the reservoir is that the two most important features as a habitat for birds are the presence of water in the reservoir and the presence and maintenance of a fence that limits disturbance within the water. The presence and maintenance of the fence, keeping people away from the water and water's edge, maximizes the value of the site as a wildlife refuge. Humans and pets disturb birds, such that birds can abandon a site, and the fence is the single most important conservation management tool at the site after the presence of water.

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Artwork Courtesy of Andy Birch

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cont.

Arthur C. Gentry, Jr. of *André Breton*

The current development plans for active recreational use don't look good for waterfront and include boardwalks in to the reservoir, paddle boats, kayaking, a swim beach and a swimming pool in the reservoir itself. As is happening across the watersheds of LA County, developers and city landscape architects are trying to "improve" riparian habitats and promote human use as much as possible through active recreational plans. We are seeing these types of plans being formulated as some of the best birding sites all along the LA River Watershed, the Silver Lake plans, in general, promote human access to most areas of the water with a small nod to be wildlife through aesthetically pleasing "improvements" such as wetland plantings and floating islands. And of course, local architects and developers are being forceful to push the construction plans through, downplaying dissenting voices that are pro-conservation as a "local minority."

Encouraging though, many in the local Silver Lake community recognize the value of the reservoir as an important wildlife habitat that deserves conserving for passive recreation use only. There are even calls to turn it into a nature reserve. An online poll conducted by the city showed that the clear majority (86%) of respondents wanted to enjoy nature and everything else at the reservoir (including, but not limited to, bird-watching). We wanted bird-watching classes to be offered! So, there is a chance that enough momentum could build to convince the city to scale back its active recreation plans. If you would like to make sure that habitat conservation for wintering waterfowl is considered, please email the SR master plan group at eng.stump@cityofspring.com and let them know of the importance of the reservoir remaining undisturbed for wintering waterfowl.

This is a moment for a local LA community and visionary policy-makers to reverse the tide of habitat loss, provide inspiration for other cities around the nation and create a true urban wildlife sanctuary in the heart of one of the largest cities in the world; a wildlife refuge with the emphasis on habitat conservation, passive recreation rather than development for active recreation.

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	<p>We, the SILVER LAKE RESIDENTS FOR LESS IS MORE, love our neighborhood. We are long-term residents, some of us born and raised here.</p> <p>We want to preserve and nurture what we have: We have an abundance of green space, we have ample recreational opportunities, we have Wildlife, and we have community. We are fortunate.</p> <p>The proposed project is full of promises, lovely rendered images, which strangely resemble scenes from the 1950's—a safe time when families strolled about in verdant parks with birds abounding, ready to land on their shoulders.</p>	C-40-1	The introductory comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-40-1	<p>Sadly, the proposed Project, despite the paid artists' renderings and the politicians "dream big" rhetoric, would create the opposite.</p> <p>We must, yet again, voice our concerns about the Silver Lake Reservoir Complex Master Plan Project (SLRCMP) Draft Environmental Impact Report (DEIR).</p> <p>All of us could be in support of some aspects of the Project, but as written, as presented, we cannot support any of the Alternatives except Alternative 1: No Project.</p> <p>Let us begin with our concerns in the South Valley, the most heavily congested area of the entire Reservoir Complex.</p> <p>The GRASSY KNOLL:</p> <p>—No New Parking Spaces—</p> <p>We are strongly opposed to 25 parking spaces at 90-degree angles to the curb at the Grassy Knoll.</p>	C-40-2	The comment expresses opposition to the addition of parking in the South Valley. As discussed in the Project Description, Section 2.5.2 of the Draft EIR, there are currently 10 parallel parking spaces along this segment of West Silver Lake Drive. By converting to 90-degree parking, the proposed Project would add 15 new parking spaces along the South Valley. As identified in Section 3.16.5 the proposed Project has been designed in consultation with City Planning, and would be consistent with the LAMC 12.37 and Mobility Plan 2035. Please see Master Response - Parking/Bike Option and Master Response - Traffic/Transportation.
C-40-2	<p>West Silver Lake Drive is less than 50 feet at the south end, and narrowing this thoroughfare would most definitely create traffic congestion, cause traffic accidents, and endanger pedestrians. That the DEIR claims this would have no impact on traffic is really quite incredible.</p> <p>Beautification is a key objective of the Project. Twenty-five vehicles parked</p>		

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	<p>lengthwise at the Grassy Knoll, however, would greatly detract from what is now a beautiful sloping lawn that the community loves. This increase in parked vehicles, sticking out into the street, would diminish the grace and charm for those relaxing in the Grassy Knoll; for those walking, biking, or driving by; and for those simply looking out their windows or sitting on their porches. In addition, more cars would create more heat from the metal bodies and more pollution from the vehicle emissions. No thank you.</p> <p>—No New Picnic Tables or Barbecue Facilities—</p>	<p>C-40-3 The comment expresses opposition to the installation of picnic tables. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-40-3	<p>The sloping, tree-lined Grassy Knoll is a lovely, shaded area where people like to spread out blankets and relax, read, and write. Plein air painters come to this verdant area to capture the beauty in acrylic or watercolor. Installing a plethora of picnic tables on the Grassy Knoll demonstrates a stunning lack of understanding of what the community loves about this very little, very special park at the south end of the Lakes. More picnic tables and barbecue facilities would not only spoil the beauty, but also, encourage more litter and more trash, bad for the neighborhood, the park goes, and the nearby residents. Good for the rats though.</p> <p>RECREATION CENTER AREA—</p> <p>—No Demolition, Construction, Expansion, Multi-Purpose Building, Night Lighting, or Relocation of the Basketball Court—</p> <p>—Dog Parks: Add Shade Trees and Make Some Improvements Within the Existing Footprint—</p>	<p>C-40-4 This comment expresses opposition to relocation of the basketball court and construction of the multi-purpose building and night lighting, but requests shade trees in the dog parks. As specified in Section 2.4 - Project Objectives, in addition to repurposing the SLRC into a public park while preserving and enhancing its unique character, another key goal is to expand existing active recreational uses and increase passive recreational uses. The proposed multi-purpose building would be consistent with the proposed Project's goals. While the 5,800 square foot facility would require some tree removal during construction, as stated in Section 3.4 Biological Resources, PDF-BIO-13, the City Tree Ordinance would require these to be replaced at a 4:1 ratio for all protected trees. Additionally, per RAP Policy, whenever trees are removed, the existing trees' diameter, measured at diameter at standard height, shall be replaced at an equal or greater caliper of new trees. Also, please see Master Response - Biological Resources.</p>
C-40-4	<p>A major Project objective in the DEIR is to expand and enhance green space, yet the Project as presented, would actually diminish green space by expanding the concrete footprint in this Area with a 5,800 square foot Building. Again, this is contrary to the goals of beautification and creating more green space. The two-story building will ruin the view of the trees, if the trees are even permitted to remain.</p> <p>In addition, attracting more people to this location would mean more traffic and more parking. (And the proposed twenty-five, 90-degree angle parking spots, on West Silver Lake Drive, as aforementioned, is neither tenable nor</p>	<p>Regarding the dog park, as shown in Figure 2-13 Proposed South Valley Renderings and Figure 2-14 Proposed Dog Park Rendering, shade trees would line the small dog park and the perimeter of the larger dog play area.</p> <p>Please see response to Comment C-40-2 with regard to the parking and traffic issue identified.</p>

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C-40-5	welcome). Van Pelt is congested as is. More congestion from increased traffic would have a significant negative impact on this narrow street.	C-40-5	Please see Master Response - Traffic/Transportation
C-40-6	Regarding the two Dog Parks: we do support adding shade trees and making other non-invasive improvements within the current footprint.	C-40-6	The comment expresses support for the addition of shade trees and other non-invasive improvements within the existing footprint of the current dog park. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-40-7	The proposed night lighting would be highly disruptive to the residents and to the Wildlife. In addition, a new Multi-Purpose Building is predicated on demolishing the current Basketball Court and relocating it in a highly undesirable location that will have significant negative impact. The current location is in an open area that does not create echo against nearby buildings. Silver Lake Boulevard on its west helps to absorb the sound. The new location will create significant Noise from the Basketball Court as well as Noise from the echoing off the buildings on either side. Residents in close proximity will have significant negative impact from the Noise and the Night Lighting. Residents who live in the hills will have significant negative impact from the Noise because sound rises and from the new Lighting that will diminish the stars and the beauty and peace of the night sky. Further, additional Lighting will significantly disrupt the nocturnal patterns of the Wildlife.	C-40-7	This comment asserts night lighting would be disruptive to residents and wildlife and that the proposed relocation of the basketball court is undesirable. As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public. As specified within Section 3.4 of the Draft EIR, bat colonies and nesting birds utilizing the site are adapted to living in an urbanized setting with the existing lighting on-site, including the adjacent residential areas and traffic along roads. The proposed Project would be designed to limit lighting within areas with the most habitat value for wildlife species and all lighting would be shielded and pointed away from the surrounding neighborhood and habitat areas. Therefore, indirect impacts from lighting, noise, and human activity during proposed Project operation would not impact or diminish long-term survival of wildlife species, including nesting birds or roosting bat species.
C-40-8	—Impact of Demolition and Construction in South Valley and Throughout Reservoir Complex—		
C-40-9	The proposed demolition and construction will, the DEIR concedes, create Noise that “unavoidably” exceeds “acceptable” limits. This will create significant negative impact for residents; companion dogs, cats, and Birds; and Wildlife—especially over an extended period, yet the DEIR offers no mitigation for this negative impact.		
C-40-10	The Demolition of “hardscaped” areas from the Meadow, the Knoll, and the Ivanhoe Reservoir to the Eucalyptus Grove and the South Valley will create significant negative impact for residents, their companion animals, and the Wildlife as outlined in the DEIR: 2.6.2. The South Valley alone will be subjected to the Demolition of 8,200 square feet of building material. We were all living in the neighborhood during the DWP Bypass Project and were subjected to the harmful air quality created during Demolition and Construction. What are often referred to as dust or dirt, mere nuisances during construction, are actually Particulate Matter 10 (PM 10), which irritates the nose, throat, and eyes,		The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with implementation of the proposed Project, thereby limiting noise impacts to hours where other noise would usually be present. Additionally, by moving the basketball court to the north, the court would be moved further away from sensitive residential receptors. As shown in Section 3.12 of the Draft EIR (Noise and Vibration), Table 3.12-21, the combined noise levels from mechanical equipment, loading activities and refuse, and open spaces without amplified music would not exceed the significance threshold of 5 dBA over ambient noise levels at any of the receptor locations.

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cont.

and the more insidious Particulate Matter 2.5 (PM 2.5), much smaller particles that can penetrate the lungs and the blood. The DEIR, however neither specifies the size of the particulate matter nor the daily levels that will permeate the air during the proposed Demolition and Construction. State regulations during the DWP Bypass Project in 2012, capped the daily limit at 50 micrograms per cubic meter. The Particulate Matter in the air, however, regularly exceeded the allowable limits.

The pollutants in the air led to respiratory illness, sometimes severe, especially for residents in close proximity to the Demolition and Construction. Both young and old were affected by the pollutants in the air. An extraordinary number of absences were recorded at Ivanhoe Elementary School because of respiratory illness. Residents' beloved animal companions suffered: At least three dogs and two cats died from respiratory related illnesses during this period of extensive Demolition and Construction. Others had to be treated for anxiety.

The DEIR must do due diligence: The air, in and around the Reservoir Complex, must be tested—according to EPA standards—prior to the final EIR, prior to any Demolition or Construction in conjunction with this proposed Project. We must have a legitimate, accurate baseline that can be used to determine allowable levels of PM 10 and PM 2.5 if the project were to go forward. The proposed Demolition and Construction—especially over an extended period—poses a tangible danger to residents, their animal companions, and the Wildlife, yet the DEIR offers no mitigation. We were here though. We know what to expect. And we don't want it.

—Ground-Borne Vibration—

Ground-borne vibration—as noted in the DEIR: 3.5-32—from heavy equipment including vibratory pile driver, backhoe, dozer, excavators, drill rig, loader, scraper, and haul trucks—“generate vibrations that propagate through the ground.” These vibrations have the potential to damage historic buildings in the South Valley as well as to exceed allowable Noise thresholds for nearby residents. During the DWP Bypass project, some residents sustained physical damage to their homes. On Rokeby, for example, some had windows and foundations crack from this kind of vibration. Residents in close proximity to the South Valley Recreation Center Area are understandably concerned about this significant negative impact should the Project go forward. We were here.

- C-40-8 This comment expresses concern regarding additional lighting impacts to wildlife. The Draft EIR Section 3.1, Impact 3.1-4 states that lighting would not be included along secondary pathways within habitat areas. Additional Mitigation Measures AES-1: Shielded Fixtures requires that all new permanent exterior lighting shall be shielded and directed downward to avoid light spill onto surrounding land uses including natural habitat areas, open water, residential areas, or into the night skies. The habitat areas including planted areas of native vegetation and open water would not be significantly impacted by proposed lighting and the SLRC would continue to function as usable wildlife habitat.
- C-40-9 The comment expresses concern for noise impacts. Noise impacts are discussed in Chapter 3.12 of the Draft EIR and impacts to biological resources are discussed in Chapter 3.4 of the Draft EIR. PDF-BIO-2 would require pre-construction nesting bird surveys and the implementation of avoidance measures during construction if nests are found to be active within 300 feet of construction activities or to the outer limits of the park area bounded by West Silver Lake Drive, Van Pelt Place, and Silver Lake Boulevard.
- C-40-10 This comment is concerned about Particulate Matter and fugitive dust emissions, groundborne vibration and impacts associated with truck trips. Regarding Particulate Matter, please see Section 3.3 Air Quality of the Draft EIR. As shown in Tables 3.3-12 to 3.3-19, the increases in localized emissions of NOx, CO, PM10, and PM2.5 during construction would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. As shown in Table 3.3-20, the increases in localized emissions of NOx, CO, PM10, and PM2.5 emissions during operation of the Project would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. With implementation of Mitigation Measure AIR-1 the regional NOx and PM2.5 emissions would be reduced to a level below the SCAQMD regional thresholds of 55 pounds per day, as shown in Table 3.3-11. With implementation of Mitigation Measure AIR-1, regional NOx and PM2.5 emissions from operations would be reduced to below the regional threshold for NOx and PM2.5, and impacts related to regional NOx and PM2.5 operational emissions would be mitigated to a less-than-significant level.

Regarding groundborne vibration, as indicated in Table 3.12-23 of the Draft EIR, the estimated vibration velocity levels from construction equipment

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C-40-10 cont.	<p>We know what to expect. And we don't want it.</p> <p>—Significant Negative Impact from Truck Trips—</p> <p>The proposed number of Truck Trips to and from our residential community during this extended project is consequential—19,625—and that astounding number is, of course, just an estimate. Nobody actually counts the number of truck trips once a project starts either. Additional Truck Trips, if needed, would simply be deemed “unavoidable.” Big Trucks create Noise; increase Traffic, Traffic Congestion, and Parking Congestion. They would awaken residents as they pull in and set up between 5:45 and 6:45 am—as they did during the Bypass Project—in order to be ready to start work at 7:00 am when Noise is permissible. Further, they would damage our streets, which had to be repaired after the Bypass Project. The DEIR deems these truck trips to be insignificant and offers no mitigation. But we know better. We were here. We know what to expect. And we don't want it.</p>	<p>would not exceed the significance thresholds of 0.12 in/sec PPV and 0.2 in/sec PPV at any of the sensitive receptors, with the exception of the historic resources located within the Project site's South Valley. However, inclusion of Mitigation Measure NOISE-5 would ensure the operation of construction equipment that generates high levels of vibration during any phase of construction occurring in the South Valley will be limited to setback distances from the South Outlet Chlorination Station and Meter House receptors. With implementation of Mitigation Measure NOISE- 5, potential structural vibration impacts on receptor V8 would be mitigated to less than significant.</p>
C-40-11	<p>—Significant Impact to Wildlife—</p> <p>We are fortunate to live among an amazing diversity of Wildlife, in the midst of a Wildlife Corridor.</p> <p>Amanda Zellmer, Associate Professor at Occidental College, asserts, “The DEIR disregarded the role of stepping-stone habitat as an important source of connectivity between significant open habitat spaces within Los Angeles.”</p> <p>This natural open space is special to residents and nonresidents alike because it is peaceful and wild. It is special because it is home to an amazing host of Wildlife and Birds—over 203 that reside here or visit on their migratory journeys.</p> <p>The Silver Lake Wildlife Sanctuary has done a stellar, comprehensive commentary on the negative impact this project poses to the Birds and other Wildlife. The Experts with whom they have consulted are credible because they have no ulterior motives for their statements. They have clearly shared critical information that DEIR must considered in the subsequent EIR—if there indeed is one. We SILVER LAKE RESIDENTS FOR LESS IS MORE are not even</p>	<p>Please see Master Response - Traffic/Transportation for further information regarding the Transportation analysis undertaken for the Project.</p> <p>C-40-11 The comment is concerned about human interference with wildlife. The Draft EIR acknowledges that the SLRC accommodates existing human utilization for recreational uses as a component of baseline conditions. Draft EIR Section 3.4, Biological Resources, describes the existing biological resources under the current intensity of recreational use, with inference to existing use by visitors. Draft EIR Section 3.4.5, Impacts and Mitigation Measures, analyzes the probable increase visitation of the SLRC to special-status species and concludes that impacts to wildlife will be less than significant.</p> <p>This comment also expresses concern regarding additional lighting impacts to wildlife. The Draft EIR Section 3.1, Impact 3.1-4 states that lighting would not be included along secondary pathways within habitat areas. Additional Mitigation Measures AES-1: Shielded Fixtures requires that all new permanent exterior lighting shall be shielded and directed downward to avoid light spill onto surrounding land uses including natural habitat areas, open water, residential areas, or into the night skies. The habitat areas including planted areas of native vegetation and open water would not be significantly impacted by proposed lighting and overall the SLRC would continue to function as usable wildlife habitat.</p> <p>The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA. Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.</p>

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going to attempt to cover all the shortcomings in the DEIR Biological Technical Report. Still, we have a few key thoughts to share.

A stated goal of the DEIR: 2.2 is to “Enhance and expand Wildlife habitat by introducing wetland and aquatic ecologies and improving upland habitat.” Experts, however, say the Construction, Grading, Noise, and Pollution may actually drive the Wildlife away. Promenades, Terraced Seating, and Sloping Lawns will increase human and canine activity in and around the Lakes and increase litter and other hazardous materials, which Wildlife and Birds, especially the Water Birds, may ingest. The DEIR says Project planners will consider nesting periods and other avian needs in sequencing the Demolition and Construction, but we really don’t really know the impact this would have on the Birds and other Wildlife. Removing the Perimeter Fence would further decrease any Wildlife population that survive the Demolition and Construction.

Daniel S. Cooper, PhD and Senior Conservation Biologist, says the DEIR Biological Technical Report “is lacking in both rigor and specificity, particularly for such a large, visible site as Silver Lake Reservoir.”

Erinn Wilson-Olgin Environmental Program Manager I South Coast Region California Department of Fish & Wildlife shared, in his Scoping Comments, stated multiple concerns about the negative impact on the Wildlife including the adverse effect of increased numbers of people and dogs, noise levels, night lighting, unnatural food sources via litter and trash receptacles, and encroaching footpaths.

The “reimagining” of this special Wildlife Area is a risk: We could lose what we already have if this project were to go forward.

—Negative Impact of Amplified Events in the Meadow—

The DEIR concedes that amplified events in the Meadow will “unavoidably” exceed allowable Noise Levels, and mitigation is impossible. How can this even be a consideration? Amplified Events will effect not only nearby residents, of whom there are many, but also residents throughout the community from Silver Lake Boulevard and West Silver Lake Drive to the hills east and west of the Meadow—because sound rises. The DEIR 2: Project Description and Table

C-40-12 This comment is concerned with the impact resulting from amplified events.

Please see Master Response - Traffic/Transportation and Section 3.16 Transportation of the Draft EIR for further information on how vehicle trips for the proposed Project were derived.

C-40-11
cont.

C-40-12

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C-40-12 cont.	<p>2.9 states, despite conceding that the Events could have a “regional draw, that only 30% of the up to 600 attendees for these events will come from outside neighborhood. 70% of the attendees then are quixotically expected to walk or travel to and from the Meadow by “other non-vehicle means.” Table 2.9 alleges Peak Use Vehicle Trips of 134 to the Meadow and 134 from the Meadow. Will Granny be skateboarding to the events? And what of those with disabilities? This data, claiming that the traffic increase would be insignificant, is almost as ridiculous as the claim that the 25 proposed 90-degree angle parking spots at the Grassy Knoll would have no impact on traffic. Silver Lake residents have a right to quiet on their streets and certainly in their homes. We say a firm “no thank you” to the proposal for Amplified Events that will congest our streets and disturb our peace.</p>	C-40-13 Please see Master Response - Fence Removal.
C-40-13	<p>—Maintain Perimeter Fence, but Replace with More Attractive Wildlife-Friendly Fence—</p> <p>The DEIR: Table 3.14.4 asserts, “The impact [of removing the Fence] is less than significant.” This assumption lacks even a modicum of credibility. Increased crime and vagrancy has been documented in other unfenced parks in Los Angeles. Our recent experiences at Echo Park should provide a sober lesson about what happens when the Fence comes down. The Perimeter Fence is a crucial aspect of neighborhood safety. Easy access to 116 acres of parkland—day and night—will clearly create a situation that cannot be controlled. We have only two Park Rangers, and our hardworking LAPD is busy patrolling our neighborhood streets; they cannot possibly patrol an area of this scope and character. And removing the Perimeter Fencing would have a dire negative impact on the Wildlife. The Fence is integral to the preservation of the terrestrial animals and over 203 species that reside here or visit seasonally. According to the Los Angeles Audubon Society, “The fence is the single most important conservation management tool at the site after the presence of water.” We do support replacing the current Fence, however, with one that is more attractive and Wildlife-friendly.</p>	<p>As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.</p>
C-40-14	<p>—Cost of Project is Astronomical, and who Benefits?—</p> <p>The cost of this project is inordinate, especially in light of the fact that Silver Lake already has a beautiful park from the Grassy Knoll and Vista over the South Dam to the Meadow, Northern Knoll, and Eucalyptus Grove. We have walking paths around the Lakes, we have a Recreation Center that hosts</p>	<p>The commenter is also referred to Master Response - Funding & Operations.</p> <p>Infrastructure available to serve the proposed project is analyzed in Utilities and Service Systems, Section 3.18 of the Draft EIR. The Draft EIR concluded that the proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities and impacts would be less than significant.</p> <p>This comment also expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>

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- C-40-14 cont. community activities throughout the year, we have a much-used Basketball Court, and two Dog Parks. Silver Lake, designated by the Los Angeles Countywide Comprehensive Park and Recreation Needs Assessment as a “low needs” community, does not need an extravagant Disneyland-type-of park. The funds that would be allocated for this Project should be used to benefit residents in “high needs” communities that do not have parks or recreation centers or to benefit existing city parks in need of repair. This proposal, with its high price tag, is an arrogant extravagance for Silver Lake, and construction cost usually goes up once a project is in progress. We don’t really know what this project, should it be allowed to go forward, would cost. We don’t need this. We don’t want to be a “world-class recreational destination” as city officials and planners have encouraged. Our community neither has nor could support the infrastructure that would be required. We, the Silver Lake Residents for Less is More are not fooled by the commissioned idyllic renderings or the highfalutin “dream big” talk. We want to preserve the peace and beauty that we have.
- The DEIR falls short. It is a fanciful proposal that will benefit the consultants, the planners, and the contractors. It will not benefit those who actually live here. It will not benefit residents in park poor communities throughout the city. And it will not benefit the Birds and other Wildlife.
- We, the Silver Lake Residents FOR Less IS More, do not want this project, which will have significant, irreversible, negative impact on our community—the people and their animal companions, and the myriad of Birds and other Wildlife.
- We want to maintain the cultural landscape and the character-defining features of the Reservoir—Historical-Cultural Monument #422.
- C-40-15 We do not want to lose the serenity, the beauty, and the Wildlife that inspired us to live in Silver Lake in the first place. We want to preserve and maintain it. The risks this Project poses are too great.
- C-40-16 We, the members of SILVER LAKE RESIDENTS FOR LESS IS MORE, strongly oppose the Project as presented in the DEIR. Because we love our community, and because the DEIR is sadly lacking in data, in mitigation, and in reality, we are compelled to support Alternative 1: No project.
- Thank you for the opportunity to share our thoughts.

- C-40-15 As described in Section 3.5.1, Cultural Resources, the SLRC is a multi-component historic district that is both the focal point and historic setting of the surrounding residential area. As such, the proposed Project has the potential to impact historical resources in the immediate surroundings through changes to the historic setting. Archival research was conducted to identify previously recorded historic resources located within 0.25-mile of the perimeter of the Project site. Due to the density of the existing development in the area, a search for previously identified historical resources was limited to a 0.25-mile radius of the Project site (study area). This study area is where the Project has the greatest potential for indirect impacts to adversely affect the eligibility of nearby historical resources. Due to the high number of previously identified historic resources (see Appendix F of the Draft EIR), only those resources that have views of the SLRC and the potential to experience an impact to their setting were analyzed for potential impacts. The search identified 103 previously recorded resources within 0.25-mile of the SLRC that have either direct or indirect views of the Project site. Direct views are defined as views of the open water from the resource's primary elevation from the public right-of-way. Indirect views are defined as watershed views that are partially obscured by other residences or foliage, or that have a direct view of the perimeter or parks around the complex but not of the water.

Under CEQA Guidelines Section 15064.5 (b), the changes to a resource and its setting would only cause a substantial adverse change if they would detract from the integrity (location, design, setting, materials, workmanship, feeling, association) of the historical resource such that the historical resource’s ability to convey its significance would be materially impaired to the degree that it would no longer be eligible as a historical resource pursuant to CEQA Guidelines Section 15064.5 (b). The Draft EIR concluded that although there would be slight view changes for some residences which may marginally affect the integrity of setting, the setting would largely remain intact. The historic resources would all still be located in a residential neighborhood around the reservoir, which would remain a neighborhood nucleus. The layout of the streets would not change as a result of the proposed Project, nor would the topography or scale. The residences would still have views of the SLRC. The changes would not affect the eligibility of individual resources or historic districts. Consequently, the minor change in views and setting would not detract from these resources’ ability to convey their significance and impacts were concluded to be less than significant.

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RESPONSE

C-40-16
cont.

Sincerely,

Julie Grant: Westerly Terrace—90026
 Maral Gharib: Westerly Terrace—90026
 Frederick Young: West Silver Lake Drive—90026
 Caren Singer: West Silver Lake Drive—90026
 Robert Wolin: West Silver Lake Drive—90026
 Christi Moore: West Silver Lake Drive—90039
 Gary Moore: West Silver Lake Drive—90039
 Eileen Marcussen: Ivanhoe Drive—90039
 Stephen Marcussen: Ivanhoe Drive—90039
 Bea DeRusha: Edgecliffe Drive—90026
 Joey DeRusha: Edgecliffe Drive—90026
 Gian Carlo Sevilla: Tularosa—90026

The Draft EIR confirms that the SLRC is a historical resource for the purposes of CEQA. The original HCM nomination form is short and limited on details and does contain an inventory or description of what the contributing and/or non-contributing resources are contained within the district, let alone inventory, categorize, and analyze its character-defining features. The Draft EIR contains an extensive history of the SLRC, including categorizing and prioritizing the character-defining features of the SLRC, which previously had not been analyzed. Information from three separate reports was synthesized for the impacts analysis on these features.

As described in Section 3.5.1, Cultural Resources, the SLRC itself is a Los Angeles Historic Cultural Monument (#422), designated in 1989. The SLRC has also been previously recorded by SurveyLA with a status code of 5S1, meaning that it is a designated City landmark. Further analysis of historical resources and impacts analysis is based on the Silver Lake Reservoir Complex Master Plan: Supplemental Historical Report and Impacts Analysis (2022) (Historical Report) provided within Appendix F of the Draft EIR.

The Draft EIR contains the most extensive description, analysis, and catalog of the features and history of the SLRC written to date. While the SLRC was evaluated as a district, rather than a Historic Cultural Landscape, that is merely a difference in terminology and organizational tools. The characterization of the SLRC as a “district” versus a “landscape” did not originate with the Draft EIR; it dates to its listing as a LAHCM and therefore predates the Draft EIR. Additionally, with the number of buildings, structures and physical infrastructure associated with the SLRC, a district is not an inappropriate organizational tool. Landscape features can and are considered character defining features in historic districts, including the SLRC, and do not necessarily require separate evaluation as “cultural landscape.” More importantly, the landscape features of the SLRC that would be defined, inventoried, and evaluated for impacts in a cultural landscape evaluation are all defined, inventoried and evaluated within the Draft EIR, including various landscaping and landscape areas, the knoll, and the meadow. The resulting analysis of impacts more than adequately addresses the potential impacts of the project, and an analysis of impacts under the auspices of a “cultural landscape” would be no different.

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- C-40-16 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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	<p>Long-time Silver Lake residents, we have attended all the meetings for the proposed new Master Plan as well as other meetings held by different neighborhood organizations and councils. Our neighbors and we have voiced our concerns about the project from the beginning. Why were we never given the option of Alternative 1—No Project?</p>	C-41-1 This comment expresses opposition to the project and asks why Alternative 1 was not given as an option. Please see Master Response - Alternative Analysis.
C-41-1	<p>“Dream big,” we have been told . . . over . . . and . . . over.</p> <p>Our dream, however, is to maintain the peace and beauty in our community and to nurture and protect the Birds and other Wildlife we have. We do not want to live in a “world class recreational destination for all of Los Angeles as well as visitors to the city.”</p>	C-41-2 The comment expresses opposition to the proposed Project based on traffic, new buildings, and increased visitors. The fundamental Objective of the Project as stated on page 2-6 of the Draft EIR is to make the best use of the SLRC as a public park to benefit area residents since it is no longer needed to support water supply to the City. The Draft EIR provides detailed assessment of impacts from increased visitorship, traffic and new buildings. Please see Master Response - Alternatives Analysis. Please see Master Response – Community Engagement Process.
C-41-2	<p>Our small community cannot sustain the kind of traffic and crowds this plan hopes to bring. We do not have the infrastructure nor could we support the infrastructure required for this sweeping, unrealistic proposal. We do not want new buildings, and we do not want more concrete where we currently have green space.</p> <p>Fortunately, we have an amazing public park with lots of green space and recreational opportunities from the open Meadow at the northeast end to the shaded Grassy Knoll at the south end. Surmounting the Grassy Knoll, we have a Walkway and a Vista overlooking the Lakes. We have a Recreation Center that hosts community meetings, workshops, yoga classes, voting, and children’s events. We have two Dog Parks, a recently reconstructed Children’s Playground, and a well used, much loved Basketball Court. We have Walking Paths around the Lakes. In addition, we have an abundance of nearby parks and recreational facilities.</p> <p>We would be happy to see certain improvements that enhance passive recreation in and around the Reservoir Complex—beautification; more trees and plants; a more attractive, wildlife-friendly perimeter fence; level sidewalks; more shade in the Dog Parks as well as other improvements within the existing footprint—but we cannot support any aspect of this Master Plan as presented because one item we might support is attached to another we cannot.</p> <p>Green space is a priority in the Master Plan, a noble objective. Why then build a 5,800 square foot, two-story building in the South Valley where we now have</p>	

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C-41-3	<p>green space? The proposed two-story Multi-Purpose Building would mar the beauty; the view of the trees would be obscured by concrete. The proposed Night Lighting would be highly disruptive to the residents and to the Wildlife. In addition, the proposed 5,800 square foot Building would require the Demolition of the present Basketball Court, which is located in an open area, not abutting buildings that create echo; the sound is absorbed by traffic on Silver Lake Boulevard whereas the new Basketball Court would be located in an undesirable location for nearby residents who would have no buffer from the Noise and the Night Lighting. Sound travels upwards, which means the Noise from the Basketball Court would disturb not only nearby residents but also those high in the hills.</p>	C-41-3 The comment expresses concern for the relocation of the basketball court and associated noise and lighting impacts. The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with implementation of the proposed Project, thereby limiting noise impacts to hours where other noise would usually be present. Additionally, by moving the basketball court to the north, the court is being moved further away from sensitive residential receptors. As shown in Section 3.12 of the Draft EIR (Noise and Vibration), Table 3.12-21, the combined noise levels from mechanical equipment, loading activities and refuse, and open spaces without amplified music would not exceed the significance threshold of 5 dBA over ambient noise levels at any of the receptor locations.
C-41-4	<p>Regarding the Zone the DEIR refers to as the Picnic Area: This is a misnomer and testifies to how out of touch with the neighborhood those who conceived this plan are. We folks in the community who fought long and hard to save this jewel of a park during the DWP Bypass Project call it the Grassy Knoll. People frequent this lovely shaded grove of mostly London Planes and Sycamores not just to picnic but also to set down blankets, read, write, paint, listen to the birds, and converse with friends and family. At least one young man proposed marriage to his sweetheart on the Grassy Knoll. This beautiful, sloping-green area is visually and emotionally soothing to those who walk or drive by. More picnic tables would mar the natural beauty and bring more trash, more litter, and more rodents.</p>	C-41-4 This comment expresses opposition to the proposed 25 parking spaces at The Knoll. As discussed in Section 2.5.2 of the Draft EIR, the proposed Project would include the addition of 90-degree parking along the north side of West Silver Lake Drive, east of Redesdale Avenue adjacent to the Silver Lake Recreation Center. Currently, there are 10 parallel parking spaces along this segment of West Silver Lake Drive. By converting to 90-degree parking, a total of approximately 25 parking spaces would be added, resulting in a net increase in parking of 15 spaces at this location. As identified in Chapter 3.16 Transportation, Section 3.16.5 - Impacts and Mitigation Measures, the proposed Project has been designed in consultation with City Planning, and would be consistent with the LAMC 12.37 and Mobility Plan 2035.
C-41-5	<p>And the proposed twenty-five parking spots at ninety-degree angles to the Grassy Knoll would dramatically mar the beauty. The view from the street or from residents' homes would look more like a parking lot than an iconic green space, and those relaxing within the Grassy Knoll would look toward a tangle of cars. The vehicles would make the area hotter and release more pollutants into the air. From a traffic and safety standpoint, this plan is beyond ill conceived. West Silver Lake Drive at the south end is about 48 feet from curb to curb. Parking vehicles perpendicular to the curb would radically straiten this thoroughfare, compromise pedestrian safety, and cause traffic congestion and accidents—especially during rush hour, as cars attempt to pull out or wait for parking spots. The DEIR is absolutely and blatantly incorrect in its assessment that impact on traffic would be minimal.</p>	While adding additional parking could introduce new conflict points (such as opening doors from parked cars, cars crossing the bike lane to park or re-enter traffic, and cars waiting in bike lanes to park their car), the additional parking spaces would improve congestion by accommodating existing visitorship and reduce parking within the neighboring residential streets. Additionally, since trees would be avoided along this area and parking would be added in a way that it would not encroach on existing trees, the impacts to The Knoll would be minimal. Finally, as discussed in Section 3.1 - Aesthetics, the proposed Project is consistent with Silver Lake Reservoir Master Plan Design Guidelines and impacts to scenic vistas would be less than significant.
	The South Valley, the southernmost end of the Lakes by the Grassy Knoll, the	C-41-5 This comment asserts the transportation assessment was incorrect and expresses concern at demolition and construction impacts.

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C-41-5 cont.	<p>Recreation Center, the Playground, the Basketball Court, and the Dog Parks is the most congested area of the entire Reservoir Complex. Van Pelt, the access street between Silver Lake Boulevard and West Silver Lake Drive, is narrow and already heavily congested at rush hour. We do not want any more traffic, accidents, crowds, buildings, demolition, or construction here.</p> <p>The impact of the Demolition and Construction itself is of serious concern. Noise Levels, especially over an extended period of time, would pose significant health and emotional problems for residents, their animal companions, and Wildlife in the immediate vicinity.</p>	<p>Regarding the transportation assessment, please see Master Response - Traffic/Transportation.</p> <p>With regard to demolition and construction, as discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.</p>
C-41-6	<p>Per page 44 of Chapter 2 of the DEIR: Project Description 2.6.2, various Park Zones including the Meadow, Knoll, Ivanhoe Reservoir, Eucalyptus Grove, and South Valley would require demolition of hardscaped areas. 8,200 square feet of building material would be demolished in the South Valley alone. This means harmful pollutants would be released into the air—not just dust and dirt—but particulate matter 10 and 2.5 (PM 10 and PM 2.5). PM 10 irritates the eyes, nose, and throat. PM 2.5, finer particles, are more dangerous because they can permeate deep into the lungs and even into the bloodstream. The current DEIR fails to say what size particulate matter would be released into the air of our residential neighborhood and at what daily levels. In 2012, during the DWP Bypass Project, state regulations capped the daily microgram limit at 50 micrograms per cubic meter, but over the sampling period during Demolition and Construction, limits were regularly exceeded.</p>	<p>C-41-6 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
C-41-7	<p>People suffered from respiratory-related illnesses during the extended Construction of the Bypass Project: A young healthy 23-year-old, for example, an underwater cameraman, had to start using steroid inhalers. An elderly woman had to go on 24-hour-a-day oxygen. Ivanhoe Elementary School reported more absences from respiratory illnesses than they had ever had. Three dogs and two cats died from respiratory-related illnesses.</p> <p>The current project cannot possibly proceed without first testing current air quality—per EPA standards—in and around the neighborhood, so that there is a base for allowable particulate matter during Demolition and Construction. The nature and scope of the proposed Demolition and Construction poses a literal health hazard to residents and their animal companions as well as to the Birds and other Wildlife that share this lovely green space with us.</p>	<p>C-41-7 This comment expresses concern over Particulate Matter. Regarding Particulate Matter, please see Section 3.3 Air Quality of the Draft EIR. As shown in Table 3.3-12 to 3.3-19, the increases in localized emissions of NOx, CO, PM10, and PM2.5 during construction would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. As shown in Table 3.3-20, the increases in localized emissions of NOx, CO, PM10, and PM2.5 emissions during operation of the Project would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. With implementation of Mitigation Measure AIR-1 the regional NOx and PM2.5 emissions would be reduced to a level below the SCAQMD regional thresholds of 55 pounds per day, as shown in Table 3.3-11. With implementation of Mitigation Measure AIR-1, regional NOx and PM2.5 emissions from operations would be reduced to below the regional threshold for NOx and PM2.5, and impacts related to regional NOx and PM2.5 operational emissions would be mitigated to a less-than-significant level.</p>

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C-41-8	<p>Page 304 of the DEIR: 3.5-32 discusses “ground-borne vibration from heavy equipment —vibratory pile driver, backhoe, dozer, excavators, drill rig, loader, scraper, and haul trucks—“that generate vibrations that propagate through the ground.” These vibrations have the potential to damage historic buildings as well as to exceed allowable Noise thresholds for nearby residents. During the DWP Bypass project, folks at the north end of the Lakes—on Rokeby—sustained physical damage: Some had windows and foundations crack from this kind of vibration. Residents in close proximity to the South Valley Recreation Center Area would be hard hit if the proposed construction were to go forward. Yet another significant concern for residents in Silver Lake and as far away as Wilshire Boulevard is that Demolition, Construction, Grading, and Terracing on and around two Reservoirs that contain 795 million gallons of water and span 77 acres results in ground borne vibrations that could compromise the integrity of the Dams. The city Inundation Map shows the devastation that could result from a breach in the Reservoirs. The geotechnical impacts of any and all proposed Demolition and Construction in this area of liquefaction and high seismic activity must be duly analyzed.</p>	C-41-8	<p>This comment expresses concern regarding health hazards from demolition and construction. Please see Section 3.3 Air Quality of the Draft EIR. As shown in Table 3.3-12 to 3.3-19, the increases in localized emissions of NOx, CO, PM10, and PM2.5 during construction would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. As shown in Table 3.3-20, the increases in localized emissions of NOx, CO, PM10, and PM2.5 emissions during operation of the Project would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. With implementation of Mitigation Measure AIR-1 the regional NOx and PM2.5 emissions would be reduced to a level below the SCAQMD regional thresholds of 55 pounds per day, as shown in Table 3.3-11. With implementation of Mitigation Measure AIR-1, regional NOx and PM2.5 emissions from operations would be reduced to below the regional threshold for NOx and PM2.5, and impacts related to regional NOx and PM2.5 operational emissions would be mitigated to a less-than-significant level.</p>
C-41-9	<p>The effects of increased Traffic, Noise, and Particulate Matter 10 and 2.5 during construction are not mere nuisances as some have said. These are consequential impacts that would surely take a toll—dangers to the physical and emotional well being of the residents, their animal companions, and the Wildlife. The DEIR offers no mitigation for these negative impacts, however.</p> <p>And the onslaught of trucks—in and out of our residential neighborhood over the course of the extended project—is also consequential. The DEIR tallies the number of trips for each separate Area, but fails to give the stunningly scary grand total of truck trips in and out of our community—19,625. How is this insignificant? Increased Traffic, Parking, and Noise, as well as the pummeling of our residential streets, are significant factors. And our streets needed repair after the pummeling of trucks and other vehicles during the DWP Bypass Project, and would probably need repair after this project too—should it go forward.</p>		<p>Regarding groundborne vibration, as indicated in Table 3.12-23 of the Draft EIR, the estimated vibration velocity levels from construction equipment would not exceed the significance thresholds of 0.12 in/sec PPV and 0.2 in/sec PPV at any of the sensitive receptors, with the exception of the historic resources located within the Project site’s South Valley. However, inclusion of Mitigation Measure NOISE-5 would ensure the operation of construction equipment that generates high levels of vibration during any phase of construction occurring in the South Valley will be limited to setback distances from the South Outlet Chlorination Station and Meter House receptors. With implementation of Mitigation Measure NOISE- 5, potential structural vibration impacts on historic resources receptors would be mitigated to less than significant.</p>
C-41-10	<p>Residents of Silver Lake, as well as residents from other neighborhoods throughout the city, have enjoyed this natural space for decades. It is special because it is peaceful and wild. It is special because it is home to a myriad of</p>	C-41-9	<p>This comment expresses concern regarding groundborne vibration, inundation from a dam breach, and impacts associated with traffic, noise and Particulate. Regarding groundborne vibration, as indicated in Table 3.12-23 of the Draft EIR, the estimated vibration velocity levels from construction equipment would not exceed the significance thresholds of 0.12 in/sec PPV and 0.2 in/sec PPV at any of the sensitive receptors, with the exception of the historic resources located within the Project site’s South Valley. However, inclusion of Mitigation Measure NOISE-5 would ensure the operation of construction equipment that generates high levels of vibration during any phase of</p>

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COMMENT

RESPONSE

C-41-10
cont.

Birds and other Wildlife. It is a resting spot for hundreds of migratory birds on their seasonal journeys. The so-called “reimagining” of this space threatens the delicate balance that makes the Lakes and Surrounding Areas special and beloved.

One of the stated objectives of the Master Plan per page 6, Chapter 2.2 is to “Enhance and expand Wildlife habitat by introducing wetland and aquatic ecologies and improving upland habitat.” All the Construction, Grading, Noise and Pollution, however, may actually drive the Birds and other Wildlife away. Promenades, Terraced Seating, and Sloping Lawns would increase human and canine activity in and around the Lakes and increase litter and other hazardous materials, which animals and birds, especially the water birds, may ingest.

If the Birds and other Wildlife survive the construction phases, removal of the Perimeter Fencing would lead to a decreased Bird and Wildlife population. The DEIR says planning will consider nesting time and other considerations, but the project is most certainly a gamble in this respect.

From all we have read of experts’ opinions, thanks to the Silver Lake Wildlife Sanctuary, the DEIR falls sadly short in its evaluation of the impact of this proposed project on the Birds and other Wildlife. Per Daniel S. Cooper, PhD and Senior Conservation Biologist, the DEIR Biological Technical Report “is lacking in both rigor and specificity, particularly for such a large, visible site as Silver Lake Reservoir.”

The Silver Lake Reservoirs are home to an amazing diversity of aquatic and terrestrial animals. We are fortunate to live in a Wildlife Corridor. Amanda Zellmer, Associate Professor at Occidental College, asserts, “The DEIR disregarded the role of stepping-stone habitat as an important source of connectivity between significant open habitat spaces within Los Angeles.”

Erinn Wilson-Olgin Environmental Program Manager I South Coast Region California Department of Fish & Wildlife is concerned about the deleterious effects of the proposal on the Wildlife too. He cites many causes of concern including increased numbers of people and dogs, noise levels, night lighting, unnatural food sources via litter and trash receptacles, and encroaching footpaths.

construction occurring in the South Valley will be limited to setback distances from the South Outlet Chlorination Station and Meter House receptors. With implementation of Mitigation Measure NOISE- 5, potential structural vibration impacts on receptor V8 would be mitigated to less than significant.

Impacts associated with a potential dam breach are analyzed in Section 3.10 Hydrology and Water Quality of the Draft EIR which concludes that compliance with applicable regulations, monitoring requirements, and notification procedures during operation of the proposed Project would result in less than significant impacts to flooding. Geotechnical impacts are assessed in Section 3.7 Geology, Soils, and Mineral Resources of the Draft EIR which summarizes there are less than significant impacts associated with seismic hazards, soil erosion, unstable geologic units or soil and expansive soil.

Regarding Particulate Matter, please see Section 3.3 Air Quality of the Draft EIR. As shown in Table 3.3-12 to 3.3-19, the increases in localized emissions of NOx, CO, PM10, and PM2.5 during construction would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. As shown in Table 3.3-20, the increases in localized emissions of NOx, CO, PM10, and PM2.5 emissions during operation of the Project would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. With implementation of Mitigation Measure AIR-1 the regional NOx and PM2.5 emissions would be reduced to a level below the SCAQMD regional thresholds of 55 pounds per day, as shown in Table 3.3-11. With implementation of Mitigation Measure AIR-1, regional NOx and PM2.5 emissions from operations would be reduced to below the regional threshold for NOx and PM2.5, and impacts related to regional NOx and PM2.5 operational emissions would be mitigated to a less-than-significant level.

Please see Master Response - Traffic/Transportation for further information regarding the Transportation analysis undertaken for the project.

C-41-10

The comment asserts the increase in construction noise and pollution would interference with wildlife. The Draft EIR acknowledges that the SLRC accommodates existing human utilization for recreational uses as a component of baseline conditions. Draft EIR Section 3.4, Biological Resources, describes the existing biological resources under the current intensity of recreational use, with inference to existing use by visitors. Draft EIR Section

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COMMENT

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C-41-10 cont.	<p>The proposed Project is a risk to the Birds and other Wildlife. We could lose what we have if this project were to go forward.</p> <p>The Amplified Events proposed for the open Meadow is beyond preposterous. Silver Lake is like a giant bowl, and as aforementioned, sound rises. Residents are entitled to have peace in their own homes. Even with all the doors and windows closed, not ideal in the summer months when most events would be scheduled, residents in close proximity to the Meadow, as well as those who live in the hills, would be forced to hear whatever is being amplified. Page 54 of Chapter 2: Project Description and Table 2.9 on page 55 says 70% of the possible 600 attendees for these events would come from the immediate neighborhood and either walk or use other non-vehicle means to come and go. Only 30%, according to the DEIR, would drive to the location. According to Table 2.9 on Page 55, this translates into Peak Use Vehicle Trips at a mere 134 in and 134 out. Really? This data lacks credibility. That the proposed project could have a "regional draw" for special events is conceded but minimized. These events would congest our streets and disturb our peace. This represents a significant negative impact on our community.</p>	<p>3.4.5, Impacts and Mitigation Measures, analyzes the probable increase visitation of the SLRC to special-status species and concludes that impacts to wildlife will be less than significant. Additionally, this section analyzes construction impacts to Candidate, Sensitive, or Special-status Species, provides mitigation measures and concludes there will be less than significant impacts with mitigation incorporated. Impact 3.4-4 also assessed whether the proposed Project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery site, determining there would be a less than significant impact.</p>
C-41-11	<p>Regarding the Perimeter Fence: The DEIR states in Table 3.14.4 "the impact [of removing the Fence] is less than significant." How can this be? We have seen crime and vagrancy documented in other unfenced parks in Los Angeles. Have we learned nothing from the recent experience at Echo Park? The Perimeter Fence is a critical aspect of neighborhood safety. The idea of easy access to 116 acres of parkland day and night is really quite incredible. We have only two Park Rangers and our LAPD are overworked patrolling the neighborhood streets. They cannot possibly patrol the area at night.</p>	<p>The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA. Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.</p>
C-41-12	<p>And finally, the Perimeter Fencing is integral to the preservation of the Wildlife—the terrestrial animals and over 203 species of Birds who share this space with us—those that reside here and those that visit on their migratory journeys. According to the Los Angeles Audubon Society, "the fence is the single most important conservation management tool at the site after the presence of water."</p>	<p>As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public. As specified within Section 3.4 of the Draft EIR, bat colonies and nesting birds utilizing the site are adapted to living in an urbanized setting with the existing lighting on-site, including the adjacent residential areas and traffic along roads. The proposed Project would be designed to limit lighting within areas with the most habitat value for wildlife species and all lighting would be shielded and pointed away from the surrounding neighborhood and habitat areas. Therefore, indirect impacts from lighting, noise, and human activity during proposed Project operation would not impact or diminish long-term survival of wildlife species, including nesting birds or roosting bat species.</p>
C-41-13	<p>The cost of this project is astronomical. These funds could be far better used to benefit residents in communities that do not have a park or a recreation center or to benefit existing city parks in need of repair. This proposal, with its high price tag, is an arrogant extravagance for Silver Lake, designated by the Los Angeles Countywide Comprehensive Park and Recreation Needs Assessment, to</p>	
	C-41-11	<p>As identified in Section 3.12 Noise and Vibration of the Draft EIR, while Mitigation Measure NOISE-4, would require a special event permit and establish guidelines for speaker placement and directionality, operating hours, and the use of temporary noise barriers, blankets, or baffles may be required</p>

C-41 Caren and Robert Singer and Wolin / Silver Lake Residents for Less is More

COMMENT

RESPONSE

C-41-13
cont.

be a “low needs” community. And construction cost usually goes up once a project has begun, and unforeseen circumstances arise. We don’t really know what this project—should it be allowed to go forward—would cost.

The “dream big” mantra has been a nightmare for residents since the idea was introduced, especially residents in close proximity to the proposed projects. The city council members of Districts 4 and 13 told us—on multiple occasions—“The voices of those who would be most impacted by the project would be given the most weight.” This has not happened, however. We keep saying “no,” yet the same proposals keep coming back, usually worse than before. None of the three council members who made these promises still serve in City Hall. We, the residents of Silver Lake, however, are still here and are still trying to save our neighborhood from the planners, developers, and others who have grandiose ideas and little concern for the wishes of those who actually reside here.

C-41-14

Some may be persuaded to support the project because the talk is big, and the artists’ renderings are beautiful, even idyllic. Our intimate neighborhood, however, cannot support such a grand scheme, “a recreational destination for the entire city.” In the greedy, arrogant, opportunistic reaching for the impossible, we could lose what we have—the serenity, the beauty, the Birds and other the Wildlife that inspired us to live in Silver Lake in the first place. Let’s please protect what we have. The risks are too great. Let’s cut the losses here and now.

As members of the SILVER LAKE RESIDENTS FOR LESS IS MORE, we strongly reject the Master Plan, which is woefully lacking in data and in reality: Alternative 1—NO PROJECT— is the only sane, safe solution in light of the DEIR as presented.

Thank you for the opportunity to share our thoughts.

Sincerely,

Caren Singer and Robert Wolin
West Silver Lake Drive: 90026

on either side of and behind speakers to limit the amount of excess noise reaching nearby sensitive receptors, noise from the amplified speaker system for special events may still temporarily exceed the significance threshold at sensitive receptors near to the amplified speaker system at location R3. Because special events may include outdoor concerts, movie nights, luncheons, or other similar types of events that draw members of the community, it may not be feasible to reduce the volume of the amplified speaker system to a level below the significance threshold while still retaining a sufficient volume level for people in the Meadow park zone to adequately hear and enjoy the special event. Therefore, while Mitigation Measure NOISE-4 would minimize sound from the amplified speaker systems for special events to the extent feasible, noise impacts would be significant and unavoidable even after mitigation is applied. However, allowable event hours would be from noon to 10:00 p.m. as the L.A. City Municipal

Code prohibits the use of amplified sound within 500 feet of any residential zone from 10:00 p.m. to 7:00 a.m. As such, special events would generate noise outside of anti-social hours and would be limited to approximately 12 events annually. Please see Master Response – Noise.

Please see Master Response - Traffic/Transportation and Section 3.16 Transportation for further information on how vehicle trips for the proposed Project were derived.

Please see Master Response - Fence Removal.

C-41-12 This comment expresses opposition to the removal of the perimeter fence. Please see Master Response - Fence Removal.

C-41-13 This comment expresses concern at the cost of the project. Please see Master Response - Funding & Operations.

C-41-14 The comment expresses opposition to the proposed Project. The fundamental Objective of the Project as stated on page 2-6 of the Draft EIR is to make the best use of the SLRC as a public park to benefit area residents since it is no longer needed to support water supply to the City. Please see Master Response - Alternatives Analysis. Please see Master Response – Community Engagement Process.

C-42 Michael Schneider / Streets For All

COMMENT

RESPONSE



Dr. Jan Green Rebstock
City of Los Angeles
Public Works, Bureau of Engineering
1149 S Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

Sent via email (engslrcmp@lacity.org, jan.green.rebstock@lacity.org)

Re: Comments on Draft Environmental Impact Report for Silver Lake Reservoir Complex Master Plan Project, SCH #2022010055

Dear Dr. Rebstock,

- C-42-1 The above organizations care deeply about fighting climate change and providing safe alternatives to the car in Los Angeles. Upon reviewing the Bureau of Engineering's plans for the redevelopment of the Silver Lake Reservoir, we feel compelled to weigh in on the options for people on bikes.
- C-42-2 Of the two options, Option 2 is the safest for people on bikes. Option 1 features too many opportunities for cars to mix with cyclists, and also induces more driving by providing even more parking. While option 2 is the best of the options presented, it's missing some key components:
- C-42-3 1. Instead of the proposed 12', traffic lanes for cars should be reduced to 10.5'. Wider traffic lanes encourage more speeding by cars, exactly what we want to avoid near an area where people are walking and biking.
- C-42-4 2. If traffic lanes are reduced, an additional 3' of space can be used as a buffer zone between the cycle track and traffic lanes.

- C-42-1 The comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-42-2 The comment expresses support for bike Option 2. Please see Master Response - Parking/Bike Option.
- C-42-3 The comment expresses support for bike Option 2, but suggests instead of the proposed 12', traffic lanes for cars should be reduced to 10.5'. Please see Master - Response Parking/Bike Option. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- C-42-4 The comment expresses support for bike Option 2, but suggests if traffic lanes are reduced, an additional 3' of space can be used as a buffer zone between the cycle track and traffic lanes. Please see Master Response - Parking/Bike Option. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

C-42 Michael Schneider / Streets For All

		COMMENT	RESPONSE
C-42-5	3. A larger concrete buffer zone not only creates safer separation, but can also be used to plant more trees along the route for additional protection, and the addition of shade for people using the cycle track.	C-42-5	The comment expresses support for bike Option 2 but suggests a larger concrete buffer zone. Please see Master Response - Parking/Bike Option. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-42-6	4. The cycle track should be raised to the sidewalk level; the current bike lane is full of gutters that are extremely dangerous for people on bikes. Being sidewalk level would provide even more physical protection for people on bikes.	C-42-6	The comment expresses support for bike Option 2 but suggests that the cycle track should be raised to the sidewalk level. Please see Master Response - Parking/Bike Option. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
C-42-7	<p>The Silver Lake Reservoir project is an exciting one, but these new protected bike lanes need to be done thoughtfully and in a way that makes people feel safe. With fully protected bike lanes, more area residents will be inclined to walk and bike to the park rather than drive. The more safe bike infrastructure the city builds, the more we can reduce VMT and adhere to our climate goals. Lastly, truly protected bike lanes will serve the community better by connecting to potential future bike infrastructure in the area, such as the proposed protected bike lanes on Sunset Bl.</p> <p>Sincerely,</p> <p>Michael Schneider Streets For All</p> <p>Damian Kevitt Streets Are For Everyone</p> <p>Terence Heuston Sunset4All</p> <p>Christine Louise Mills LA River Communities for Environmental Equity</p>	C-42-7	The comment expresses support for protected bike lanes to aid with the reduction of VMT and climate goals while connecting bike infrastructure. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-1 Alyssa Reponen

COMMENT

RESPONSE

I-1-1 | Excellent plan. We hope you get it built as quickly as possible. I see no problems with the draft EIR. I do hope that the final plan includes public bathrooms, as that is a huge concern for sanitary reasons with the current setup of the Silverlake Meadow. Thank you.

I-1-1 | The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-2 Robert Ashton

COMMENT

RESPONSE

I-2-1

The Silver Lake Reservoir Complex Master Plan is a brilliant initiative. It is a bold and imaginative use of a now redundant resource. But, more importantly, it will significantly improve the quality of life of the people of Los Angeles. I am originally from London and was lucky enough to have lived very close to two of the best known - and biggest - parks in the city, Hyde Park and Regents Park.

One of the biggest takeaways from my experiences of regularly walking through these gardens was how they transformed the pace of the city and my own well being: I might be only a few hundred yards from hectic and noisy Marble Arch or the Euston Road, but the parks provided much needed peace and solace from the hustle and bustle of life. I believe the Silver Lake development can offer similar benefits.

It will also be a very welcome addition to the existing types of parkland in LA because it offers a completely unique experience. At present LA parks can be broadly be divided into two types:

1) neat, genteel, pretty and accessible, but quite small (eg Barnsdall, Echo Park, MacArthur)

2) rugged, wild and expansive, but not necessarily easily negotiated (eg. Elysian, Griffiths)

The experiences they offer are, therefore, quite binary - either a gentle walk and rest stop or a pulse pumping hike with views. The nearly 120 acre Silver Lake project appears to combine both these experiences with an ornamental garden, meadow, picnic area, seating, overlook and observation platform for those seeking a more genteel experience and a nature trail, steep knoll, fitness circuit, basketball court, soccer field and promenade for the more adventurous and athletic.

I have visited the reservoir over the past 20 years (I ran around the lake well before the running path was built when other runners could be counted on one hand) and have lived on W Silver Lake Drive for the past eight years. During that time I have seen and experienced the massive upshift in activity and enjoyment of the facility as new, small improvements (the Inanhoe footpath inside the fence etc) have been added.

However, the scale and scope of this new Master Plan can only serve to improve peoples' leisure time and enhance their pleasure and experiences of LA exponentially.

is not for eight years, although I have visited the area regularly since 1992. develop

I-2-1

The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-3 Jesse Gillan

COMMENT

RESPONSE

I-3-1 This is going to severely impact parking for lakefront residents. Most dwellings on W Silver Lake Dr. have no driveway, therefore limiting residents to street parking. The current traffic from visitors makes parking challenging enough. Once this site becomes even more of a "destination" matters will only get worse. Will there be any planning to implement parking permits or other restrictive measures for access from visitors?

I-3-1 As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive Please see Master Response - Parking/Bike Option. In addition, please see Master Response - Traffic/Transportation for a discussion on parking evaluations related to CEQA.

I-4 Michael Hayes

COMMENT

RESPONSE

I-4-1	As a resident of Silver Lake, I truly cannot wait for the day that I will be able to walk around what is planned to be the best park in Los Angeles. The proposed renovation of the reservoir looks to be about as good as can be asked for.	I-4-1	The comment expresses support for the Project. The commenter requests that a food and beverage component be added to the Master Plan. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-4-1	I feel the only improvements could come from the following changes.		
I-4-2	1) Recreation center to have a food & beverage component like the boat house in Echo Park. The despite a number of restaurants nearby, the area offers very little in terms of quick affordable bites that could be enjoyed while at the park.	I-4-2	The comment requests removal of the fitness circuit. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-4-2	2) Drop the "fitness circuit" in favor of almost any other planned use within the park. Anecdotally, these fitness equipment areas throughout the city seem expensive and useless. If nothing else, study the use or utilization rate of existing facilities throughout the city. I have NEVER seen a public fitness area being used in earnest. Best case scenario, curious kids use them as park toys... and only for a short time.	I-4-3	As discussed in the Project Description, Section 2.5.6 of the Draft EIR, bike parking or bike share stations would be located at all key pedestrian connection points shown on Figure 2-17 of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-4-3	3) Add metro bike docks at North and South ends of the park. With the loss of a previous --yet problematically infrequent-- metro bus (Line 201) The city provides almost no affordable or convenient way to access this park for those that A) don't live within walking distance or B) don't have / want access to a personal car.		

I-5 Linda Okamura

COMMENT

RESPONSE

I-5-1 We will be facing a future of worsening droughts - Silver Lake Reservoir should be returned to water storage for an uncertain future - cover the 'lake' and create a 'reflecting pool' to keep the aesthetics closer to the original 'lake'. Recreation areas around the 'lake' can still happen - but -- much greater thought needs to be done to the future of droughts & emergency use water storage.

I-5-1

Please see Master Response – Drought Conditions.

This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-6 Alex Freedman

COMMENT

RESPONSE

I-6-1 | Having participated in a number of the community workshops, and knowing how many competing visions there were for this space, I think this final plan looks like a really nice compromise among interests. It seems to balance diverse kinds of uses while also centering the ecological restoration work.

I-6-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-7 Isaac Rubinstein

COMMENT

RESPONSE

	It is a shame that in 2022 (and beyond) we are contemplating spending millions of dollars to "renovate" an already beautiful , purposeful center of our community which thousands of people enjoy everyday.	I-7-1	The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-7-1	Why is money not being spent on severely underserved communities in Los Angeles who desperately need simple play structures and parks for their children. Why is this money not being spent on addressing homelessness in our city?	I-7-2	The environmental impacts associated with implementation of the proposed Project have been analyzed in Chapter 3, Environmental Setting, Impact Analysis, and Mitigation Measures of the Draft EIR.
I-7-2 I-7-3	What will the environmental impact be on this community? There is already not enough parking. What makes Silver Lake so beautiful is its quietness. Who will deal with the traffic? the litter? The neighborhood will.	I-7-3	Please see Master Response - Traffic/Transportation for a discussion of transportation and parking.
I-7-4	Who will deal with the homeless people who will inevitably be attracted to these facilities? Will there be a fence built around the lake like Echo Park to keep people out?	I-7-4	Please see Master Response - Homelessness.
I-7-5	This project is clearly serving special interests somewhere. WHO IT IS NOT SERVING ARE THE RESIDENTS OF SILVER LAKE. I emphatically reject these plans, as they are against the interests of the actual people who live here. They also perpetuate an unjust, unequal society. Many local residents we have discussed these plans with are actually talking about moving from Silver Lake because of this project which is a more honest "temperature check" of the true feeling of the community.	I-7-5	As discussed in Section 2.7, Project Operations and Maintenance litter removal would be part of the proposed Project's onsite maintenance activities. In addition, the proposed Project would include removal of portions of the existing perimeter fence over time as the park zones are constructed. Please see Master Response - Homelessness and Master Response - Fence Removal.
	Sincerely, Isaac Rubinstein. Ainslev Cohen. Malcolm Rubinstein. and Leila Rubinstein		The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-8 Ainsley Cohen

		COMMENT	RESPONSE
I-8-1		Pls do not touch the reservoir. Nobody in our neighborhood wants this change. We do not want the traffic and the area cannot support the additional traffic!!!! We do not need school buses and tour buses coming thru residential streets. Pls use the funds towards the homeless issue that is devastating to all of us. Pls leave the reservoir alone. Pls allocate these funds somewhere where they are needed.	I-8-1 Please see Master Response - Traffic/Transportation. In addition, the comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-8-2			I-8-2 The comment on using the funds from the proposed Project to the homeless issue does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Currently, neither funding sources nor a named operator have been identified for the proposed Project. Please see Master Response - Funding and Operations.

I-9 Andrew Lush

COMMENT

RESPONSE

I-9-1

The Master Plan misses a huge opportunity, which is to provide equitable, local access to urban outdoor swimming. Currently those living near Silver Lake or farther east who do not own a car or cannot devote the significant amount of time needed to visit beach cities many miles away will never be able to swim outdoors in Los Angeles, a city known for its hot, sunny weather. Please look at the way outdoor swimming in natural bodies of water is part of civic life in Berlin or Copenhagen. The floating dock in the current Master Plan could be larger and include swim ladders and a designated area water rope to keep swimmers far from waterfowl, or the meadow could include a small beach (or both). This can be done but only requires imagination. We can have BOTH increased wildlife conservation AND urban outdoor swimming access as seen in European cities. Thank you for your consideration.

I-9-1

Chapter 2 Project Description of the Draft EIR includes a detailed description of the proposed Project's components. The comment requests that the Master plan include access to outdoor swimming opportunities. The proposed Project is described in Chapter 2 of the Draft EIR and does not include swimming. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-10 Mary Anne Hattemer

COMMENT		RESPONSE
I-10-1	I love the entire plan. Great job. Hope it is completed as soon as possible. Can't wait to walk around the beautiful lake.	I-10-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-11 Anonymous

COMMENT

RESPONSE

I-11-1	Hargreaves is a self interested firm out of their element and locale. Their terrible urbanization proposals will RUIN, not improve, the Silver Lake reservoir. A grossly disruptive and irresponsibly heavy handed approach that will cause chaos during construction and chaos if completed—for the community and visitors alike. What parking strategies are being implemented for visitor access?? Nobody rides public transportation to get here. Everyone drives. There's not enough parking to facilitate the onslaught of this recreational absurdity. Nobody wants terribly designed education centers or islands. You are not welcome here Hargreaves. Stay in the Bay.	I-11-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-11-2		I-11-2	As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.
I-11-3		I-11-3	The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-12 Anonymous

		COMMENT	RESPONSE
I-12-1	Parking??? No parking solutions on the map. Where will people park? Epitome of nealigence.	I-12-1	As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

I-13 Anonymous

COMMENT

RESPONSE

I-13-1

The Metro line 201 doesn't stop on Silver Lake Dr anymore. No adjacent bus lines come close to being convenient for visitors to utilize.

What are the justifications for stating there will be little impact on the neighborhood? This will be a catastrophe, drawn out for several years. Dark times.

I-13-1

The comment discusses the lack of bus lines to the site. Although Metro is a separate agency from the City that would be responsible for bus lines and the Project does not have any elements requiring changes to Metro bus lines, the Metro Micro line would service the Project area. Please also note PDF-TRA-6, which calls for City of LA departments to coordinate to look for additional opportunities to expand public transit services to the Project area. The impacts associated with the proposed Project are analyzed in Chapter 3 of the Draft EIR. The Transportation Impact Assessment (TIA) included as Appendix K of the Draft EIR provides an estimate of increased public use of the SLRC and impacts to public transit systems and parking. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-14 Glen Beard

COMMENT

RESPONSE

I-14-1	<p>What are the plans to address the Areas of Known Controversy? How do citizens who live right off the reservoir raise their voices against this? Noise, parking, traffic, wildlife displacement, homelessness, more noise during events? How do we stop this from happening?</p> <p>1.5 Areas of Known Public Controversy CEQA Guidelines Section 15123 states that an EIR shall identify areas of controversy known to the Lead Agency, including issues raised by the agency and the public. Based on comments</p>	I-14-1	<p>The areas of known controversy listed in Section 2.5 are addressed throughout sections included in Chapter 3.0, Environmental Setting, Impact Analysis, and Mitigation Measures of the Draft EIR.</p> <p>Also, please see Master Responses – Homelessness, Public Safety, Noise, Biological Resources, and Traffic/Transportation.</p>
	1. Introduction	I-14-2	<p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. Also, please see Master Response – Biological Resources.</p>
	Silver Lake Reservoir Complex Master Plan Project 1-4 October 2022	I-14-3	<p>This comment expresses concern regarding parking, traffic, and circulation impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response – Traffic/Transportation and Master Response – Parking/Bike Option.</p>
	Draft Environmental Impact Report	I-14-4	<p>This comment expresses concern regarding impacts to habitat and trees. Impacts to these resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Please see Master Response – Biological Resources.</p>
	received during the scoping meetings and NOP comment period, the following	I-14-5	<p>Please refer to Section 3.12, Noise of the Draft EIR for a detailed discussion on the impacts from construction activities. Please also see Master Response – Noise.</p>
	issues are known		
	to be of concern and may be controversial. Each issue is further evaluated in		
	the EIR:		
	<ul style="list-style-type: none"> • Removal of the perimeter security fencing and related concerns regarding 		
	homeless		
I-14-2	encampments, public safety, and impacts to wildlife		
	<ul style="list-style-type: none"> • Increased parking and traffic circulation on local streets 		
I-14-3	<ul style="list-style-type: none"> • Pedestrian connections and pedestrian safety 		
	<ul style="list-style-type: none"> • Connectivity with the bike network and cyclist safety 		
I-14-4	<ul style="list-style-type: none"> • Potential impacts to habitat and tree removals 		
I-14-5	<ul style="list-style-type: none"> • Noise impacts from construction activities and amplified sound during special 		
	events		

I-15 Kristen McGrath

COMMENT

RESPONSE

I-15-1 | Where is your meeting on 26th

I-15-1

The commenter was contacted via email and mail prior to the public meeting and was forwarded information on the public meeting details.

A virtual public meeting was held on October 26, 2022, at 6:00 pm on Zoom during the public comment period for the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, no additional response is needed.

I-16 Paul McGrath

	COMMENT	RESPONSE
I-16-1 Where is meeting	I-16-1 The commenter was contacted via email and mail prior to the public meeting and was forwarded information on the public meeting details. A virtual public meeting was held on October 26, 2022, at 6:00 pm on Zoom during the public comment period for the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, no additional response is needed.	

I-17 Beth Rabin

COMMENT

RESPONSE

I-17-1

Hello, we are glad for this plan to be moving forward! However, looking at the map, we notice a GLARING omission: the playground! Where is the playground??? We see the basketball court, the community center, and the play field, but no play structure. We raised our children here and the playground was an important gathering place for families with young children. Please make sure that a play structure is included in the plan!!

I-17-1

As shown in Figure 2-13 of the Draft EIR, the existing playground within the South Valley will remain as part of the proposed Project. In addition, the comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-18 Michelle Faucheux

COMMENT

RESPONSE

I-18-1	<p>Hi There,</p> <p>I understand that this project is going through despite a lot of concern in the neighborhood. Outside of the continual concern about traffic and parking in an already congested neighborhood, I wanted to speak directly to the Ivanhoe section of the plans. I've lived facing Ivanhoe for 15 years. I moved into a quiet neighborhood with a natural setting. While other sections of the proposed plan are set well away from the residences the Ivanhoe section is basically just across a small quiet street. We already feel the impact of people being able to see directly into our bedrooms when the upper section opened, and people illegally smoking on the park benches that blows directly into our home windows. Now an education center, outdoor classroom, and amplified speaker systems are being discussed in this tight small area? I honestly feel like no concern has been given to the long term residents who have supported this area for years and years. Build a park if you must, but do we need to also make it a theme park? Has any thought been given to the fact that this neighborhood was not designed for this type of heavy use? I know a lot has been said in reference to Echo Park Lake, but Echo Park Lake was converted into a public park in 1895 in a yet to be congested city, not 2022, it was designed and expanded with parking etc in mind. We already see the weekends overrun with walkers where people have to walk in the street, what is your proposed solve for that when there are thousands of more people coming here every weekend? Where will they park? Most of us on W. Silver Lake only have street parking available to us. Where will we park? What about buses with school children showing up all day to visit the outdoor classrooms? Where will they park? The LA Zoo has a massive parking lot to accommodate these things, where do you intend to build that in this small congested neighborhood? I've yet to see ANYTHING addressing parking concerns. You've designed something that is not realistic for the scope of an existing neighborhood. The LADWP may have donated their land but what about all the land surrounding the reservoir that is private and will be heavily impacted? Again I understand a desire for a better designed walking trail and expanded dog park, but is it possible to scale back the outdoor classroom plans, use of speaker systems, anything that involves events and theme parking the area up? The meadow for instance is a quiet place where people go to sit and spend time with their families. This is what a park should be and what the neighborhood can support, not a mini Griffith Park or Santa Monica Pier. Thanks for you attention to this.</p>	I-18-1	The comment expresses concern for current conditions onsite. The analysis of impacts associated with construction of the proposed Project components are described in Chapter 3 of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-18-2		I-18-2	Please see Master Responses – Traffic/Transportation and Community Engagement Process. In addition, the comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-18-3		I-18-3	The comment expresses concern for increased visitation and impacts to parking. The Transportation Impact Assessment (TIA) included as Appendix K of the Draft EIR provides an estimate of increased public use of the SLRC and impacts to public parking. The TIA evaluates parking demands caused by the proposed Project in Section 4.5 page 129 of Appendix K. The Draft EIR provides two options for increasing parking to accommodate visitors to the park. The limited increase in parking would improve parking availability compared to existing conditions. However, impacts to parking availability are not an environmental impact that CEQA identifies as potentially significant to the environment. Nonetheless, the TIA provides an assessment conforming to the City's DOT TAG requirements. No additional analysis is required. Please also see Master Response – Traffic/Transportation.
I-18-4		I-18-4	Please see Master Response – Noise. In addition, the comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-19 Theresa Sterling

COMMENT

RESPONSE

I-19-1 | Traffic and parking mitigation plans: what are they? I don't see any parking or traffic upgrades.

I-19-1 The comment asks to see traffic and parking mitigation plans. The Transportation Impact Assessment (TIA) included as Appendix K of the Draft EIR provides an estimate of increased public use of the SLRC and impacts to traffic and parking. The TIA evaluates parking demands caused by the proposed Project in Section 4.5 page 129 of Appendix K. The Draft EIR provides two options for increasing parking to accommodate visitors to the park. The limited increase in parking would improve parking availability compared to existing conditions. However, impacts to parking availability are not an environmental impact that CEQA identifies as potentially significant to the environment. Nonetheless, the TIA provides an assessment conforming to the City's DOT TAG requirements. No additional analysis is required. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please also see Master Responses – Traffic/Transportation and Parking/Bike Option.

I-20 Shirley Egbert

COMMENT

RESPONSE

I-20-1	The Masterplan looks beautiful and well thought out, however,	I-20-1	Section 3.16, Transportation, of the Draft EIR discussed the proposed Project's impact on transportation. Also, please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.
I-20-2	1. How would the Masterplan impact parking and traffic in the area?		
I-20-2	2. What safety measures are implemented to cross both Silverlake Blvds?		
I-20-3	3. Where is the budget to build and maintain the parks?		
I-20-4	4. What assurance does the Masterplan not become the next Echo Park or the Los Angeles River homeless encampments?	I-20-2	Offsite improvements are discussed in the Project Description, Section 2.5.2 of the Draft EIR and shown on Figure 2-17. To further improve the safety of pedestrian crossings around the reservoir a few changes have been proposed in Chapter 3 of the Final EIR. In addition, based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.
I-20-5	5. Is this the right time to use taxpayer funds where the City of Los Angeles has other pertinent crises to address?		
I-20-6	7. Will 24/7 multiple LAPD cars be patrolling the surrounding hills and the reservoir?		
I-20-7	8. Should we expect crime to increase in the surrounding neighborhoods?		
I-20-8	9. As the reservoir is a wildlife sanctuary, what assurance is the building of the Masterplan won't impact their current ecosystem?	I-20-3	Please see Master Response - Funding and Operations.
		I-20-4	Please see Master Response – Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-20-5	Please see Master Response - Funding and Operations.
		I-20-6	Please see Master Response - Public Safety.
		I-20-7	Please see Master Response - Public Safety.
		I-20-8	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
			The commenter is also referred to Master Response - Biological Resources.

I-21 John Butcher

COMMENT

RESPONSE

I-21-1 Put in a better fence, Ilike the Rowena Reservoir fence, all the way around the reservoir. At minimum, keep the old fence! Stop inviting homeless and druggies without a fence.!

I do not support a 15 vear proiect. California is swimmina in monev. Tap that!

I-21-1 As stated in the Draft EIR, the proposed Project would remove portions of the existing perimeter fence over time as the park zones are constructed while maintaining or introducing new fencing needed to secure existing LADWP facilities, protect habitat, and protect the public. Please see Master Response-Fence Removal and Master Response - Homelessness. Additionally, the comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-22 Mary Frauchiger

COMMENT

RESPONSE

I-22-1 | My Husband and I are strongly opposed to the proposed project and have
 I-22-2 | serious concerns. Our top concerns are removal of the perimeter fence; noise
 I-22-3 | nuisances caused by special events and amplified music; construction noise;
 I-22-4 | negative impacts on wildlife; traffic, congestion and crime; duration of the
 I-22-5 | project; disruption of the quality of life for residents living within 500 feet of the
 complex.

I-22-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Master Response - Fence Removal.

I-22-2 Please see Master Response – Noise.

As discussed in Section 3.12, Noise and Vibration, potential noise and vibration impacts of the proposed Project from construction activities and operations were analyzed utilizing factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide and the FTA's groundborne vibration and noise criteria for assessing potential impacts relating to building damage and human annoyance were used, as appropriate. Although implementation of mitigation measures would reduce noise level and associated impacts at noise-sensitive receptors, noise levels could still exceed local jurisdiction significance thresholds when taking into account the potential worst-case overlap of the various construction phases. Therefore, noise impacts during construction were determined to be significant and unavoidable.

I-22-3 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-22-4 Please see Master Response - Public Safety for a discussion on the implementation of a Security Plan. In addition, this comment expresses concern regarding traffic, congestion, and crime which are analyzed in Sections 3.14, Public Services and 3.16, Transportation of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-22-5 The comment expresses concern related to the duration of construction of the Project. Impacts are addressed throughout Chapter 3, of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-23 Hugh Kenny

COMMENT

RESPONSE

I-23-1 Gentlepersons
You may remember that the consensus of the citizens at the meetings was to have as little impact on the property and surrounding area as possible. Yet you insist on prevailing with your plan which will produce more harm than good..
I-23-2 Please reduce your goals. Don't take down the fence.
Thank you,
Hugh Kenny

I-23-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-23-2 Please see Master Response – Fence Removal. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-24 Jayson Matthews

	COMMENT	RESPONSE
I-24-1	Why do you want to ruin silverlake further with this nonsense project? We don't want to live next to echo park lake. The traffic around here is already unbearably bad. This is a horrid idea.	I-24-1 The comment expresses opposition to the proposed Project. For a discussion on traffic-related impacts, please refer to Section 3.16, Transportation of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-25 John Butcher

COMMENT

RESPONSE

I-25-1 | I oppose the plan. 180 months to renovate Silver Lake Reservoir is absurd!! California is swimmig in money.. Tap that!

I-25-1 The comment expresses opposition to the proposed Project. Also, please see Master Response – Funding and Operations. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-25-2 | There needs to be a fence, like the fence around Rowena Reservoir, around the reservoir to protect it from homeless and drug use gatherings

I-25-2 Please see Master Response – Fence Removal. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-26 Scott Stenberg

	COMMENT	RESPONSE
I-26-1	I've lived in the area for over 10 years now and am gravely concerned about these ambitious plans. First and foremost, I feel that this is an unfortunate and ill-timed misallocation of financial resources away from those most in need.. The homeless population of Silverlake and surrounding areas are part of our community, whether we like it or not; the population has grown and spread since COVID. These people need our financial resources and community management to rehabilitate and find temporary and new housing. It's the clear priority, much more so than recreation for both immediate residents and those from surrounding areas. Second, this area of Silverlake simply cannot support the traffic influx and parking requirements of this plan. You simply cannot drive to this area without hitting an already over-trafficked part of the city - each side bottlenecks already, so an increase in traffic flow will make living here and traveling to and from nearly impossible. We are simply not set up for this and while the intent is positive and many good people have put hard work into this project, it should be shelved, resources should be allocated to those who are truly in need, and we can all be grateful for the beautiful reservoir and existing resources that we are lucky to take advantage of. Thank you for your consideration.	I-26-1 Please see Maser Response – Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-26-2		I-26-2 Traffic-related impacts of the proposed Project are discussed in Section 3.16, Transportation of the Draft EIR. Also, please see Master Response - Traffic/Transportation. In regard to funding, please see Master Response - Funding and Operations. The comment is noted and will be forwarded to the decision-makers for their review and consideration.

I-27 McShane Murnane

COMMENT

RESPONSE

I-27-1

In response to the Draft EIR dated Oct 6, 2022, our local household and local business still maintain enthusiastic support of this project. The overall impact of the quality of life for residents, expanded natural habitats, and added city resource greatly outweighs the inconvenience of the construction process. This is a project LA needs to be in conversation with Global Cities.

I-27-1

The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-28 Elzie Whitlow

	COMMENT	RESPONSE
I-28-1 I am totally for Alternative 2.	I-28-1	The comment expresses support for Alternative 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-29 Woody Thompson

COMMENT

RESPONSE

I-29-1 | Alternative 2 is the far superior plan with the least amount of environmental
I-29-2 | impact while still allowing for significant aesthetic renovations. Parking is still
the #1 which is not adequately addressed in any proposal or alternative.

I-29-1 The comment expresses support for Alternative 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-29-2 Please see Master Response - Traffic/Transportation.

I-30 Sherry Walker

	COMMENT	RESPONSE
I-30-1	I am very strong to support it ! We all, I mean the wild creatures and us, live in the same world. and it is the home for all of us!! We have to protect it!!!	I-30-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-31 Lenore Dowling

COMMENT

RESPONSE

I-31-1 I have been a resident of Silver Lake for 46 years. My children attended Ivanhoe, King Jr. High, and Marshall HS. We have always valued Silver Lake from our deck and from dog walks by the lake. The wild life present here are important residents that enrich our lives, and should not be endangered by development. Alternatives 2 or 3, 3 preferably, are closest to preserving this treasure to Silver Lake residents -- newly arrived and old timers. We join with our neighbors who insist on saving the character and profile of this beloved lake. thank you

I-31-1 The comment expresses support for Alternatives 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-32 Joy Boyajian

COMMENT

RESPONSE

I-32-1

I am voicing my agreement with the Silverlake Wildlife sanctuary on supporting alternative 3.
I believe that more is not always better especially when it come to altering nature and the needs of the wildlife. Wildlife can be pushed either out of our area completely or move even more into resident streets to adapt to loss of habitat. It took some time for the heron to return but I am not sure it is the numbers it once was. If climate change has taught us nothing it is to preserve what we have and be better stewards. We “improve” on nature then struggle to regain it’s delicate balance. Pls consider the recommendations of the Silverlake wildlife sanctuary. They have no gain in This but to preserve the peace and beauty that comes from nature and nature alone.

Thank you,

I-32-1

The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-33 Wendy Klein

COMMENT

RESPONSE

I-33-1 | I am in support of the plans. It would be nice to have a bocce ball court.

I-33-1 The proposed Project is described in Chapter 2 of the Draft EIR and does not include a bocce ball court. The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-34 Brian Wakil

	COMMENT	RESPONSE
I-34-1	<p>I concur with the SLWS recommendation below: SLWS has proposed several alternatives and mitigation measures to the intensive development proposed under the Master Plan that would provide the public with excellent opportunities to interact with nature, maintain needed open space in an area where available open space is quickly diminishing and protect and enhance the habitat for the many wildlife and bird species that rely on the reservoir complex. Open space areas near urban land uses function as a visual amenity, as a passive recreational asset, a groundwater recharge site, and a “storehouse” for natural species populations. We urge you to carefully consider the Reduced Intensity Alternative and the Natural and Open Space Preserve Alternative, as well as mitigation through elimination and modification of proposed project components.</p>	<p>I-34-1 The comment expresses support for Alternatives 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please also see the responses to Comment Letter C-28.</p>

I-35 Brian Wakil

COMMENT

RESPONSE

I-35-1

I concur with the SLWS as per below:
SLWS has proposed several alternatives and mitigation measures to the intensive development proposed under the Master Plan that would provide the public with excellent opportunities to interact with nature, maintain needed open space in an area where available open space is quickly diminishing and protect and enhance the habitat for the many wildlife and bird species that rely on the reservoir complex. Open space areas near urban land uses function as a visual amenity, as a passive recreational asset, a groundwater recharge site, and a “storehouse” for natural species populations. We urge you to carefully consider the Reduced Intensity Alternative and the Natural and Open Space Preserve Alternative, as well as mitigation through elimination and modification of proposed project components.

I-35-1 Refer to response to Comment Letter I-34.

I-36 Mike Jordan

	COMMENT	RESPONSE
I-36-1	<p>fail to see the value add here. so people can dip their toes? say they got their way? what's the problem you are solving? at considerable expense and disruption just to enhance something trendy? public safety is questionable. disruption of the neighborhood is certain. cost as well. and for what? what return on the investment? the place already looks gorgeous. many other parts of the city could use the upgrade. this is more about local politics than pragmatic intent.</p>	<p>I-36-1 The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-37 Guillermo Bordarampe

COMMENT

RESPONSE

I-37-1	<p>Just make the sides of the reservoir prettier, like the ones in the Ivanhoe dam. Maybe a few floating islands could work for the fowl to make nests there. No new buildings are necessary, maybe it could be opened during the day for people to walk around and close at dusk for safety reasons. All that construction could be very disruptive for the wildlife, and in particular for the coyotes that would be displaced. The extra traffic and reduced parking for residents, in particular the ones who live across the street from the reservoir and pay property taxes would be affected in a very negative way. Leave good enough alone!!!</p>	I-37-1	The Project Description, Section 2.5.4 and Figure 2-10 of the Draft EIR describe the proposed edge treatments around the reservoir. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-37-2		I-37-2	The comment expresses support for the habitat islands. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-37-3		I-37-3	The comment expresses opposition to construction of buildings as part of the proposed Project. Please see Master Response – Alternatives Analysis. Also, please see Master Response- Public Safety. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-37-4		I-37-4	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Please also see Master Response – Biological Resources.
I-37-5		I-37-5	Please see Master Response - Traffic/Transportation. The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-38 Karen Cusolito

COMMENT

RESPONSE

I-38-1

As a resident, I endorse Alternative 3 Silver Lake Natural Lands and Open Space Preserve. Gated perimeter fencing should allow access only from dawn to dusk.
As a second choice, I would prefer Environmentally Superior Alternative 2.

I-38-1

The comment expresses support for Alternative 2 or 3 as well as fencing and park access during daylight hours only. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-39 Lena Najarian

COMMENT

RESPONSE

I-39-1 | I support the evolution of the SLRC. The draft EIR reveals no material environmental impact while the master plan would offer both people and wildlife a beautiful respite from the city surrounding it. As responsible stewards of this property, we're charged with seeing that it fulfill its fullest potential.

I-39-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-40 Adam Kopald

	COMMENT	RESPONSE
I-40-1	<p>Let's get the reservoir complex master plan completed, and soon! Los Angeles is, and has always been, a park poor city. The SRCMP is a thoughtful, useful, beautiful and only partial solution to this great problem!</p> <p>Thank You,</p> <p>Adam Kopald. CD4</p>	<p>I-40-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-41 August Brown

COMMENT

RESPONSE

I-41-1 I strongly support the new proposals in the master plan for the reservoir from Silver Lake Forward. Restoring the site to be a vibrant, biodiverse home for plant and wildlife is incredibly important, as are the renovations to make it a more accessible and pleasant recreation site. The plan is a careful balance of broad community needs, and as a Silver Lake resident, it will greatly enhance quality of life in the neighborhood for residents and the city as a whole. I don't see any adverse impacts in the plan and would strongly encourage its swift adoption and construction.

I-41-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-42 Annie Arsha

COMMENT

RESPONSE

I-42-1 | Can't wait for this project to be completed so that we could utilize the reservoir to its fullest capacity!

I-42-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-43 Donald Parker

COMMENT

RESPONSE

I-43-1

I am and have been appalled at the idea of doing anything with Silverlake reservoir other than simply leaving it as it is from the inception of the current master plan.

For me, the devastation of wildlife habitat alone is enough to object but the addition of crowding, noise and trash make the entire project repugnant.

The Silverlake community around the reservoir has been peaceful and quiet, devoid of gang or other criminal activity for a century and now; developers are going to be allowed to kill the tranquillity and nature because of greed. This plan will result in a scar rather than a beauty mark!

I-43-1

Impacts to biological resources are analyzed in Section 3.4 of the Draft EIR, impacts to population and housing are analyzed in Section 3.13, and impacts to noise are analyzed in Section 3.12. As described in the Project Description, Section 2.7.1, a Security Plan would be prepared as part of the proposed Project. Also, please see Master Response - Public Safety.

The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-44 Debbie Slater

COMMENT

RESPONSE

I-44-1

I am not in favor of moving forward with the Master Plan.
I feel it is really arrogant to think that Silver Lake Reservoir is more in need of Green Space than the rest of Los Angeles. With all the density housing and TOC projects being erected across the city there are much needier communities where design and money would be more beneficially used.
Spending money on these modifications would be better served in other areas of Los Angeles: Homelessness, Education, Infrastructure, City Council restructuring, etc. We do not even know how much it will cost or who will be the caretakers of the space.
DO NOT APPROVE THIS PLAN!

I-44-1

Please see Master Responses - Funding and Operations and Homelessness. Also, the 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-45 Doris Slater

COMMENT

RESPONSE

I-45-1 | The EIR shows significant impact to the community. I am in favor of Alternative 1 - no changes. I don't think these changes will enrich the neighborhood I have lived in for 50 years.

I-45-1 | The comment expresses opposition to the proposed Project and identifies a preference for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-46 Peter Taylor

	COMMENT	RESPONSE
I-46-1	This is a terrific plan, a result of years of input. It strikes an excellent balance among all stakeholders. Let's move forward without changes!	I-46-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-47 Terence Heuston

COMMENT

RESPONSE

I-47-1

Hi,
I support Silver Lake Forward's vision for the reservoir complex. Public space should be opened for use by the public. Thank you for your time.
Best,
Terence Heuston

I-47-1

The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-48 Dan Gaffey

COMMENT

RESPONSE

I-48-1

Hi,

A lot of us would love to go kayaking on the reservoir! Letting people use the water would significantly expand the city's scarce park/recreational acreage.

Thanks,
Dan

I-48-1

As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.

I-49 Chris Young

COMMENT

RESPONSE

I-49-1

How did this go through without a skatepark? Or anything for kids older than toddlers in a playground? Promenades, picnicking, ornamental gardens, benches and viewing, "outdoor classrooms," an "education center," a dog park, a basketball court always occupied by adult men. There's just nothing for someone 8 to 18 years old. There's a lot for parents of young children and the 20 to 50 year olds (and all of us older than that) love to walk and jog. Same with the picnicking and "viewing." But it's a real shame no actual 'activities' could have been included for kids, tweens, and especially teenagers in a neighborhood full of young people.

I-49-1

The comment expresses opposition to the lack of activities available for 8- to 18-year-olds. The proposed Project design is described in Chapter 2 of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-50 Waseem Jafar

COMMENT

RESPONSE

I-50-1 | please consider adding a petanque/bocce court ideally in or around a shaded area in the south valley part located somewhere around the proposed basketball court. there are several residents who would like to have such a court.

I-50-1 The proposed Project is described in Chapter 2 of the Draft EIR and does not include a pétanque or bocce ball court. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-51 Christi Moore

COMMENT

RESPONSE

I-51-1 I vote for Alt 3. Why spend a lot of money which no has. The Basketball
 I-51-2 Court is fine where it is and so is the Rec center. There is not really space for
 busses of children to take field trips. A field trip to the Los Angeles River would
 show more nature. Bathrooms would need to be locked and cleaned
 continually. Keep it simple. Use some funds to finish the sidewalk near the
 basketball courts.

I-51-1 The comment expresses support for Alternative 3. The commenter is also referred to Master Response – Funding and Operations. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-51-2 The comment regarding the adequacy of the location of the existing basketball court and recreation center is noted. As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-52 Charles Herman-Wurmfeld

	COMMENT	RESPONSE
I-52-1	<p>Well this is wonderful.</p> <p>I am thrilled to see so much infrastructure for use by people, children, nature lovers and families.</p> <p>I am glad to know chain link fences will come down everywhere. They are a psychic scourge on our neighborhood and dangerous for wildlife that needs to move smoothly and safely around the valley. Anyone who says the status quo fence and concrete scene is good for wildlife is making a smoke screen to try and derail this beautiful park. Do not be swayed by the "save the coyotes" crowd championing do nothing in support of wildlife. These were the same failed arguments used to try and derail the meadow project and now thousands of people annually enjoy that outdoor space, romantic sunsets and quiet places to walk or kick a ball.</p>	<p>I-52-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-52-2	<p>My only critique is that there is nowhere to swim. I am part of a large community of silver lake swimmers who are eagerly awaiting a reversal on this front and the inclusion of swim infrastructure into this beautiful plan. I'm not going to be angry if I don't get it, but I will say this is a great opportunity to create a world class wild swimming area at the south end by the dam.</p> <p>Oh - and I'd love to see a community garden space up by the coop preschool at the north end near the little parklet. It's the perfect location with community/ walking path and school access.</p> <p>That's my two cents.</p> <p>Thank you for all.</p> <p>Charles Herman-Wurmfeld Silver lake neighborhood council 2009-2014</p>	<p>I-52-2 The comment recommends that the proposed Project include swimming and the addition of a community garden. The proposed Project is described in Chapter 2 of the Draft EIR and would not include these uses. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-53 Hope Arnold

COMMENT

RESPONSE

I-53-1

As a Home owner of over 18 years in silver lake. I am thrilled to finally see the creation and implementation of a plan that will bring, environment and community to the lake. This can only help grow our worth and our experiences. Thank you to everyone that's spent time creating and seeing this through. The plan looks fantastic. Bravo.

I-53-1

The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-54 Andrew May

	COMMENT	RESPONSE
I-54-1	I use the SLR for my morning run 4 days a week. I support the Silver Lake Reservoir Complex Master Plan Project Draft Environmental Impact Report	I-54-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-55 Andrew May

COMMENT

RESPONSE

I-55-1 | I use the SLR for my morning run 4 days a week. I support the Silver Lake Reservoir Complex Master Plan Project Draft Environmental Impact Report

I-55-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-56 Sailor Made

COMMENT

RESPONSE

I-56-1	As a resident of Silverlake (on Edgewater Terrace) for 28 years I vehemently oppose this plan for a build. Our hamlet now has entirely too much automobile, foot traffic and noise where there was once peace. The reservoir has become a destination and this is very violating to the neighborhood.	I-56-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-56-2	If the reservoir is open even more than it has already been, it will welcome more trouble and echo woes of Echo Park.	I-56-2	The proposed Project operational hours are described in the Project Description, Section 2.7.2 of the Draft EIR. Also, please see Master Response - Public Safety. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-56-3	That said, wildlife has also already been completely disrupted with the opening of the meadow.	I-56-3	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-56-4	There are also non-permitted music groups that come to play live music on Sunday evenings in the park and it is very unwelcome to many neighbors including myself.	I-56-4	The comment describes existing conditions at the Project site. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-56-5	Thank you for your time. Please do not open our doors to more traffic and visitors and problems that the neighborhood cannot absorb as it is.	I-56-5	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	Thank you.		

I-57 Florence Rosen

COMMENT

RESPONSE

I-57-1 | IM AGAINST ALL IMPROVEMENTS AS A RESIDENT OF 65 YEARS

I-57-1

The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-58 Julia Stuart Yilmaz

COMMENT

RESPONSE

I-58-1 I am excited that the city is making plans to beautify the Silver Lake Reservoir and add additional green space to our neighborhood. I also have several concerns that I hope are considered as this project moves forward. First, please consider more opportunities for children in this plan. While there is plenty in here for dogs, children's play equipment and opportunities to engage in the natural beauty are missing! Second, please consider how this resource will be managed--where will bathrooms, parking, trash pick-up and drinking water be located? How will the space be monitored to ensure people using the space follow the guidelines (for example, the meadow is not supposed to have amplified music, but it happens all the time). I live very close to the meadow and no public agency takes responsibility for this space, and despite outreach to Mitch O'Farrell's office, LAPD, and Parks and Rec. I want to ensure that there is a management plan in place BEFORE problems occur, like what happened at Echo Park Lake. Thank you.

I-58-2

I-58-3

I-58-4

I-58-5

I-58-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-58-2 The comment requests that the project design include equipment and space for children. As described in Chapter 2, Project Description of the Draft EIR, an Education Center is proposed that would provide educational opportunities. The proposed Environmental Education Center and other outdoor educational features would be implemented to provide immersive educational programs for K-12 schools. In addition, seating terraces, the picnic grove, information play area, overlooks, walking path expansion, and updates to the South Valley facilities would also occur. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-58-3 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-58-4 As described in the Project Description Section 2.7.1 of the Draft EIR, a Security Plan would be prepared. In addition, as described in Section 2.7.2 of the Draft EIR, the routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and

I-58 Julia Stuart Yilmaz

COMMENT

RESPONSE

manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-58-5 See response to Comment I-58-3.

I-59 Irene Tanji

		COMMENT	RESPONSE
I-59-1	My husband and I are long-time residents of Silverlake (since 1964)) and our neighborhood is definitely not the quiet, peaceful one it used to be. The traffic congestion and parking issues are atrocious. The Meadows was planned for quiet relaxation. We definitely did not anticipate the countless visitors who further add to the congestion and noise. Therefore, we oppose the Master Plan in its entirety.	I-59-1	The comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-59-2		I-59-2	The comment discusses current conditions of the Project site and expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-60 Patricia Silva

COMMENT

RESPONSE

- I-60-1 | The development plan will definitely take away from the natural and peaceful beauty of the meadow and the reservoir.
- I-60-2 | It will also create more traffic and less parking for the residents and the walkers.
- I-60-3 | Griffith Park is so close by and has picnic areas and large spaces and playground equipment for families and their children plus parking.
I see no reason for this project to take place.
What you need to work on is our major traffic jams we have EVERYDAY on Glendale Blvd and Fletcher!

- I-60-1 | Aesthetic impacts related to the implementation of the proposed Project are analyzed in Section 3.1, Aesthetics of the Draft EIR. All impacts were determined to be less than significant with implementation of mitigation measures. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-60-2 | Section 3.16, Transportation, of the Draft EIR discussed impacts of the proposed Project related to traffic and transportation. Also, please see Master Response - Traffic/Transportation.
- I-60-3 | This comment expresses opposition to the proposed Project and discusses other recreational opportunities within the City. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-61 Paul Feldman

COMMENT

RESPONSE

I-61-1	As a 31-year Silver Lake homeowner residing a block from the reservoir, I want to make clear that the Silver Lake Reservoir Complex Master Plan remains replete with negative environmental impacts, several of which can only be remedied if the plan is scuttled and the complex is left as it currently is (Alternative 1).	I-61-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-61-2	Table 3.16-3 stating that the impact to transportation and traffic and parking are less than significant without mitigation being needed is a total joke.	I-61-2	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. The commenter is referred to Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.
I-61-3	The plan also contains several misconceptions, misstatements or worse, such as in 3.16-2, where it continues (as the draft EIR did) in stating that County Metro bus service is provided to the reservoir by the #201 bus along West Silver Lake Drive. That bus service was discontinued in June 2021, long before even the draft Master Plan was completed and made public. (The fact that I pointed this out in comments on the draft plan, but this plan still talks of the #201, probably speaks volumes).	I-61-3	The comment states that Bus Line #201 is discontinued. As noted in Transportation, Section 3.16.1, the Draft EIR notes that according to LA Metro's NextGen Bus Plan, Line # 201 will be discontinued. This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-61-4	Even though the draft plan stated, that there is limited parking and traffic congestion and that plentiful alternate modes are "paramount" to the plan working, the current plan still does not contain adequate traffic, parking (or public transportation) solutions and thus should be summarily rejected on environmental grounds because without a decent solution, there will be deleterious impacts on transportation and traffic, on aesthetics, on air quality, on noise, and on the neighborhood's population, among other impacts. Is there a way to sufficiently mitigate these problems? No, there is not. There is no logical place to add the necessary road widths or parking for a project this size and adding parking would again create environmental impacts that could not be mitigated in terms of aesthetics, air quality, greenhouse gas emissions, water quality, land use and planning, noise, transportation and traffic and impact on population and housing.	I-61-4	The comment raises general concerns regarding aesthetics, air quality, greenhouse gas emissions, water quality, land use, noise transportation, and population and housing impacts. Impacts associated with these resources are analyzed throughout Chapter 3 of the Draft EIR. Please see Master Response - Traffic/Transportation.
I-61-5	The plan would further compress motor traffic on streets that are already frightfully narrow and are often made even more narrow by parked vehicles and pedestrians/runners who use the street instead of the walking path. Most Silver Lake side streets don't even have sidewalks because they are so narrow. The few cyclists who use city bike paths in the area would not be much of an "alternate mode" of transportation while further parking and traffic congestion, not to mention reduced neighborhood aesthetics, would have an additional negative environmental impact, including life-threatening consequences due to the inability of LA Fire Dept. trucks and ambulances and other emergency vehicles to access these narrow streets which would be utterly clogged with parked cars of Complex users and additional traffic. Anything other than	I-61-5	This comment expresses concern regarding aesthetics impacts. Impacts related to aesthetic resources are analyzed in Section 3.1, of the Draft EIR. All impacts were concluded to be less than significant with mitigation incorporated.
I-61-6		I-61-6	Please see Master Response - Public Safety and Master Response - Traffic/Transportation. As described in Transportation Section 3.16.5 of the Draft EIR, in consultation with LADOT, an emergency access analysis for the proposed Project was performed. Construction activities would be confined primarily to within the perimeter of the SLRC and would not impact surrounding roadways or restrict access for emergency vehicles. The proposed Project would include implementation of PDF-TRA-1 and PDF-TRA-2, requiring the implementation

I-61 Paul Feldman

COMMENT

RESPONSE

I-61-6
cont.

Alternative 1 would guarantee a much heightened chance, probably an inevitability over the long run, of otherwise unnecessary fatalities and increased fire danger due to the lack of transportation accessibility if this wildly over-the-top project is undertaken in a compressed, clogged residential neighborhood.

of a traffic management plan and construction staging plan which would include detour routes and BMPs, as well as coordination with and advance notice to local emergency providers. In addition, PDF-TRA-3 would require construction trips to be scheduled during off-peak hours, and PDF-TRA-4 would ensure that temporary access shall be provided to any parcels that may be impacted by construction. As part of the Operations and Maintenance Plan to support operations, an Evacuation Plan would be prepared. Ingress and egress within the Project site would continue to operate similar to existing conditions, and no changes to emergency access would occur. During public events PDF-TRA-5 would ensure that event permittees develop a site-specific traffic control plan to minimize congestion and vehicle miles traveled. Traffic control strategies for events will include inbound/outbound flex lanes and sheriff-controlled intersections. Traffic control plans will also identify nearby public parking facilities and identify passenger pick-up/drop-off locations. Permittees will be required to consider the cumulative traffic impacts of their event in relation to other events in the Project Area. The traffic control plans will also identify emergency service egress and access. Impacts to emergency vehicle access were concluded to be less than significant in the Draft EIR.

The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-62 Paul Feldman

COMMENT

RESPONSE

I-62-1	<p>An ongoing significant (and unsolved) environmental issue with this plan is caused by the absence of perimeter fencing around the complex. That fencing should remain in place, as would occur fully only in Alternative 1, in order to protect and enhance now-abundant wildlife. The plan has called for so-called habitat islands to be floated on the water. But it also makes clear that there will be a whole lot more interaction and by nature, interference, by human beings on the water, the Knoll, the Overlook, the Eucalyptus Grove and other areas. The planners have conceded that the Reservoir already provides "an important year-round resource of fresh water for wildlife, particularly for local and migratory waterfowl." Birds on the Reservoir grounds, according to the master plan CURRENTLY (without 'habitat islands') include "hummingbirds, crows, blackbirds, gulls, herons, egrets and ducks....Great Blue Herons, Great-Horned Owls, Northern Mockingbirds and Red-Tailed Hawks." Observers also see squirrels, rabbits, lizards, possums, bobcats, coyotes, and particularly apt for the creators of this master plan --- skunks.</p> <p>Yet the current plan declares "less than significant damage" would occur if the perimeter fencing were removed and in 3.4-31, the report writers actually have the gall to say "No impacts to wildlife are anticipated from the installation of the proposed habitat fencing or the removal of the perimeter fence. Overall, operational impacts of the proposed Project to wildlife are considered less than significant."</p> <p>It doesn't take a degree in rocket science - and it shouldn't take a job touting development for a planning firm hired by the city - to know that an area like this without a perimeter fence will prove less comfortable or enticing for wildlife, while making it more enticing for unhoused people who the city has failed to offer sufficient assistance for. A major open dark space like this smack dab in the middle of a residential neighborhood (with no major arteries and precious little parking) is a recipe for disaster, creating safety problems for both the wildlife and the general public.</p>	<p>I-62-1 Impacts related to wildlife are discussed in Section 3.4 of the Draft EIR. Please see Master Response - Fence Removal. This comment is noted for the record and will be forwarded to the decision makers for review and consideration.</p> <p>I-62-2 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Public Safety. This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-62-2		

I-63 Paul Feldman

COMMENT

RESPONSE

I-63-1 As a 31-year Silver Lake homeowner residing a block from the reservoir, I want to reiterate that the Silver Lake Reservoir Complex Master Plan is full of negative environmental impacts, several of which can only be remedied if the plan is scuttled and the complex is left as it currently is. (In other words, the only solution is Alternative 1).

I-63-2 For one thing, the EIR fails to adequately address the negative environmental impact of construction. Issues which include traffic, hazardous materials, noise, air quality, greenhouse gas emissions, aesthetics and biological resources. Unless this wasteful, unnecessary project is scuttled, thousands of truck trips would be necessary for months or years to cart out the concrete and other materials to change the face of the reservoir complex. The environmental impacts are indeed hugely significant, in terms of noise, dirt and other substances in the air, causing a negative impact for humans and wildlife alike. Even if the walls were pushed into the existing reservoir area, the same problems, with just as much noise, dirt and other substances in the air, would have an unmitigated immediate and long-term impact on humans and wildlife.

I-63-3 As well, there is the folly of not keeping a reservoir in place in case it's needed again in the long run -- or simply to continue serving as a source for firefighters to draw water from in order to combat the increasing wildfires and structural fires in Northeast Los Angeles and beyond due in part to climate change.

I-63-4 Lowering the walls could also create flooding hazards in the neighborhood and in others downhill toward the Echo Park and MacArthur Park districts. Construction and the final results would increase the already overloaded traffic, particularly during rush hour, throughout the neighborhood and Northeast Los Angeles, both already highly congested. Not to mention the clogged parking that already exists in the neighborhood and would only intensify - making most streets that are already inadequate in width totally inaccessible to fire trucks, ambulances and other emergency life and property saving equipment.

I-63-5 The plan has severe problems that are impossible to remedy, and alternatives 2 and 3 do not do enough to address these issues.. The only logical plan is Alternative 1 -- doing nothing.

I-63-6 The need for continued perimeter fencing and the issues of wildlife safety, construction chaos and insufficient parking, were made time and again by a vocal majority of residents and stakeholders who attended the public sessions

I-63-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-63-2 The Draft EIR evaluates construction of the proposed Project throughout Chapter 3, including potential impacts to traffic, hazardous materials, noise, air quality, greenhouse gases, aesthetics, and biological resources. As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

I-63-3 As described in Public Services, Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department. The proposed Project was designed in order to allow LAFD to continue to use the reservoir for water for emergency purposes as outlined in Section 3.14.1, of the Draft EIR. The SLRC is currently used as a source of water for firefighting operations. Under an agreement with LADWP, both the City and County of Los Angeles Fire Departments may use reservoir water storage for firefighting purposes, and both departments have used the water in the past. The SLRC would continue to be available for use by City and County Fire Departments.

I-63-4 As described in Hydrology and Water Quality, Section 3.10.1 of the Draft EIR, LADWP maintains water levels in the reservoirs several feet below the overflow elevation. As such, the existing overflow spillway does not discharge water from within the SLRC to the LACFCD storm drain system west of the proposed dam under normal operating conditions. Operation of the proposed Project would not require physical alterations to overflow spillway or result in substantial increases to water levels in the reservoirs due to proposed drainage facilities and groundwater pumping, which could increase the likelihood for discharge. As required under DSOD regulations, LADWP would continue to monitor weather and lower the water levels in the reservoirs in advance of an anticipated storm event to prevent overtopping the reservoirs

I-63 Paul Feldman

COMMENT

RESPONSE

I-63-6
cont.

prior to the master plan being completed. And time and again, the firms developing the master plan have ignored these concerns, making a mockery of the clear desires of the majority of stakeholders, who would now be asked to fund most of this project. Ignoring public sentiment, the designers have plowed ahead, for God knows what reasons, with a plan that would leave large portions of the complex open 24/7 to any humans who care to be there - regardless of the welfare and safety of the wildlife or the general public and residents of what is one of the few remaining coherent and workable neighborhoods in the city of Los Angeles.

or exceeding the stormwater drainage capacity west of the reservoir. Stormwater falling on the outer boundary of the SLRC would drain southwest to the Ballona Creek watershed similar to existing conditions and routed into the municipal stormwater system.

Therefore, the proposed Project would continue to capture stormwater within the proposed Project site. Compliance with applicable federal, State, and local regulations, such as those regulating stormwater runoff in the MS4 and LADPW Hydrology Manual, would ensure impacts remain less than significant with regard to flood flows, erosion, and runoff.

I-63-5

Please see Master Response - Traffic/Transportation.

As described in Public Services Section 3.14.1 of the Draft EIR, in consultation with LADOT, an emergency access analysis for the proposed Project was performed.

Construction activities would be confined primarily to within the perimeter of the SLRC and would not impact surrounding roadways or restrict access for emergency vehicles. The proposed Project would include implementation of PDF-TRA-1 and PDF-TRA-2, requiring the implementation of a traffic management plan and construction staging plan which would include detour routes and BMPs, as well as coordination with and advance notice to local emergency providers. In addition, PDF-TRA-3 would require construction trips to be scheduled during off-peak hours, and PDF-TRA-4 would ensure that temporary access shall be provided to any parcels that may be impacted by construction.

As part of the Operations and Maintenance Plan to support operations, an Evacuation Plan would be prepared. Ingress and egress within the Project site would continue to operate similar to existing conditions, and no changes to emergency access would occur. During public events PDF-TRA-5 would ensure that event permittees develop a site-specific traffic control plan to minimize congestion and vehicle miles traveled. Traffic control strategies for events will include inbound/outbound flex lanes and sheriff-controlled intersections. Traffic control plans will also identify nearby public parking facilities and identify passenger pick-up/drop-off locations. Permittees will be required to consider the cumulative traffic impacts of their event in relation to other events in the Project Area. The traffic control plans will also identify

I-63 Paul Feldman

COMMENT

RESPONSE

emergency service egress and access. Impacts to emergency vehicle access were concluded to be less than significant in the Draft EIR.

I-63-6

Please see Master Response - Community Engagement Process.

The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-64 Paul Feldman

COMMENT

RESPONSE

I-64-1	<p>As a 31-year Silver Lake homeowner residing a block from the reservoir, I want to make clear that the Silver Lake Reservoir Complex Master Plan is replete with negative environmental impacts, several of which can only be remedied if the plan is scuttled and the complex is left as it currently is. (As in Alternate 1). Section 2 of the plan talks about a Green New Deal and about LA seeking to achieve zero waste.</p> <p>Unfortunately, the serious, impossible to mitigate, problems in this plan - on issues including traffic, parking, truck trips, length of construction, hazardous materials, noise, air quality, greenhouse gas emissions, water quality and aesthetics - make it a total zero (except for all the zeros in the price tag) and a complete waste of taxpayers' money, while providing new deals that could well put lots of green into the coffers of chosen developers, construction companies and, perhaps, campaign war chests.</p>	I-64-1	<p>Impacts associated with the proposed Project are addressed in Chapter 3 of the Draft EIR and include the environmental issues outlined in the comment. Also, please see Master Response - Funding and Operations. The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
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I-65 Robert Moore

COMMENT

RESPONSE

I-65-1

Regarding the Silver Lake Draft EIR, I would like to express my support for Alternative 3 with the following elements of Alternative 2:

- The Knoll - no shade structure/ pavilion to be built on Knoll or Meadow
- The South Valley - all changes here to match Alternative 2: updating the Rec Center, minor updates to the Dog Park, no add/relocate picnic tables, no relocate or resize play field and basketball court, no construction of entry plaza/ seating or new Multi-Purpose Facility, yes tree planting.
- Other Improvements - no new street parking along W SL Drive or Silver Lake Blvd

I appreciate the desire to give the public increased exposure to the wildlife of the reservoir, however, the delicate nature of the ecosystem requires a very light touch. I very much lean toward the maintenance of a nature preserve situation over a human recreational/educational condition.

Thank you for your consideration.

Yours truly,
Robert Moore

I-65-1

The comment expresses support for Alternative 3 with elements of Alternative 2. Please see Master Response - Alternatives Analysis for a discussion on hybrid alternatives. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-66 Marsea Goldberg

COMMENT

RESPONSE

I-66-1	I have lived in Silverlake close to 30 Years. I love it here. I am concerned about a few key issues:	I-66-1	This comment expresses concern for crowds and does not raise any issues with respect to the content and adequacy of the Draft EIR.
I-66-2	Crowds, lack of parking, traffic	I-66-2	As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option. For a discussion on traffic and transportation please refer to Section 3.16 Transportation of the Draft EIR.
I-66-3	There needs to be more open space in Los Angeles		
I-66-3	And less building!		
I-66-3	This small park		
I-66-3	Is mobbed now. Too many joggers with no consideration		
I-66-4	For people with small children, pets and older folk. Ever time I walk the lake I'm afraid of someone		
I-66-4	Knocking into me as they run. Perhaps have a seperate track for runners!		
I-66-5	Also where are the wild animals, coyotes etc that live in the reservoir complex supposed to go. Leave it wild!	I-66-3	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-66-5	Leave the park simple.		
I-66-6	Clean up the disgusting dog park it's gross.		
I-66-6	What about installing a wadding pool for dogs		
I-66-6	And a doggy water fountain.		
I-66-6	Parking, traffic, over use, native animal space without humans. Keep it simple!	I-66-4	This comment relates to project design. As described in Chapter 2, Project Description, of the Draft EIR, the proposed Project includes a total of approximately 33 acres of redeveloped useable space, including approximately 10 acres for active and passive recreation and approximately 5.5 miles of walking paths and trails to provide public access throughout the Project area. The expanded walking paths are intended to expand public access.
I-66-7	Thank you		
I-66-7	Marsea Goldberg		
I-66-7	323 8392340	I-66-5	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
		I-66-6	The comment provides suggestions related to the design of the dog park. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-66-7	The comment requests that the project remain simple. The proposed Project is described in Chapter 2 of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-67 Donald Parker

COMMENT

RESPONSE

I-67-1 | The idea of developing Silverlake reservoir has been absurd from the
 I-67-2 | beginning. I am against any development which will affect wildlife negatively
 I-67-3 | and cause crowding, noise and trash.
 I-67-4 | The reservoir is nearly empty now so almost all of the points of the master plan
 I-67-5 | are useless. Silverlake residents and stakeholders have, as a majority,
 I-67-6 | expressed displeasure with the master plan from its inception yet we get closer
 and closer to implementing it. Please halt ALL further plans to develop
 Silverlake reservoir!

I-67-1 This comment expresses opposition to the project and concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-67-2 The comment expresses opposition to the proposed Project due to crowding. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-67-3 Noise impacts are addressed in Section 3.12, Noise and Vibration of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-67-4 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

As described in the Project Description Section 2.7 of the Draft EIR, routine operations and maintenance of the proposed Project would be guided by the Operations and Maintenance Plan prepared for the Project, which would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the

I-67 Donald Parker

COMMENT

RESPONSE

Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park.

I-67-5 Please see Master Response – Drought Conditions.

I-67-6 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-68 James Ellsworth

COMMENT

RESPONSE

<div>I-68-1</div> <div>Plan seems like a good start.</div> <div>I see no mention of any ADDITIONAL BATHROOMS. Expecting every park user to walk all the way to the rec center is unrealistic, especially for anyone with mobility issues or young children.</div>	<div>I-68-1</div> <div>As described in Project Description, Section 2.5.1 of the Draft EIR, public restrooms would be included as a part of the proposed Meadow Park Zone and would be directly accessible from the promenade to serve the proposed Project area as a whole.</div>
<div>I-68-2</div> <div>I see no mention of where, or how trash is going to be collected. THERE WILL BE TRASH. I suggest NOT planting pointy succulents or cactus that inevitably capture wrappers and plastic and become VERY hard to clean out.</div>	<div>I-68-2</div> <div>As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</div>
<div>I-68-4</div> <div>WHEREVER POSSIBLE I would prefer to eliminate the barbed wire fence. I understand security concerns regarding the fence. But barbed wire cyclone fencing is not a good vibe for a community park. Most people agree we need something better than that. Building new fencing will of course be expensive, (but probably a DWP requirement in areas to protect infrastructure).</div> <div>My preference is to remove the fence and HIRE A PARK RANGER to handle security concerns. Having a small team of rangers available to help with security, cleanliness, emergencies, and community outreach is a more humane and inclusive way to keep the park safe and clean. Let's have a face, not a fence.</div>	<div>I-68-3</div> <div>As described in the Project Description, Section 2.5.5, the planting design for the proposed Project would be aligned with the City's New Green Deal goals of increasing tree canopy and protecting native biodiversity. The proposed Project would include eight planting zones ranging from gardens within the promenade, ornamental gardens, and embankment slope planting, to habitat areas.</div> <div>This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</div>
	<div>I-68-4</div> <div>Please see Master Response - Fence Removal.</div>

I-69 Ilene Wilson-Thompson

COMMENT

RESPONSE

I-69-1 I thank you for keeping myself and others, "In -The-Know!" OMG! Who are these people who have infiltrated the community, that always want to make these changes in a community that many(not all) are clearly a guest of! Every piece of land does not have to be developed/enhanced into a wild life sanctuary, and/or Leisure World! The problem continues to expand, especially with all of the "Newbies" I've observed in and around the area. I don't mean to sound selfish, but this community used to be one of Los Angeles's "Best Kept Secrets." Now, as I walk or drive through and around the reservoir, and streets, I observe people driving, parking and walking the area...and you can almost bet, they are not residents. No longer can one have a stroll around the reservoir without bumping into folk in droves! Is the ultimate idea/plan, to make the area look like NYC's Central Park? Or, even more relatable, like the area up around the residential area of Lake Hollywood? Residents have been fighting that for years because so many people park on the narrow streets, etc.

I-69-2 I am definitely opposed to this proposal. There are houses, surrounding our reservoir that will be directly impacted by the increase in traffic - both vehicles, public transit, and cyclists. My God...the streets are not that wide to support parking that has been proposed. We don't need it! There are plenty of spots throughout Los Angeles, that already exists, for pleasure and or concert venues (just heard that possibility mentioned)!! And let's not forget about the increase in crime that may become inflated, as we already have an influx of people casing out our bedroom community.

I-69-3

I-69-4

I-69-5 So...how, when and where do I get my vote in? And again...what is the name of the group in favor of this? Please share. I've had my head in the sand, and recently had left hip replacement. I can't thank you enough, for making me aware!

Ilene Thompson😊

I-69-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-69-2 Please see Master Response - Traffic/Transportation.

I-69-3 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the proposed Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

Please see Master Response - Noise.

I-69 Ilene Wilson-Thompson

COMMENT

RESPONSE

- I-69-4 As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Police Department. LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the Project Site.
- Please see Master Response - Public Safety.
- I-69-5 Please see Master Response - Community Engagement Process.
- This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-70 Chris Aaron

	COMMENT	RESPONSE
I-70-1	<p>I am a third generation LA native from Silverlake. I am in favor of the the revised option # 2 instead of the alternative plans for the Silverlake reservoir.</p> <p>Thank you,</p> <p>Chris</p>	<p>I-70-1 The comment expresses support for Alternative 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-71 Erica Goebel

COMMENT

RESPONSE

I-71-1 A home-owner of Silverlake, I have walked regularly around the reservoir for the last 38 years. The meadow is a good addition, however, its maintenance is poor: plants are not trimmed; sprinklers are not fixed, paths are not repaired, trash is not removed. Dog owners bring their pets into the meadow despite the rule of not dogs. Joggers run in the streets; they take risks among the ever increasing traffic. The flower vender and food truck park on curved parts of the street, endangering the traffic and pedestrian flow.

I-71-2 Adding more parking spaces, removing and narrowing traffic lanes will make the traffic worse, bike riding more dangerous, and put pedestrians that ignore safety precautions more at risk.

I-71-3 The evidence of the poor maintenance of the existing path/meadow portends increased problems for the area if ever the project occurs. Who will maintain the floating islands? The suggested picnic tables and benches (currently marked by vandals)? Clean up trash regularly? Replace and trim plants in the water and in the landscape.

I-71-4 We do not want our narrow-streets neighborhood to have an education center with parking spaces for school buses. Field trip groups should go to other sites for wetland examples: not a man-made one in the midst of homes and personal sanctuaries.

I-71-5 Also, the money should be spent in another neighborhood in LA that needs green space or improved recreation. Silverlake has many parks nearby already. Give a community that doesn't have sufficient green space this unnecessary project's budget.

I-71-6 Like others, I feel no option should be offered; maintain the paths, meadow, streets that we currently have. Offer that option to Silverlake residents.

I-71-7 Address the horrible traffic build-up at Glendale Blvd. and Fletcher.

I-71-8 I don't want to make my serene neighborhood a destination/attraction beyond what we already offer for ourselves and others that discover our peaceful reservoir.

I-71-9 Finally, I would like to see an honest summation of the remarks by people who oppose the change. "Exciting opportunity" and "No significant impact" and "wide community support" pepper the Master Plan process by the leadership voices. There must be equal reporting of the concerned residents who oppose this project

I-71-1 This comment is introductory and does not address a specific environmental issue in the Draft EIR. This comment does not raise a specific issue related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR.

I-71-2 The comment discusses current conditions at the site. To note, as described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-71-3 Based on comments received during the Draft EIR comment period, the City has decided to implement Option 2, the bike-only improvement as part of the proposed Project. Please refer to Master Response - Parking/Bike Option. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-71-4 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the

I-71 Erica Goebel

COMMENT

RESPONSE

Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-71-5 The comment expresses opposition to the Education Center uses proposed. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-71-6 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-71-7 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-71-8 The comment requests that traffic be addressed. The Draft EIR evaluates the proposed Project's contribution to the existing baseline condition including an assessment of cumulative impacts to local traffic. The traffic study included in Appendix K provides recommendations for off-site improvements that are not part of the proposed Project. Please see Master Response - Traffic/Transportation.

I-71 Erica Goebel

COMMENT

RESPONSE

I-71-9 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-72 Paul Feldman

COMMENT

RESPONSE

I-72-1	<p>In my two-minute audio comment at the virtual meeting tonight (Oct. 26), I did not have time to address the either misguided or disingenuous comments of certain supporters of the master plan who said that the plan was favored by the community at public meetings. As a 31-year Silver Lake resident, I take umbrage at any such suggestion.</p> <p>What happened at those meetings was the planners' equivalent (with the assistance of so-called community stakeholder groups) of a three-card monte game, in which the public was never provided an opportunity to just simply and clearly state whether or not they wanted a development project to move forward.</p> <p>Instead, meeting-goers were given 'options' to choose among several pro-active development plans and could not simply state their preference for leaving the reservoir complex (which already includes the meadow, the recreation center facility and playground and ball fields and dog parks etc.) alone. Nor was one of the options leaving the complex (and the wildlife within) alone except for, say, nothing but construction of a new, more aesthetically designed, outer fence, or simply adding nothing more than a handful of small islands for birds out on the water.</p> <p>The first time that the public truly has had a chance to say there should be no project is in the alternatives section of this report. But, big surprise, the report by the handsomely paid planners says that Alternative 1 (no changes) is now not even an option. Why? Because, the report states, "the fundamental objective of the proposed Project, to repurpose the SLRC as a public park, would not be met."</p> <p>The 'fundamental objective' of the project is the fundamental objective ONLY because the planners never provided the public with the opportunity to simply say that what was actually wanted was to NOT go ahead with such a project. (The planners, Hargreaves, by the way, have said in the past they have never previously even undertaken such a small project in the midst of residential neighborhood and their majestic drawings are about as relevant these days as the designs prepared more than a half-century ago to reduce LA's smog by carving holes in the Santa Monica Mountains and blowing the dirty air out to the desert).</p> <p>The only reasonable and fair-minded approach at this point - after hearing the clear, widespread community opposition on the Zoom meeting tonight - is to return to the earlier EIR process and actually poll the community and any other necessary stakeholders to find out what is really wanted, particularly considering that, according to the earlier draft EIR report, it would be the Silver Lake community, through a Mello-Roos taxing scheme, that would eventually be asked in a formal voting process whether it would pay for a large portion of the hundreds of millions of dollars of so-called "improvements."</p>	I-72-1	<p>This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>Please see Master Response - Community Engagement Process.</p> <p>I-72-2 Section 5.3.1 of the Draft EIR includes a description of the No Project Alternative and Section 5.5.1 of the Draft EIR includes an analysis of the No Project Alternative. Also, please see Master Response - Alternatives Analysis.</p> <p>This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-72-3 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-72-4 Please see Master Response - Community Engagement Process. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-72-5 Please see Master Response - Funding and Operations and Master Response - Community Engagement Process.</p> <p>The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.</p>
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I-73 Yvette Boleslav

COMMENT

RESPONSE

I-73-1	Like many, I cherish the Reservoir and am concerned that working plans to expand it are overly ambitious in terms of neighborhood impact. I advocate for Alternative 2 with some elements of the working plan, ie: wetlands footpaths.	I-73-1	The comment expresses support for Alternative 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-73-2	I'd like to see an expanded offering of group exercise classes at the rec center as well as The Meadow (outdoor yoga), maybe weekly escorted nature walks.		
I-73-3	But outdoor events for up to 600 people would enormously alter the quiet, low-key neighborhood feel! Who would be in charge of the programming?	I-73-2	The proposed Project, described in Chapter 2 of the Draft EIR, would not include group exercise classes at the rec center, outdoor yoga, or escorted nature walks. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-73-4	I'm also concerned about the Reservoir being open until 10:30pm and becoming a party space, though some lighting for later evening walks would be welcome.		
I-73-5	Also didn't see specifics on homeless protocols to prevent an Echo Park-type situation developing. In the same vein, the many structures and seating areas will require a lot of upkeep. Wondering if that's been budgeted, especially as it's highly likely we're heading into a recession. The source of the funding for this project has always been a bit of a mystery!	I-73-3	As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
I-73-6			
I-73-7	Finally, regardless of the scope, once construction has begun, my neighbors and I would GREATLY appreciate no work on Saturdays or holidays and a start time no earlier than 7:30.am. We're construction-weary as there has been so much in our neighborhood over the last few years. I have 3 major construction projects to the north, east and south of my house currently, and I'm near the Reservoir so 5 years of more construction will take a toll!		Please see Master Response - Noise.
I-73-8	Thank you for listening and trying to bring us all together around a plan acceptable to most. It's not an enviable job!	I-73-4	As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.
			The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.
		I-73-5	Please see Master Response – Homelessness.

I-73 Yvette Boleslav

COMMENT

RESPONSE

I-73-6

As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - Funding and Operations.

I-73-7

This comment expresses concern regarding the proposed timing of construction. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

Construction work hours would comply with Bureau of Engineering Master Specification and/or as allowed by LAMC § 41.10 - Construction Noise. LAMC Section 41.40 prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between

I-73 Yvette Boleslav

COMMENT

RESPONSE

7:00 a.m. to 9:00 p.m.; and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m.).

I-73-8

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-74 Dene Feldman

COMMENT

RESPONSE

I-74-1	For some reason Silver Lake Forward is aggressively pushing this project. I don't trust that there is not monetary motivation amongst city officials and others. Something about this does not make any sense- at every meeting thus far, the number of people who DO NOT want this to happen are in the overwhelming majority yet the project continues to move forward.	I-74-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-74-2	I live by the reservoir. I welcomed the meadow and the new walking path. However, these two additions have resulted in a marked increase in traffic in the neighborhood. Those and any other recent improvements can not be compared to this extravagant and unnecessary plan. For all the 'stakeholders' who live even a few streets away from the reservoir, the ongoing construction and horrific traffic implications will not impact them to the degree that it will	I-74-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-74-3	those living directly at the reservoir. I and others have chosen to live in this neighborhood because it is a refuge in the chaos of Los Angeles. I vote for NO IMPROVEMENTS. Thank you		The commenter is referred to Master Response - Traffic/Transportation, regarding operational parking and traffic activity.
I-74-4		I-74-3	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
		I-74-4	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-75 Elizabeth Keenan

COMMENT

RESPONSE

I-75-1 | No Loud concerts or extra parking spaces. Traffic is insane as it is.
I-75-2 |

I-75-1 Please see Master Response - Noise.

I-75-2 As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option and Master Response - Traffic/Transportation.

I-76 Mike Jordan

		COMMENT	RESPONSE
I-76-1	if what's being proposed is to repurpose the reservoir complex and surrounding streets to accommodate weekly concerts or events of either regional or local scope for up to 600 persons and employing amplified sounds, then I VEHEMENTLY OBJECT!!! this will cause a regular disruption of the peaceful neighborhoods surrounding the reservoir. and sound does travel quite well around the reservoir. so we residents will have to put up with all the noise and flux of attendees. NOT A GOOD PLAN. there are more reasonable alternatives that not so extreme. please defer to something more considerate of the needs and quality of life for local residents.	I-76-1	As outlined in Section 2.7.2 of the Draft EIR, the proposed Project could include weekly special events up to a total of 12 events. Please see Master Response - Noise.
I-76-2			The comment expresses opposition to the proposed Project. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-76-3			
		I-76-2	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR. Also, please see Master Response - Noise.
		I-76-3	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-77 Mike Jordan

COMMENT

RESPONSE

I-77-1	what i really don't get about this plan is why we need to re-purpose the reservoir property for things like outdoor events and concerts, which would be noisy and disruptive in a residential neighborhood, when there is a venue already in existence a couple of miles away that has the space, the parking, the accessibility needed for such activity - griffith park, why go all this expense to do something so redundant? the plan on the table would be very costly and also nightmarish for people who just want to live their lives in peace. what is so magical about having an outdoor concert venue in silver lake? why must silver lake be the target? whose interests are served? don't the residents matter any more?	I-77-1	Please see Master Response - Noise.
I-77-2		I-77-2	Please see Master Response - Funding and Operations. This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-77-3		I-77-3	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-78 Mike Jordan

COMMENT

RESPONSE

I-78-1	this is classic design by committee. the whole is not greater than the sum of its parts. for example. re-do the rec center. that happened about 25 years ago when the original rec center was replaced. the facility is currently in good condition and serves the community. do the proponents of this new plan even know this? or is this just some territorial power grab by a special constituency? like the reservoir has become a political football being bandied about in a pointless power struggle. the rec center is fine as is. next: the dog park. well used, and each and every day. it's a place for dogs and their owners, as it has been for the last 30 years. re-do the dog park and it will just get worn back to the run it is now in no time. this proposal is a waste of funds better allocated for more important things.	I-78-1	Comment noted. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-78-2		I-78-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-78-3		I-78-3	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-78-4		I-78-4	The comment expresses opposition to proposed Project components associated with the recreation center. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-78-5		I-78-5	The Project Description, Section 2.5.1 of the Draft EIR, describes the updates proposed at the Dog Park. As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Dog Park similar to existing conditions. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-78-6		I-78-6	Please see Master Response - Funding and Operations. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-79 Meghan Rogers

COMMENT

RESPONSE

<div>I-79-1</div> <p>Hello,</p> <p>I am a long time resident of Silver Lake and mother of two young girls who love to take advantage of the Reservoir walking path and playground daily.</p>	I-79-1	The comment expresses concern regarding the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
<div>I-79-2</div> <p>I'd like to officially voice my concerns over the EIR and Silver Lake Master Plan as I feel some, if not most, of it will be detrimental to the neighborhood. Based on the information outlined in the EIR:</p>	I-79-2	The comment expresses opposition to removal of the fence. Please see Master Response - Fence Removal. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
<div>I-79-3</div> <ol style="list-style-type: none"> 1. I strongly oppose the removal of the barrier fence. 2. I strongly oppose construction of terraced seating areas. 		
<div>I-79-4</div> <p>First and foremost, the removal of the barrier fence surrounding the reservoir is incredibly concerning. Not only does it currently protect wildlife and prevent litter, it also protects our little ones learning to ride bikes, use scooters, or in the instance of my youngest, walk on these paths. I'd be extremely uncomfortable letting my children explore on their own (in one of the only pedestrian only areas available in Silver Lake) should the fence be removed. The appeal of water, for young children, is remarkably strong. Without that fence, the likelihood of a serious accident seems exponentially increased and I adamantly disagree with removing it.</p>	I-79-3	The comment expresses opposition to the terraced seating component of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
<div>I-79-5</div> <p>Second, I oppose the construction of multiple terraced seating areas based on the information provided by the EIR. Residents and visitors alike happily take advantage of the meadow and the grassy areas by the rec center for this very reason already. To being construction on man-made seating areas seems needless, disruptive to wildlife and incredibly disruptive to the many residents surrounding the reservoir who will endure construction noise.</p>	I-79-4	As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
<div>I-79-6</div> <p>As I've voiced throughout the collaborative master plan process, the master plan as it stands seems to achieve the opposite of its stated objective: construction in the area will inevitably disrupt existing wildlife, migratory birds will look elsewhere for habitat, and the quality of life for those who enjoy the existing benefits of the reservoir, such as the current running path, playground and rec center as it stands will be unable to do so for years to come based in the information laid out in the EIR.</p>		The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park.
<div>I-79-7</div> <p>Please reconsider this overall plan. As a resident, I'm incredibly concerned by</p>		Also, please see Master Response - Fence Removal for a discussion associated with impacts of fence removal on wildlife.
<div>I-79-8</div> <p></p>		The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-79 Meghan Rogers

COMMENT	RESPONSE
I-79-5	As discussed in the Project Description, Section 2.5.4, for safety purposes the proposed project would remove the steep, slippery surface around the reservoir by installing different edge treatments. In addition, the proposed Project design would maintain a consistent 6- to 12-inch curb around the edge of the reservoir to provide a barrier between the walking path and edge of slope, and signage would state public access restrictions, including no swimming.
I-79-6	The comment expresses opposition to the terraced seating component of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-79-7	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-79-8	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.
I-79-9	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources.
I-79-10	As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
I-79-11	Please see Master Response – Noise.

I-79 Meghan Rogers

COMMENT

RESPONSE

I-79-12

the noise reports (for personal reasons) and fence removal objectives for the overall community.

Thank you for your attention; Best,
Meghan Rogers
401-316-5200

I-79-12

The comment requests consideration of the fence removal surrounding the proposed Project area. Please see Master Response - Fence Removal and Master Response - Public Safety for a discussion related to removal of the fence. The comment is noted and will be forwarded to the decision-makers for their review and consideration.

I-80 Erica Goebel

COMMENT

RESPONSE

I-80-1 I have attached a photo today (10/29/22) of Silverlake Blvd. and the 101 freeway offramp. Pictured is a huge pile of trash on the sidewalk, one of many -- some larger, more dangerous, occupied or not -- that is the reminder, every time we venture out, of our city's horrible homeless crisis. Yet only 1.8 miles away, the Silverlake Reservoir that is NOT in crisis, is the focus of an expensive, unnecessary "face-lift", a so-called, improvement project, for an affluent, resourced neighborhood.

I-80-1 SHAME< SHAME< SHAME on you and the city leadership that barrels on with blinders, apparently inside its silos, unable /unwilling to re-direct financial resources, repurpose staff and consultant talent and energy to help reduce human suffering,. Shouldn't the needs of the thousands of desperate, unhoused people come before leisure-time viewing platforms, walking paths, and floating islands??? It is wrong, an embarrassment for the city, and a waste of money and solutions that should be addressed elsewhere. You are fiddling while Rome burns.

I-80-1 Please see Master Response – Homelessness and Master Response - Funding and Operations.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-80 Erica Goebel

COMMENT

RESPONSE

I-80-2



I-80-2 The attachment is noted.

I-81 Anna Donlin

COMMENT

RESPONSE

I-81-1	Regarding the Silver Lake Reservoir Complex (SLRC) Master Plan Draft EIR I am all for DOING NOTHING. I am against the Silver Lake Master Plan.	I-81-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-81-2	Reasons why: Reservoir Footprint Removes Reservoir from Recreation for Over a Decade - Negatively impacting my health as a neighbor who uses the area Commercializes a Non-Commercial Space	I-81-2	This comment expresses concerns about the construction duration. As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
I-81-3	Noise Pollution		
I-81-4	Bathrooms = Homeless Encampment Urbanizes Natural Settings		
I-81-5	Maintenance - Cannot be Maintained & Will Fall Into Neglect		
I-81-6	Interrupts What is Now Great Cost - The design isn't better than what is there now. Not for the cost.		
I-81-7	Water is the reason why this lake is so appealing. The Master Plan reduces the reservoir's footprint by quite a lot. The Master Plan fills in the lake with islands that will become plastic trash and debris magnets. And visually these cut up the clean line of just a huge expanse of water. This alone diminishes the beauty of all the water in the reservoir. People love going to the ocean for the wide openness of the water. People fight against putting anything into it for a reason. We need to keep the water a big uninterrupted expanse. There is plenty of land around the city to create native habitats. But there are very, very, very few expanses of water in the city, and none like the Silver Lake reservoir. Keep it uninterrupted. Read Blue Mind by Wallace J. Nichols to understand.		
I-81-8			
I-81-9	The Master Plan defeats the purpose of the lake as a recreational space as a park. I am 60 years old. I've used this park for the last 20 years for exercise. It has been a beautiful freely accessible local amenity as is. One I cherish. This plan will diminish my ability to stay healthy by being able to access the park for the next decade. I don't have access to anything so close and easy to get to w/o crossing a freeway.		
I-81-10	The Master plan commercializes a non-commercial neighborhood setting. No 600 person concert venue. Absolutely not. This is not beneficial to the neighborhood and only serves commercial interests. This neighborhood is a		
I-81-11			
			As discussed in Air Quality, Section 3.3.5 of the Draft EIR, in the <i>amicus curiae</i> brief submitted for the <i>Sierra Club v. County of Fresno</i> case (<i>Friant Ranch Case</i>) (SCAQMD 2014; SJVAPCD 2014), the CEQA criteria pollutants significance thresholds from the air district were set at emission levels tied to the region's attainment status, they are emission levels at which stationary pollution sources permitted by the air district must offset their emissions and CEQA project must use feasible mitigations, and they are not intended to be indicative of any localized human health impact that a project may have. This is further supported by the City's guidance document, <i>Air Quality and Health Effects</i> (<i>Sierra Club v. County of Fresno</i>), that addresses the potential for identifiable health impacts to result from air pollutants analyzed in City environmental documents prepared pursuant to CEQA in response to the California Supreme Court decision on December 24, 2018, the <i>Sierra Club v. County of Fresno</i> case (<i>Friant Ranch Case</i>) (City of Los Angeles 2019). The City's guidance document focuses on significant impacts identified in City EIRs and the feasibility of directly relating any identified significant adverse air quality impact to likely health consequences. The City's guidance document provides information to the public regarding the health consequences associated with exposure to air pollutants and explains why direct correlation of a project's pollutant emissions and anticipated health effects is currently infeasible, as no expert agency has approved a quantitative method to reliably and meaningfully translate mass emission estimates of criteria air pollutants to specific health effects for the scale of projects typically analyzed in City EIRs. Therefore, the project's exceedance of the mass regional and localized

I-81 Anna Donlin

COMMENT

RESPONSE

I-81-11 cont. bowl and any amplified noise reverberates. It will negatively impact any summer activity I would like to have on my own property in my own back yard. I wouldn't be able to set my own music because the amplified music from the lake would drown out mine. I know this because this last summer some jerk had amplified music down on the great lawn and it sounded like it was almost next door. This proposal is the work of a lobbyist. I call BULLSHIT on the benefit to the immediate neighborhood. It only benefits commercial interests. Any online booking system is also a nightmare, as is the required structural safety requirements for large gatherings. That doesn't benefit the neighbors or neighborhood. This is criminal.

I-81-13 The educational center at the base of that hill will be constantly booked by city-connected commercial interests, or turn into a homeless encampment. The bathrooms will become a source of crime, filth, and homelessness. NO BATHROOMS. The "educational center" sounds like a Trojan Horse. On the waterfront? C'mon. Create a geo location app that educates one about the reservoir, or about nature, about the herons, about the geese, about the coyotes who all make a home here. Make another app as a sound scape for the reservoir. More flexible and easier to maintain. No buildings on the grounds. How much will that cost to maintain.

I-81-15 No opening up more park space for people to trash. Lot's of alcoholic hipsters visit here. You can see by the twelve packs, six packs, vodka, whiskey, wine bottles they set out on the sidewalks along Silver Lake Blvd, Glendale Blvd, Brier, etc., after a night of partying. One sees it on the great meadow as well. Opening more land to people just trashes it. It's lovely uninterrupted nature right now. One can nature bathe by walking past the hill along Armstrong Avenue. It isn't trashed. No one is sleeping in it. One can just enjoy. It's a blessing.

I-81-16 The added parking creates congestion and dangerous driving/parking conditions. No additional parking along the reservoir. Absolutely not. There is no room to safely place any parking. No room to get in or out of one's car safely in south facing traffic on the east side of the reservoir. The geometry of the street driving south creates blind spots and people will get hit. No room for perpendicular parking on the west side of the lake. One can't pull out of a spot without blocking both directions of traffic. It creates a dangerous situation.

emissions threshold (i.e., pounds per day NOx thresholds) from project-related activities does not necessarily indicate that the project will cause or contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels.

Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify O3-related health impacts caused by NOX or VOCs emissions from project level. Therefore, it is infeasible to connect the Project level NOX emissions to O3-related health impact at this time.

The primary health concern with exposure to NOX emissions is the secondary formation of O3. Based on discussions with air quality management district staff (SCAQMD 2016b), and as the *amicus curiae* briefs submitted for the Friant Ranch Case suggested, because of the complexity of O3 formation and given the state of environmental science modeling in use at this time, it is infeasible to determine whether, or the extent to which, a single project's precursor (i.e., NOX and VOCs) emissions would potentially result in the formation of secondary ground-level O3 and the geographic and temporal distribution of such secondary formed emissions. Meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of O3. Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify O3-related health impacts caused by NOX or VOCs emissions from local level (project level). Notwithstanding these scientific constraints, the disconnect between Project level NOX emissions and O3-related health impact cannot be bridged at this time. See also the City's supplement discussion on Air Quality and Health Effects, providing further detail and concluding the same regarding why direct correlation of a project's pollutant emissions and anticipated health effects is currently infeasible, as no expert agency has approved a quantitative method to reliably and meaningfully translate mass emission estimates of criteria air pollutants to specific health effects for the scale of projects typically analyzed in City EIRs, at https://planning.lacity.org/odocument/e1a00fbf-6134-4fa9-b6fd-54eee631effb/City_of_LA_-_Air_Quality_and_Health_Effects_and_Attachments.pdf

Implementation of Mitigation Measure AIR-1 would reduce short-term and temporary NOX emissions, including from construction equipment, as shown

I-81 Anna Donlin

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I-81-16 cont.	People can take the bus. The 92 or the 182 takes one a block away from the reservoir. Isn't that the way things are sold in this town? Like density housing? People can take the bus or ride a bike. There is even an e-bike metro station at the 92 bus stop a block away one can ride a bike to the reservoir with.		in Table 3.3-23 of the Draft EIR. With implementation of Mitigation Measure AIR-1, short-term construction NOX emissions would be reduced to below the localized emission significance threshold for NOx. Therefore, short-term and temporary impacts related to localized NOX construction emissions would be less than significant with mitigation.
I-81-17	The Master Plan urbanizes many natural settings. Trees are better to look at for the health of the neighboring homes rather than a shade pavilion or educational center. The herons do just fine without people invading their habitat. It's a primal and healthy thing to experience nature uninterrupted. The plan is like saying the city will landscape Angeles National Forest so that people can use it more. It defeats the purpose of why it is so attractive now.	I-81-3	Please see Master Response – Noise.
		I-81-4	Please see Master Response - Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-81-18	The Master Plan cannot be maintained. The existing landscaped areas, while maintained, aren't maintained that well. Things are usable, but uh, sometimes icky. The trash overflows the trash cans after a weekend, and in the summertime after warm evenings. The great meadow's "lawn" is a patchwork of mowed weeds and different grasses. (Rec & Parks might look into planting Kurapia as a beautiful green ground cover. It mows well, is a beautiful green, and is extremely drought resistant. And it packs tight, pushing out weeds. I have it along the side of my house, along the walkway. It's green and I hardly water it. It wants more room to grow too.) All the designed spaces with different designations will never be able to be maintained like they should be. They will fall into disrepair like it is so common in Los Angeles. Not enough resources per capita to keep things nice. Currently people bring their own chairs and picnic items. Currently homeless people command a few benches at the great lawn. The reservoir should be considered a "beach". It should be a blank slate where people create their experience. It diffuses the cost of enjoying the reservoir to those enjoying the reservoir. There is no overcrowding of the land around the reservoir. The land doesn't need to expand to cater to current demands of the space. There is no need for more space to meet the needs of those currently recreating at the space. The cost of this project doesn't make what is already there better.	I-81-5	As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-81-19	One word to describe the plan: Interruption	I-81-6	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Master Response - Funding and Operations.

I-81 Anna Donlin

COMMENT

RESPONSE

I-81-19
cont.

This plan interrupts the beauty of the expanse of water.
 It interrupts the beauty of the expanse of uninhibited nature.
 It interrupts wildlife using that uninterrupted expanse of nature.
 It interrupts my use, as a neighbor, and everyone else's use of the space for physical exercise and social engagement.
 It interrupts the tranquil nature of the basin where the reservoir resides, and where many people have chosen to live because of that tranquility.
 It interrupts a non-commercial residential area, opening it up to commercialization.
 It interrupts immediate neighborhood's environmental well being in the name of being good for the planet. This project is bad for the planet. It builds hard scapes that are too costly to maintain, and ones that will turn into blight.
 It interrupts the blank slate that is a meadow, lake, and walking/running path.

Basically, it's the water. The water and only the water that makes this space magical. Let's save our money and put it towards this. Keeping that water in the basin.

And again, this Master Plan is not better than what currently exists. This isn't someone's yard where they want to entertain and can maintain its repair and how it is used, it's got a different purpose. The Master Plan definitely isn't worth the time or cost to build it. It can never be maintained. Too many weirdos ready to break shit. Look at the Sixth Street Bridge.

- I-81-7 As described in Chapter 2, Project Description, of the Draft EIR, the proposed Project would maintain water levels similar to existing conditions with the additions or some wetland habitat around the perimeter of the reservoirs and new habitat islands as shown on Figure 2-4 of the Draft EIR. The wetland habitat would cover a small percentage of the overall reservoir footprint.
- See response to I-81-5 regarding maintenance.
- I-81-8 The comment expresses an opinion that the wetland islands will not improve the visual resource. The DEIR evaluates impacts of the proposed Project on visual resources in Section 3.1. Views of the reservoir from surrounding viewpoints are provided to assist with the evaluation. The DEIR concludes that the proposed Project would result in softening some view of the reservoir edges through the installation of vegetation and floating islands. Alternative 3 was evaluated without the islands. See Master Response - Alternatives Analysis.
- I-81-9 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
- I-81-10 As discussed in Lane Use, Section 3.11 of the Draft EIR, the Project site is zoned Open Space and the City of Los Angeles Silver Lake-Echo Park-Elysian Valley Community Plan designates the Project site as Open Space. The proposed Project would not include changes to the existing zoning or open space land use designation and would not result in land use or development patterns inconsistent with the existing use.
- The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the

I-81 Anna Donlin

COMMENT

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Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-81-11 Please see Master Response - Noise.

I-81-12 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-81-13 Please see Master Response - Public Safety and Master Response - Homelessness.

I-81-14 The comment expresses opposition to the Education Center proposed under the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-81-15 Please see Master Response - Funding and Operations.

I-81-16 As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

I-81 Anna Donlin

COMMENT

RESPONSE

Impacts related to traffic and transportation including geometric hazards are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Please see Master Response - Traffic/Transportation.

- I-81-17 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. The commenter is also referred to Master Response - Biological Resources.
- I-81-18 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
- The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-81-19 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-82 Marinda Kaiser

COMMENT

RESPONSE

I-82-1	<p>Because I am very concerned with wildlife that has resided in the reservoir area, including many birds that use the area as a protected refuge currently, I am urging the City to use Alternative 3 to the proposed project plan, with some elements taken from Alternative 2, as detailed below:</p> <ul style="list-style-type: none"> - The Knoll - no shade structure/ pavilion to be built on Knoll or Meadow - The South Valley - all changes here to match Alternative 2: updating the Rec Center, minor updates to the Dog Park, no add/relocate picnic tables, no relocate or resize play field and basketball court, no construction of entry plaza/ seating or new Multi-Purpose Facility, yes tree planting. - Other Improvements - no new street parking along W SL Drive or Silver Lake Blvd 	I-82-1	<p>The comment expresses support for Alternative 3 with elements of Alternative 2 (hybrid alternative). Hybrid Alternatives are covered in Section 5.5.4 of the Draft EIR. Also, please see Master Response - Alternatives Analysis.</p>
I-82-2	<p>There are Environmental Impacts, if the Master Plan Project were to move forward, that cannot be mitigated and may cause lasting harm to both the community and the wildlife that shares our land.</p> <p>Alternative 3 with these Alternative 2 elements is an environmentally superior alternative that is feasible and still meets the Project objectives, with open habitat as an irreplaceable educational resource.</p>	I-82-2	<p>This comment also expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>Please see response to Comment I-82-1.</p>

I-83 David And Irene Tanji

COMMENT

RESPONSE

I-83-1 We definitely oppose the Silver Lake Reservoir Complex Draft EIR in its entirety.
 I-83-2 We already are inconvenienced by heavy traffic and lack of parking spaces -
 why do we need to tolerate additional inconvenience to the residents,
 especially when coveted street parking will be flooded with visitors. The
 I-83-3 Meadows was designed as a quiet place - now all rules are ignored and
 residents have to deal with noise in addition to traffic and parking issues. We
 I-83-4 vote NO on this proposal.

I-83-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-83-2 The comment discusses current traffic and parking conditions and expresses concerns regarding future lack of parking. As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option. Also, please see Master Response - Traffic/Transportation.

I-83-3 The comment describes existing conditions at the Project site. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-83-4 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-84 Ethan Lower

COMMENT

RESPONSE

I-84-1	I think this project is a really fucking stupid idea. The idea that this will positively impact the niche environment that silverlake has in any was is idiotic.	I-84-1	The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-84-2	Why don't you have the big parking lot that needs to go in in the advertisement for the project? That's a whole lotta concrete, doesn't sound very environmentally friendly to me. This will do nothing but displace the animals that live in the reservoir and are protected by the fence around it. Another thing. If you have access to water, there will be fish, and no matter how hard you try to stop people from fishing there, people will introduce invasive species to fish for them. Look at echo park, whole lotta fish in there that shouldn't be.	I-84-2	The proposed Project is described in Chapter 2 of the Draft EIR. The proposed Project does not include the addition of a parking lot. The comment is noted for the record.
I-84-3	On that note, the amount of trash that people will bring into the this new area will be immense. People are dirty, I know this is just an attempt to make more money that won't get funded, but if it goes through, silverlake will turn into echo park in a few months, green, stinky, and full of trash. We should keep the natural environment that is there and leave it the fuck alone. Griffith park is a stone throw away, get off your lazy ass and drive there, takes 10 minutes.	I-84-3	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-84-4		I-84-4	The proposed Project, which is described in Chapter 2, Project Description, of the Draft EIR did not include fishing. As discussed in Section 2.5.1 of the Draft EIR, as a habitat enhancement feature, Silver Lake Reservoir would be stocked with fish species that would provide food supply for wading birds. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-84-5		I-84-5	As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-84-6			
I-84-7			

I-84 Ethan Lower

COMMENT

RESPONSE

- I-84-6 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
- I-84-7 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-85 Tanya Tolmachoff

COMMENT

RESPONSE

I-85-1	As a longtime resident and homeowner in Silver Lake, I participated in the many public meetings prior to the Pandemic to develop a Master Plan for Silver Lake Reservoir Complex. It seems that none of the valuable input given by residents who will be the most affected were actually taken into consideration in the drafting of the EIR.	I-85-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-85-2	In a neighborhood that already has access to numerous green areas and parks, there is no valid reason for such a major redevelopment plan. The community made it clear that they did not support any new construction and development, however improving and modernizing current features such as the dog park and recreation center would be welcomed and appreciated. There are other more important community issues that could be addressed with the funding that would be spent on this unneeded cosmetic facelift for the reservoir. The joy gained in the presence of the Silver Lake Reservoir is in its natural beauty and wildlife habitat. Please let's not let it be destroyed by this foolish plan.	I-85-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-85-3			
I-85-4			
I-85-5	I am strongly in favor of Alternative #1 (DO NOTHING) rather than the proposed plan in the EIR. Thank you.	I-85-3	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.
			As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
		I-85-4	The commenter is also referred to Master Response - Funding and Operations.
		I-85-5	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-86 Keren Yilmaz

COMMENT

RESPONSE

I-86-1	The current EIR significantly underestimates the availability of parking spots as it does not account for on-street neighborhood parking within the half-mile radius of the reservoir. While efforts to reduce VMT and to shift park users to alternative transport modes is laudable, the area will still experience significant parking and traffic congestion. The study does little to discuss or quantify neighborhood impacts. I would recommend further analysis on this topic as well proposed recommendations, such as greater permit restrictions within park vicinity.	I-86-1	As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.
I-86-2			
I-86-3			
I-86-4			The commenter is also referred to Master Response - Traffic/Transportation.
I-86-5	Additionally, there is little discussion on pedestrian safety beyond ensuring walking safety on Silver Lake Blvd. Again, because the EIR underestimates neighborhood parking impact, residents within the 1/2-mile vicinity will experience more traffic as well as vehicles that exceed safety limits as envisioned in the Vision Zero Program. I encourage the EIR to be considerably more holistic in its impact analysis and expand the boundary in its considerations of available parking so as to be more comprehensive in discouraging car-based transport.	I-86-2	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant.
I-86-6		I-86-3	Please see Master Response - Traffic/Transportation.
I-86-7		I-86-4	Please see Master Response - Traffic/Transportation.
		I-86-5	This comment expresses concern regarding pedestrian safety. Impacts related to pedestrian safety are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. The commenter is also referred to Master Response - Traffic/Transportation.
		I-86-6	Please see Master Response - Traffic/Transportation.
		I-86-7	This comment expresses concern regarding parking impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant.

I-87 Christi Moore

COMMENT		RESPONSE
I-87-1	I commented earlier before the meeting. I am in favor of Alt # 1. Previously I voted for #3 before I understood.	I-87-1 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-88 Manohla Dargis

COMMENT

RESPONSE

	Regarding: The Silver Lake Reservoir Complex Master Plan Project	I-88-1	The commenter is referred to Section 3.3, Air Quality of the Draft EIR regarding impacts to air quality and Section 3.12, Noise and Vibration regarding noise impacts. The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-88-1	My husband and I own a home in Silver Lake and we enjoy the reservoir area on a near-daily basis. We cherish this beautiful, peaceful urban oasis and we believe that it should be improved, making it more hospitable for humans and for wildlife. But we are dismayed by the city's Master Plan, which does not prioritize wildlife and green space, and will, in fact, actually increase air and noise pollution in Silver Lake. Instead, we enthusiastically support "Alternative 3 – Silver Lake Reservoirs Natural Lands and Open Space Preserve Alternative." Here is why we do not support the city's Master Plan:	I-88-2	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-88-2	1. The Master Plan does not put the environment first: there is too much hardscaping – too much concrete – and too few green spaces. The City of Los Angeles does not need more built environments. Its people need more green spaces and environmentally sensitive areas that protect and sustain the city's wildlife.	I-88-3	The comment asserts that the removal existing fencing preventing access to habitat by humans and pets would be a significant change from current baseline conditions, adversely impacting wildlife, and that the Draft EIR failed to disclose, analyze and mitigate these impacts. As discussed in the Project Description, Section 2.5 of the Draft EIR, the perimeter fence would be removed in phases as different park zones are constructed. This comment expresses concern regarding impacts to wildlife. Also, please see Master Response - Biological Resources and Master Response - Fence Removal. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. No impacts to wildlife are anticipated from the removal of the perimeter fence as described in the Draft EIR.
I-88-3	We are particularly dismayed that the plan does not protect birds. Per the Audubon Society: "the two most important features as a habitat for birds are the presence of water in the reservoir and the presence and maintenance of a fence that limits disturbance within the water: The presence and maintenance of the fence, keeping people away from the water and water's edge, maximizes the value of the site as a wildlife refuge. Humans and pets disturb birds, such that birds can abandon a site, and the fence is the single most important conservation management tool at the site after the presence of water." Without a fence or similar barrier, unleashed dogs will enter the water and so will people. The LAPD has already been forced to rescue people who have illegally entered the reservoirs, twice in 2019.		
I-88-4	2. We are opposed to the introduction of special events in the reservoir area, specifically amplified events. These events will increase both air and noise pollution, and will be disruptive for the wildlife in the reservoir area and for people who enjoy the area's tranquility. These events will, as the plan states, draw car drivers to an already congested area, generating more air pollution. These events will also increase noise pollution in a neighborhood already over-burdened with noise pollution, including from area bars.		As discussed in Chapter 3 of the Final EIR, based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. Therefore, no public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.
I-88-5	3. We are also gravely concerned by the proposal to add 135 parking spots to Silver Lake Boulevard, an already badly congested road. More parking spots	I-88-4	As discussed in response I-88-3, the proposed Project would not include public access to open water.

I-88 Manohla Dargis

	COMMENT	RESPONSE
I-88-5 Cont.	means more cars means more pollution. Per the American Lung Association, Los Angeles has the worst ozone pollution in the United States. The City of Los Angeles should be doing everything in its power to encourage residents and visitors to walk, ride bicycles and use public transportation! To that end, the city should focus its resources on developing and improving bike lanes; fixing sidewalks for disabled and able-bodied people; and adding and improving public transportation. The world is in a climate emergency and anything that encourages car use is wrong.	Please see Master Response – Noise. The proposed Project would include up to 12 special events. Impacts associated with the addition of special events were analyzed throughout Chapter 3 of the Draft EIR, including Sections 3.3 Air Quality, 3.4 Biological Resources, 3.12 Noise and Vibration, and 3.16 Transportation.
I-88-6	The city should instead embrace the far more environmentally sensitive Alternative 3.	I-88-5 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.
	Sincerely, Manohla Dargis November 3, 2022	I-88-6 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-89 Adam Pergament

COMMENT

RESPONSE

I-89-1 on Armstrong Ave, just to the north of Silver Lake Blvd where the new path at the ridge will be accessible, we are seeing a growing number of joggers and cyclists in the street rather on the dirt path or Armstrong sidewalk. The ability to stay in one lane with oncoming traffic is becoming a safety issue for both automobiles and the pedestrians and cyclists in the street. How can this be mitigated especially since there will be a new access point to the path at the top of the hill at Edgewater Ter? And this hill is a blind hill to vehicles until they reach the peak. The issue is heightened at dusk and late in the day when both the auto traffic flow and the joggers are at their highest rate of use. In addition

I-89-2 Armstrong has become a vehicle short cut to Glendale Blvd or Silver Lake Blvd depending on direction of flow.

I-89-1 As shown on Figure 2-17 of the Draft EIR, the proposed Project would include 2.5 miles of promenade and there would also be 3 miles of paths and trails throughout and around the reservoir. No offsite/street improvements are proposed along Armstrong Avenue; however, the proposed Project would include bike lane improvements along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

I-89-2 Please see Master Response - Traffic/Transportation.

I-90 Julia Grant

		COMMENT	RESPONSE
I-90-1	Please leave our reservoir and surrounding areas as it is. These changes proposed by the Silver Lake Master Plan will increase traffic and harm the wildlife.	I-90-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-90-2		I-90-2	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
I-90-3		I-90-3	The comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-91 James Chinlund

COMMENT

RESPONSE

I-91-1

I am a resident of Silverlake and have lived here for over 25 years. I walk the reservoir every day and want to send this note and express my full SUPPORT for the plan. I believe that it is a thoughtful holistic idea that would allow for the public to take advantage of the amazing resource that is this fenced off space, and open it up for celebration and enjoyment of nature in an area that is underserved for public space. Really hoping this gets done!

all the best

James Chinlund

I-91-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-92 Fred Aronow

COMMENT

RESPONSE

I-92-1	I and my family have been reviewing and participating in this planning process since it started. Although some of our suggestions were not favored with inclusion, it looks like a good plan in general. There are two comments we have. First, has consideration been given to the potential lack of water during a more severe drought period than we are experiencing now -- in terms of all the floating habitats, connections of pathways over water, etc. A plan for this eventuality, temporary or permanent, needs to be included in the overall planning. Second, I see there in planning to reorganize South Valley recreation fields and structures. The present community center building was recently rebuilt and there doesn't seem to be any additional utility added, just relocating playing fields and basketball courts that already exist and are quite functional. We don't see any purpose in recreating public facilities that are already in place and functioning. We and our grandchildren use them all the time and, while such facilities always require maintenance, they don't seem to be defective or unusable. Seems like that one, two or three million dollars could be better spent elsewhere -- for instance, subsidizing a bus line so more people could take advantage of the facilities. This is more than just a local recreational facility now, but most people have to drive to get here from any distance.	I-92-1	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-92-2		I-92-2	Please see Master Response - Drought Conditions.
I-92-3			As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wetlands Management. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
I-92-4		I-92-3	The comment expresses opposition to some improvements proposed in the South Valley park zone. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-92-4	Please see Master Response - Funding and Operations.

I-93 Jerold Kress

COMMENT

RESPONSE

I-93-1	I am a longtime home owner on the 1600 block of N Benton Way. My street is already a cut-thru for the morning/evening commuter traffic. I see NO remediation for the impact that this project will have on the streets such as N Benton Way that feed into the project area. I see no discussion of where people using the project will park. Though I think the project is worthwhile, the impact on the neighborhood streets is not addressed sufficiently. Also, the project may inspire further small lot/apartment/condo development in the area that has already seen many old homes bulldozed. Enough with the destruction of old homes. Please address these issues!	I-93-1	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
I-93-2		I-93-2	As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.
I-93-3			Also, please see Master Response - Traffic/Transportation.
I-93-4		I-93-3	The comment expresses support for the proposed Project but is concerned about impacts to neighborhood streets. Please see Master Response - Traffic/Transportation. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-93-4	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-94 Noah Baylin

		COMMENT	RESPONSE
I-94-1	Responding to proposals for the renovated Silver Lake Complex, while I am in favor of many of the improvements, I would like to register my opposition to having public event concerts held in the reservoir meadow 12 times a year between 12pm-10pm as well as my concern about the impact of adding 135 additional parking spots. The area around the reservoir is prized for being pedestrian-friendly and adding all these spots would add to the increasing traffic congestion. The area around the reservoir is also an echo chamber -- holding concerts in the meadow would be an imposition on all the residents who live around the perimeter -- plus there's no shortage of nearby areas where concerts programming's available.	I-94-1	The comment expresses opposition to special events. Please see Master Response – Noise. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-94-2		I-94-2	Please see Master Response - Parking/Bike Option.
I-94-3		I-94-3	Please see Master Response – Noise..

I-95 Anonymous

COMMENT

RESPONSE

I-95-1	We moved to Silver Lake to escape the madness and chaos of other areas of Los Angeles. It is a quiet, semi-private 'best-kept secret' kind of place, bucolic and placid and peaceful. This plan wants to turn the entire reservoir complex into a tourist trap with schools, museums, live events with music, walking tours, floating islands, sitting areas, athletic areas, and who knows what else. A clown show, for all we know.	I-95-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-95-2		I-95-2	Chapter 2 Project Description of the Draft EIR contains a detailed description of proposed Project components. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-95-3	The residents that live just off the reservoir do not want this park implemented.	I-95-3	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-95-4	It will increase traffic, cause complete parking chaos (where is everyone supposed to park?), it will be clangy, bangy, ongoing noise all day for YEARS		
I-95-5	while it gets built—and after that, even MORE noise after people start flocking there! People will show little or no respect for the residents that make their homes off the reservoir.		
I-95-6			
I-95-7			
I-95-8	Wildlife: where are they going to go? We already have massive problems with coyotes; now you want to displace them into the hills surrounding the reservoir?		
I-95-9	What about the surplus of homelessness that this park will encourage?	I-95-4	Please see Master Response - Traffic/Transportation.
I-95-10	Why are incredibly much-needed funds going to this park? The city is so desperate for plans to be implemented to help out issues that go way above and beyond the building of a park, a very unnecessary and astonishingly neglectful plan.		As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.
I-95-11	Who is going to maintain this park? That's more money right there, and before	I-95-5	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. For example, the Ivanhoe Overlook and Eucalyptus Grove would need to be constructed before the East and West Narrows to avoid potential damage to any of the new facilities (e.g., new pathways). Table 2-3 of the Draft EIR lists total construction durations for each proposed park zone. For the purposes of the environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As
I-95-12	long the city will increase the amount of property tax on every resident around the reservoir to pay for the upkeep of this tourist monstrosity.		

I-95 Anonymous

COMMENT

RESPONSE

shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

- I-95-6 This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.
- I-95-7 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-95-8 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
- I-95-9 Please see Master Response – Homelessness.
- I-95-10 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic. Also, please see Master Response - Funding and Operations.
- This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-95-11 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

I-95 Anonymous

COMMENT

RESPONSE

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-95-12 Please see Master Response - Funding & Operations.

I-96 Silka Luisa

COMMENT

RESPONSE

I-96-1 I-96-2 I-96-3 I-96-4 I-96-5	As a current resident of Silver Lake, I do not want the project to proceed. After reviewing the proposal, I'm too worried about the environmental impact to wildlife from what will be such a sustained period of construction and an increase in traffic and noise. This seems like it will only damage our already incredibly special ecosystem at the reservoir.	I-96-1	The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-96-2	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources.
		I-96-3	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
		I-96-4	This comment expresses concern regarding impacts to noise. Impacts related to noise are analyzed in Section 3.12, Noise and Vibration, of the Draft EIR. Please see Master Response - Noise.
		I-96-5	This comment expresses concern regarding impacts to the site's ecosystem. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-97 A T	COMMENT	RESPONSE
I-97-1	<p>I would like to show my support for "Alt 2: Reduced Project" as proposed in the plan. I believe this is a beautiful plan that will bring in necessary greenery, trees, and wildlife habitat for the area, while making this a more scenic place for all Angelenos to visit. And I believe it will be more cost effective for the city, allow the city to put money into maintaining the greenery and paths ways, instead of letting them get overcrowded by unintended shrubs and weeds as they have been for years, and keep the paths maintained as they are slowly eroded. I think we need to make the Silver Lake Reservoir the best possible version of what it already is—a place for exercise, greenery, and nature—without planning so big that we can't afford the project or especially the necessary maintenance that comes after.</p>	<p>I-97-1 The comment expresses support for Alternative 2 and opposition to Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
	<p>I oppose Alt 3 because this area does not need the 8-foot fence all around the reservoir and we do need to restore habitats for animals and wildlife. We should make this more welcoming by removing as many fences as possible, but using the more subtle designed separation between wildlife and humans that are proposed in the plan.</p>	<p>I-97-2 The comment makes suggestions regarding different Project elements. The proposed Project, described in Chapter 2 of the Draft EIR. The comment is noted and does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-97-2	<p>CONS OF THE MAIN PROPOSED PROJECT:</p>	
	<p>I feel strongly we should be working to increase the functionality of the reservoir with natural elements, not structures, as much as possible. Silver Lake and Los Angeles in general needs more shade trees that are appropriately sized. The shade pavilions proposed for the plan is not as necessary and planting large shade trees that can add to the natural environment and provide the shade the area needs and habitat for birds and animals. Structures will also attract graffiti and will need regular maintenance that the city thus far does not adequately provide to other neighborhood parks in this area. We also need many many more shade trees in the Meadow which currently provides almost zero shade for park-goers. Look at where people congregate (or don't) on a hot sunny summer day when we should be encouraging people to be outside. If we want people to keep their ACs off, we need to provide them peaceful shaded areas outside to use consistently.</p>	
	<p>Regarding the living laboratory and observation platform, I think we again don't need to be building an observation platform in a place that can be natural and really connect the water to new greenery without a structure. The observation</p>	

I-97 A T

COMMENT

RESPONSE

I-97-2 cont.	<p>platforms on the east and west sides of the reservoir are unnecessary built structures that will not add to the plans and will attract graffiti and need regular maintenance.</p> <p>I'm so glad that LADWP will continue to use their facility, but I believe if we want this reservoir to feel like we are bringing nature into the community, we need to provide more trees and other coverage for the many cars and storage that they place on their property. There has to be a way to shield these from the elements and from public view to make the area more appealing. Please plan for more trees or screening plant life in this area.</p> <p>Please provide green ground cover or fake grass for the dog park, and please provide shade trees. I do not have a dog, but I see so many people hanging out in direct sun in the heat of summer when there could be beautiful trees to help them stay cool.</p>	I-97-3 Please see Master Response - Funding and Operations. In addition, as described in the Project Description, Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-97-3	And please, if we are going to spend a hundred million dollars on this project, can we please allocate money to maintain this area? I know money is tight, but we should be having crews come out at least once a month (or at least once a quarter) to remove weeds from pathways that are sometimes 4 feet high! We also need to fill gaps in paths after rain storms.	I-97-4 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. For example, the Ivanhoe Overlook and Eucalyptus Grove would need to be constructed before the East and West Narrows to avoid potential damage to any of the new facilities (e.g., new pathways). Table 2-3 of the Draft EIR lists total construction durations for each proposed park zone. For the purposes of the environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
I-97-4	And for those of us who use this park and the paths every day, can there please be noise and dust mitigation so we are not left without a usable park for the 10 years of construction?	<p>As described in Air Quality, Section 3.3 of the Draft EIR, the localized effects from the on-site portion of the Project's construction emissions, including dust, were evaluated at the nearby sensitive receptor locations that would be potentially impacted by Project construction in accordance with the SCAQMD's <i>Final Localized Significance Threshold Methodology</i>. During its construction phase, the Project would comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment and with SCAQMD's regulations, such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Furthermore, the Project would utilize construction contractors in compliance with state on-road and off-road vehicle rules, including the ATCM that limits</p>

I-97 A T

COMMENT

RESPONSE

heavy-duty diesel motor vehicle idling to five minutes at any location (13 CCR, Section 2485), the Truck and Bus regulation that reduces NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR, Section 2025) and the In-Use Off-Road Diesel Fueled Fleets regulation that reduces emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). The Project's construction contractor would be required to comply with these regulatory control measures. Compliance with these regulatory control measures would ensure the Project would not conflict with AQMP control strategies intended to reduce emissions from construction equipment and activities. Impacts were concluded to be less than significant.

The commenter is also referred to Master Response - Noise.

I-98 Sue Iri

COMMENT

RESPONSE

11/17/22

Dr. Jan Green Rebstock
City of Los Angeles, Public Works, Bureau of Engineering
1149 S. Broadway – 6th Floor
Mail Stop 939
Los Angeles, CA 90015—2213

Dear Dr. Rebstock:

I am a 44 year resident of Silver Lake, just north of the Reservoir, and have great affection for the area and particularly the Reservoir. It has been a source of beauty and peace in a stressful time. The wildlife it supports is key to that peace- the feeling that in spite of the world's problems, nature carries on.

The proposed Reservoir Master Plan is flawed, and since the environmental impacts cannot be mitigated and may cause lasting harm to both the community and the wildlife the Reservoir supports, I do not support it. The damage to existing communities of birds and animals would be severe, and add to the already shaky environment there, brought about by the many construction projects over the years within the Reservoir property. Importantly, since we are in a historic drought, possibly permanent, I'm not convinced that our water will be sufficient to fill the Reservoir continually, or to support the many proposals in the Plan.

Silver Lake has Griffith Park as a wonderful asset, one of the largest city parks in the country and within 10 minutes of us. We also have the meadow, within the Reservoir property, for residents that want a nearby green space to rest and recreate with their families and friends. If we are to retain the community spirit and calm beauty of the Silver Lake area, we must not rush to revise and control this lovely space. The planned lack of fencing and nighttime access alone are recipes for unintended and unwanted consequences and would pose permanent problems for the community.

Although this Plan has had extensive attention, and much work has been done to put it in motion, I think it is ill considered and wrong for our community.

Sincerely,



Sue Iri
2755 Angus Street
Los Angeles, CA 90039
sirigrafx@gmail.com
323-533-9451

- I-98-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-98-2 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
- I-98-3 Please see Master Response – Drought Conditions.
- I-98-4 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-99 Nathaniel Koenig

COMMENT

RESPONSE

I-99-1	I am 24 and grew up in silverlake by the reservoir. I played sports at the rec center as a child, hung out with my friends in the meadow as a teenager and now run around the reservoir a few times a week. Could there be some improvements? Sure. But a 300 million / 5-15 year project is not where i think Los Angeles and Silverlake NEED to spend money time and energy. I am all for a combination of alternatives 2 and 3. Nathaniel	I-99-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-99-2		I-99-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-99-3		I-99-3	The comment expresses support for Alternatives 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-100 Grigor Bakchajian

		COMMENT	RESPONSE
I-100-1	The reservoir complex does not need an elaborate and expensive makeover. I live on Kenilworth and the traffic is already out of control in this neighborhood. Since the building out of the meadow, there is even more traffic, noise and garbage. This proposal is over the top and this community can not absorb even more traffic, parking, and the noise and disruption of years of construction. Please consider alternatives 2 and 3. Koko	I-100-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-100-2		I-100-2	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
I-100-3		I-100-3	The comment describes the existing Project site. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. No changes to the Draft EIR are required in response to this comment.
I-100-4		I-100-4	The comment expresses support for Alternative 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-101 Brian Wakil

COMMENT

RESPONSE

I-101-1 I would like to vote against the proposed project in all of its 'Alternatives'.
 I-101-2 I have lived in this community for 30 years and have learned that the perimeter
 fence around the lake is the best protection for the wildlife it contains and
 preserves.
 I-101-3 Please leave our lake and it's surrounding land just the way it is.

I-101-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-101-2 Please see Master Response - Fence Removal.

I-101-3 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-102 Janet Upjohn

COMMENT

RESPONSE

I-102-1	I have lived in the neighborhood since 1987 and have seen many positive changes including those to the reservoir specifically the pathway and the meadow. My children loved the rec center, the playground and played many years of sports. What worries me is that you are talking a much loved and well used neighborhood park (used by folks not just in the neighborhood but local) and creating a destination. At one meeting I believe the goal was to compare it to Disneyland. The reservoir is already a success and I worry about increased traffic and it's impact. Most specifically as the reservoir and its surrounding area are already well used and loved this does not seem like the best use of city money.	I-102-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-102-2		I-102-2	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-102-3		I-102-3	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
I-102-4		I-102-4	Please see Master Response - Funding and Operations. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-103 Carol Ng

COMMENT

RESPONSE

I-103-1 | I have been a Silver Lake resident for 61 years and have a strong interest in
 I-103-2 | what happens here. After attending the October 2022 meeting and reviewing
 pertinent parts of the Draft EIR, I choose Alternative 1. This alternative would
 best minimize the impact on the neighborhood and the wildlife therein.

I-103-3 | For sure, this space should never have the perimeter fence removed! Silver
 I-103-4 | Lake is not a lake and, as a reservoir, it is paved with straight sides. Anyone
 falling in would be hard-pressed to get out of it. Some people have compared
 I-103-5 | it to Echo Park Lake, but that is a man-made lake with earthen sides. Oh and
 the depth of SL is comparatively much deeper than EP.

SL Reservoir is most suitable as a passive recreation area.

I-103-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-103-2 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-103-3 The comment expresses opposition to removal of the perimeter fence. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-103-4 As discussed in the Project Description, Section 2.5.4, of the Draft EIR. The proposed Project would include edge treatments all around both reservoirs as shown on Figure 2-10 of the Draft EIR. Also, please see Master Response - Public Safety for a description of the Project's Security Plan implementation.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-103-5 The comment expresses support for a passive recreation project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-104 Peter Alexander

COMMENT

RESPONSE

I-104-1	I appreciate the concept of turning Silver Lake into a more useful parcel but because of the overly-enthusiastic scope of the proposal, the time-span need to finish the proposed work and the disruption it would cause due to where the lake is - situated in a traffic path between 3 major freeways, the gridlock traffic that already exists, and the cost outlay of the city to enhance a park in an already affluent and park rich neighborhood when so many other parts of the city have a vastly greater need, I cannot endorse the scope of this proposal.	I-104-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-104-2	<p>I fully endorse addressing the immediate and obvious existing needs: an expanded and renovated dog park (it's currently an unsightly health hazard), grading and improvement of the pedestrian paths around the lake and adding more drinking fountains and benches.</p> <p>Restoring wetland habits, enhancing all upland habitats, and perhaps adding an overlook pathway could be acceptable and/or worthy additions that enhance the existing environment and not designed to draw crowds.</p>		<p>The commenter is referred to Master Response - Traffic/Transportation regarding operational traffic activity.</p> <p>The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.</p>
I-104-3	<p>I do not endorse building new parking lots, a new recreation center, new educational centers, classrooms, a floating deck, anything involving kayaking, or regrading the Meadow, the Knoll or the Grassy Patch. The impact that would have on the area is untenable and not needed.</p> <p>I've lived and worked in silver Lake since 1986 and I have enjoyed the improvements that have been made since that time, but we are a privileged community that has reached a saturation point of attractiveness and functionality. The city should do what's needed up upkeep/upgrade our existing lake infrastructure and and spend more it's money on less fortunate areas of the city in greater need of public amenities</p> <p>Thank you, Peter Alexander</p>	<p>I-104-2</p> <p>I-104-3</p>	<p>As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.</p> <p>The comment expresses support for some components of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
		I-104-3	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's

I-104 Peter Alexander

COMMENT

RESPONSE

potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-105 Joyce Peyton

	COMMENT	RESPONSE
I-105-1	I am concerned with the current plans to add Wetland Habitat Islands and Shallow Wetland Shoreline Transtion Habitat to the Silver Lake Reservoir Complex Master Plan. These changes will add many new habitats that didn't previously exist for mosquitoes to breed and multiply. I could not find a mention of a potential mosquitoes problems in the MP Study documents. What are your plans for mosquito abatement? WE ALREADY HAVE A MOSQUITOES PROBLEM IN SL AND MUST ELIMINATE ALL STANDING WATER IN OUR YARDS!	I-105-1 This comment expresses concern regarding the creation of wetland habitats and the potential to create an increase in the mosquito population at the SLRC. Mosquito control is under the purview of the Greater Los Angeles Vector Control District. The SLRC is currently a large body of water under the purview of this vector control agency. The Operation and Maintenance Plan will include mosquito control methods. The remainder of the comment consists of a general opinion and does not address a specific issue related to the adequacy or completeness of the DIER. No further response is necessary.
I-105-2	I AM ALSO EXTREMELY OPPOSED TO REMOVING THE FENCES BECAUSE OF CRIMINAL ACTIVITIES AND SAFETY REASONS FOR THE CHILDREN, ADULTS AND THE ANIMALS!	I-105-2 The comment expresses opposition to removal of the perimeter fence. Please see Master Response - Fence Removal and Master Response - Public Safety.

I-106 Pamela Burian

COMMENT

RESPONSE

I-106-1 | I am opposed to the millions of dollars proposed for Silverlake reservoir
 I-106-2 | project. Not only is it a total waste of money it will be extremely disruptive to
 I-106-3 | our community. This money could be spent addressing homelessness, sports
 for kids, upgraded parks in underserved communities and so on. I do not
 understand spending millions on unnecessary project that majority in this
 community oppose.

I-106-1 | Please see Master Response - Funding and Operations.

I-106-2 | The comment expresses opposition to the proposed Project. This comment
 does not raise any issues with respect to the content and adequacy of the
 Draft EIR. Therefore, it is noted for the record and will be forwarded to the
 decision-makers for their review and consideration.

I-106-3 | The comment expresses opposition to the proposed Project and requests that
 funds be spent elsewhere in the community. Please see Master Response -
 Funding and Operations. This comment does not raise any issues with respect
 to the content and adequacy of the Draft EIR. Therefore, it is noted for the
 record and will be forwarded to the decision-makers for their review and
 consideration.

I-107 Jeff Lindfors

		COMMENT	RESPONSE
I-107-1	Looks good! Hope it moves forward. I hope there is money budgeted for upkeep. The existing Meadow and plants always look so sad.	I-107-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-107-2		I-107-2	Please see Master Response - Funding and Operations. In addition, as described in the Project Description, Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-108 Anonymous

COMMENT

RESPONSE

I-108-1

As a new resident of Silver Lake, I have noticed the lack of available community garden space in our neighborhood. There are two community gardens at Micheltorena Elementary School and Manzanita Street, but they are not large enough to serve the needs of the community and they are removed from the heart of Silver Lake. The Silver Lake Reservoir Master Plan is a perfect opportunity to establish a new community garden that will be more accessible to residents of Silver Lake. Community gardens bring a myriad of benefits, including fresh produce with a lower carbon footprint, physical exercise, mental wellbeing, and community bonding. There is plenty of space in The Knoll and the Eucalyptus Grove that could be set aside for a community garden. Garden plot rent can cover the cost of water, and the garden could also be a convenient site for neighbors to bring their organic waste for composting. In summary, I encourage the Bureau of Engineering and the rest of the Master Plan team to consider adding a community garden to their vision for the Silver Lake Reservoir Complex.

I-108-1

The proposed Project, described in Chapter 2 of the Draft EIR, would not include a community garden. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-109 Geoffrey Booth

		COMMENT	RESPONSE
I-109-1	I strongly support the Silver Lake Reservoir Complex Master Plan (SLRCMP) project. I do not wish for it to be scaled back in any way. If anything, I feel that the current plan removes too many recreational features present in earlier designs: and I wish there were a playground at the north end of the site.	I-109-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-109-2		I-109-2	The comment expresses support for the proposed Project. The comment requests the addition of a playground on the north side of the Project. The proposed Project, described in Chapter 2 of the Draft EIR, would not include a playground. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-110 Paul Feldman

COMMENT

RESPONSE

I-110-1	The authors of the master plan and draft eir display unmitigated gall, if not utter negligence or legally dubious trickery, to contend that there is no need to mitigate the multiple severe impacts on the environment - including air quality, noise, greenhouse gas emissions and the spread of hazardous materials - by choosing any plan other than Alternative 1 (doing nothing). Chapter 3.12 of the eir (noise and vibrations, page 33 of 62) states (boldface added): Project construction activities would generate a maximum of up to 335 worker trips per day, and a maximum of up to 494 truck trips per day. These worker and truck trips would be distributed throughout the Project area at up to a maximum estimated 5 work sites assumed. It is anticipated that these trips would occur primarily on collector and arterial streets as well as freeways throughout the Project area....Page 30 of the same chapter says construction would be underway from 2025 to 2030: Construction On-Site Construction Noise Construction of the Project is anticipated to begin in the first quarter of 2025, pending Project consideration and approval, and is estimated to be completed in the third quarter of 2030. How do the planners reach the conclusion that such a massive project in a residential neighborhood should move forward? In part by providing no data from the DOT assessing how much traffic (and parking during construction and afterward) would clog substandard residential streets where vehicles already routinely block adequate access for emergency vehicles including fire trucks and ambulances and at times,	I-110-1	The comment expresses opposition to the proposed Project and support for Alternative 1. The Draft EIR evaluates impacts to air quality, noise, greenhouse gas emission, and hazardous materials for both construction and operation of the proposed Project in detail in Chapter 3. Mitigation Measures have been identified to avoid or minimize impacts. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-110-2	garbage and delivery trucks. Another example of the trickery is on Page 28 of the same chapter, which indicates that the project will not have a major impact on the neighborhood because it will bring in fewer than 400 more people to the complex than at present - for entire weekends. On one hand, that means hundreds of millions of dollars would be spent and unmitigated, unwanted and environmentally noise, traffic etc. would be inflicted on the neighborhood - all for changes expected to draw fewer than 250 people more than now on an average weekend day. On the other hand, the figures are more likely to be ludicrous underestimates, designed to tamp down the estimated impact in regard to noise, traffic etc. so that the planners can maintain that there are no serious problems that would require quashing the project.	I-110-2	As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
I-110-3	The authors/designers of this monstrosity are arguing out of both sides of their mouths. If their mouths were triangular, they'd likely be arguing out of all three sides. Of course, the other thing the eir doesn't consider, or even discuss after several meetings where the public was shown gorgeous utopian drawings of a completed project, is how on earth one goes from the current configuration to the final plan. Where are the drawings of the project while it is	I-110-3	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.
I-110-4		I-110-3	This comment expresses concern regarding traffic impacts. The City has coordinated with the Department of Transportation (DOT) in preparing the Draft EIR through the scoping process. Impacts related to traffic and transportation, including emergency vehicle access are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. The commenter is also referred to Master Response - Traffic/Transportation.
I-110-5		I-110-4	As described in the Project Description, Section 2.7.2 of the Draft EIR, the proposed Project would also allow for large, scheduled public events, including outdoor concerts, movie nights, or luncheons, and requiring amplified sound. It is anticipated that up to approximately 600 visitors would attend such events, with a mixture of approximately 70 percent of attendees coming from the immediate neighborhood by walking or other non-vehicle means, and 30 percent driving in to attend the event. The proposed Project is anticipated to be a local serving recreational Project. However, the proposed Project could have a regional draw during special events. For purposes of this analysis, a special event

I-110 Paul Feldman

COMMENT

RESPONSE

I-110-8	under construction over a five year period? Why does the draft eir not address the actual construction project? Could it be an effort to to hide the football while the monied interests seeking to ruin this lovely neighborhood are conned into submission?The only clue is the number of daily truck trips, worker trips and the time involved. No consideration appears to have been given in the eir to what would actually be torn down, where it would be taken and how that configures with the current roadways, the water currently in the reservoir and the water supply in the future. Nor does it make clear what would happen if the city began work without having full funding --- and what the city's obligation would be if massive chunks are carved out of the existing reservoir complex and the project is then stopped because the money has run out. Not to mention maintaining the facility after it is completed, if it ever were to be. At this point, the city is so ridiculously incapable that it can't make adequate sidewalk repairs near the rec center, for years the barrels along the walking path had to be picked up personally by late Councilman LaBonge because the city couldn't be bothered --- and to this day, a community volunteer waters the fledgling trees along the walking path to keep them alive because the city doesn't do it. If the suggestion is that eventually an outside vendor would be hired to run and maintain the complex, that is a true travesty, rife with the possibilities of further making the complex a Disney-like space in order to pay for the maintenance. Alternative 1 is the only fair, logical and correct solution.		would be assumed to occur weekly during the three months of summer vacation (presumably June, July, and August), for a total of 12 events annually. These events would require a permit from the City and would be staffed appropriately.
I-110-9			Please see Master Response – Noise.
I-110-10		I-110-5	The Draft EIR evaluates potential impacts of noise and traffic congestion in Chapter 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-110-11			Please see Master Response - Funding and Operations.
I-110-12		I-110-6	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-110-13			Please see Master Response - Funding and Operations.
		I-110-7	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-110-8	This comment requests further details about the proposed timing of construction. As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

I-110 Paul Feldman

COMMENT

RESPONSE

This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

- I-110-9 As described in Utilities and Service Systems, Section 3.18.5 of the Draft EIR, Table 2-6 provides an estimate of the amount of construction-related waste that would be exported during Project construction. Across all park zones approximately 21,450 cubic yards of demolition debris (asphalt, earthwork, and general construction debris) and approximately 13,264 cubic yards of site preparation debris (vegetation and minor earthwork) would be generated. The volumes of solid waste generated during construction would contribute to the diminishing of available landfill capacity. It is anticipated that the City would deliver the majority of its non-hazardous construction waste to the privately-owned Sunshine Canyon Landfill and/or LACSD's Scholl Canyon Landfill, which are located nearest to the Project site and permitted to accept 12,100 TPD and 3,400 TPD, respectively.
- I-110-10 Please see Master Response – Drought Conditions.
- This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-110-11 Please see Master Response - Funding and Operations.
- I-110-12 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
- The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment

I-110 Paul Feldman

COMMENT

RESPONSE

is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-110-13 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-111 Alexander M

COMMENT

RESPONSE

I-111-1

I believe it is likely that the EIR and the master planning documents I have seen severely, and possibly intentionally, underestimate the number of net-new visitors to this park. The renderings show a park that is meant to be world-class, with the habitat islands, the promenades looping over the water, and the gathering areas. This is a \$300M+ project - by comparison, Manhattan's new "Little Island" cost only \$260M, and that park is so busy it requires ticketing and queues on the weekends.

The average number of daily visitors to the top-10 city parks in the U.S. over 42,000 (2009 numbers:
<https://www.statista.com/statistics/190057/number-of-visitors-to-city-parks-in-the-us-200>

I-111-1

Please see Recreation and Parks, Section 3.15.5 of the Draft EIR for analysis of anticipated new visitors and potential impacts which were concluded to be less than significant.

I-111-2

Please see Master Response - Parking/Bike Option and Master Response - Traffic/Transportation.

I-111-2

Based on the renderings, it is clear an "attraction" park is desired. So, even if the numbers are just a fraction of those parks, the idea that the new reservoir master plan would only net a max capacity of 400 strains credulity. It also seems all too convenient that those 400 net new visitors fits EXACTLY into the number of new parking spots that could be made available.

I am in the neighborhood, and I could have been pro-park, but right now I am strongly anti-park because the estimates of visitation and parking needs make it clear to me that the most likely thing is numbers are being fudged, willfully or subconsciously, by planners want to "do something".

I advocate for no park or a scaled down version that is not meant to be a city-wide and tourist attraction.

The comment expresses opposition to the proposed Project and support for Alternatives 1 and 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-112 Alexander M

COMMENT

RESPONSE

I believe it is likely that the EIR and the master planning documents I have seen severely, and possibly intentionally, underestimate the number of net-new visitors to this park. The renderings show a park that is meant to be world-class, with the habitat islands, the promenades looping over the water, and the gathering areas. This is a \$300M+ project - by comparison, Manhattan's new "Little Island" cost only \$260M, and that park is so busy it requires ticketing and queues on the weekends. The average number of daily visitors to the top-10 city parks in the U.S. over 42,000 (2009 numbers: <https://www.statista.com/statistics/190057/number-of-visitors-to-city-parks-in-the-us-200>

I-112-1 Please see response to Comment I-111.

I-112-1

Based on the renderings, it is clear an "attraction" park is desired. So, even if the numbers are just a fraction of those parks, the idea that the new reservoir master plan would only net a max capacity of 400 strains credulity. It also seems all too convenient that those 400 net new visitors fits EXACTLY into the number of new parking spots that could be made available. I am in the neighborhood, and I could have been pro-park, but right now I am strongly anti-park because the estimates of visitation and parking needs make it clear to me that the most likely thing is numbers are being fudged, willfully or subconsciously, by planners want to "do something". I advocate for no park or a scaled down version that is not meant to be a city-wide and tourist attraction.

I-113 Geoffrey Lower

COMMENT

RESPONSE

I-113-1

This entire process has been steered toward the approval of a plan that few of the “stakeholders” wanted. From the beginning- we were asked to choose which company should design the project- not whether we wanted the project. Then we were asked to choose between “ overblown” designs or slightly scaled down , but still ostentatious, designs . Never were we allowed to vote to not proceed with any project. We were told to dream big. This is a nightmare and will never vote to increase my taxes, which is in the Masterplan, as an option to pay for something that we do not need.

I-113-1

The comment expresses opposition to the proposed Project. Please also see Master Response - Community Engagement Process.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-114 Hugh Kenny

		COMMENT	RESPONSE
I-114-1		<p>If you're on the meadow path and you stop at the water fountain. The one near the crosswalk entrance, you might be aware of the Richard Neutra studio on the other side of Silver Lake Blvd. Well, actually, you would have to take a couple steps further to the west to look at it because there's an magnificent 90 year old Canary Pine and it's two companions in that of sight. Dion Neutra had a remedy. He wrote this in his blog: To have this view so blocked is unacceptable, much as we would never like to see a tree lost. Since we lost 30 other trees further South to create the walkway*, surely a case can be made here, to loose three more in this area. He petitioned the Neighborhood Council, who reacted with horror and dismissed his appeal but here it is again locked into the master plan. We are going to spend our days watching many other trees and their habitats destroyed. Hell- our habitat is being destroyed.</p>	<p>I-114-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-114-2		<p>The fate of our trees is buried in Environmental Report under the heading, Biological Services, God help us. Their devastation of habitat, is reviewed as a "insignificant effect" And the Master Plans barkers might spare us the "We're going to replace them 4 to 1" sleight of hand trick and take their tents and circus with them to a less aware neighborhood. *Emphasis. mine</p>	<p>I-114-2 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Also, please see Master Response - Biological Resources.</p>

I-115 Paul Feldman

COMMENT

RESPONSE

I-115-1	<p>The authors of the master plan and draft eir display unmitigated gall, if not utter negligence or legally dubious trickery, to contend that there is no need to mitigate the multiple severe impacts on the environment - including air quality, noise, greenhouse gas emissions and the spread of hazardous materials - by choosing any plan other than Alternative 1 (leaving things basically as is).</p>	I-115-1	<p>As analyzed throughout Chapter 3 of the Draft EIR, mitigation measures would be implemented to reduce the significance of environmental impacts.</p>
I-115-2	<p>Chapter 3.12 of the eir (noise and vibrations, page 33 of 62) states Project construction activities would generate a maximum of up to 335 worker trips per day, and a maximum of up to 494 truck trips per day. These worker and truck trips would be distributed throughout the Project area at up to a maximum estimated 5 work sites assumed. It is anticipated that these trips would occur primarily on collector and arterial streets as well as freeways throughout the Project area....</p> <p>Page 30 of the same chapter says construction would be underway from 2025 to 2030:</p> <p>How do the planners reach the conclusion that such a massive project in a residential neighborhood should move forward? In part by providing no data from the DOT assessing how much traffic (and parking during construction and afterward) would clog substandard residential streets where vehicles already routinely block adequate access for emergency vehicles including fire trucks and ambulances and at times, garbage and delivery trucks.</p>	I-115-2	<p>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.</p>
I-115-3	<p>Another example of the trickery is on Page 28 of the same chapter, which indicates that the project will not have a major impact on the neighborhood because it will bring in fewer than 400 more people to the complex than at present - for entire weekends.</p> <p>On one hand, that means hundreds of millions of dollars would be spent and unmitigated, unwanted and environmentally noise, traffic etc. would be inflicted on the neighborhood - all for changes expected to draw fewer than 250 people more than now on an average weekend day</p>	I-115-3	<p>The commenter is also referred to Master Response - Traffic/Transportation and Master Response - Noise.</p>
I-115-4	<p>On the other hand, the figures are more likely to be ludicrous underestimates, designed to tamp down the estimated impact in regard to noise, traffic etc. so that the planners can maintain that there are no serious problems that would require quashing the project.</p>	I-115-3	<p>Please see Master Response - Traffic/Transportation.</p>
I-115-5	<p>The authors/designers of this monstrosity are arguing out of both sides of their mouths. If their mouths were triangular, they'd likely be arguing out of all three sides.</p> <p>As a 31-year homeowner a block from the reservoir, I say that this eir bears no relationship to environmental realities and should be tossed where it belongs - in the recycling bin. Alternative 1 is the only logical and legal solution.</p>	I-115-4	<p>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
		I-115-5	<p>The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-116 Paul Feldman

COMMENT

RESPONSE

I-116-1 The eir before us doesn't consider, or even discuss after several meetings where the public was shown gorgeous utopian drawings of a completed project, how on earth one goes from the current configuration to the final plan. Where are the drawings or descriptions of how the demolition and construction would actually be undertaken and accomplished over the five year period? Why does the draft eir not actually address the specifics of the construction project?

I-116-2 Could it be an effort to to hide the football while the monied interests seeking to ruin this lovely neighborhood are conned into submission?

I-116-3 The only clue in the eir is the number of daily truck trips, worker trips and the time involved. No consideration appears to have been given in the eir to what would actually be torn down, where it would be taken and how that configures with the current roadways, the water currently in the reservoir and the water supply in the future. Nor does it make clear what would happen if the city began the demolition without having full funding --- and what the city's obligation would be if massive chunks were carved out of the existing reservoir complex and the project was then halted because the money has run out.

I-116-4 Not to mention maintaining the facility after it is completed, if it ever were to be. At this point, the city is so ridiculously incapable that it can't make adequate sidewalk repairs near the rec center, for years the barrels along the walking path had to be picked up personally by late Councilman LaBonge because the city couldn't be bothered --- and to this day, a community volunteer waters the fledgling trees along the walking path to keep them alive because the city doesn't do it.

I-116-5 If the suggestion is that eventually an outside vendor would be hired to run and maintain the complex, that is a true travesty, rife with the possibilities of further making the complex a Disney-like space in order to pay for the maintenance.

I-116-6 As a 31-year Silver Lake homeowner, I say that Alternative 1(not moving forward with this half-baked travesty) is the only fair, logical and correct solution.

I-116-1 Please see Master Response - Community Engagement Process.

I-116-2 This comment requests further details about the proposed timing of construction.

As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

I-116-3 Please see Air Quality, Section 3.3.5 of the Draft EIR for analysis related to temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and fugitive dust emissions which would result from demolition.

Table 2-6 in Section 3.18 of the Draft EIR provides an estimate of the amount of construction-related waste that would be exported during Project construction. Across all park zones, the Project would export approximately 21,450 cubic yards of demolition debris (asphalt, earthwork, and general construction debris). It is anticipated that the City would deliver the majority of its non-hazardous construction waste to the privately-owned Sunshine Canyon Landfill and/or LACSD's Scholl Canyon Landfill, which are located nearest to the Project site and permitted to accept 12,100 TPD and 3,400 TPD, respectively.

I-116-4 Please see Master Response - Traffic/Transportation.

I-116-5 Please see Master Response – Drought Conditions.

I-116 Paul Feldman

COMMENT

RESPONSE

- I-116-6 Please see Master Response - Funding and Operations.
- I-116-7 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
- The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-116-8 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-117 Vincent Brook

		COMMENT	RESPONSE
I-117-1	I strongly support only minimal improvements to the reservoir. If it were only the considerable toll on the community, the extravagant alternative would be outrageous. But the cost, at a time when there are FAR more urgent city issues to be addressed, starting with homelessness, makes the grandiose plan obscene! Please. please don't engage in such irresponsible recklessness!	I-117-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-117-2		I-117-2	Please see Master Response - Funding and Operations. In addition, the comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-118 Leslie Edmonds

COMMENT

RESPONSE

I-118-1	I'm very excited to see this plan come to life. However, I'm concerned about the idea of having "horizontal/ head-in" parking on SLB. That style is currently on Glendale and Brand BLVDs. in Glendale and requires that the driver BACKS out into traffic, which there is a lot of. It's a hazard to the driver and those cars heading their way in the traffic lanes. It will be worse around the reservoirs since there are few lights to slow traffic and it's used as a bypass to the 2 fwy.	I-118-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-118-2			
I-118-3	I also hope that the bathrooms that will/ must be placed near the Meadow and hopefully on the West side of the property will be low profile and may even have planting on the roof or sides to add a more natural look and be less "invasive".	I-118-2	As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-118-3	The proposed Project, described in Chapter 2 of the Draft EIR, would not include the addition of bathrooms at these locations. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-119 Robert Burton

	COMMENT	RESPONSE
I-119-1	I'm in favor of the Environmental impact report as presented as I think this is a once-in-a-generation opportunity to transform an area of the city that has been underutilized for decades.	I-119-1 The comment expresses support for the environmental analysis and proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-120 Karen Cusolito

COMMENT

RESPONSE

	My name is Karen Cusolito. I live at 2508 Armstrong Ave.	I-120-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment expresses concern regarding traffic associated with the proposed project. The commenter is referred to Master Response - Traffic/Transportation and Master Response - Funding and Operations. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	Re: South Valley, Recreation Center		
I-120-1	The expansion of the rec center in the South Valley, with the construction of the multi-purpose structure containing an indoor basketball court, the moving of the soccer field and outdoor basketball court, as well as adding event spaces, will bring in more visitors and vehicles to an already crowded area.		
	Presumably, this is one of the "attractions" of the Master Plan. Organized teams will use it, as this is how these facilities are used and paid for. How greatly will the need for parking increase as players and parents crowd in for competitions? The DEIR offers no numbers.	I-120-2	This comment expresses concern with regard to parking. Please see Master Response - Traffic/Transportation.
I-120-2	A "mitigation" proposed in the Plan is to convert the 10 parallel parking spaces on W. Silver Lake Drive just to the west of the Recreation Center to 25 spaces of 90 degree parking. (still pitifully inadequate for this overlarge "sports facility") Such a mitigation would only cause increased dangerous congestion.	I-120-3	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Please see Master Response - Traffic/Transportation. The commenter is also referred to Master Response - Parking/Bike Option.
	Cars backing out of the Rec Center parking will be at constant risk of collisions, as drivers have a hard time seeing around them with this kind of parking. How many walkers with children and strollers in tow; how many bicyclists will be greatly endangered? This is not considered in the DEIR.		As described in Transportation, Section 3.16.5 of the Draft EIR, emergency access analysis in this section was conducted in consultation with LADOT. The proposed Project would include implementation of PDF-TRA-1 and PDF-TRA-2, requiring the implementation of a traffic management plan and construction staging plan which would include detour routes and BMPs, as well as coordination with and advance notice to local emergency providers. In addition, PDF-TRA-3 would require construction trips to be scheduled during off-peak hours, and PDF-TRA-4 would ensure that temporary access shall be provided to any parcels that may be impacted by construction.
I-120-3	Other dangerous problems with this "mitigation" remain unresearched by the DEIR. There will be massive congestion on West Silver Lake Drive where three streets turn onto it. It is the major artery linking residents and visitors to Silver Lake Boulevard and thence to the rest of the city. Will this greatly narrowed, clogged street be able to let fire trucks and paramedics safely through?		
	The leafy, pleasant aesthetic of this green picnic area, and its peace that residents and visitors love, would be replaced by a threatening snarl of traffic.	I-120-4	Please see Master Response - Parking/Bike Option.
I-120-4	No new parking, plus Alternatives 1 or 2 specifying "no new sports facility" are the only good alternatives here if the integrity, safety and peace of the South Valley residents and visitors are to be preserved.		The comment expresses support for Alternative 1 and 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-121 La Ship

		COMMENT	RESPONSE
I-121-1	SAVE our 90yr. CANARY PINE + 2 companion trees - such beauty, environmental benefits are a long lived loved symbol of Silver Lake Sanctuary - Buried in the Environmental Report, under the heading Biological Services ? Your immediate attention to this matter much appreciated	I-121-1	This comment expresses concern regarding impacts to a specific mature Canary Island pine and two adjacent trees. Impacts to biological resources including trees are analyzed in Section 3.4, Biological Resources, of the Draft EIR. The PDFs are outlined in Chapter 2, Project Description of the Draft EIR and with implementation of mitigation measures outlined in Section 3.4, all impacts were concluded to be less than significant. Mitigation measures and project design features specific to mature trees include Mitigation Measures BIO-4, BIO-5, and Project Design Features PDF-BIO-13 and PDF-BIO-14. Also, please see Master Response - Biological Resources.

I-122 Ethan Gold

COMMENT

RESPONSE

I-122-1

Remember, those of us who actually live at the lake — who desperately oppose the massive increases of traffic, and decreases of quiet — live here 24/7. The idea to turn Silver Lake into a kind of amusement park, in an area of the city that already has such a lake at Echo Park, and one of the world's biggest urban parks at Griffith Park, misses what makes this corner of the city special and livable. Please take into consideration those who are most impacted. I know that gets called NIMBYism, but it really does affect us more. And by "us" I am also including the blue herons, Canada geese, and myriad other WILDLIFE that, having been driven from clean spaces to live and breed, call Silver Lake home. Let this remain a quiet space. PLEASE limit development.

I-122-1

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All biological impacts were concluded to be less than significant with implementation of mitigation measures, as applicable (see also Master Response - Biological Resources). The comment also expresses concern for traffic. Impacts to traffic area analyzed in Section 3.16, Transportation and impacts were concluded to be less than significant (see also Master Response - Traffic/Transportation).

Overall, the comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-123 Jackson Sweeney

	COMMENT	RESPONSE
I-123-1	This proposal is incredibly exciting. We very much look forward to this project moving ahead.	I-123-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-124 Rolando Riggio

COMMENT

RESPONSE

I-124-1	<p>There needs to be:</p> <p>1) HydroVoltaics involved in this project. It will drastically reduce evaporation and generate power for the surrounding community. That's too much open still water to be used for power generation.</p>	I-124-1	<p>The proposed Project, described in Chapter 2 of the Draft EIR, would not include hyrdovoltaic technology. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-124-2	<p>2) Chinampas need to be implemented in order to preserve historical horticultural practices.</p>	I-124-2	<p>The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-125 Austin Lozano

COMMENT		RESPONSE
I-125-1	I think the draft EIR is a great plan to turn the current walking path and meadow into a fully integrated park. It provides more space and better interaction with the water and surrounding greenspace. The city should move forward asap! My only critique is I had hoped the plan included some actual interaction with the water such as a swimming zone or a launching point for kayaks, pedal boats, etc.	I-125-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-125-2		I-125-2 The proposed Project, described in Chapter 2 of the Draft EIR, would not include swimming or other water interactions. In addition, as discussed in Chapter 3 of the Final EIR, the use of kayaking by docents has been eliminated as a Project feature. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-126 Dene Feldman

COMMENT

RESPONSE

I-126-1

I hope your organization understands that there are people who are involved with Silverlake Forward who are consistently pushing a narrative that more people are for this master plan than are against it. I think they think that by repeating this falsehood over and over, it will become truth. However, in every meeting that has occurred, the majority of people at these meetings have made it known that they are opposed to this plan. If this plan is pushed through regardless of the obvious opposition to it, there will be huge pushback and a stink will be made.

I-126-1

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-127 Pat Saperstein

	COMMENT	RESPONSE
I-127-1	While it's even more important to upgrade parks in lower-income, less-served areas, parks in general in Los Angeles do not live up to the standards set in other cities. The Silver Lake reservoir could be a jewel in a string of wonderful L.A. parks and needs updating from its previous usage as a reservoir to be able to serve residents more fully.	I-127-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-128 Yasmin Grewal-Kok

COMMENT

RESPONSE

I-128-1 | It's critically important that the fences come down around the reservoirs - I fully approve this master plan!

I-128-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-129 Andrew Sears

	COMMENT	RESPONSE
I-129-1	<p>I've lived here 30 years and support all the plans for new projects at the reservoir complex. The concept of parks should always be more than keeping thing the same and uninspired just to keep people from visiting. New technologies for ecology and environment, combined with education are necessary to keep new generations engaged. That is our only hope for the future. I am primarily submitting these comments because I'm worried that only people living in fear of change will submit comments and complaints. Thanks for all your hard work!</p>	<p>I-129-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-130 Morgan Blair

COMMENT

RESPONSE

I-130-1 | I'm mostly advocating "No Fishing" I have seen what happens to non fish wildlife @ Echo Park ie Turtles, Geese & Ducks on the receiving end of the hook from kids and some adults.

I-130-1 | As described in the Project Description, Section 2.5.1 under Habitat Islands, the proposed Project would include stocking of the reservoir with fish species that would provide food supply for wading birds. The proposed Project would not include fishing. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-131 Casey Wollenberg

COMMENT		RESPONSE
I-131-1	Given that once this project is completed, it will attract visitors from far and wide, residents need to be protected at the very least with permit-only parking so that the neighborhood is still livable.	<p>I-131-1 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.</p>

I-132 Patricia McGrath

COMMENT

RESPONSE

I-132-1 | Where is any new parking are or parking structure in the plan?
The Nelly built DWP Office may have space for a public strucure.

I-132-1 As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-133 Bruce Burke

COMMENT

RESPONSE

<div>I-133-1</div> <p>Hello! I attended most of the scheduled community discussions on the proposed Silver Lake Master Plan. Recently, I have received emails from a group opposed to any and all renovations to the complex. As someone who enjoys proximity to the reservoir, those emails compel me to add my own thoughts and opinions.</p>	<div>I-133-1</div> <p>This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
<div>I-133-2</div> <p>1. I am impressed with the thoughtful, community-oriented design of the proposed complex and am very excited to see it implemented. 2. I feel there is a missed opportunity in the design. Given the state's move to eliminate sales of combustion engine vehicles by 2035, it would be a perfect opportunity to install charging stations in the DWP parking lot that's adjacent to the complex. Many local residents (including me) live in older, multifamily housing stock for which installation of on-site charging stations is both difficult and prohibitively expensive. Given that current technology requires a significant time commitment to charge vehicle batteries, having the opportunity to do so while also enjoying the beautifully revitalized park would enable our community to more fully participate in the state's ambitious carbon reductions goal. To facilitate turnover, the stations could charge market rates for the first hour and then increase the rate significantly for additional time/energy used. The additional revenue generated could be used to offset park maintenance.</p>	<div>I-133-2</div> <p>The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
<div>I-133-3</div> <p>Thank you for the opportunity to share my thoughts. Again, I am very pleased with the proposed design. Based on what I learned during the community meetings, I feel it effectively balances the community's often opposing requests for both development and wildlife preservation.</p>	<div>I-133-3</div> <p>The proposed Project is described in Chapter 2 of the Draft EIR and would not include the installation of charging stations in the DWP parking lot. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
<div>I-133-4</div>	<div>I-133-4</div> <p>The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-134 Maryann Kuk

COMMENT

RESPONSE

I-134-1

This DEIR should (must) be approved. The "no project" option really means that the City, County and the LADWP will not have any mitigation projects outlined for the work that will (must) be done in order to utilize this asset for more than a view lake. Only as a view lake, with more and longer droughts, its future is in jeopardy. Much needed projects like storm water run off, the Pacific Flyway improvement, urban wildlife encouragement/tolerance and, not the least, an improved and enhanced community amenity that will be needed more than ever as the City inevitably gets more crowded and hotter. This community amenity will be an asset to the immediate and expanded neighborhood. The fears expressed are common from people who don't want change. Not to change is not an option.. Surely improving this unproductive, (as other than a view lake) unattractive water body would benefit greatly by the ultimate, community agreed-to mitigation. Moving forward with the guidance of the EIR proposals will not only be nice. It is a necessity.

I-134-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-135 Nicole Antoine

	COMMENT	RESPONSE
I-135-1	<p>Some have said they want the Education Center built because it'll give them restrooms, which many would like. Instead - how about just the restrooms like at the North Hollywood Rec Center? See attached photo.</p> <p>- voted a FINALIST in 2022's Best Public Restrooms (USA) https://www.bestrestroom.com/other-finalist/?finalist=3307&bryear=2022</p> <p>- Installed by LA Recreation and Parks with Council member Krekorian</p> <p>- Cost under \$200,000 (in 2019)</p> <p>"The self-cleaning restrooms at North Hollywood Recreation Center are holding to its promise in a community with a large homeless population. They cut maintenance cleaning times considerably. The restrooms' interior is sanitized automatically after a set number of flushes. Touch less features include toilet tissue dispenser, soap dispenser, faucet and hand dryer. Exiting the restroom is also touch less. Graffiti is easily removed from the stainless steel and porcelain interior. An alarm will sound off if someone attempts to stay inside for too long and the door will open."</p> <p>These restrooms will actually be used and the cost is minimal to the amount to install a new building that will have restrooms. Please protect the open space and consider Alternatives 3 with aspects of 2.</p> <p>Thank you for reading. Nicole</p>	<p>I-135-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include additional stand-alone restrooms. Also, the comment expresses support for Alternative 3 with aspects of Alternative 2. Please see Master Response - Alternative Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-135 Nicole Antoine

COMMENT

RESPONSE

I-135-2



I-135-2 The attachment is noted. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-136 Mandy Kaiser

COMMENT

RESPONSE

I-136-1	<p>Some have said they want the Education Center built because it'll give them restrooms, which many would like. Instead - how about just the restrooms? Award-winning, self-cleaning, stand-alone restrooms - already here at North Hollywood Recreation Center</p>	I-136-1	<p>The proposed Project, described in Chapter 2 of the Draft EIR, would not include stand-alone restrooms. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
	<p>These were: voted a FINALIST in 2022's Best Public Restrooms (USA), installed by LA Recreation and Parks with Councilmember Krekorian, and cost under \$200,000 in 2019. These restrooms will actually be used.</p>	I-136-2	<p>The proposed Project is described in Chapter 2 of the Draft EIR. This comment expresses concern regarding impacts to wildlife and cultural resources.</p>
	<p>They are a far less impactful mitigation for the negative impacts of the proposed Education Center, a building that:</p> <ul style="list-style-type: none"> - Would destroy already scant land habitat for both wildlife and education; - Would violate several Historic-Cultural Monument Standards (our Reservoir is HCM #422); - Is also called an 'event space' or 'community space' which implies the noise, crowds and traffic that come with those; 		<p>Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. As described in Section 3.5, Cultural Resources, of the Draft EIR, the SLRC itself is a Los Angeles Historic Cultural Monument (#422), designated in 1989. Proposed Project impacts were concluded to be less than significant.</p>
I-136-2	<ul style="list-style-type: none"> - Would propose a bus parking lot along SL Blvd for intended visitors; - Duplicates other indoor resources already built (Recreation Center); - Does not comply with the Open Space Zoning directives to preserve open space as a balance to urban density; - And is promoted by some as necessary because it would provide restrooms. <p>Really? An entire building just for its restrooms? No need!</p> <p>Let's get what we need - restrooms - rather than what we don't need - another building.</p>		<p>The comment also expresses opposition to certain aspects of the proposed Project. This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-137 Joshua Shenk

COMMENT

RESPONSE

I-137-1	<p>I'm writing to make two points.</p> <p>First, I enthusiastically support all aspects of this plan that convert land around the reservoir--and the reservoir itself--into usable space for recreation. A healthy urban life requires parks the way a body requires a heart and lungs. LA is severely deficient in spaces to gather, recreate, and experience a touch of nature.</p> <p>Second, I drastically oppose any LADWP operations in and around the reservoir, other than vital work for the site itself. The location of office space on the reservoir and the use of reservoir land as a parking area for LADWP trucks is severely disruptive to the neighborhood.</p> <p>I'm glad to support this conversation in any way I can. Thanks. -</p> <p>Joshua Shenk</p>	<p>I-137-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-137-2 As described in the Project Description, Section 2.2 of the Draft EIR, LADWP currently operates various facilities within the SLRC in support of water supply operations, and some of these facilities would be preserved for LADWP operations, staff, and future projects. LADWP has, and will continue to have, operational responsibilities within the SLRC, such as maintaining the integrity of the dams and active use, maintenance of LADWP onsite facilities, and conveying water to both reservoirs. This comment does not raise a specific issue related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to this comment.</p>
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I-138 Wendy Mitchell

	COMMENT	RESPONSE
I-138-1	I live in Silverlake, quite close to the north end of the lake. I went to multiple community meetings (Friendship Hall, Marshall HS) when the master plan was being prepared. I thought there was a great deal of community input, and that the plan was a compromise in many ways. Now I see some groups claiming there was "no input". Some very vocal community members are asking that NOTHING BE DONE, basically saying they don't want any impact on traffic, no more people visiting, THEIR neighborhood. The same outcry was heard when the meadow was opened: "they" will come, "they" will park on our streets, "no one will use it", "we don't need it". The meadow is loved by many neighbors and in full use on sunny days without any noticeable disruption.	I-138-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-138-2	The only impact of the master plan that can't be fully mitigated is noise from construction and possibly noise from events. This can be addressed by limiting construction hours (which I believe the city already does), and limiting events to daylight hours on weekends. The floating islands will enhance wildlife habitat not in any way limit them. There will be plenty of space for the multitude of coyotes, squirrels, rats, as well as both native and nonnative birds. I think the inner paths should be limited to daylight use, thus a fence surrounding the reservoir would be beneficial.	I-138-2 This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, this 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously.
I-138-3		I-138-3 The comment provides an opinion on the effects to wildlife and surrounding fence. Please see Master Response - Fence Removal. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-139 Sandy Kaye

COMMENT

RESPONSE

I-139-1 | I move that the LADOT do the official traffic count for the EIR. I move that the traffic count needs to be inclusive of and focus on times when there are no “left turn restrictions” in effect, and inclusive of Saturdays and Sundays.
I move that the traffic count in the current EIR be disqualified on the basis that it is misrepresenting the actual traffic.

I-139-1 The City coordinated with LADOT during the preparation of the Draft EIR. LADOT approved the assumptions used for the Traffic Impact Assessment included as Appendix K of the Draft EIR and used to prepare Section 3.16, Transportation. Also, please see Master Response - Traffic/Transportation.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-140 Christopher Covella

		COMMENT	RESPONSE
I-140-1	I am in favor of the self-cleaning, stand-alone restrooms. It would be nice to see them on both ends of the reservoir. I also support alternative 3 with regard to all proposals.	I-140-1	The proposed Project, described in Chapter 2 of the Draft EIR, includes restrooms as part of a proposed Community Center, not as a stand-alone structure. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-140-2	Thank you, Chris Covella	I-140-2	The comment expresses support for Alternative 3. Please see Master Response – Alternatives Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-141 Geoffrey Lower

COMMENT

RESPONSE

I-141-1

The 90 degree parking that is proposed on the south end of the lake will add congestion to an already chaotic traffic situation. The road is barely wide enough as it is to accommodate parallel parking and two lanes of traffic. Cars backing out into the road while another car waits to come into that spot will stop traffic. Parking is already hard to come by for residents all around the lake. I don't feel this was adequately addressed in the DEIR.

I-141-1

This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. The commenter is also referred to Master Responses - Traffic/Transportation and Parking/Bike Option.

I-142 Geoffrey Lower

	COMMENT	RESPONSE
I-142-1	<p>I move that the LADOT do the official traffic count for the EIR.</p> <p>I move that the traffic count needs to be inclusive of and focus on times when there are no "left turn restrictions" in effect, and inclusive of Saturdays and Sundays.</p> <p>I move that the traffic count in the current EIR be disqualified on the basis that it is misrepresenting the actual traffic.</p> <p>Thank you,</p> <p>Chris Covella</p>	<p>I-142-1 The City coordinated with LADOT during the preparation of the Draft EIR. LADOT approved the assumptions used for the Traffic Impact Assessment included as Appendix K of the Draft EIR and used to prepare Section 3.16, Transportation. Also, please see Master Response - Traffic/Transportation.</p> <p>This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-143 Kate Schley

COMMENT

RESPONSE

I-143-1

The beauty of the reservoir is how local and low key it is, it's simple beauty. Nature has found its home here, and we have the fortune of witnessing everyday.

The plans scare me a little, the original photos somehow hold more peace, due to them being less "designed" I worry the work will make the area feel commercialised/a destination in a different way, but hopefully over time, nature will take its place again.

The biggest goal should be to ensure nature, wildlife, animals and humans can live United in the space. We get pleasure from the nature surrounding the reservoir, that must be the priority and come before all else. Not commodities. Just nature. Please, please don't overdo this space for humans (E.g. do we really need more than 2 toilets like there currently are in the REC) wildlife and nature first - that's what brings us the calming, peaceful pleasures.

I-143-1

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-144 Jonathan Schley

	COMMENT	RESPONSE
I-144-1	<p>As a resident who currently enjoys the reservoir daily, I think that while the existing facilities can be improved/expanded, it should be entirely repurposed. I think areas like the meadow which currently act as natural public space should not be changed and left as is. Additionally, I would in no way add additional restrooms. This creates a situation in which people stay and linger too long and it moves from being a local amenity to an attraction like echo park which I would not like. There's already a problem at the existing rec center with homeless people using the toilets as bathing areas with the sinks and we don't need or want more of that in the neighborhood which is generally well contained to such things.</p>	<p>I-144-1 The comment expresses opposition to the addition of public restrooms. The proposed Project would include the addition of restrooms. Please see Master Response - Public Safety for a discussion on the proposed Project's Security Plan. In addition, please refer to Section 3.13, Population and Housing of the Draft EIR, for a discussion on homeless strategies within the City. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-145 Kelly Coyne

COMMENT

RESPONSE

I-145-1 I fully support the creation of an open park around the reservoir. Lakes are rare and precious in LA and for too long a few privileged people have fought to keep this lake unusable, and its grounds just a backdrop for their million dollar views. But this lake belongs to all of us, and the popularity of Echo Park Lake shows how much these spaces are needed.

I-145-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-145-2 My wildest dream for that space would be to open a portion of it to swimming. This may not be possible but any way possible to allow people to interact with the water - dangling our feet off a dock, even row boats- would be amazing and life affirming.

I-145-2 The comment expresses support for swimming and contact with the water. The proposed Project, described in Chapter 2 of the Draft EIR, would not include swimming. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-146 Brandon Depriest

	COMMENT	RESPONSE
I-146-1	<p>For this project to be environmentally friendly and align with the name “conservation” then it needs to have 100% native California plant species. In the plans I have seen, there is an entire section called the eucalyptus grove. Eucalyptus are water competing, invasive non-native trees to California and should NOT be included in this plan whatsoever and it’s rankle embarrassing to have made it to the first draft.</p> <p>Consult an environment science expert for this project, listen to them.</p>	<p>I-146-1 This comment expresses concern regarding the use of native plants and the perceived impression that the project plans are creating a eucalyptus grove. The commenter has misunderstood the plans for the future status of the existing eucalyptus groves. In Section 3.4.5, Biological Resources, of the Draft EIR, the future creation of a tree succession plan to complete the phased removal of eucalyptus trees from the SLRC within a 15-year timeframe is discussed. No new eucalyptus trees are proposed for planting at the SLRC. Also, please see Master Response - Biological Resources.</p>

I-147 Rita Valencia

COMMENT

RESPONSE

I-147-1 | Thanks for a beautiful, thorough, well considered and well researched plan. Our iconic reservoir is truly a treasure and this plan will unlock its potential.

I-147-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-148 Susan Borden

	COMMENT	RESPONSE
I-148-1	<p>Please make sure there are plenty of benches along the paths. I am 76 years old and definitely need frequent opportunities to sit down on a walk. More benches will get me to walk further. Thank you.</p>	<p>I-148-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include benches along the paths. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>The suggestion to include benches has been noted for the record and will be forwarded to the decision-makers for their review and consideration. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR.</p>

I-149 Chris Young

COMMENT

RESPONSE

I-149-1 | I just feel like the skatepark was overlooked - there's not really anything for all the great kids in the neighborhood - especially teenagers, Thanks for considering (there are no skateparks in the greater neighborhood)

I-149-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include the skatepark. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-150 Andrew Bush

I-150-1 | yes, I'm in favor of making this a park!

COMMENT

I-150-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-151 Cash McBride

COMMENT

RESPONSE

I-151-1	Hi there! This looks exceptional! My suggestion - it seemed this was the case actually from the concept photos, but I wanted to make sure there is care for the importance of gravel or dirt running and walking paths. As a runner silver lake reservoir is one of the only parks in the area that has a running path that is not cement. This is extremely valuable to folks of all ages (and dogs!) to avoid injury and strain on knees, ankles, hips, etc. Thank you!	I-151-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-151-2		I-151-2	This comment suggests use of gravel or soil for walking paths and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-152 David Jones

	COMMENT	RESPONSE
I-152-1	I support Alt 1 (No project alternative). Alt 1 will beautify the reservoir, provide improved areas for nature to thrive, and allow the community to enjoy improved recreational areas. Thank you for this amazing plan and effort. Will there be a community voting process to join?	<p>I-152-1 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>The commenter is also referred to Master Response - Community Engagement Process.</p>

I-153 Pilar Munoz

COMMENT

RESPONSE

I-153-1

I would like to add my support to proceed with the environmental report as it stands with Alt 1- No Project Alternative. I am not in favor of Alt 2 or 3. Is there a ballot or voting process? I am a resident and homeowner on West Silver Lake Drive. I believe that Alt 1 option provides a perfect balance between preserving nature and providing the community with recreation and education. Above all the wire fence creates a jail look which defects the beautification of the area. Thank you! It is a wonderful plan.

I-153-1

The comment expresses support for Alternative 1, however, is discussing support for the proposed Project and removal of the perimeter fence. The commenter does not support Alternatives 2 and 3.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-154 Karen Lower

COMMENT

RESPONSE

I-154-1	The DEIR raises many concerns as there are numerous proposed "improvements" with negative impacts on the Silver Lake Reservoir environment, nearby residents, and community that are categorized with No or Less than Significant Impact.	I-154-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-154-2	Section 3.15 New Park Facilities Impacts - Less Than Significant The loss of land for the existing wildlife habitat is Significant. The knoll is home to coyotes and other wildlife. There is no mention of where these animals are to go.	I-154-2	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources.
I-154-3	The DEIR makes no mention of who will maintain the improvements, police the use of the space, or stop people from throwing unwanted fish, turtles, and more into the water like Echo Park - has anyone visited Echo Park reservoir lately? It's a disaster. Filthy. Restrooms should be closed by the public health department.	I-154-3	As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Also, please see Master Response - Public Safety.
I-154-4	Chapter 4.2 Unavoidable Significant construction noise and vibration. This alone should end this unnecessary "improvement project". There is mention of "temporary" noise impact. 5-15 years. The use of the word "temporary" is debatable.		
I-154-5	It took about 5 years for the DWP to lay the new pipe under the reservoir. It caused disruptive traffic flow from Rowena to W Silver Lake Drive, endless dust and debris in the air, noise, and vibration to homes on the reservoir, and complaints were disregarded by many people. Our friends lived on W Silver Lake Drive at that time. They worked from home. It caused high stress from noise, their home shook, and their many calls to DWP went unanswered.		
I-154-6	Ch 2. 4.6 Traffic impact - Less Than Significant To whom I would like to know. 500 Construction-crew round-trip daily commuter cars in the reservoir area. We can barely move easily today around the reservoir. Silver Lake Blvd is bumper-to-bumper during rush hours. Ch.2-6 19000 truck haul trips in total. Less Than Significant? Really? This begs a question, "how flawed is this report"? Anyone who lives in the direct vicinity of the reservoir knows this is a lie.	I-154-4	As stated in the comment, the Draft EIR discloses significant and unavoidable impacts for on-site construction noise and groundborne vibration related to human annoyance. The Draft EIR, as required by CEQA Statutes and Guidelines Section 15126.4, identifies all feasible and relevant mitigation measures related to the significant and unavoidable impacts. These mitigation measures include NOISE-1 through 3 and NOISE-5 as shown in the Chapter 3.12, Noise, of the Draft EIR. These mitigation measures would reduce but not completely eliminate the impacts. Further, the CEQA Statutes and Guidelines Section 15126.2 states that "significant environmental effects which cannot be avoided if the proposed project is implemented" or "where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described". Chapter 5, Analysis of Alternatives, of the Draft EIR describes in detail the alternatives considered. Chapter 5 determined that while Alternative 1 (No Project Alternative) is the environmentally superior alternative, pursuant to Section 15126(e)(2) of the
I-154-7	Ch. 4.2 Table 2-9 600+ person amplified events with Significant and Unavoidable Noise". 12 X Year. This is part of my question 3.15 New Park Facilities. Events should be		

I-154 Karen Lower

COMMENT

RESPONSE

I-547-7 Cont.	included in this and not designated as Less Than Significant.		
I-154-8	Fig. 2-4 No perimeter Fencing. Go look at Echo Park. This suggestion is reckless. Will destroy the integrity of the wildlife environment. Anytime you introduce people to these areas you are agreeing to destroy them.		CEQA Statutes and Guidelines, when the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from the remaining options. Alternative 2 is considered the Environmentally Superior Alternative. However, CEQA Guidelines do not require an agency to select the environmentally superior alternative (CEQA Guidelines 15042-15043), and allow for the selection of alternatives that more effectively meet project objectives and obtain project benefits. Alternative 2 would meet all of the project objectives, but to a lesser degree than the proposed Project. Eliminating the ability to provide special events at the park diminishes the objective to "increase spaces for community and family gatherings." In addition, by eliminating all built structures, Alternative 2 would not provide all the recreational and community benefits included in the proposed Project and envisioned in the primary project objective.
I-154-9	Table 2-8 New Structures. This will destroy the wildlife in the area. They will never return. The Herons never returned after the DWP's construction lasted or years laying the pipe. This is will cause exhaustive damage.		As described in Chapter 2, Project Description, of the Draft EIR, the Project's construction activities are expected to occur over a five-year period. Section 3.12, Noise, of the Draft EIR does not identify any permanent noise increases resulting from Project operation and impacts related to operations and permanent noise increases would be less than significant.
I-154-10	Table 2-7,-2-8 2300+ new visitors per week. The area cannot handle the current level of visitors. People disregard parking signs and park on both sides of neighboring streets constraining the flow of traffic. Adding 160 parking spaces is not going to handle 2300+ new visitors. That's just simple math.		
I-154-11	The DEIR recommends Alternate 2. I support Alternate 3. After reading every single comment from the meetings it is more than clear the real stakeholders do NOT want this project, they did not vote for it, and there was never an option provided at the community meetings which I attended, to say NO. Many people stood up and said "NO", and yet somehow this continues to move forward.	I-154-5	The comment expresses concern for a previous project that occurred at the Project site. The proposed Project is described in Section 2 of the Draft EIR. Noise and vibration impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Air quality impacts are discussed in Section 3.3, Air Quality, of the Draft EIR.
I-154-12	The cost of the project is exhaustive. As with any project, the projected cost will be higher. The funding options in Ch. 7 are simply naming possible funding sources. Nothing is available and will require effort to raise funds. The Mello Roos funding option is buried and people do not realize what that would mean to them. As a homeowner who does not support the project as a whole, why would I want to pay for a proposed "improvement" that will destroy the wildlife, keep migratory birds from returning - The Canadian geese are rarely seen anymore and stay for shorter periods of time since the DWP project installing the pipe on the bottom of the reservoir took years. Furthermore, why would	I-154-6	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are fully analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
I-154-13		I-154-7	As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant.

I-154 Karen Lower

	COMMENT	RESPONSE
I-154-14	<p>any community want to invite in more people when it is already stressed by the numbers? More trash, graffiti, and crime. You just need to walk through the meadow Monday morning to see the trash left behind. People don't clean up after themselves or their dogs - that are not supposed to be in the meadow! I am a dog owner, I love dogs. I really don't mind them running in the meadow, but I do mind seeing their poop everywhere! People don't clean up after themselves.</p> <p>Trees are dieing. Why plant more trees that will die? Who is going to maintain?</p> <p>Why build new structures at the pain and cost to the community that does not need improvements?</p>	<p>I-154-8 Please see Master Response - Fence Removal.</p> <p>I-154-9 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
I-154-15	<p>Gain, I have to mention, the DEIR doesn't mention who will maintain all these proposed improvements. This is a huge consideration.</p>	<p>I-154-10 Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.</p> <p>I-154-11 Please see Master Response - Community Engagement Process. The comment expresses opposition to the proposed Project and support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-154-16	<p>I will close with one final comment (I have a hundred more but this is all overwhelming). The reservoir is an important resource for wildfires. I don't think that should change. Helicopters should have access at any time. Water should never be drained as EVERY DROP COUNTS! Whatever is ultimately decided on, I think it would be very important to keep it as such.</p> <p>Thank You for reading. Karen Lower</p>	<p>I-154-12 Please see Master Response - Funding and Operations. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-154-13 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources.</p> <p>I-154-14 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.</p> <p>The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility</p>

I-154 Karen Lower

COMMENT

RESPONSE

similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Also, please see Master Response - Funding and Operations.

- I-154-15 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-154-16 The SLRC is currently used as a source of water for firefighting operations for both the City and the County of Los Angeles Fire Departments. As discussed in the Project Description, Section 2.7.2 of the Draft EIR, the proposed Project would be designed to include minimal vegetation along the south end of the reservoir, where water could be drawn from via helicopter by the City and the County of Los Angeles Fire Departments in order to continue to support the use of the reservoir for firefighting needs.

I-155 Tara Pattie

	COMMENT	RESPONSE
I-155-1	I am a homeowner in Silver Lake and I want to express my support for the Silver Lake Reservoir Master Plan. I've felt for years that the park's unsightly and dangerous fenced pathways are a missed opportunity for a beautiful, thriving community commons. We should be working together toward making the urban landscape better in Los Angeles, rather than blocking any progress in fear of the area becoming a destination for 'outsiders' coming in to use the park. A park is a public place that should be enjoyed by all — not just the wealthy homeowners that live next to it. Making it more beautiful and sustainable for wildlife would have a positive impact on the surrounding area and its residents.	I-155-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-156 Hugh Kenny

COMMENT

RESPONSE

I-156-1 Gentle persons:
I would very much appreciate seeing a list of the trees that you plan to take away. I am in dread that I will see a tree that I am particularly fond of, or possibly provided some care to, being cut away. I would like an opportunity to come to terms with these "removals", or when appropriate, advocate for a particular tree.
I imagine that information is on hand now, and if I would be particularly pleased to receive it sooner than later. Many thanks,
Hugh Kenny

I-156-1 Please see Appendix D - Biological Technical Report of the Draft EIR for more information about what trees will be affected by the proposed Project.

The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Also, please see Master Response - Biological Resources.

I-157 Lenore Dowling

		COMMENT	RESPONSE
I-157-1	I have lived in Silver Lake since 1976, 46 years and love this neighborhood. The lake and environs are treasures enjoyed by residents who want to protect this treasure. I agree with comments -- written and verbal -- that want to protect the lake with adequate fencing, (#3), and not develop public places, expand parking, and make the area vulnerable to the consequences of unwise decisions about the future of the lake. It is not being selfish to protect the wildlife and environment. As one responder noted -- we don't need a developed recreation area. Residents and dogs have happily walked around the lake for many years. I oppose plans that would disrupt the neighborhood (albeit, for only a few years) and potentially destroy the peaceful place that we residents value and want to protect.	I-157-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record.
I-157-2		I-157-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-158 Paul Feldman

COMMENT

RESPONSE

I-158-1	As a 31-year Silver Lake homeowner residing a block from the reservoir, I want to make clear that the Silver Lake Reservoir Complex Master Plan remains replete with negative environmental impacts, several of which can only be remedied if the plan is scuttled and the complex is left as it currently is (Alternative 1).	I-158-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-158-2	Table 3.16-3 says the impact to transportation and traffic and parking are less than significant without mitigation being needed. That is a total joke. The plan also contains several misconceptions, misstatements or worse, such as in 3.16-2, where it continues (as the draft eir did) in stating that County Metro bus service is provided to the reservoir by the #201 bus along West Silver Lake Drive. That bus service was discontinued in June 2021, long before even the draft Master Plan was completed and made public. (The fact that I pointed this out in comments on the draft plan, but they were ignored, probably speaks volumes).		The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-158-3	Even though the draft plan stated that there is limited parking and traffic congestion and that plentiful alternate modes are "paramount" to the plan working, the current plan still does not contain adequate parking (or transportation) solutions and thus should be summarily rejected on environmental grounds because without a decent solution, there will be deleterious impacts on transportation and traffic, on aesthetics, on air quality,	I-158-2	Please see response to Comment I-61-3
I-158-4	on noise, and on the neighborhood's population, among other impacts. Is there a way to sufficiently mitigate these problems? No, there is not. There is no logical place to add the necessary road widths or parking (particularly at the already congested area cited at the grassy knoll near the rec center) for a project this size and adding parking would again create environmental impacts that could not be mitigated in terms of aesthetics, air quality, greenhouse gas emissions, water quality, land use and planning, noise, transportation and traffic and impact on population and housing.	I-158-3	Please see Master Response - Traffic/Transportation.
I-158-5	The plan would further compress motor traffic on streets that are already frightfully narrow and are often made even more narrow by parked vehicles and pedestrians/runners who use the street instead of the walking path. Most Silver Lake side streets don't even have sidewalks because they are so narrow. The few cyclists who use city bike paths in the area would not be much of an "alternate mode" of transportation while further parking and traffic congestion, not to mention reduced neighborhood aesthetics, would have an additional negative environmental impact, including life-threatening consequences for the inability of fire trucks and other emergency vehicles to access these narrow streets which would be utterly clogged with parked cars of Complex users and additional traffic.	I-158-4	Aesthetics impacts are discussed in Section 3.1 of the Draft EIR. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Air quality impacts are discussed in Section 3.3 Air Quality. The Draft EIR concluded that impacts would be reduced to less-than-significant levels with implementation of mitigation.
		I-158-5	Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.
			The comment raises general concerns regarding aesthetics, air quality, greenhouse gas emissions, water quality, land use, noise transportation, and population and housing impacts. Impacts associated with these resources are analyzed throughout Chapter 3 of the Draft EIR.
I-158-6		I-158-6	Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option. As described in Public Services Section 3.14.1 of the Draft EIR, in consultation with LADOT, an emergency access analysis for the proposed Project was performed.
			Construction activities would be confined primarily to within the perimeter of the SLRC and would not impact surrounding roadways or restrict access for emergency vehicles. The proposed Project would include implementation of PDF-TRA-1 and PDF-TRA-2, requiring the implementation of a traffic management plan and construction staging plan which would include detour routes and BMPs, as well as coordination with and advance notice to local

I-158 Paul Feldman

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emergency providers. In addition, PDF-TRA-3 would require construction trips to be scheduled during off-peak hours, and PDF-TRA-4 would ensure that temporary access shall be provided to any parcels that may be impacted by construction.

As part of the Operations and Maintenance Plan to support operations, an Evacuation Plan would be prepared. Ingress and egress within the Project site would continue to operate similar to existing conditions, and no changes to emergency access would occur. During public events PDF-TRA-5 would ensure that event permittees develop a site-specific traffic control plan to minimize congestion and vehicle miles traveled. Traffic control strategies for events will include inbound/outbound flex lanes and sheriff-controlled intersections. Traffic control plans will also identify nearby public parking facilities and identify passenger pick-up/drop-off locations. Permittees will be required to consider the cumulative traffic impacts of their event in relation to other events in the Project Area. The traffic control plans will also identify emergency services egress and access. Impacts to emergency vehicle access were concluded to be less than significant in the Draft EIR.

I-159 Paul Feldman

COMMENT

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I-159-1	As a 31-year Silver Lake homeowner residing a block from the reservoir, I want to make clear that the Silver Lake Reservoir Complex Master Plan remains replete with negative environmental impacts, several of which can only be remedied if the plan is scuttled and the complex is left as it currently is (Alternative 1).	I-159-1	The comment expresses opposition to the proposed Project and support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-159-2	The plan would further compress motor traffic on streets that are already frightfully narrow and are often made even more narrow by parked vehicles and pedestrians/runners who use the street instead of the walking path. Most Silver Lake side streets don't even have sidewalks because they are so narrow. The few cyclists who use city bike paths in the area would not be much of an "alternate mode" of transportation while further parking and traffic congestion, not to mention reduced neighborhood aesthetics, would have an additional negative environmental impact, including life-threatening consequences due to the inability of LA Fire Dept. trucks and ambulances and other emergency vehicles to access these narrow streets which would be utterly clogged with parked cars of Complex users and additional traffic. Anything other than Alternative 1 would guarantee a much heightened chance, probably an inevitability over the long run, of otherwise unnecessary fatalities and increased fire danger due to the lack of transportation accessibility if this wildly over-the-top project is undertaken in a compressed, clogged residential neighborhood.	I-159-2	Please see Master Response - Traffic/Transportation and response to Comment I-61-1.
I-159-3	Table 3.16-3 stating that the impact to transportation and traffic and parking are less than significant without mitigation being needed is nonsensical and would be laughed out of court.	I-159-3	The comment expresses support for Alternative 1. Please see Master Response - Traffic/Transportation. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-160 Paul Feldman

COMMENT

RESPONSE

I-160-1	As a 31-year Silver Lake homeowner residing a block from the reservoir, I want to reiterate that the Silver Lake Reservoir Complex Master Plan is full of negative environmental impacts, several of which can only be remedied if the plan is scuttled and the complex is left as it currently is. (In other words, the only solution is Alternative 1).	I-160-1	The comment expresses opposition to the proposed Project and support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-160-2	For one thing, the EIR fails to adequately address the negative environmental impact of construction. Issues which include traffic, hazardous materials, noise, air quality, greenhouse gas emissions, aesthetics and biological resources. Unless this wasteful, unnecessary project is scuttled, thousands of truck trips would be necessary for months or years to cart out the concrete and other materials to change the face of the reservoir complex. The environmental impacts are indeed hugely significant, in terms of noise, dirt and other substances in the air, causing a negative impact for humans and wildlife alike. Even if the walls were pushed into the existing reservoir area, the same problems, with just as much noise, dirt and other substances in the air, would have an unmitigated immediate and long-term impact on humans and wildlife. As well, there is the folly of not keeping a reservoir in place in case it's needed again in the long run -- or simply to continue serving as a source for firefighters to draw water from in order to combat the increasing wildfires and structural fires in Northeast Los Angeles and beyond due in part to climate change.	I-160-2	As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
I-160-3	Lowering the walls could also create flooding hazards in the neighborhood and in others downhill toward the Echo Park and MacArthur Park districts.		The comment raises general concerns regarding aesthetics, air quality, greenhouse gas emissions, water quality, land use, noise transportation, and population and housing impacts. Impacts associated with these resources are analyzed throughout Chapter 3 of the Draft EIR.
I-160-4	Construction and the final results would increase the already overloaded traffic, particularly during rush hour, throughout the neighborhood and Northeast Los Angeles, both already highly congested. Not to mention the clogged parking that already exists in the neighborhood and would only intensify - making most streets that are already inadequate in width totally inaccessible to fire trucks, ambulances and other emergency life and property saving equipment.	I-160-3	Please see Master Response – Drought Conditions.
I-160-5	The plan has severe problems that are impossible to remedy, and alternatives 2 and 3 do not do enough to address these issues.. The only logical plan is Alternative 1 -- doing nothing.	I-160-4	The proposed Project would not contribute to flooding hazards. LADWP will continue to operate the SLRC consistent with existing dam safety requirements. The proposed Project would not affect any of the dams or their operations. The sanitary wall modifications described in the Project Description, Chapter 2 of the Draft EIR, would not change water level objectives of LADWP's SLRC operations plan. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-160-6	The need for continued perimeter fencing and the issues of wildlife safety, construction chaos and insufficient parking, were made time and again by a vocal majority of residents and stakeholders who attended the public sessions prior to the master plan being completed.		
I-160-7	And time and again, the firms developing the master plan have ignored these	I-160-5	Please see Master Response - Traffic/Transportation.
I-160-8			This comment addresses various construction impacts, provides suggestions for reducing the Project's impacts during construction, or request further details about the proposed timing of construction. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft

I-160 Paul Feldman

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I-160-8
cont.

concerns, making a mockery of the clear desires of the majority of stakeholders, who would now be asked to fund most of this project. Ignoring public sentiment, the designers have plowed ahead, for God knows what reasons, with a plan that would leave large portions of the complex open 24/7 to any humans who care to be there - regardless of the welfare and safety of the wildlife or the general public and residents of what is one of the few remaining coherent and workable neighborhoods in the city of Los Angeles.

EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

I-160-6 Please see Master Response - Traffic/Transportation.

I-160-7 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-160-8 Please see Master Response - Fence Removal.

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-161 Paul Feldman

		COMMENT	RESPONSE
I-161-1	As a 31-year Silver Lake homeowner residing a block from the reservoir, I want to make clear that the Silver Lake Reservoir Complex Master Plan is replete with negative environmental impacts, several of which can only be remedied if the plan is scuttled and the complex is left as it currently is. (As in Alternate 1). Section 2 of the plan talks about a Green New Deal and about LA seeking to achieve zero waste.	I-161-1	The comment expresses opposition to the proposed Project and support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-161-2	Unfortunately, the serious, impossible to mitigate, problems in this plan - on issues including traffic, parking, truck trips, length of construction, hazardous materials, noise, air quality, greenhouse gas emissions, water quality and aesthetics - make it a total zero (except for all the zeros in the price tag) and a complete waste of taxpayers' money, while providing new deals that could well put lots of green into the coffers of chosen developers, construction companies and, perhaps, campaign war chests.	I-161-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-161-3		I-161-3	Please see Master Response - Funding and Operations.

I-162 Paul Feldman

COMMENT

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I-162-1 In my two-minute audio comment at the virtual meeting on Oct. 26 I did not have time to address the either misguided or disingenuous comments of certain supporters of the master plan who said that the plan was favored by the community at public meetings. As a 31-year Silver Lake resident, I take umbrage to such statements. What happened at those meetings was the planners' equivalent (with the assistance of so-called community stakeholder groups) of a three-card monte game, in which the public was never provided an opportunity to just simply and clearly state whether or not they wanted a development project to move forward. Instead, meeting-goers were given 'options' to choose among several pro-active development plans and could not simply state their preference for leaving the reservoir complex (which already includes the meadow, the recreation center facility and playground and ball fields and dog parks etc.) alone. Nor was one of the options leaving the complex (and the wildlife within) alone except for construction of a new, more aesthetically designed, outer fence, or simply adding nothing more than a handful of little islands for birds out on the water.

I-162-2 The first time that the public truly has had a chance to say there should be no project is in the alternatives section of this report. But, big surprise, the report by the handsomely paid planners says that Alternative 1 (no changes) is now not even an option. Why? Because, the report states, "the fundamental objective of the proposed Project, to repurpose the SLRC as a public park, would not be met."

I-162-3 The 'fundamental objective' of the project is the fundamental objective ONLY because the planners never provided the public with the opportunity to simply say that what was actually wanted was to NOT go ahead with such a project. (The planners, Hargreaves, by the way, have said in the past they have never previously even undertaken such a small project in the midst of residential neighborhood and their majestic drawings are about as relevant these days as the designs prepared more than a half-century ago to reduce LA's smog by carving holes in the Santa Monica Mountains and blowing the dirty air out to the desert). The only reasonable and fair-minded approach at this point - after hearing the clear, widespread community opposition on the Zoom meeting - is to return to the earlier EIR process and actually poll the community and any other necessary stakeholders to find out what is really wanted, particularly considering that, according to the earlier draft EIR report, it would be the Silver

I-162-1 Please see response to Comment I-72-1

I-162-2 Please see response to Comments I-72-2 and I-72-3.

I-162-3 Please see response to Comments I-72-4 and I-72-5.

I-162 Paul Feldman

		COMMENT	RESPONSE
I-162-4	Lake community, through a Mello-Roos taxing scheme, that would eventually be asked in a formal voting process whether it would pay for a large portion of the hundreds of millions of dollars of so-called "improvements."	I-162-4	Please see response to Comment I-72-5.
I-162-5	As such, the only reasonable alternative at this point is Option 1, not moving forward at this point with the project.	I-162-5	The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-163 Paul Feldman

COMMENT

RESPONSE

I-163-1

The authors of the master plan and draft eir display unmitigated gall, if not utter negligence or legally dubious trickery, to contend that there is no need to mitigate the multiple severe impacts on the environment - including air quality, noise, greenhouse gas emissions and the spread of hazardous materials - by choosing any plan other than Alternative 1 (doing nothing). Chapter 3.12 of the eir (noise and vibrations, page 33 of 62) states: Project construction activities would generate a maximum of up to 335 worker trips per day, and a maximum of up to 494 truck trips per day. These worker and truck trips would be distributed throughout the Project area at up to a maximum estimated 5 work sites assumed. It is anticipated that these trips would occur primarily on collector and arterial streets as well as freeways throughout the Project area....

Page 30 of the same chapter says construction would be underway from 2025 to 2030: Construction On-Site Construction Noise Construction of the Project is anticipated to begin in the first quarter of 2025, pending Project consideration and approval, and is estimated to be completed in the third quarter of 2030. How do the planners reach the conclusion that such a massive project in a residential neighborhood should move forward? In part by providing no data from the DOT assessing how much traffic (and parking during construction and afterward) would clog substandard residential streets where vehicles already routinely block adequate access for emergency vehicles including fire trucks and ambulances and at times, garbage and delivery trucks.

Another example of the trickery is on Page 28 of the same chapter, which indicates that the project will not have a major impact on the neighborhood because it will bring in fewer than 400 more people to the complex than at present - for entire weekends.

On one hand, that means hundreds of millions of dollars would be spent and unmitigated, unwanted and environmentally noise, traffic etc. would be inflicted on the neighborhood - all for changes expected to draw fewer than 250 people more than now on an average weekend day

On the other hand, the figures are more likely to be ludicrous underestimates, designed to tamp down the estimated impact in regard to noise, traffic etc. so that the planners can maintain that there are no serious problems that would require quashing the project.

The authors/designers of this monstrosity are arguing out of both sides of their mouths. If their mouths were triangular, they'd likely be arguing out of all three sides.

Of course, the other thing the eir doesn't consider, or even discuss after several

I-163-1 Please see response to Comment I-110.

I-163 Paul Feldman

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I-163-1
cont.

meetings where the public was shown gorgeous utopian drawings of a completed project, is how on earth one goes from the current configuration to the final plan. Where are the drawings of the project while it is under construction over a five year period? Why does the draft eir not address the actual construction project? Could it be an effort to to hide the football while the monied interests seeking to ruin this lovely neighborhood are conned into submission?

The only clue is the number of daily truck trips, worker trips and the time involved. No consideration appears to have been given in the eir to what would actually be torn down, where it would be taken and how that configures with the current roadways, the water currently in the reservoir and the water supply in the future. Nor does it make clear what would happen if the city began work without having full funding --- and what the city's obligation would be if massive chunks are carved out of the existing reservoir complex and the project is then stopped because the money has run out.

Not to mention maintaining the facility after it is completed, if it ever were to be. At this point, the city is so ridiculously incapable that it can't make adequate sidewalk repairs near the rec center, for years the barrels along the walking path had to be picked up personally by late Councilman LaBonge because the city couldn't be bothered --- and to this day, a community volunteer waters the fledgling trees along the walking path to keep them alive because the city doesn't do it.

If the suggestion is that eventually an outside vendor would be hired to run and maintain the complex, that is a true travesty, rife with the possibilities of further making the complex a Disney-like space in order to pay for the maintenance.

Alternative 1 is the only fair, logical and correct solution.

I-164 Paul Feldman

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I-164-1	<p>This draft letter, submitted for discussion and vote at the Nov. 14 meeting of the Silver Lake Reservoir Committee of the Silver Lake Neighborhood Council, was supported by an overwhelming number of community stakeholders. Due to parliamentary stalling tactics, no final vote on the letter was taken that night --- despite the clearly overwhelming support for it due to its endorsement of Alternative 1 (no project). The letter clearly cites flaws, inadequacies and outlandish assertions in the deir, which I, as a 31-year Silver Lake resident, wholeheartedly believe to be true and should be considered so that Alternative 1 is the option chosen. .</p>	<p>I-164-1 Please see Master Response - Community Engagement Process.</p> <p>The comment expresses opposition to the proposed Project and support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-164-2	<p>DRAFT LETTER From: Debbie Slater To: Deborah Weintraub, Mary Nemick, Wendy Delgado, & Dr. Jan GreenRebstock — L.A. Department of Public Works, Bureau of Engineering Elena Maggioni — L.A. Department of Recreation and Parks Craig Weber Mehendale — L.A. Planning Department Councilmember Mitch O’Farrell (CD-13) Councilmember Nithya Raman (CD-4) Meghan Quinn — Hargreaves Jones</p> <p>DRAFT EIR COMMENTS FROM THE SILVER LAKE NEIGHBORHOOD COUNCIL</p> <p>To whom it may concern: Although the Silver Lake Neighborhood Council (SLNC) finds that the draft Environmental Impact Report (DEIR) for the Silver Lake Reservoirs Complex Master Plan (SLRCMP) describes some impacts of the proposed project, there are significant omissions. Proposed changes would significantly alter the unique character of the bucolic Silver Lake community, in particular the neighborhoods surrounding the body of water and green space known as the Reservoirs. It is important to understand that the vast majority of our Stakeholders strongly feel the existing Reservoirs Complex — a gem of our community— should NOT be modified in any way (DEIR Chapter Five, table 5-1 Alternative 1.) Some Stakeholders also support options described in Alternatives 2 and 3 (Chapter Five, table 5-1.) Therefore, as representatives of its community, the SLNC supports Alternative 1, and very few aspects of Alternatives 2 and 3. *Listed Below We agree Los Angeles needs more parks and green space. However, Silver Lake is a park-proud community with access to numerous parks and open spaces, including Griffith Park, two recreation centers and the L.A. River. We do NOT believe Silver Lake is one of the communities in need. We urge the city to focus funds and future design plans on communities which are park poor, which will benefit Los Angeles as a whole. Furthermore, our community is confused about the proposed timeline of this project: how much money it will truly cost; where exactly that money will come from; who will maintain; who will pay to maintain? We question the use of city funds being put toward a “Recreational Want” above city needs and strongly</p>	<p>I-164-2 Comment noted. This comment does not raise any specific issues with respect to the content of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-164-3	<p>I-164-3 This comment expresses concern regarding impacts to community character. Impacts to aesthetics are analyzed in Section 3.1, Aesthetics, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>	<p>I-164-3 This comment expresses concern regarding impacts to community character. Impacts to aesthetics are analyzed in Section 3.1, Aesthetics, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
I-164-4	<p>I-164-4 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>	<p>I-164-4 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-164-5	<p>I-164-5 Please see Master Response - Alternative Analysis.</p>	<p>I-164-5 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.</p>
I-164-6	<p>I-164-6 As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the</p>	<p>I-164-6 As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the</p>

I-164 Paul Feldman

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I-164-7 Cont.	oppose any Corporate Contributions with naming opportunities. Homelessness, infrastructure, and affordable housing are much more urgent needs and should be the focus of the city's budget, along with improving green space throughout Los Angeles. We ask that our community's concerns be carefully considered and that every city official involved in decisions regarding the Reservoirs complex carefully read Chapter 5 of the DEIR and consider the impact this project would have on residents, Stakeholders and wildlife. In addition: • The DEIR states that, of the types of impacts considered, the most significant and unavoidable impact is noise and vibration associated with construction and operation of the proposed complex. While the DEIR proposes measures to mitigate this noise, the SLNC urges that the City ALWAYS prohibit amplified music or other loud activities in the complex, regardless of the project, and that construction noise mitigation measures are adhered to strictly and expanded beyond the proposed measures. Page 3 of 4	I-164-6	dams, the proposed Project would use the reservoirs as part of a park to benefit area residents. Please see Master Response - Funding and Operations.
I-164-8	Page 4 of 4 Silver Lake Reservoir Advisory Committee Agenda - Page 4 of 4 • Alternatives two and three in the DEIR propose improvements to the dog park and recreation center, as well as the re-grading and restoration of pedestrian paths around the reservoir. These improvements would address pressing safety concerns in the area and serve the recreational needs of the community without disturbing the serene beauty of the community's core element. We would support replacing the current fence with a new, wildlife-friendly fence. • Access should continue to be from dawn to dusk and new lighting should not be installed. • We disagree with the proposed parking enhancements around Silver Lake Reservoir. We do not feel traffic was accurately observed due to Covid-19 restrictions and therefore downplays existing traffic patterns. We are concerned no additional ADA parking accommodation has been included. Adding more parking will worsen an already overloaded corridor in our community and is in violation of the city's mobility goals. • The community has voiced a desire for the reservoir complex to be a space for quiet gatherings, communing with nature and exercise. We appreciate the decibel level studies carried out, but those studies do not take into consideration the way sound carries through the "bowl" created by the surrounding hills. Sound may not quite be crossing over the legal threshold, but these reverberations last longer, and carry further at barely acceptable volumes. The Silver Lake Reservoir should not become another city event space, as it will disturb neighbors that live within this reverberant bowl as well as displace wildlife. • The Los Angeles Department of Water and Power (LADWP) is required to maintain the reservoirs for other environmental purposes, including maintaining the dams. An		As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
I-164-9			The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-164-10		I-164-7	Please see Master Response - Funding and Operations and Master Response - Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-164-11		I-164-8	Please see Master Response - Alternatives Analysis.
I-164-12		I-164-9	Please see Master Response - Noise.
I-164-13		I-164-10	The comment expresses support for Alternative 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-164-14			
I-164-15			

I-164 Paul Feldman

COMMENT

RESPONSE

I-164-16 opportunity exists to repurpose a decommissioned drinking water facility in a way that could benefit the community, restore habitats, and provide ecological benefits to ecosystems within the complex. However, SLRC has been designated a Protected Area for Wildlife (PAW) as part of the City's Wildlife Ordinance. Therefore, slow and incremental changes should be implemented rather than wrenching wholesale upheaval proposed in the DEIR. The community deserves a clearer and more decisive EIR and Master Plan. We believe that the missing factor for the project's impact on the community is a direct point of contact for the public to express concerns, ask questions and get real time responses. And, as previously stated, ALL communities in Los Angeles deserve equitable access to recreational and green spaces. Upwards of \$300 million should not be spent on the privileged park-proud community of Silver Lake.

I-164-17 Sincerely,

I-164-18 Silver Lake Neighborhood Council

I-164-19

I-164-11 Please see Master Response - Fence Removal.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

I-164-12 Please see Master Response - Parking/Bike Option.

I-164-13 Please see Master Response - Traffic/Transportation.

I-164-14 Please see Master Response - Traffic/Transportation.

I-164-15 This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Please see Master Response – Noise.

I-164-16 Please see Master Response – Biological Resources (Wildlife Corridors).

I-164-17 Please see Master Response - Community Engagement Process.

I-164-18 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs

I-164 Paul Feldman

COMMENT

RESPONSE

for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-164-19 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The commenter is also referred to Master Response - Funding and Operations.

I-165 Dorcas Tokes

COMMENT

RESPONSE

I-165-1	Adding my appreciation and support for the maintenance of the reservoir perimeter fence as is. The need for security in the last 45 years that I have lived in the same house on Kenilworth Ave., a block from the reservoir shore, has grown, despite any "gentrification" of the neighborhood.	I-165-1	The comment expresses support for maintaining the perimeter fence. Please see Master Response - Fence Removal. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-165-2	We lived near the Luxemburg Gardens in Paris for a while. It is an interesting observation how reluctant the French are to alter, renovate, modernize their traditional urban spaces. So the same wooden toy boats for children are along the banks of the pond, the same rod iron chairs, the same iron wrought entrance gates....and the expectation of this simplicity is infectious...so even tourists love going there... We love the way the meadow is untouched...the water is only for viewing, etc. you get my point.	I-165-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-166 Berkley Johnson

	COMMENT	RESPONSE
I-166-1	Nothing is perfect but I strongly approve of going forward with this plan. Thank you.	I-166-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-167 Paul Feldman

COMMENT

RESPONSE

I-167-1	<p>As a 31-year Silver Lake homeowner living a block from the reservoir, I question the legality of the draft eir process and frankly, of the entire master plan process for the Silver Lake Reservoir complex.</p> <p>The lengthy exercise has been marred by obfuscation, misdirection, lies and failures to follow proper procedures -- all, it appears, for the benefits of political and monied interests that want to develop a so-called "world-class" attraction on what for a century has served as a pristine, beloved community resource both for humans and wildlife.</p>	I-167-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-167-2	<p>Chapter 5.5.1 of the draft eir says that under Alternative 1, the no project alternative, the "fundamental objective of the proposed Project, to repurpose the SLRC as a public park, would not be met." But the ENTIRE master planning process, which came up with this alleged "fundamental objective," never gave residents of the community and other stakeholders the opportunity that so many begged for -- a simple yes or no vote on whether there should be a repurposing project.</p> <p>Rather, city officials and the design team directed meeting-goers at every session on the master plan to choose between various "improvements" to the complex and the mantra they kept repeating was "think big."</p> <p>At no time, even under the protests of speakers at the meetings, was the public ever asked whether it actually wanted a re-purposement of the complex, which already features a meadow, rek center, dog park, walking paths, the dam, the grassy knoll etc. etc.</p> <p>Thus, the eir's fancy-footing language disdaining Alternates 1 is based on an entirely unfounded assumption that there is community support for a massive re-purposement of the complex (for which, I might add, the master plan says the community would then be on the hook to pay for).</p> <p>This comment process has also been conducted in a manner that a court would most surely be bound to dismiss.</p>	<p>I-167-2 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-167-3 The commenter is also referred to Master Response - Community Engagement Process and Master Response - Funding and Operations.</p>
I-167-3	<p>When the draft eir was released and the deadline for submitting comments was set, the document posted by the city did not even contain Chapter 5, which spells out the alternatives to the proposed plan. Thus, early comments were based on an incomplete plan in which people were not afforded alternatives to consider.</p> <p>Then, when the city realized it had a problem, it extended the comment period to December 2. HOWEVER, even as of today (Nov. 28), the 'submit a comment' page on the draft eir link:</p> <p>https://comment-tracker.esassoc.com/silverlake_master/index.html#/27/welcome.</p> <p>STILL says the deadline for submitting comments was Nov. 21.</p>	

I-167 Paul Feldman

	COMMENT	RESPONSE
	Not only that, but the site for submitting comments has been down for unknown periods of time: https://comment-tracker.esassoc.com/silverlake_master/index.html#/27/welcome	
I-167-3 cont.	And not only that, last week, I received an email from the city Bureau of Engineering saying that one of my previous comments was "blank" because "of a technical error." I have since written back twice to ask for the date of the allegedly blank comment so I could resubmit it (since I have sent several comments over the past few weeks). What did I get in reply? Nothing but an automated email with no useful information in regard to my question.	
I-167-4	Please toss out this eir and start the process over. Or just leave the complex alone. Period.	I-167-4 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Master Response - EIR Recirculation Requirements.

I-168 David Shayne

COMMENT

RESPONSE

I-168-1 | This neighborhood can barely handle the traffic as is and the area around the
 I-168-2 | reservoir is already a traffic accident waiting to happen with current use. Plus,
 adding light and noise to a small neighborhood where sound carries is
 unbearable. Please consider options 1 or 3 (personally I support 3). Thank you
 for your time.

I-168-1 | This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.

This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR (for a discussion related to the removal of amplified sound from the proposed Project).

Light would be added to the proposed Project as shown on Figure 2-8 of the Draft EIR and described in Chapter 2, Project Description. All lighting would be shielded and pointed away from the surrounding neighborhood or wildlife areas.

The comment is noted for the record and will be forwarded to the decision-makers for consideration.

I-168-2 | The comment expresses support for Alternatives 1 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-169 David Shayne

	COMMENT	RESPONSE
I-169-1	<p>This neighborhood can barely handle the traffic as is and the area around the reservoir is already a traffic accident waiting to happen with current use. Plus, adding light and noise to a small neighborhood where sound carries is unbearable. Please consider options 1 or 3 (personally I support 3). Thank you for your time.</p>	<p>I-169-1 The comment expresses support for Alternatives 1 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-170 Dan Gershon

COMMENT

RESPONSE

- I-170-1 | I'm a 35 year resident of Silver Lake and I am against having a "global tourist destination " in our quiet neighborhood.
- I-170-2 | This project will transform the area negatively. Parking and trash are but a few of the negative impacts on the reservoir and surrounding areas.

I-170-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-170-2 As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option. Also, please see Master Response - Traffic/Transportation.

As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-171 Joseph Hankins

	COMMENT	RESPONSE
I-171-1	Thanks to everyone for all of the work on this. I fully support the master plan that we developed through two years of community outreach and consensus building. I'm ready for us to get to work transforming the reservoir into a space for wildlife and for humans to enjoy together.	I-171-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-172 Guy Vidal

COMMENT

RESPONSE

I-172-1 | We'd like to see an annual
1. crossing of the lake swimming event
2. Mini sail boat regata
Once per year that's all.
Would be super exciting.
Thank you

I-172-1 | The proposed Project, described in Chapter 2 of the Draft EIR, would not include swimming or water use. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-173 Geoffrey Lower

	COMMENT	RESPONSE
I-173-1	<p>My fear is that the DEIR will be approved by the City of Los Angeles, against the wishes of the local community, and construction funds will be initiated by an already financially strapped city. Once draining and demolition have begun and funds dry up, the Melli Roos that is buried in the DEIR will be brought up for a vote. It is like asking the patient to pay for surgery after opening them up but before the operation is begun. If this project were brought up for a vote NOW, as opposed to after it has been sprung, the vote would be overwhelmingly against.</p>	<p>I-173-1 The comment expresses opposition and concern regarding funding for the proposed Project. Please see Master Response - Funding and Operations for a discussion on potential funding sources for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-174 Maegan Houang

COMMENT

RESPONSE

I-174-1

I am a Silverlake resident and I strong support moving forward with the Master Plan. The three alternatives to the Master Plan considered in the DEIR undermine the community's goals identified during the planning process.

If we do nothing to the reservoirs, we are doing ourselves and our wildlife a disservice.

Please go forward with the Master Plan.

Thank vou.

I-174-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-175 Johnny Wahba

	COMMENT	RESPONSE
I-175-1	<p>I strongly support moving forward with the master plan for the following reasons.</p> <p>1. The community strongly supports moving forward with the Master Plan, which reflects the consensus reached at the culmination of a comprehensive two-year planning process.</p> <p>The three alternatives to the Master Plan considered in the DEIR each fall short of the goals the community identified during the planning process.</p> <p>2. Doing nothing to the Reservoirs would have severe negative impacts on our community and on our wildlife. The community strongly supports moving forward with the Master Plan, which reflects the consensus reached at the culmination of a comprehensive two-year planning process.</p> <p>3. The three alternatives to the Master Plan considered in the DEIR each fall short of the goals the community identified during the planning process.</p> <p>4. Doing nothing to the Reservoirs would have severe negative impacts on our community and on our wildlife.</p>	<p>I-175-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-176 Mike Pessah

COMMENT

RESPONSE

I-176-1 | As a long time (15 years!) Silver Lake resident and homeowner, I support this plan. Thank you for all the hard work that went into this thoughtful and aesthetically pleasing design.

I-176-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-177 Jason Mcdade

		COMMENT	RESPONSE
I-177-1	Whatever is created needs to have a tasteful fence around it like the do at LACMA with park hours clearly stated and no overnight camping	I-177-1	Please see Master Response - Fence Removal. In addition, as described in Project Description, Section 2.5.3 of the Draft EIR, the proposed park hours would be from 5:00 a.m. to 10:30 p.m. The proposed Project, described in Chapter 2 of the Draft EIR, would not permit overnight camping. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-178 Louise Steinman

		COMMENT	RESPONSE
I-178-1	I-178-1	It looks to us like a fait accompli/inside job to foist this SLMP on the community and the City; no matter the seriousness of the objections already submitted at public meetings.	I-178-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-178-2	I-178-2	As 26 year neighborhood home-owners (located a block from the reservoir), we initially enthusiastically supported the study and conceptual plan to improve wildlife protection and public access. We attended meetings, submitted surveys, went on open house tours. Missing from that study until VERY recently, when we reviewed the DEIR, were details and discussion of the multi-dimensional impact upon the neighborhood during the prolonged construction phase: noise, traffic, construction parking, the duration itself; wildlife displacement, etc.	I-178-2 This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.
I-178-3/178-4	I-178-3	Especially concerning is that the DEIR (LADOT) states traffic would be a 'no impact' issue resulting from the project. We all know that is LUDICROUS, especially given that the DEIR allows public events drawing 600 people, allowed 12x a year. We have no confidence that these events would be well monitored. We are STRONGLY against this.	I-178-3 This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
I-178-6	I-178-4	As has been said, this neighborhood is not lacking in recreational amenities. (The Meadow; the LA River bike path; Griffith Park, for goodness sake.) We also have serious social issues—homelessness being a top priority. The objectives of the current plan require a process and dictate an outcome that will radically diminish the quality of life and character of this neighborhood for the significant future. (probably the duration of our lives here.) We are firmly opposed to the plan DEIR under consideration and endorse alternatives #1 and #3.	I-178-4 This comment expresses concern for construction parking and duration. As described in the Project Description, Section 2.6.2, it is assumed that all staging of materials and vehicles would be accommodated within the SLRC, and no on-street parking would be impacted for construction of the proposed park zones within the SLRC. Construction of offsite improvements would require partial road closures and equipment may be staged near the proposed work areas along Silver Lake Boulevard and West Silver Lake Drive, as needed.
I-178-8		Together with our neighbors (both homeowners and renters alike) on Earl Street, we have fought long and hard to reduce the cut-through traffic on our narrow street. What remains out of our control is frequent overweight truck traffic. Without this issue being addressed in the DEIR, we can only expect this situation to worsen should the plan go forward.	
I-178-9		Thank for considering my comments. I will be deeply disheartened if, in spite of wide community push-back, this plan is rammed through.	
I-178-10			As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of the analysis in the Draft EIR, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. For the purposes of the environmental analysis, the 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. Table 2-3 of the Draft EIR lists total construction durations for each proposed park zone if constructed individually as funding becomes available. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, the comment is noted and no changes to the Draft EIR are required in response to this comment.
I-178-11			
I-178-12			
I-178-13			

I-178 Louise Steinman

Louise Steinman
2414 Earl Street
Los Angeles, CA 90039

COMMENT

RESPONSE

- I-178-5 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
- I-178-6 This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
- I-178-7 The comment expresses opposition to special events that would occur under the proposed Project. As discussed in the Project Description, Section 2.5.6 of the Draft EIR, during special events, a special events permit from the City would be obtained and would require shuttles be available to the Project site if deemed necessary. Multimodal transportation would be encouraged through the inclusion of mobility hub elements such as bikeshare and drop-off locations for ride share services. Also, as outlined in Section 2.5.8 of the Draft EIR, PDF-PS-2, would include security lighting for nighttime events and PDF-TRA-5, would include the development of a site-specific traffic control plan.
- This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-178-8 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-178-9 Please refer to Section 3.13, Population and Housing of the Draft EIR, for a discussion on homeless strategies within the City. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-178-10 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-178 Louise Steinman

COMMENT

RESPONSE

- I-178-11 The comment expresses support for Alternative 1 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-178-12 As outlined in the Project Description, Section 2.5.8 of the Draft EIR, PDF-TRA-1: would require the development of a Construction Traffic Management Plan prior to the start of construction. In addition, as shown on Table 2-11, a haul route permit would be obtained from the City of Los Angeles, Department of Building and Safety. Also, please see Master Response - Traffic/Transportation. The comment is noted and will be forwarded to the decision-makers for consideration.
- I-178-13 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-179 Louise Steinman

COMMENT

RESPONSE

To Engineering Dept: It looks to us like a fait accompli/inside job to foist this SLMP on the community and the City; no matter the seriousness of the objections already submitted at public meetings.

I-179-1 Please see response to Comments I-178-1 through I-178-13

As 26 year neighborhood home-owners (located a block from the reservoir), we initially enthusiastically supported the study and conceptual plan to improve wildlife protection and public access. We attended meetings, submitted surveys, went on open house tours. Missing from that study until VERY recently, when we reviewed the DEIR, were details and discussion of the multi-dimensional impact upon the neighborhood during the prolonged construction phase: noise, traffic, construction parking, the duration itself (180 months??); wildlife disturbance, etc.

Especially concerning is that the DEIR (LADOT) states traffic would be a 'no impact' issue resulting from the project. We all know that is LUDICROUS, especially given that the DEIR allows public events drawing 600 people, allowed 12x a year. We have no confidence that these events would be well monitored.

I-179-1

As has been said, this neighborhood is not lacking in recreational amenities. (The Meadow; the LA River bike path; Griffith Park, for goodness sake.) We also have serious social issues—homelessness being a top priority. The objectives of the current plan require a process and dictate an outcome that will radically diminish the quality of life and character of this neighborhood for the significant future. (probably the duration of our lives here.) We are firmly opposed to the plan DEIR under consideration and endorse alternative #3.

Together with our neighbors (both homeowners and renters alike) on Earl Street, we have fought long and hard to reduce the cut-through traffic on our narrow street. What remains out of our control is frequent overweight truck traffic. Without this issue being addressed in the DEIR, we can only expect this situation to worsen should the plan go forward.

Thank for considering our comments. We will be deeply disheartened if, in spite of wide community push-back, this plan is rammed through.

Louise Steinman
2414 Earl Street
Los Angeles, CA 90039

I-180 Lloyd Hamrol

COMMENT

RESPONSE

	<p>It looks to us like a fait accompli/inside job to foist this SLMP on the community and the City; no matter the seriousness of the objections already submitted at public meetings.</p>	I-180-1	<p>Please see Master Response - Community Engagement Process.</p>
I-180-1	<p>As 26 year neighborhood home-owners (located a block from the reservoir), we initially enthusiastically supported the study and conceptual plan to improve wildlife protection and public access. We attended meetings, submitted surveys, went on open house tours. Missing from that study until VERY recently, when we reviewed the DEIR, were details and discussion of the multi-dimensional impact upon the neighborhood during the prolonged construction phase: noise, traffic, construction parking, the duration itself (180 months??); wildlife disturbance, etc.</p>		<p>This comment expresses concern regarding noise, traffic, and wildlife impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
I-180-2	<p>Especially concerning is that the DEIR (LADOT) states traffic would be a 'no impact' issue resulting from the project. We all know that is LUDICROUS, especially given that the DEIR allows public events drawing 600 people, allowed 12x a year. We have no confidence that these events would be well monitored.</p>		<p>As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. For the purposes of the environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.</p>
I-180-3	<p>As has been said, this neighborhood is not lacking in recreational amenities. (The Meadow; the LA River bike path; Griffith Park, for goodness sake.) We also have serious social issues—homelessness being a top priority. The objectives of the current plan require a process and dictate an outcome that will radically diminish the quality of life and character of this neighborhood for the significant future. (probably the duration of our lives here.) We are firmly opposed to the plan DEIR under consideration and endorse alternative #3.</p>		
I-180-4			
I-180-5	<p>Together with our neighbors (both homeowners and renters alike) on Earl Street, we have fought long and hard to reduce the cut-through traffic on our narrow street. What remains out of our control is frequent overweight truck traffic. Without this issue being addressed in the DEIR, we can only expect this situation to worsen should the plan go forward.</p>		<p>The comment is noted for the record and will be forwarded to the decision-makers for consideration.</p>
I-180-6	<p>Thank for considering our comments. We will be deeply disheartened if, in spite of wide community push-back, this plan is rammed through.</p> <p>Lloyd Hamrol 2414 Earl Street Los Angeles, CA 90039</p>	<p>I-180-2</p> <p>I-180-3</p>	<p>Please see Master Response - Traffic/Transportation.</p> <p>The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.</p> <p>As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that</p>

I-180 Lloyd Hamrol

COMMENT

RESPONSE

repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to enhance the SLRC to become beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-180-4 Please see Master Response - Homelessness.

The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-180-5 Please see Master Response - Traffic/Transportation.

I-180-6 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-181 Leo Malek

COMMENT

RESPONSE

I-181-1 | My family and I are extremely excited to welcome the changes highlighted in the Master Plan. These modifications would have a massive positive impact on the community as well as the wildlife we are keen on preserving. The Master Plan is an immense benefit to Silver Lake residents and we cannot wait to enjoy the improvements to our jewel.

I-181-1 | The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-182 Brent Butler

	COMMENT	RESPONSE
I-182-1	<p>My family and the community strongly support moving forward with the Master Plan, which reflects the consensus reached at the culmination of a comprehensive two-year planning process. We spent a lot of time getting a plan the vast majority of the community is behind.</p> <p>The three alternatives to the Master Plan considered in the DEIR each fall short of the goals the community identified during the planning process.</p> <p>Doing nothing to the Reservoirs would have severe negative impacts on our community and on our wildlife.</p> <p>The Master Plan provides real benefits, with only minimal temporary impacts limited to the construction process itself.</p>	<p>I-182-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-183 Jennifer Stoller

COMMENT

RESPONSE

I-183-1	<p>As a lake facing resident I am extremely concerned about the impacts the DEIR identifies as "not less than significant effect." Here are a few of the many concerns I have:</p>	I-183-1 This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Also, please see Master Response - Noise.
I-183-1	<p>1. I am particularly concerned about the lasting sound in the bowl that we call SilverLake. As it stands from across the lake we hear illegal nighttime gathering on the meadow. Even a few drums can be heard well into the night. The thought of open fences and 600 person events is horrifying. Not to mention the impact on the resting wildlife.</p>	I-183-2 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources.
I-183-2	<p>2. An additional concern is the original masterplan's construction impact on the birds and wildlife in our area. I do not believe the data in the DEIR even touches on the depth of effects. Having lived here for 20 years I can tell you that each time we have human activity (construction) we lose birds/animals. For example, we no longer have the blue heron habitat in the Eucalyptus grove in front of our house (lost with the bypass line). The meadow knocked out the ground squirrels and rabbits and coyote habitat, the coyotes now roam the streets on the hills being fed by humans.</p>	I-183-3 The comment expresses support for Alternatives 1 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-183-3	<p>Short of having NO masterplan (Alternative 1).... Alternative 3 with the addition of NO BUILT STRUCTURES and elevated trails is the ONLY solution that minimizes the impact and is the best environmentally responsible solution!</p>	

I-184 Adam Kopald

	COMMENT	RESPONSE
I-184-1	<p>The city of Los Angeles is notoriously park poor. The Silver Lake Master Plan, as finalized, will allow generations of Angelenos to appreciate this tranquil spot, rich in wildlife and beauty, and will provide much needed recreational and educational opportunities. Lets push past the NIMBYS and the naysayers and give L.A. a park amenity that will serve the entire Northeast of the city for years and years to come. Please, approve the Master Plan without delay!</p>	<p>I-184-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-185 Khoi Pham

COMMENT

RESPONSE

I-185-1	<p>Observation #1:</p> <p>I have been attending community meetings and hearing how the utmost objective of the development of the SL Reservoir per the Master Plan is to make sure it addresses equity and inclusion. Ironically, this fervor and dismissive push for the Master Plan is in fact sowing division, stirring problems, provoking and agitating, and pitting neighbors against one another. I would say that if we step back from the brink of development fervor and hysteria, and respect the SL Reservoir as-is, the SL Reservoir is actually already in its most equitable state of access to all. Currently, anyone and everyone is able to walk, jog, wheelchair, relax, observe, meditate, engage. This equitable state is achieved regardless of race, creed, lifestyle (active or passive), social economic group, zip code of residence, left or right of the political spectrum, preservationist/development minded. I urge the BOE to scrap the Master Plan and bring harmony back to the community that was unnecessarily riled.</p>	I-185-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-185-2	<p>Observation #2</p> <p>At a time when throughout the city fencings are going up to protect and maintain the peace and safety of public spaces, for example:</p> <ol style="list-style-type: none"> The underpass of the 101 Freeway on Silver Lake Blvd The underpass of SUNset on Silver Lake Blvd The entire Echo Park Lake The median at the corner of Duane and Glendale Blvd The list goes on and on <p>We yet unwisely are taking steps back to the future to remove the current fence around the SL Reservoir. Please remember it's a lot easier to break something than it is to put back together. Don't break up this neighborhood.</p>	I-185-2 The proposed Project would include the removal of the perimeter fence (see Master Response - Fence Removal) and would also include the preparation of a Security Plan (see Master Response - Public Safety).
I-185-3	<p>Observation #3</p> <p>We must learn from our previous errors in decision and judgment. Case in point, when the Silver Lake meadow parklet was opened on the Northeast end of the SL reservoir, the developer soon after quickly disappeared along with all the grand opening fanfare. The hard work of follow-up has fallen on the residents of the community to undo the damage caused by the opening of the parklet, to maintain the quality of life and safety for the resident. These actions have included:</p> <ol style="list-style-type: none"> Installing no overnight 2AM-6AM parking sign Enforcing no large campers overnights Citing illegal vendors that pop up in the area without operating and Dept of Health permit Installing signs to remind violators of the Meadows rules <p>The LAPD statistics for the Meadows bring facts and reality to wishful thinking. Why would we ignore history and let history repeat itself? It is not common sense. Doing the wrong thing once is shame on you, doing the wrong thing again a second time is shame on us!</p>	<p>I-185-3 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.</p> <p>The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. See also, Master Response - Public Safety. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-186 John Kerr

		COMMENT	RESPONSE
I-186-1	The park is beautifully designed here, but one element I wish was included was swimming opportunities in the lake. Additionally, I think the bi-directional bike lane element on Silver Lake BLvd needs to be re-thought. If only between Duane and Armstrong, the process of moving from the northbound, east side bike lane to the westside bi-directional lane, will add time and stress to cyclists using this heavy commuter route and result in more cyclists riding in mixed traffic. Ideally, instead of Option 1 with extra parking, you should have the bi-directional lane so park users can cycle closer to the park on the west side of SLB while bike commuters can maintain a northbound bike lane along the eastside of SLB.	I-186-1	The proposed Project, described in Chapter 2 of the Draft EIR, would not include swimming. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-186-2		I-186-2	Please see Master Response - Parking/Bike Option.

I-187 D Mcarthur

COMMENT

RESPONSE

I-187-1

The East Narrows overlook at Chapter 5.2.4 of the Master Plan is to be positioned "over the water and above a habitat island" but that seems a recipe for direct public access to that island -- even with fencing in place on the overlook. That juxtaposition, together with the flimsiness of the overlook bridge fencing shown in View C page 161, would be entirely self-defeating for preserving habitat. Please ask your engineers to create a decent separation between the publicly accessible overlook itself and the adjacent habitat island.

I-187-1

The comment is a general opinion and does not address a specific aspect of the adequacy or completeness of the Draft EIR. No further response is necessary.

I-187 D Mcarthur

COMMENT

RESPONSE

I-187-2 This is a portion of a figure from the Master Plan. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-187-2



I-188 Jennifer Stoller

COMMENT

RESPONSE

I-188-1

Additional note: I would like to point out that this master plan was forced upon us. The direct neighbors were NEVER asked if we want a "master plan" and when one appeared it was designed around someone's idea of what the entire neighborhood desired. The confusion process of surveys and meetings were misleading. We were only ever asked what part of each plan we wanted, not if we wanted one, or better yet... a choice of plans/ideas with scaling environmental impact.

As a 30 year long environmental graphic designer, who deals with architectural plans daily, even I was confused by the way this information was presented to the community. It is a shame that this has been an incredibly poorly run project. It could have been a uniformly embraced improvement on the existing property if it was handled better.

What do the neighbors want? (there was an informal 100 person sampling of a door to door survey submitted to Ru) - - - Change the fence to something beautiful and wildlife friendly (do not remove it or we will have Echo Park 2.0)

- clean up the paths and add an elevated overlook area or two
- remove dying trees
- add native plants/grasses and a responsible water recapture irrigation plan
- leave the newly renovated rec center as is. It was just improved and has served the larger community perfectly for the last 20 + years.
- spend the surplus on under service communities in los angeles.

I-188-1

Please see Master Response - Community Engagement Process. The comment lists desired project components. The proposed Project is described in Chapter 2 of the Draft EIR. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-189 Andrew Foster

	COMMENT	RESPONSE
I-189-1	<p>The community strongly supports moving forward with the Master Plan, which reflects the consensus reached at the culmination of a comprehensive two-year planning process.</p> <p>The three alternatives to the Master Plan considered in the DEIR each fall short of the goals the community identified during the planning process.</p> <p>Doing nothing to the Reservoirs would have severe negative impacts on our community and on our wildlife.</p> <p>The Master Plan provides real benefits, with only minimal temporary impacts limited to the construction process itself.</p>	<p>I-189-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-190 Kabir Akhtar

COMMENT

RESPONSE

I-190-1

About the Meadow:

The "ornamental gardens" is a mistake - do not add it. The meadow's popularity since day 1 is mostly due to its wide open space — the neighborhood's backyard.

According to the Project Description, you plan to take the existing 3.4 acre Meadow and expand it to 7.5 acres (which is good!) — but then you replace 1.5 acres of the very popular current flat grassy area with gardens which feature "a series of depressions in the ground", and which are illustrated in Figure 2-6 as not suitable for anyone to sit or play on.

So while the "Silverlake Lawn" and the "Great Lawn" serve this function, please consider leaving the entirety of the Meadow as usable open grassy space, where the neighborhood has gathered for a decade.

I-190-1

The comment requests that ornamental gardens not be added to the Meadow. As described in Project Description, Section 2.5.1 of the Draft EIR, the gardens would be a mix of native and regionally adapted water-wise (drought-tolerant) plants with an emphasis on attracting pollinator species. Within the gardens, there would be a series of depressions in the ground to function as rain collectors during rain events. Adjacent to the gardens would be picnic grove spaces lined with design elements such as berms and depressions that offer spaces for gathering and play.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-191 Jeff Carr

I-191-1 | The Master Plan looks great! Let's implement it!

COMMENT

I-191-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-192 Robert Soderstrom

COMMENT

RESPONSE

I-192-1 I enthusiastically endorse the proposed plan of the Master Plan! The EIR process has been level and fair and I believe all issues of concern have been properly addressed by the city in DEIR. Members of our community voted repeatedly in surveys to elect features they'd like to see in the Master Plan, and the city has done an excellent job studying those features in this DEIR. thank you for your work.

I-192-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-193 Laurien Alexandre

	COMMENT	RESPONSE
I-193-1	<p>We have lived one block off the Reservoir, on Armstrong Ave. for over 25 years. We are not supportive of this master plan --- the time involved feels way too long and a tremendous burden on the neighborhood. The parking problems and other related issues feel very difficult. We would like space opened for more people to walk and sit and enjoy the grounds. But beyond that, we do not supportive expansive growth plan.</p>	<p>I-193-1 Please see Master Response - Traffic/Transportation regarding parking and traffic impacts.</p> <p>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-194 Joy Boyajian

COMMENT

RESPONSE

I-194-1 I believe that protection of the ecosystem and nature should be the priority. We've already seen the changes with the building happening in Silverlake and the displacement of animals. I no longer see skunks, possums and raccoons like I used to but am seeing more brazen coyotes and rodents with the changes. Having gone to all the meetings, I do agree it seemed like there was an under current agenda that was pushed through and not what I heard people say. I'm not opposed to changed but it must be by the people and for the people especially the residents who will live with the consequences. And reviewed and approved by an independent wildlife preservation group. Thank you.

I-194-2

I-194-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-194-2 Please see Master Response - Community Engagement Process. This comment does not raise any issues with content and adequacy of the Draft EIR and is noted for the record.

I-195 Joy Boyajian

	COMMENT	RESPONSE
I-195-1	<p>I believe that protection of the ecosystem and nature should be the priority. We've already seen the changes with the building happening in Silverlake and the displacement of animals. I no longer see skunks, possums and raccoons like I used to but am seeing more brazen coyotes and rodents with the changes. Having gone to all the meetings, I do agree it seemed like there was an under current agenda that was pushed through and not what I heard people say. I'm not opposed to changed but it must be by the people and for the people especially the residents who will live with the consequences. And reviewed and approved by an independent wildlife preservation group. Thank you.</p>	<p>I-195-1 Please see response to Comment I-194.</p>

I-196 Marsian De Lellis

COMMENT

RESPONSE

I-196-1	I am in support of the proposed improvements to the Silver Lake reservoir. I only wish that there could be a community pool with a sauna. I hope there will be bike lanes with physical barriers and self cleaning restrooms. I'd like the sidewalks to be fixed and ADA compliant so that the area can be accessible to more people. We could also get rid of some parking and make dedicated bus lanes so that residents of other neighborhoods can have better access to our park. I hope that we can figure out how to better share our park with others.	I-196-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-196-2		I-196-2	The proposed Project, described in Chapter 2 of the Draft EIR, would not include a pool or self-cleaning restrooms. The proposed Project would include the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-196-3		I-196-3	The proposed Project is described in Chapter 2 of the Draft EIR. In addition, as outlined in PDF-TRA-6 states that the future site operator and City departments will work together to explore options to expand public transit connection to the Project site. The comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-197 Janice Tanaka

I-197-1 | Follow the Money
who is really profiting by creating this environmental disaster?
I love this area and visit often
please don't let anyone destroy it.

COMMENT

I-197-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-198 Jackson George

COMMENT

RESPONSE

I-198-1 | Fully support this plan. It's such a great opportunity to re-naturalize the reservoir and to make it a real point of pride for the neighborhood and the city.

I-198-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-199 Debbie Slater

COMMENT

RESPONSE

I-199-1	<p>This is my additional comment. I have had more time to review the DEIR and I don't think it accurately describes the environmental impacts to the SLRC of the PROPOSED master plan. In specific, it does not accurately show traffic impacts, wildlife/nature impacts during construction or from removing the fence. There is no reference to air quality which will be greatly affected from construction and long term increased traffic. The other main street, West Silver Lake Blvd, was not included in traffic study nor were any side streets. Our streets are too narrow to absorb an increase of 380+ visitors a day. Our community has held several meetings regarding the DEIR and the majority feel this report has some huge holes. I urge you to continue to sturdy before submitting to the city.</p>	I-199-1	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
I-199-2			
I-199-3			
I-199-4			
I-199-5			This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-199-6			
		I-199-2	This comment expresses concern regarding impacts to wildlife during construction. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
		I-199-3	Please see Master Response - Fence Removal.
		I-199-4	This comment expresses concern regarding air quality impacts during construction and operation. Impacts related to air quality are analyzed in Section 3.3, Air Quality of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
		I-199-5	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR, and the supporting Traffic Impact Assessment included as Appendix K of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.
		I-199-6	The comment expresses that the Draft EIR analysis is missing information. This comment does not raise any direct issues with respect to the content of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-200 Christopher Covella

COMMENT

RESPONSE

<p>I-200-1</p> <p>I-200-2</p> <p>I-200-3</p>	<p>Hello,</p> <p>I am a third generation resident and the traffic in my street Duane that acts as a passthrough from the 2 freeway and the reservoir at Silverlake blvd is a parking lot mornings, evenings, and especially on weekends all day and night.</p> <p>It's so bad that I can't pull in or out of my driveway without having an awkward confrontation with those blocking the way. They honk their horns, toss their trash from the window of the car, and occasionally urinate on the street or people's yards because the traffic is so congested.</p> <p>The negative impacts of construction, the years of disturbance, and when finished, the increased daily noise, crowds, traffic, and harm to our wildlife are not worth moving forward with the master plans that have been proposed.</p> <p>If I supported an alternative it would be #3.</p> <p>Thank you,</p> <p>Chris Covella</p>	<p>I-200-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Master Response - Parking/Bike Option.</p> <p>I-200-2 This comment addresses various construction impacts. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.</p> <p>As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.</p> <p>Please see Master Response - Noise.</p> <p>The commenter is also referred to Master Response -Traffic/Transportation.</p> <p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>I-200-3 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
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I-201 Louis Guin

COMMENT

RESPONSE

I-201-1 | Please, do NOT remove the perimeter fence. this is vital for the safety our neighborhood.

I-201-1 Please see Master Response - Fence Removal.

I-202 Simon Miller

COMMENT

RESPONSE

I-202-1 | Strongly support implementation of the master plan as soon as possible.

I-202-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-203 Elizabeth Bougart-Sharkov

COMMENT

RESPONSE

<p>I-203-1</p> <p>I-203-2</p> <p>I-203-3</p> <p>I-203-4</p> <p>I-203-5</p>	<p>November 30, 2022 Re: PROPOSED SILVER LAKE RESERVOIR MASTER PLAN</p> <p>Dear LA BoE and LA DPW Officers: As a longtime resident in Silver Lake, I am taking the liberty to write and bring to your attention an opinion I share with most of the Silver Lake Residents. We feel very strongly about any possible intervention projects affecting the Reservoir Grounds and the adjacent residential neighborhoods. Here is my input and I hope it will be taken under consideration:</p> <p>The Meadow:</p> <ul style="list-style-type: none"> • Expend ornamental and rain gardens. • No Education Center seating terraces, informal play area, or floating docks! <p>I-203-3</p> <ul style="list-style-type: none"> • No special events to be held over there. The area needs to retain its passive recreation character! <p>The Knoll:</p> <ul style="list-style-type: none"> • Remove damaged or dying trees only. • Reduced tree succession plan tree planting. • None of the proposed shade structures, trails and seating terraces installed. • No additional new lighting! <p>Ivanhoe Reservoir:</p> <ul style="list-style-type: none"> • None of the features would be implemented • No new lighting! It will harmfully interfere with the adjacent residential homes. <p>The Eucalyptus Grove:</p> <ul style="list-style-type: none"> • Remove damaged or dying trees only. • Reduced tree succession plan tree planting. • No overlook, seating terraces, or habitat fences • Move promenade away from the water edge. • Preserve the existing and unique wildlife habitat. • No new lighting to interfere with the blue heron nests. <p>The East and West Narrows:</p> <ul style="list-style-type: none"> • Leave it the way it exists now! No features to be implemented! • No new lighting. <p>Pg. 2 - PROPOSED SILVER LAKE RESERVOIR MASTER PLAN</p>	<p>I-203-1 The comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-203-2 The comment expresses opposition to the ornamental and rain gardens. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-203-3 The comment expresses opposition to specific components of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-203-4 The comment notes Project components they would like to see implemented, removed, or modified from the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-203-5 The comment notes Project components they would like to see implemented, removed, or modified from the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
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I-203 Elizabeth Bougart-Sharkov

COMMENT

RESPONSE

I-203-5 Cont.	<p>The South Valley:</p> <ul style="list-style-type: none"> • Updates to the Rec. Center – yes. • Minor update to Dog Park. • Add new trees. • No new features. • Improve the existing lighting. <p>Habitat Islands:</p> <ul style="list-style-type: none"> • No fish in the Reservoir. • Preserve existing wildlife populated areas by using nonobstructive methods. Preservation of the wildlife must be PRIORITY! <p>Other Improvements:</p> <ul style="list-style-type: none"> • No extra parking on the periphery of the Reservoir! Traffic as it is now is heavy enough. • Maintain the existing fence. • No nighttime access – open from dusk to dawn! <p>Thank you for your considerations!</p>	I-203-6 Please see Master Response - Traffic/Transportation.
		I-203-7 Please see Master Response - Fence Removal.
		I-203-8 This comment is conclusory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-203-8	<p>Sincerely, Elizabeth Bougart-Sharkov, Intl. Assoc. AIA /Former SLNC Board Member & Chair SLNC Urban Design & Preservation Committee/</p> <p>3040 Silver Lea Terrace Los Angeles, Ca 90039 323.662.4741</p>	

I-204 Martin Gottlieb

		COMMENT	RESPONSE
I-204-1	I'm SO against this. I've lived in Silver Lake since 1986. I've gone through the necessary disruption of new water piping. We needed that. We do not need another recreational park area and all the construction/disruption/congestion that comes with it.	I-204-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-204-2	Griffith Park and Echo Park Lake are easily accessible, open to all and convenient. Renovating the rec center might have merit, but any other money might be better suited to expand parks in communities that don't have such easy access to outdoor recreational spaces.	I-204-2	Please see Master Response - Funding and Operations for a discussion related to Project funding. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-205 Julia Grant

COMMENT

RESPONSE

I-205-1 | Please resist doing anything to our Silver Lake Reservoir. You will only disturb the wildlife environment and ecosystems as well as the viability of the neighborhood..

I-205-1 The comment expresses opposition to the proposed Project and concern for the wildlife environment. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-206 Frederick Silny

	COMMENT	RESPONSE
I-206-1	<p>SUPPORT FOR ALTERNATIVE 3</p> <p>My name is Frederick G. Silny and I have lived in Silver Lake with my family since 1980 and in my current home at 2247 West Silver Lake Drive since 1986.</p> <p>I have reviewed the DEIR and taken part in many community meetings regarding the planned development of the reservoir.</p> <p>After careful deliberation, I support Alternative 3.</p> <p>Alternative 3 accomplishes the primary objective of the project - "Create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character."</p> <p>Alternative 3 would repurpose, preserve and enhance the reservoir, but with a priority to preserve open space for wildlife and limit public access to the facility.</p> <p>Alternative 3 is focused on improving/maintaining current habitat values in much of the park, while maintaining some recreational features in the South Valley.</p> <p>Alternative 3 avoids significant environmental impacts by reducing construction impacts and by eliminating the significant and unavoidable impact associated with operational noise during permitted special events at the SLRC.</p> <p>Alternative 3 avoids many other environmental problems inherent in the "larger" project such as -</p> <ul style="list-style-type: none">• a lack of perimeter fencing which impacts wildlife and public safety,• greatly increased traffic and visitors and the inevitable negative environmental impact,• construction that goes on for years and the significant and unavoidable impact,• and many other environmental issues. <p>I hope that you will take my thoughts into account as you evaluate the DEIR and that you will support Alternative 3.</p> <p>Sincerely,</p> <p>Frederick G. Silny</p>	<p>I-206-1 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-207 Dana Duff

COMMENT

RESPONSE

I-207-1 | I live in the neighborhood and am very concerned about the impact on traffic—Silver Lake Boulevard is already severely backed up every morning and evening.

I-207-1 | Please see Master Response - Traffic/Transportation.

I-207-2 | Please see Master Response - Fence Removal.

I-207-2 | I'm also very concerned about the negative effect the construction and removal of the fence will have on wildlife. It sounds like the environmental impact evidence is being minimized.

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-207-3 | We are happy with the way the lake and parks are now.
Thank you.

I-207-3 | The comment expresses opposition to the proposed Project. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-208 Molly Siple

	COMMENT	RESPONSE
I-208-1	<p>Until 2 years ago when I sold my house I lived at 2178 Moreno Drive in the house my step-father built in 1934. I do live north now, but my heart is still in Silverlake. As one of the original residents of the neighborhood, the plans for developing the lake in the way described is particularly sickening. This oasis, the visual retreat we all enjoyed, and where we welcomed those who lived elsewhere, may very likely be altered both in character and certainly function. forever. Remove the fence and add islands, fish, restrooms and we have a public park in a time when bird flyways are being disrupted and the homeless need places to camp. The lake has always been a blessed presence within Silverlake, but never meant to be an activity center. Again, the changes proposed are sickening.</p>	<p>I-208-1 The comment expresses opposition to the proposed Project. This comment expresses concern regarding impacts to visual resources, wildlife, and homelessness. Please see Section 3.1, Aesthetics and Section 3.4, Biological Resources of the Draft EIR. Please see Master Response – Homelessness.</p>

I-209 Linden Waddell

COMMENT

RESPONSE

I-209-1	Hello, I have lived in wonderful Silver Lake for almost 40 years. I am a homeowner and business owner in Silver Lake and live on the east side of the reservoir. Regarding the Draft EIR, I vote for ALTERNATIVE 1 - NO PROJECT.	I-209-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-209-2	Here are my reasons: 1) The reservoir is one of the last PASSIVE, SERENE places left in this busy city. THAT is already a huge resource, enjoyed by so many, including EXISTING PARK FACILITIES: the Silver Lake walking paths, neighborhood recreation center, 2 dog parks, basketball court, playground and The Meadow (its crowding and lack of parking notwithstanding); not to mention the VIEW and the ability to enjoy the PASSIVE space. No need to 'entertainment-ize' the space!	I-209-2 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-209-3	2) Silver Lake already HAS an abundance of riches in regard to parkland in our area. In addition to the above, in zip code 90039 there's Tesla Pocket Park, Sunnynook River Park, Glenhurst Park, North Atwater Park, Bond Park, Red Car River Park, Marsh Street Nature Park, Chevy Chase Park, Rattlesnake Park, Elysian Valley Gateway Park. In zip code 90026: Echo Park, Bellevue Recreation Center, Laurel and Hardy Park, Rockwood Community Park, Elysian Park Section 6. Within a few miles we also have the LA River if we want bike paths and kayak rides; and, for goodness' sake, Griffith Park - that offers practically everything under the sun. Public parks and improvements should be championed in less-fortunate areas of the city. This EXPENSIVE PROJECT is just NOT necessary!	I-209-3 Please see Master Response - Funding and Operations. The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-209-4	3) We are a NEIGHBORHOOD - not a commercial zone - not created to support this kind of activity - why turn a residential area into Disneyland?	I-209-4 The comment described existing conditions. Impacts related to traffic, parking and noise as they relate to the proposed Project can be found in Sections 3.12, Noise and Vibration, and 3.16, Transportation (see also Master Response - Traffic/Transportation). This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-209-5	4) People point to The Meadow as a triumph. Perhaps on a serene Tuesday. But on the weekends and holidays, I beg to disagree. As someone who lives on the east side of the reservoir (just ½ block up from the meadow), the TRAFFIC, PARKING and NOISE are sometimes unbearable. And that's when it's being used appropriately. "Bad actors" further misuse the space, bringing alcohol, trespassing after hours, holding numerous for-profit activities, blaring amplified music, bringing their dogs. The Meadow's purpose is noble, its actual misuse is tragic.	I-209-5 The comment describes an existing noise issue at the Project site. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-209 Linden Waddell

COMMENT

RESPONSE

I-209-5 Cont.	<p>There was particularly one (of several) loud concerts with amplified music held at the Meadow during the summer. Ok, ok, not to be a killjoy, I just let it be – even though it was disturbing our evening with invading noise AND past Meadow hours AND an activity not allowed on the grounds. When it was STILL blaring past 10:00pm, I thought that it was late enough -- time for it to end. I called the local police department (and it was 'after hours' so I had to go through many other departments and phone numbers to finally speak to someone) and when I told the desk clerk about the incident, he said they were 'well aware' of it (as it had been going on all night and they had received many complaints). I asked why it hadn't been shut down and he said it was 'just a noise disturbance' – therefore a very low priority. It was MORE than a 'noise complaint' – it was a prohibited activity, after hours, in a public space. The police didn't seem to care about that. How are we, as citizens, neighbors and 'sitting ducks' supposed to get any professional satisfaction to a complaint if this is the passive response?</p>	I-209-6 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-209-6	<p>I went through my Instagram account and took screen shots of over 35 incidents posted publicly on IG involving misuse of The Meadow – various fitness classes (for profit), concerts, dogs, alcohol, organized meetings, ALL against the purpose of The Meadow. Check out @silverlakemeadow on IG for documentation. A few are posted here with these comments.</p>	I-209-7 As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option. Also, please see Master Response - Traffic/Transportation.
I-209-7	<p>5) The parking mitigations in the DEIR make a mockery out of Silver Lake Blvd. and Silver Lake Drive – thoroughfares for the neighborhood and overused by commuters. Parallel parking? 135 spaces on the east side alone, from Armstrong to the dog park? Ha! Traffic flow would come to a standstill as a queue of cars awaits a car in their lane waiting to back into a parallel space. Impatient drivers would go around into oncoming lanes. Let's not be naïve. LA drivers are aggressive, and this parking 'solution' makes the thoroughfares UNSAFE for us all. Let alone the CONSTRUCTION TIME to create the parking -- taking away the use of the thoroughfares for months at a time.</p> <p>Also, parking options were NEVER presented at community meetings prior to the DEIR. NOW they show up -- without prior vetting or comment -- and are crouched in there for approval. BAD BUSINESS.</p>	I-209-8 Please see Master Response – Drought Conditions.
I-209-8	<p>6) Drought. It's getting worse. The DEIR proposed areas make this is a water-based project, counting on 'access to the water' for its success. Right</p>	<p>Also, as described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wetlands Management as outlined in Section 2.7.1 of the Draft EIR.</p> <p>This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-209 Linden Waddell

COMMENT

RESPONSE

I-209-8 Cont.	now, the reservoir can be any height without impacting its beauty, the wildlife, or current use. The proposed project demands that the water be maintained at a particular level. What happens when there just isn't enough water to meet the newly remodeled banks? Not enough water to provide the kind of 'destination entertainment' it's being designed for?	I-209-9	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-209-9	7) NIMBY. We've been called that at meetings. We've been told that we (who have been here a long time) do not welcome change. You know what? We who have been here have experienced NOTHING BUT CHANGE, have HISTORY and EXPERIENCE to back up what we say and are NOT AFRAID of projects and changes, WE JUST HAVE THE WISDOM TO KNOW BETTER! HISTORY. We are supposed to learn from HISTORY. What about the HISTORY of Echo Park Lake and its shameful homeless encampments? What about the HISTORY of developing the (very modest) Meadow and its resulting traffic, parking and misuse issues? What about the HISTORY of wildlife interruption as the result of past changes? The HISTORY of construction and noise and air quality disruptions when the reservoir was dry? The HISTORY of "another white affluent neighborhood getting more stuff" while less fortunate neighbors are overlooked? A HISTORY of water safety (or lack of safety)? The HISTORY of fire-fighting helicopters needing access to the water? Tom LaBonge's legacy for a passive space? The HISTORY of the reservoir as a designated cultural monument and prudent remodeling restrictions that come with that designation (that I didn't see addressed in the DEIR)?	I-209-10	Please see Appendix F, which includes ESA's Supplemental Historic report (2022), a 2004 report by Greenwood and Associates, a 2005 report prepared by CH2MII, a 2019 report by GPA Consulting and a 2020 memo by GPA Consulting. There is substantial and significant amount of history included in all of those reports. The HCM nomination form that is currently used did not exist when the SLRC was listed in 1989 and the narrative that was originally included was limited. In an effort to address this shortcoming, the reports listed above include large histories of the SLRC.
I-209-10		I-209-11	Please see Master Response - Traffic/Transportation. The comment is noted and will be forwarded to the decision-makers for review and consideration.
I-209-11	8) Traffic mitigation. The DEIR says there will be no negative effects of traffic to the area as a result of this proposed project. HOW CAN THAT BE DECLARED???? How could LADOT determine that, when the DEIR allows for amplified concerts - up to 12 per year occurring - with an estimated 600 in attendance???? This is just a joke, don't waste my time. My neighborhood organized ourselves and it took us THREE YEARS to sign petitions, work with LADOT and CD13 to implement signage and mitigations for tiny Earl Street so that WAZE would stop sending cut-through traffic down our narrow neighborhood street, which disrupted our living conditions, caused vehicle accidents, stuck a tour bus in place, hit a pedestrian, resulted in daily fistfights among frustrated drivers, kept us from being able to use our driveways, and made our day-to-day a living hell. The situation has improved slightly, but drivers DO NOT pay heed to the sign limitations, just like over on Dwayne Street (I feel for those poor folks). So DO		

I-209 Linden Waddell

	COMMENT	RESPONSE
I-209-11 Cont.	NOT TELL ME that adding public EVENTS and a NEW EXCITING DESTINATION and GATHERING PLACE at the reservoir would "NOT NEGATIVELY IMPACT TRAFFIC." Shame on LADOT and the authors of the DEIR.	I-209-12 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-209-12	9) Wildlife. They were here first. They are one of the main reasons I adore Silver Lake. I will defer to the experts in our area who are anti-project to address their concerns in this regard, with my full support.	I-209-13 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	10) As a tax-paying homeowner, we bought property here for the SERENITY of Silver Lake within a metropolis, not for THIS, the antithesis of our values.	
I-209-13	11) I have attended practically every community meeting regarding this issue, in person and via zoom. At every live meeting, and at the last two online meetings held regarding the DEIR, the overwhelming MAJORITY were against the project. NO PROJECT (Alternative #1) was the #1 choice. The president of the SLRC was AT a recent zoom meeting I attended and was WITNESS to the resulting straw poll, yet his group and their interests did NOT represent the MAJORITY with a motion presented a few weeks later. And at THAT meeting, it was shot down. Other than asking to mitigate the noise levels after the projects are completed, they want to 'blank check' everything else: including the fact that LADOT said this project as presented would have 'no traffic impact' on the neighborhood...that alone is a huge JOKE.	I-209-14 Please see Master Response - Traffic/Transportation.
I-209-14	WHO ARE THE ADVOCATES OF THIS PROJECT? I don't know why we, as individuals, are not being heard nor represented, it astounds me. Maybe now that Mitch O'Farrell has been out-voted from returning as a Councilperson for CD 13, this 'vanity project' will go away?	I-209-15 The comment expresses opposition to the proposed Project and support for Alternative 1.. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-209-15	LEAVE IT BE! FIX OUR SIDEWALKS INSTEAD! LET UNDERREPRESENTED NEIGHBORHOODS USE FUNDS!	
	NO PROJECT, ALTERNATIVE #1.	
	Sincerely, Linden Waddell 2341 Cove Avenue Los Angeles, CA 90039	

I-209 Linden Waddell

COMMENT

RESPONSE

I-209-15
Cont.



I-209 Linden Waddell

COMMENT

RESPONSE

I-209-15
Cont.



I-209 Linden Waddell

COMMENT

RESPONSE

I-209-15
Cont.

I-209 Linden Waddell

COMMENT

RESPONSE

I-209-15
Cont.



I-210 Heather Lowe

COMMENT

RESPONSE

I-210-1	Birders have recorded observations of over 140 species at the reservoir and have visited it annually during the winter season since the early 1900s.	I-210-1	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-210-2	Surrounding neighborhoods and the entire city of Los Angeles welcomes Silver Lake as being a Wildlife Sanctuary. It perpetuates and adds to the iconic beauty and historic nature of Silver Lake. To create a wildlife sanctuary and migratory bird refuge, establishing a permanent protected habitat for them, fencing must be retained. All current public use facilities should remain.	I-210-2	Please see Master Response - Fence Removal.
I-210-3	The parking slots, created by cutting down lanes that are already narrow, is a backward solution to an already congested area. Anyone who has visited this site regularly would never agree to it.	I-210-3	As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
I-210-4	Who are the people that deem these changes to be acceptable? What is at stake?		This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-210-5		I-210-4	Please see Master Response - Parking/Bike Option.
			As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.
		I-210-5	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

I-210 Heather Lowe

COMMENT

RESPONSE

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-211 Henrik Reh binder

COMMENT

RESPONSE

I-211-1 | I am a longtime homeowner in Silverlake. I want to voice my deep opposition
to the Master Plan as presented. The 15 year construction plan is
unacceptable. It places tremendous burden on all of those who live near the
I-211-2 | Reservoir. As well, the plan to have much more traffic in the area is also
unacceptable.

I-211-1 | The comment expresses opposition to the proposed Project. This comment
does not raise any issues with respect to the content and adequacy of the
Draft EIR. Therefore, it is noted for the record and will be forwarded to the
decision-makers for their review and consideration.

I-211-2 | This comment expresses concern regarding traffic impacts. Impacts related to
traffic and transportation are analyzed in Section 3.16, Transportation, of the
Draft EIR. All impacts were concluded to be less than significant. Also, please
see Master Response - Traffic/Transportation.

I-212 Stephanie Bartron

COMMENT

RESPONSE

I-212-1	Submitting this as a local resident, and as a garden designer. I support the Master Plan, and this EIR, but there are 3 elements I am very concerned about, that this EIR does not analyze or adequately mitigate.	I-212-1	This comment is introductory and expresses general support for the proposed Project. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-212-2	1. Plastic grass/artificial turf is proposed as a surface for the renovated dog park. This material breaks down, creating microplastic debris, including aerosols that can injure dogs, pollution impacts (not reviewed in EIR) and also expensive replacement cost burdens and landfill waste as often as every 10 years. These impacts are not reviewed in the EIR and are of considerable concern.	I-212-2	The commentor introduces information that discuss the effects of climate change cited from the Jane Goodall Institute, a community conservation organization, and a Los Angeles Times news article that references a California Environmental Protection Agency, Office of Environmental Health Hazard Assessment report, <i>Indicators of Climate Change in California, Fourth Edition</i> (November 2022). Similar information that discusses the effects of climate change is provided in section 3.8.1, <i>Environmental Setting</i> , of Chapter 3.8, <i>Greenhouse Gas Emissions</i> , of the Draft EIR, which provides information on the effects of climate change related to water supply, public health, increased risk of forest fires, and loss of habitat and ecosystems, and weather and temperature impacts.
I-212-3	As a garden designer, I work with plant selection. The MP and EIR do specify native plants and trees. But they also include options for climate adapted/drought tolerant non-native ornamental plants and trees. The EIR also says that the BSA "does not support black walnut woodland" and this is incorrect. Not only are there already 4 black walnuts growing there already, but the BSA is located between several native stands of this endangered local tree species, and the Knoll presents an excellent opportunity to establish a new colony of Black Walnut Woodland, which would also offer greater biodiversity support. Throughout the project, locally native plants and especially trees should be planted exclusively, especially in Upland habitat and Promenade areas.		
I-212-4	#3 - wildlife connectivity through the park is not analyzed, specifically access to the water. Ramps must be included in the wetland terraces to accommodate flightless and juvenile birds. The Education Center should also be moved into the Seating Terraces, allowing unimpeded access from the Knoll habitat area to the water. Additionally, tunnels/pipes and/or bridges should be added to allow wildlife to access water while pedestrian paths are occupied by humans.		
I-212-5	Thank you! I otherwise support the plan and the EIR, and am grateful for the opportunities that this offers us all.		
I-212-6			The commentor requests that the EIR analyze the effects of the Master Plan on climate change. As explained on pages 3.8-32 and 3.8-33, of Chapter 3.8, <i>Greenhouse Gas Emissions</i> , of the Draft EIR, the Office of Planning and Research (OPR) released a technical advisory on CEQA and climate change that provided guidance on assessing the significance of GHG emissions for individual projects. The OPR technical advisory states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment." In addition, as stated on page 3.8-24 of the Draft EIR, the effects of GHG emissions are cumulative and should be analyzed in the context of a cumulative impact analysis. Consistent with state guidelines, the EIR analyzes the effects of the Master Plan on climate change in a cumulative context. CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions. CARB's 2017 Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, City's Green New Deal, and the Los Angeles Green Building Code all apply to the Project and are all intended to reduce GHG emissions to meet the Statewide targets set forth in AB 32 and amended by SB 32. As discussed on pages 3.8-50 through 3.8-62 in Section 3.8, <i>Greenhouse Gas Emissions</i> , of the Draft EIR, and as shown in detailed consistency tables 4, 5, and 6 in the <i>Air Quality and</i>

I-212 Stephanie Bartron

COMMENT

RESPONSE

Greenhouse Gas Technical Appendix for the Project, which is provided in Appendix B of the Draft EIR, the Project would be consistent with the applicable provisions of these plans. Therefore, the Draft EIR properly concludes, based on substantial evidence, that the Project's GHG impacts are less than significant and mitigation measures are not required.

Regarding GHG impacts into future years through 2050 (i.e., approximately the next three decades), CARB adopted the 2017 Climate Change Scoping Plan Update to ensure that California meets its 2030 GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The Scoping Plan also demonstrates that various combinations of policies, regulations, and advancing technologies would allow the Statewide emissions level to remain very low into future years to enable the State to meet the 2050 targets. Based on the above, the Project would not conflict with CARB's Scoping Plan, and there would be an anticipated decline in Project emissions once fully constructed and operational; the Project would not conflict with the State's GHG reduction targets for 2030 and 2050.

With respect to the Project's additional water usage, as described on page 3.8-44 of the Draft EIR, GHG emissions associated with the Project's water usage, were considered within the Project's operational GHG emissions and presented in Table 3.8-6. As discussed in Chapter 2.0, *Project Description*, of the Draft EIR, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and California Green Building Standards (CALGreen) Code, which would include, but not limited to, the installation of low-flow toilets, low-flow faucets, low-flow showers, and other water conservation measures. In addition, as described in Section 3.18, *Utilities and Service Systems*, of the Draft EIR, the Project would include strategies to reduce irrigation water demand. The Project would include ornamental garden areas consisting of a combination of native and drought-tolerant species appropriate to the Los Angeles region to provide a plant palette adapted to climate change. Transition habitat zones would be irrigated with reservoir water on a separate cycle appropriate for the drought-tolerant, coastal scrub planting palette proposed under the proposed Project. This irrigation strategy would be validated by reservoir water quality testing and soil analysis under proposed operations. Remaining upland habitat, lawn areas, and ornamental gardens would be irrigated via a potable water supply available from the

I-212 Stephanie Bartron

COMMENT

RESPONSE

LADWP distribution system which would require a dedicated meter. If recycled water is available in the future, it could be used to irrigate ornamental planting (see Chapter 2.0, *Project Description*, and Section 3.18, *Utilities and Service Systems*, of the Draft EIR, for additional details).

I-212-3 Comment noted. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-212-4 The comment states that the Draft EIR is incorrect in its analysis that the BSA does not support black walnut woodland. The Draft EIR Section 3.4, Biological Resources, identifies the Southern California black walnuts and coast live oaks onsite but states that they are not likely naturally occurring. As stated in Section 3.4, the entire Knoll and Silver Lake Meadow Park is overlaid with Urban land-Dapplegray-Soper complex soils resulting from human-transported material. Additionally, remnants of an irrigation system were observed adjacent the Southern California black walnut and coast live oak trees. These two tree species need to be dominant or co-dominant in the tree canopy and attaining 30% to 50% relative cover (Keeler-Wolf and Evens 2006). As stated in Section 3.4 of the Draft EIR, neither of these species acquire that level of dominance or co-dominance as all woodlands present within the project site are dominated by non-native species (see Impact 3.4-2 in the Draft EIR). The occurrences of these two species are not related to a remnant stand of native woodlands but rather likely planted trees in an urban ruderal landscape. Lastly, the City's Protected Areas for Wildlife & Wildlife Movement Report found that no documented sensitive natural plant communities were found within SLRC.

Additionally, the comment states that the project should use locally native plants and trees exclusively, especially in the upland habitat and Promenade areas. The Draft EIR and SLRC Master Plan have stated that the upland habitat areas (12 acres) will be planted with site appropriate native plant species including southern California black walnut. Baseline conditions for trees located along the Promenade consist primarily of non-native trees species planted and maintained by the Bureau of Street Services. Street trees are not proposed for removal or replacement at this time. Areas in which the Promenade enters the proposed native habitat areas will be planted with native species.

I-212 Stephanie Bartron

COMMENT

RESPONSE

- I-212-5 The comment states that the Draft EIR did not analyze wildlife connectivity through the SLRC specifically access to water. Currently, access to the water at the SLRC is restricted through perimeter fencing and the steep concrete and asphalt covered basin edges. Access to water is currently restricted to birds capable of flight. The comment continues with the further recommendations concerning wildlife access to water and has been noted. As currently designed, the proposed Project would increase wildlife access to the water's edge. Please see Impact 3.4-4 of the Draft EIR for further analysis of impacts to wildlife corridors, which were found to be less than significant.
- I-212-6 The comment expresses support for the overall proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-213 Cecilia Bordarampe

COMMENT

RESPONSE

I-213-1	I am in opposition to any of the proposed "improvements" being proposed to the Silver Lake Reservoir and surrounding areas. The reservoir is already a beautiful, welcoming and enjoyable place to be because it is quiet and peaceful - it's also why people desire to visit or move to the neighborhood. The proposed changes would disrupt that peacefulness entirely. Even after the construction phase, parking would still be so limited for residents and visitors alike, which also affects access to local businesses. Preserving the wildlife is negated completely when capacity is expanded for more visitors, let alone allowing outdoor events. The mere idea of accommodating outdoor events is a thoughtless one. Anyone living near the lake can hear music playing from someone listening to a boom box at the park or having a house party - sound reverberates off the hills easily and the sound pollution from events at the lake would be a huge disturbance to the residents. Traffic is already an issue around the lake and through the small streets of the neighborhood as people cut through at peak times of day and allowing for more activities and events at the site would dramatically hinder traffic flow and cause congestion. Traffic would be a huge problem during construction, as well. The reservoir, parks and paths are useful and enjoyable as is - keep it that way.	I-213-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-213-2		I-213-2	As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response – Parking/Bike Option and Master Response – Traffic/Transportation.
I-213-3			This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-213-4		I-213-3	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-213-5		I-213-4	As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant. Please also see Master Response – Noise. Other impacts of the proposed Project related to noise are analyzed in Section 3.12, Noise, of the Draft EIR. The comment noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-213-5	Please see Master Response – Traffic/Transportation.

I-214 Joyce Bordarampe

COMMENT

RESPONSE

I-214-1 I am opposed to the proposed plan to take down the fence, more visitors for special events hosted at the lake. This is not a NIMBY issue; everyone in Los Angeles is welcome to visit the meadow and to enjoy the peaceful walk around the lake. I am concerned about safety issues if the fence is taken down. I am concerned about destroying the habitat that currently live inside the perimeter of the fence. The plans for new pathways, special events, and increased visitor traffic is going to completely disrupt the peacefulness of the neighborhood, as well as the wildlife that already live here. When the meetings began, no one asked the residents if the improvements were even desired or needed and the initial survey that was sent out covered a 5 mile radius, allowing people who had no vested interest in the neighborhood's peace and serenity a voice in the direct impacts to actual Silver Lake residents. We were never told that construction could last up to 15 years. The noise and congestion will be unbearable. I can see no benefit to the neighborhood except to the developer that gets awarded the project. Who is really behind this project that stands to profit from unneeded changes to this neighborhood gem??

I-214-2

I-214-3

I-214-1 Please see Master Response – Fence Removal.

I-214-2 The comment expresses concern regarding new pathways, special events, and increased visitor traffic as they relate to impacts on the neighborhood and wildlife. Please see Master Response – Traffic/Transportation.

As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant. Please see Master Response – Traffic/Transportation.

Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response – Biological Resources.

This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

214-3 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The commenter is referred to Master Response – Community Engagement Process.

I-215 Guillermo Bordarampe

COMMENT

RESPONSE

I-215-1	I am opposed to any changes to the Silver Lake reservoir and surrounding parks and paths. Everyone enjoys the experience of visiting and living around the lake as it is currently. I have huge concern about the disruption to the wildlife that call Silver Lake home. The construction would be an obvious disturbance to their current habitat.	I-215-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-215-2			
I-215-3	The reservoir welcomes any and all visitors that want to enjoy the paths and parks as they exist currently, so this is not a question of excluding people from our neighborhood. I have big concerns about the impact of accommodating more visitors to this small neighborhood given the parking and high traffic issues we already deal with on a daily basis. Many areas of Silver Lake have no sidewalks and as someone who enjoys walking through the neighborhood streets daily, having more cars in the area is a safety issue since people use the side streets to cut through trying to avoid traffic on the main streets. I've tried to raise these issues many times at the meetings, as did many of my neighbors and the option of not taking any action to "improve" the area was dismissed. I have felt very unheard while others were entertaining ideas of swimming and boating in the lake! No one wants these changes to our beautiful and peaceful neighborhood.	I-215-2	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-215-4		I-215-3	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-215-5		I-215-4	Please see Master Response – Traffic/Transportation.
		I-215-5	Please see Master Response – Community Engagement Process.
I-215-6	Has anyone polled the local businesses and restaurant owners about the impact of lack of parking if these plans get approved? It's hard to find parking spaces currently when visiting these local spots.	I-215-6	Please see Master Response – Traffic/Transportation and Master Response – Public Safety.
I-215-7	After all this time I have not read any research that seems adequate enough to address issues of safety and crime, let alone traffic. I want the lake and its perimeter to stay the same and keep the peace. Thank you.	I-215-7	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-216 Ian Becker

COMMENT

RESPONSE

I-216-1

Writing to oppose the Silver Lake improvements plan. PLEASE leave the Silver Lake reservoir as it is. It is functional to the community as a walking path, and to the wildlife inside the fence and on the water. We do not need to waste money on this project, nor do we need the noise, disruptions, and problems of such a huge project.

Leave the Lake alone, spend the money elsewhere!

I-216-1

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-217 Kayten Schmidt

		COMMENT	RESPONSE
I-217-1	I oppose the plan for improvements to the silverlake reservoir. This is an already full and beautiful area that does not need development and cannot handle	I-217-1	The comment expresses opposition to the proposed Project. This comment expresses concern regarding traffic, parking, and noise impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR, also please see Master Response – Traffic/Transportation. Impacts related to Noise are analyzed in Section 3.12, Noise and Vibration of the Draft EIR, also, please see Master Response – Noise. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-217-2	More traffic, more parking and more noise. The noise is already over an acceptable threshold with normal park and walking path use. This money would		
I-217-3	be much better spent helping the homeless situation in silverlake. Please leave the reservoir alone.	I-217-2	Please see Master Response – Noise.
		I-217-3	Please see Master Response – Funding and Operations and Master Response – Homelessness.

I-218 Michael Kortlander

COMMENT

RESPONSE

I-218-1 | I support enriching the park with the proposed plan. Let's make the most of our public spaces.

I-218-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-219 Kevin Bannerman

COMMENT

RESPONSE

I-219-1	As a 25 yr resident in this neighborhood, I support Alternative 2 or 3. I think we need improvements to the reservoir but I am very much against making this area a public park focused either on education or recreation. I live on the northern end, west side of Ivanhoe and we are in a fairly tight amphitheater; noise travels up. I hear local events loud and clear. I am fine with the rare event like the nursery school fundraisers, but the idea of regular after hours visitors aides by night lighting is not why I moved to this neighborhood. I hate to be a NIMBY but I think this is a very specific situation and the impact on those who live here is being ignored or mocked. I fully supported development of the Meadow and am glad to see it successful but that big open space is not similar to the north end/Ivanhoe. I am all in for habitat development but please do not ruin my neighborhood and my living experience by capitulating to pressure groups who do not live in the immediate area. Thank you.	I-219-1	The comment expresses opposition to parts of the proposed Project and support for either Alternative 2 or 3. Please see Master Response – Alternatives Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-219-2		I-219-2	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Also, please see Master Response – Noise. Section 2.5.3 of the Draft EIR describes the proposed lighting plan for the proposed Project and Figure 2-8 of the Draft EIR shows the location of the different lighting levels throughout the proposed Project area. All lighting would be shielded and pointed away from the surrounding neighborhood and wildlife areas.
I-219-3		I-219-3	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-220 Ken Lee

COMMENT

RESPONSE

	NO! NON! STOP! CEASE! DESIST! NEGATIVE! NEIN! ABSOLUTELY NOT! NO WAY! NIX! NYET! DISAGREE! HALT!	I-220-1 The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-220-1	Please make no mistake about my sentiments about the proposed project in any form. My wife and my daughter--Dorothy and Brittany, respectively--are similarly opposed. So be sure to count this as three votes AGAINST, and not just one.	I-220-2 Please see Master Response – Traffic/Transportation.
	We've been residents of the Silver Lake neighborhood for nearly 40 years. There have been additions and improvements--mostly by private enterprise--that have made the neighborhood more attractive. Ivanhoe Elementary School, Trader Joe's, Starbucks, Gelson's, several eateries are some examples.	I-220-3 Please refer to Master Response – Public Safety for a discussion on safety measures proposed by the Project.
I-220-2	This proposal will make vehicular traffic even more of nightmare. I predict a radical increase in gridlock, fender benders, road rage, and car-on-pedestrian accidents.	I-220-4 The comment expresses opposition to the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-220-3	With a higher number of out-of-neighborhood visitors, I also predict an increase in crime. Actually, that has already happened. Since the last improvement of the reservoirs several years ago, car thefts and home robberies--and the concomitant addition of home alarms and security systems--have gone up over previous 10-year periods.	
I-220-4	In a word, NO! Also: NON! STOP! CEASE! DESIST! NEGATIVE! NEIN! ABSOLUTELY NOT! NO WAY! NIX! NYET! DISAGREE! HALT!	

I-221 Mollie Mcdowell

	COMMENT	RESPONSE
I-221-1	<p>When selecting plants and trees, it's very important to choose 100% native plants (and not cultivars/hybrids/clones) and help restore native ecosystems and fight invasive species.</p> <p>They provide important, ecological benefits and help heal the land and our communities. One simple example—the leaf litter our native coast live oak trees acidifies the ground and prevents invasive species like the dreaded aggressive tree of heaven (ailanthus) from growing. Of course, native plants are drought friendly too, which makes them a no-brainer.</p>	<p>I-221-1 This comment expresses the opinion of the virtues of planting native plant species and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-222 Douglas Loewy

COMMENT

RESPONSE

I-222-1	The EIR makes clear what the residents of Silver Lake already know: the Reservoir Master Plan will cause serious disruption to the community for the next 10-20 years. The neighborhood simply does not have the infrastructure to support such a massive and ridiculously expensive construction project. Given the scope of the project \$250 million seems much too low. Silver Lake Blvd. and West Silver Lake Drive can barely handle the morning and evening commutes as is. Any construction project in the area, no matter how small, has a severe impact on traffic and major and side streets. Dust, traffic, noise, parking issues for the (un)foreseeable future are going to destroy the quality of life in Silver Lake for both tenants and property owners. There are much less intrusive improvements that can be made to the reservoir complex that will beautify the area while maintaining the quality of life for all residents of the Community.	I-222-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-222-2			The commenter is also referred to Master Response – Funding and Operations.
I-222-3		I-222-2	Please see Master Response – Traffic/Transportation.
		I-222-3	Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Also, please see Master Response – Traffic/Transportation. The comment expresses opposition to the proposed Project. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-223 Shirley Egbert

	COMMENT	RESPONSE
I-223-1	Are we improving the quality of the habitats at the Reservoir? By disturbing the current ecosystems. Should we not just leave it as is and let corrosion take place naturally? Would it be more eco-friendly to repurpose the existing materials into something new instead of building a new structure?	I-223-1 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. Also, impacts to habitat are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-224 Sara Collis

COMMENT

RESPONSE

I-224-1 | UpdAting the reservoir is needed, it will bring up property value and be a community area that we are missing in silverlake . There is a lot of wasted space that could be better used as park space, playgrounds, running trails and more.

I-224-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-225 Megan Burton

	COMMENT	RESPONSE
I-225-1	I sincerely hope this master plan goes through and my children get to grow up with an improved reservoir. At ages 1 and 3, we usually walk the reservoir loop once a week and play in the meadow or park on weekends. It would be incredible for the space to offer even more shaded walking trails, and wetland and woodland educational experiences.	I-225-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-226 Catherine Geanuracos

COMMENT

RESPONSE

I-226-1	<p>I strongly support the master plan and the findings of the EIR:</p> <ul style="list-style-type: none"> - The community strongly supports moving forward with the Master Plan, which reflects the consensus reached at the culmination of a comprehensive two-year planning process. - The three alternatives to the Master Plan considered in the DEIR each fall short of the goals the community identified during the planning process. - Doing nothing to the Reservoirs would have severe negative impacts on our community and on our wildlife. - The Master Plan provides real benefits, with only minimal and temporary impacts limited to the construction process itself. <p>Thank you for moving this process forward!</p>	I-226-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-226-2		I-226-2	Please see Master Response – Alternatives Analysis. Please see Master Response - Community Engagement Process.
I-226-3		I-226-3	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-227 Damir Vukovljak

	COMMENT	RESPONSE
I-227-1	<p>It is incredibly short sighted to derail a multi generational improvement to the neighborhood by stating the construction will be disruptive. With that view no progress would ever occur. I am in full support of the master plan and the process that has led to the plan. Please don't let provincial perspectives derail a perfectly implementable project that is sure to benefit many people now and in the future!</p>	<p>I-227-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-228 Paul Feldman

COMMENT

RESPONSE

I-228-1

The authors of the master plan and draft eir display unmitigated gall, if not utter negligence or legally dubious trickery, to contend that there is no need to mitigate the multiple severe impacts on the environment - including air quality, noise, greenhouse gas emissions and the spread of hazardous materials - by choosing any plan other than Alternative 1 (doing nothing). Chapter 3.12 of the eir (noise and vibrations, page 33 of 62) states: Project construction activities would generate a maximum of up to 335 worker trips per day, and a maximum of up to 494 truck trips per day. These worker and truck trips would be distributed throughout the Project area at up to a maximum estimated 5 work sites assumed. It is anticipated that these trips would occur primarily on collector and arterial streets as well as freeways throughout the Project area....

Page 30 of the same chapter says construction would be underway from 2025 to 2030: Construction On-Site Construction Noise Construction of the Project is anticipated to begin in the first quarter of 2025, pending Project consideration and approval, and is estimated to be completed in the third quarter of 2030. How do the planners reach the conclusion that such a massive project in a residential neighborhood should move forward? In part by providing no data from the DOT assessing how much traffic (and parking during construction and afterward) would clog substandard residential streets where vehicles already routinely block adequate access for emergency vehicles including fire trucks and ambulances and at times, garbage and delivery trucks.

Another example of the trickery is on Page 28 of the same chapter, which indicates that the project will not have a major impact on the neighborhood because it will bring in fewer than 400 more people to the complex than at present - for entire weekends.

On one hand, that means hundreds of millions of dollars would be spent and unmitigated, unwanted and environmentally noise, traffic etc. would be inflicted on the neighborhood - all for changes expected to draw fewer than 250 people more than now on an average weekend day

On the other hand, the figures are more likely to be ludicrous underestimates, designed to tamp down the estimated impact in regard to noise, traffic etc. so that the planners can maintain that there are no serious problems that would require quashing the project.

The authors/designers of this monstrosity are arguing out of both sides of their mouths. If their mouths were triangular, they'd likely be arguing out of all three sides.

I-228-1

The Draft EIR evaluates impacts from construction for each of the issues raised in the comment including air emissions, noise, greenhouse gas emissions, hazardous materials and vibration in Chapter 3 of the Draft EIR. Mitigation measures have been identified where impacts may be considered significant. The Draft EIR complies with CEQA requirements to identify environmental impacts and to evaluate the feasibility of alternatives to the proposed Project that would meet the project objectives and reduce impacts. As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available. Also, please see Master Response - Community Engagement Process.

I-228 Paul Feldman

	COMMENT	RESPONSE
I-228-1 Cont.	<p>Of course, the other thing the eir doesn't consider, or even discuss after several meetings where the public was shown gorgeous utopian drawings of a completed project, is how on earth one goes from the current configuration to the final plan. Where are the drawings of the project while it is under construction over a five-year period? Why does the draft eir not address the actual construction project? Could it be an effort to to hide the football while the monied interests seeking to ruin this lovely neighborhood are conned into submission?</p> <p>The only clue is the number of daily truck trips, worker trips and the time involved. No consideration appears to have been given in the eir to what would actually be torn down, where it would be taken and how that configures with the current roadways, the water currently in the reservoir and the water supply in the future. Nor does it make clear what would happen if the city began work without having full funding --- and what the city's obligation would be if massive chunks are carved out of the existing reservoir complex and the project is then stopped because the money has run out.</p> <p>Not to mention maintaining the facility after it is completed, if it ever were to be. At this point, the city is so ridiculously incapable that it can't make adequate sidewalk repairs near the rec center, for years the barrels along the walking path had to be picked up personally by late Councilman LaBonge because the city couldn't be bothered --- and to this day, a community volunteer waters the fledgling trees along the walking path to keep them alive because the city doesn't do it. (Addendum: the city has in the last week or so finally begun fixing the sidewalks near the rec center --- including tearing up perfectly good sidewalks next to the hilly area from the rec center left toward the dam. Not only is this work a complete waste of funds in and of itself, it demonstrates how incapable the city is for building a massive project around the complex and then being responsible for maintaining it. Moreover, the clogging of that area of W. Silver Lake Drive this week shows how completely foolhardy and untenable the eir proposal to add a bunch of diagonal parking spaces in this specific area is. What a joke).</p>	<p>I-228-2 Comment noted. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. The commenter is also referred to Master Response – Funding and Operations.</p> <p>I-228-3 Please see response to Comment I-110-13.</p>
I-228-2	<p>If the suggestion is that eventually an outside vendor would be hired to run and maintain the complex, that is a true travesty, rife with the possibilities of further making the complex a Disney-like space in order to pay for the maintenance. Alternative 1 is the only fair, logical and correct solution.</p>	
I-228-3		

I-229 Paul Feldman

COMMENT

RESPONSE

I-229-1

The authors of the master plan and draft eir display unmitigated gall, if not utter negligence or legally dubious trickery, to contend that there is no need to mitigate the multiple severe impacts on the environment - including air quality, noise, greenhouse gas emissions and the spread of hazardous materials - by choosing any plan other than Alternative 1 (doing nothing). Chapter 3.12 of the eir (noise and vibrations, page 33 of 62) states: Project construction activities would generate a maximum of up to 335 worker trips per day, and a maximum of up to 494 truck trips per day. These worker and truck trips would be distributed throughout the Project area at up to a maximum estimated 5 work sites assumed. It is anticipated that these trips would occur primarily on collector and arterial streets as well as freeways throughout the Project area....

Page 30 of the same chapter says construction would be underway from 2025 to 2030: Construction On-Site Construction Noise Construction of the Project is anticipated to begin in the first quarter of 2025, pending Project consideration and approval, and is estimated to be completed in the third quarter of 2030. How do the planners reach the conclusion that such a massive project in a residential neighborhood should move forward? In part by providing no data from the DOT assessing how much traffic (and parking during construction and afterward) would clog substandard residential streets where vehicles already routinely block adequate access for emergency vehicles including fire trucks and ambulances and at times, garbage and delivery trucks.

Another example of the trickery is on Page 28 of the same chapter, which indicates that the project will not have a major impact on the neighborhood because it will bring in fewer than 400 more people to the complex than at present - for entire weekends.

On one hand, that means hundreds of millions of dollars would be spent and unmitigated, unwanted and environmentally noise, traffic etc. would be inflicted on the neighborhood - all for changes expected to draw fewer than 250 people more than now on an average weekend day

On the other hand, the figures are more likely to be ludicrous underestimates, designed to tamp down the estimated impact in regard to noise, traffic etc. so that the planners can maintain that there are no serious problems that would require quashing the project.

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I-229-1 Please see response to Comments I-110 and I-228.

I-229 Paul Feldman

COMMENT

RESPONSE

I-229-1
Cont.

Of course, the other thing the eir doesn't consider, or even discuss after several meetings where the public was shown gorgeous utopian drawings of a completed project, is how on earth one goes from the current configuration to the final plan. Where are the drawings of the project while it is under construction over a five-year period? Why does the draft eir not address the actual construction project? Could it be an effort to to hide the football while the monied interests seeking to ruin this lovely neighborhood are conned into submission?

The only clue is the number of daily truck trips, worker trips and the time involved. No consideration appears to have been given in the eir to what would actually be torn down, where it would be taken and how that configures with the current roadways, the water currently in the reservoir and the water supply in the future. Nor does it make clear what would happen if the city began work without having full funding --- and what the city's obligation would be if massive chunks are carved out of the existing reservoir complex and the project is then stopped because the money has run out.

Not to mention maintaining the facility after it is completed, if it ever were to be. At this point, the city is so ridiculously incapable that it can't make adequate sidewalk repairs near the rec center, for years the barrels along the walking path had to be picked up personally by late Councilman LaBonge because the city couldn't be bothered --- and to this day, a community volunteer waters the fledgling trees along the walking path to keep them alive because the city doesn't do it. (Addendum: the city has in the last week or so finally begun fixing the sidewalks near the rec center --- including tearing up perfectly good sidewalks next to the hilly area from the rec center left toward the dam. Not only is this work a complete waste of funds in and of itself, it demonstrates how incapable the city is for building a massive project around the complex and then being responsible for maintaining it. Moreover, the clogging of that area of W. Silver Lake Drive this week shows how completely foolhardy and untenable the eir proposal to add a bunch of diagonal parking spaces in this specific area is. What a joke).

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I-230 Paul Feldman

COMMENT

RESPONSE

I-230-1 Please see response to Comments I-110 and I-228.

I-230-1

The authors of the master plan and draft eir display unmitigated gall, if not utter negligence or legally dubious trickery, to contend that there is no need to mitigate the multiple severe impacts on the environment - including air quality, noise, greenhouse gas emissions and the spread of hazardous materials - by choosing any plan other than Alternative 1 (doing nothing). Chapter 3.12 of the eir (noise and vibrations, page 33 of 62) states: Project construction activities would generate a maximum of up to 335 worker trips per day, and a maximum of up to 494 truck trips per day. These worker and truck trips would be distributed throughout the Project area at up to a maximum estimated 5 work sites assumed. It is anticipated that these trips would occur primarily on collector and arterial streets as well as freeways throughout the Project area....

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Another example of the trickery is on Page 28 of the same chapter, which indicates that the project will not have a major impact on the neighborhood because it will bring in fewer than 400 more people to the complex than at present - for entire weekends.

On one hand, that means hundreds of millions of dollars would be spent and unmitigated, unwanted and environmentally noise, traffic etc. would be inflicted on the neighborhood - all for changes expected to draw fewer than 250 people more than now on an average weekend day

On the other hand, the figures are more likely to be ludicrous underestimates, designed to tamp down the estimated impact in regard to noise, traffic etc. so that the planners can maintain that there are no serious problems that would require quashing the project.

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I-230 Paul Feldman

COMMENT

RESPONSE

I-230-1
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I-231 Paul Feldman

COMMENT

RESPONSE

I-231-1 Please see response to Comments I-110 and I-228.

I-231-1

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I-231 Paul Feldman

COMMENT

RESPONSE

I-231-1
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I-232 Paul Feldman

COMMENT

RESPONSE

I-232-2 Please see response to Comments I-110 and I-163.

I-232-1

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COMMENT

RESPONSE

I-232-1
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I-233 Paul Feldman

COMMENT

RESPONSE

I-233-1 Please see response to Comment I-229.

I-233-1

Resubmitted after receiving word from Dr. Jan Rebstock that this comment space appeared blank when previously submitted: The authors of the master plan and draft eir display unmitigated gall, if not utter negligence or legally dubious trickery, to contend that there is no need to mitigate the multiple severe impacts on the environment - including air quality, noise, greenhouse gas emissions and the spread of hazardous materials - by choosing any plan other than Alternative 1 (doing nothing).

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COMMENT

RESPONSE

I-233-1
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If the suggestion is that eventually an outside vendor would be hired to run and maintain the complex, that is a true travesty, rife with the possibilities of further making the complex a Disney-like space in order to pay for the maintenance. Alternative 1 is the only fair, logical and correct solution.

I-234 Rosalyn Steiner

COMMENT

RESPONSE

I-234-1

The current plan will destroy the reservoir's animal life and the adjoining neighborhoods as well. This Plan protects NOONE AND NOTHING and endangers an entire community. To take down the fencing will be catastrophic. And what is now a secure and peaceful little haven will become a crime-ridden and disgusting place.
Rosalyn Steiner

I-234-1

The comment expresses opposition to the proposed Project. Please see Master Response - Fence Removal and Master Response - Public Safety. Also, impacts to wildlife are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Police Department. LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Please see Master Response – Public Safety.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-235 Marol Butcher

COMMENT

RESPONSE

I-235-1

My comment is attached below .

Marol Butcher

DRAFT EIR
Public Comment on the Draft EIR for the Silver Lake Reservoir Complex
Master Plan Project

Wednesday, November 30, 2022

As a resident of Silver Lake, living on Edgewater Terrace since 1999, it is important I comment on the SLR Complex Master Plan EIR. The Draft EIR does not accurately represent the numerous negative effects a large development - proposed as the Silver Lake Reservoir Complex Master Plan - will have on our neighborhood.

I-235-2

Silver Lake is a small "community" that includes single family residences alongside multi-family apartment complexes - situated closely together on windy, narrow streets. The surrounding neighborhood consists of a rapidly growing urban area. The community has managed to coexist within the current structure - however, not without severe growing pains. The neighborhood has almost reached its limit. Developing the current Silver Lake Reservoir into a "major recreational destination" within an area exploding from the growth and influx of an ever-growing city, is negligent as well as irresponsible.

The Draft EIR is not taking into consideration existing issues within the community and how a development of this massive size will put a huge burden on the neighborhood.

Below are a few of many errors that the Draft EIR fails to address:

• **Significant Environmental Effects on Wildlife**

I-235-3

Although it is addressed in the Draft EIR that measures will be taken to respect nesting birds and their migration habits, it is impossible to stop and start construction no matter how large the "buffer zone" is. The many years of construction noise will disturb any wildlife, driving them away.

The EIR does not address large crowds of people gathering around the reservoir - especially if all the fencing is removed there is no way the wildlife can be protected from human visitors.

I-235-1

This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-235-2

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

As described in Population and Housing, Section 3.13.5 of the Draft EIR, the proposed Project would occur in a developed area and would not result in growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/ planned levels that would result in an adverse physical change in the environment. As noted above, although the proposed Project would enhance the facility for use by the local community including providing additional parking, it would not be expected to result in a new desirable destination or neighborhood feature that would attract a local housing boom. The SLRC is already an anchor destination for the local community. Furthermore, the proposed Project would not introduce unplanned infrastructure that was not previously evaluated in the adopted Silver Lake-Echo Park-Elysian Valley Community Plan or General Plan. The proposed Project involves the enhancement and addition of public park amenities within the SLRC. The proposed Project would not induce new residential development or result in population growth in the service area. The proposed Project is not intended to facilitate growth, but instead serve the recreational needs of the surrounding communities.

I-235-3

Please see Master Response - Fence Removal.

This comment expresses concern regarding construction and operation impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-235 Marol Butcher

COMMENT

RESPONSE

DRAFT EIR
Public Comment on the Draft EIR for the Silver Lake Reservoir Complex
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• **Influx of Visitors to the Reservoir Complex**

I-235-4

The EIR does not take into consideration that making Silver Lake a "Los Angeles Recreation Destination" will overwhelm this relatively small residential area – adding massive congestion with no way to support the visiting population. See Traffic and Parking.

I-235-4 Please see Master Response - Traffic/Transportation.

• **Traffic**

I-235-5

The Draft EIR has determined traffic issues to be a low priority and does not see any increase with the Master Plan. This is unrealistic and entirely incorrect. The current ever growing traffic patterns in the surrounding area are already massively congested. Silver Lake Blvd. / Glendale Blvd. / Fletcher Blvd. are overburdened with commuters ALL DAY as they are used as options for freeway access. How could adding a major recreation facility NOT add to traffic? Expecting visitors to take public transportation or ride bikes is a dream but not realistic.

I-235-5 Please see Master Response - Traffic/Transportation.

Is it possible the assessment was made during the pandemic – when traffic was at a low point? That is the only explanation I can find for this gross error.

I-235-6 Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.

• **Parking**

I-235-6

Street parking in areas surrounding the reservoir is extremely limited due to the narrow streets. Multi-family apartments lack garage parking for many residents. Adding a large influx of daily visitors will create even more of a parking issue. The Draft EIR proposing 15 additional parking spaces is an insult to the residents that will be giving up access to their homes on a daily basis and an irresponsible "solution".

I-235 Marol Butcher

COMMENT

RESPONSE

DRAFT EIR
Public Comment on the Draft EIR for the Silver Lake Reservoir Complex
Master Plan Project

• **Proposed Removal of Fencing Surrounding the Reservoir**

I-235-7

As mentioned previously, the Draft EIR does not address the effect visitors will have on the wildlife if the fencing is removed. Security will become a major issue to protect the wildlife as well as the surrounding neighborhood. Currently, there are only 2 Park Security Rangers to handle the entire LA city park system.

• **Sound – Construction & Amplified Music**

I-235-8

The Draft EIR does not address the fact that the area surrounding the reservoir acts as a natural amphitheater – every sound is amplified and echoes around the surrounding neighborhood. Sound from years of construction, followed by additional recreation activities with amplified music events (600+ people 12 times per year or more) would be unbearable for wildlife as well as the neighboring residents.

A Few Thoughts From a Resident:

• **The Surrounding Neighborhood is Park Poor**

I-235-9

Supporters of the Silver Lake Reservoir Master Plan have stated that there are not enough park areas within a 2-mile radius. Currently there are existing park areas within the Silver Lake Reservoir complex itself. Parks in close proximity to Silver Lake include Griffith Park (one of the largest park spaces in the country), Elysian Park, and Echo Park Lake. We are not a “park poor” neighborhood.

• **Cost**

I-235-10

The quoted “budget” for the Silver Lake Reservoir Complex Master Plan is \$268 million – an unrealistic estimate when it was proposed and will be even higher in today's market. Where are these funds coming from? How will the Complex maintenance and security be handled and paid for? Never once has this been addressed. Both issues are extremely concerning with a project of this scope.

I-235-7

Please see Master Response - Fence Removal and Master Response - Public Safety.

The Draft EIR evaluates impacts of fence removal on wildlife in Section 3.4 on page 3.4-31 and concludes that removing the fence would increase accessibility to the water for wildlife.

As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.

I-235-8

The Silver Lake Reservoir has unique geography and is surrounded by hills on all sides. This can potentially lead to sound reverberations and amplification due to Project activities. The on-site operational noise from the Project was analyzed using the CadnaA noise modeling software. CadnaA is a Windows-based software Project that predicts and assesses noise levels in the vicinity of noise sources based on International Organization for Standardization 9613-2 algorithms for noise propagation calculations. CadnaA considers environmental factors, such as topography, intervening structures, and distance (both horizontally and vertically) from a noise source. This is particularly relevant for projects containing outdoor meeting, performance, and gathering areas at varying elevations that would have amplified sound and could potentially affect surrounding land uses and receptors. Since the Project has various open-air areas that create a relatively complex soundscape, the CadnaA model was used to estimate the various noise sources and their effects on the ambient noise environment. The CadnaA modeling accounted for 14 receptor points surrounding the Project site. Operational noise from the Project was evaluated at each modeling point and

I-235 Marol Butcher

COMMENT

RESPONSE

compared to the closest ambient noise levels measured at R1 through R8 for each respective modeling point.

Thus, the Draft EIR analysis considers the topography of the surrounding area and the results of the CadnaA modeling are reported in Tables 3.12-19 through 3.12-22. The results show that impacts would be less than significant for all on-site operational noise excluding special events with amplified noise. However, special events with amplified noise are no longer being considered under the Project and therefore, there would be no impact due to amplified noise.

I-235-9 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-235-10 Please see Master Response - Funding and Operations.

I-235 Marol Butcher

COMMENT

RESPONSE

I-235-11 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please refer to Section 3.13, Population and Housing of the Draft EIR, for a discussion on homeless strategies within the City. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

DRAFT EIR
Public Comment on the Draft EIR for the Silver Lake Reservoir Complex
Master Plan Project

In Summary:

Do we NEED this expansion or do supporters WANT it out of entitlement and greed? Consistently the wishes of the majority of residents have been ignored - to leave the reservoir as it is – making only minor improvements, preserving the tranquility and sanctuary the current complex already provides.

The fact our city is currently in a homeless crisis is an issue that cannot be pushed aside. It's time to step back and get our priorities in check – spending funds where they can benefit the residents of the city most.

Sincerely,

Marol Butcher
Resident of Silver Lake Since 1999
2362 Edgewater Terrace
Los Angeles, CA 90039

Email: weegeeg@gmail.com

I-236 Barbara Hoff

COMMENT

RESPONSE

- I-236-1 The DEIR fails to adequately analyze the environmental impacts caused by the proposed project and any justification for this very expensive project when other neighborhoods need parks.
- I-236-2 I OPPOSE the proposed project because of the short-term and long-term / permanent negative impacts it will have on the Silver Lake Reservoir Complex natural resources, wildlife, and the neighborhood as a whole. I OPPOSE the project objective which calls for a “bold design that repurposes the Silver Lake Reservoir Complex into a public park” (pg ES-2).
- I-236-3 At the numerous community meetings people said the peacefulness and serenity of the Reservoir are some of the most appealing features and these would be lost if the proposed plan is allowed to go forward.
- I-236-4 I SUPPORT the project objectives that “enhance and expand wildlife habitat (pg ES-2) which is what the majority of neighborhood property owners and residents stated at the numerous community meetings, well-attended by hundreds of people per meeting. The protection of wildlife and improvements to their habitats must be priorities.
- The neighborhood did not request this massive project, it was DUMPED on us. We recognize there needs to be repairs to the sidewalks, pathways, drainage, the removal of damaged and dead trees and plants, the need for new trees and plants, an on-going funded plan for maintenance of the trees and plants, and upgrades to the existing recreation center building, dog park, and existing lighting. However the scope of the proposed project is too big for the project site and too expensive for a neighborhood that has easy access to several parks with active and passive recreational activities: Griffith Park, Echo Park, Elysian Park, Glenhurst Park, Juntos Family Park, and Glassell Park and Recreation Center. There are other neighborhoods in Los Angeles that are park-poor, clearly not the case for Silver Lake. The DEIR must justify the need for this project when other neighborhoods need parks and recreational facilities..
- We did NOT request additional buildings, an education center, new multi-purpose facility, shade structures and pavilions, floating docks, new construction, additional lighting, seating and viewing terraces and observation platforms, increased parking and new parking configuration, or the proposed

- I-236-1 The comment expresses that the analysis in the Draft EIR is inadequate. This comment does not raise any specific issues with respect to the content of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

- I-236-2 The comment expresses opposition for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-236-3 The comment expresses opposition to the proposed Project objective. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the

I-236 Barbara Hoff

COMMENT

RESPONSE

	special events for up to 600 people with amplified sound which would be intensified because of the natural bowl configuration of the project site and adjacent neighborhood.		Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.
I-236-5	The DEIR analysis "determined that the proposed project would result in significant and unavoidable environmental impacts related to construction noise, operational noise associated with an amplified speaker system during special events, construction vibration associated with human annoyance, and cumulative construction and operational noise. In addition, recreation would result in significant and unavoidable impacts due to the associated noise impacts."		As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
I-236-6	The DEIR erroneously claims that "All other potentially significant impacts would be reduced to a less than significant level with implementation of mitigation measures." This is not true especially because the impacts of increased traffic and parking were not analyzed realistically and the issue of crime did not get sufficient analysis and input and review by the Los Angeles Police Department.	I-236-4	The comment expresses support for the enhanced and expanded wildlife Project objective; however, expresses general opposition to the proposed Project.
I-236-7	The DEIR fails to adequately analyze the environmental impacts caused by the following: Removal of the Perimeter Fencing: Perimeter fencing is absolutely necessary for public safety, to prevent crime and vandalism, and to protect wildlife. If the project site were accessible 24/7 it would attract encampments and exacerbate crime as seen in Echo Park, MacArthur Park and some parks in the Valley. "Fencing off perimeters to secure park area grounds" is part of the LAPD Maturing Safe Parks Program begun in the late 1990s. There needs to be proper perimeter fencing of 8'-12' for public safety and to further enhance and protect wildlife which is extremely stressed because of loss of habitat due to real estate development, increased traffic and human activity and the climate catastrophe. There is no mitigation for the severe impacts that would be caused by the loss of perimeter fencing.		The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.
I-236-8	Installation of new habitat fencing: Existing habitat fencing and signage is disregarded so this needs thorough analysis and a better system. Massive Grading and Construction These will degrade, uproot and destroy		As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-236 Barbara Hoff

COMMENT

RESPONSE

I-236-8 Cont.	natural habitats and the existing ecosystem which will cause the loss of birds and ground-dwelling animals, nesting and borrowing areas and degrade the open water that supports wildlife including migratory birds. The DEIR fails to analyze these issues.		This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-236-9	Noise and Vibration: These issues will last between five and fifteen years and will severely impact the residents, traffic and wildlife yet the DEIR calls these a "Less than Significant Impact." These need further analysis and clearly presents more reasons not to go forward with this project.	I-236-5	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Please see Master Response - Noise.
I-236-10	Parking and Traffic: The proposed parking plans are insane and must be further analyzed and ultimately eliminated. The streets are not wide enough for the proposed parking plan. Cars backing out of spaces will cause accidents because of the increased number of parking spaces and the reconfigured plan, the volume of traffic and the large number of people walking and running around the reservoir and going to the dog park, playing basketball at the existing courts, and attending activities at the Recreation Center. Emergency vehicles would be blocked or have difficulty getting through when there is a high volume of activities and traffic. And if there were 600 people attending special events traffic and parking would be a nightmare. The DEIR falsely claims a "Less than significant Impact and No mitigation measures required" while it also states that an "average of 390 additional visitors per day" will visit the Reservoir. How would any of these issues be mitigated? These issues need thorough analysis.	I-236-6	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. The commenter is also referred to Master Response - Traffic/Transportation.
I-236-11	The Biological Resources Section is "inaccurate and ill-researched" according to the Santa Monica Mountains Conservancy Chief Conservation Biologist Dan Cooper. He wrote that the DEIR is "lacking in both rigor and specificity...without current, accurate, and credible data on biological resources...efforts at restoration will with fall short or could actually result in further degradation of the site." While experts can disagree, his comments must be addressed and thorough analysis is needed.	I-236-7	Please refer to Master Response – Public Safety and Master Response - Fence Removal.
		I-236-8	Please see Master Response - Fence Removal.
		I-236-9	This comment expresses concern regarding noise and vibration impacts. Noise and vibration impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. The commenter is also referred to Master Response - Noise.
I-236-12	Regarding Project Alternatives: Alternative 1 No Project is acceptable but it doesn't address some improvements that are necessary such as walkway repairs and drainage grading. Some elements of Alternative 2 and Alternative 3 would be acceptable: The Meadow - Alternative 3; The Knoll - Alternative 3 with additions to increase / expand the tree succession plan; Ivanhoe Reservoir	I-236-10	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. The commenter is also referred to Master Response - Traffic/Transportation.
		I-236-11	Please see Master Response - Biological Resources.
		I-236-12	Please see Master Response - Alternatives Analysis.

I-236 Barbara Hoff

		COMMENT	RESPONSE
I-236-12 Cont.	I-236-13	<p>- Alternative 3; The Eucalyptus Grove - Alternative 3 with additions to increase / expand the tree succession plan; The East and West Narrows - Alternative 2; The South Valley - Alternative 2 with modifications for no additional lighting poles; Habitat Islands - Alternative 3 unless they can be created properly and not cause degradation of the site and in consultation with Dan Cooper, Chief Conservation Biologist of the Santa Monica Mountains Conservancy. The site MUST create proper habitat to protect and support ducks and migrating and regional bird populations in consultation with dan Cooper and the Audubon Societies.</p>	<p>I-236-13 See Master Response - Biological Resources.</p> <p>I-236-14 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.</p> <p>The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.</p>
I-236-14		<p>Other Improvements: Alternative 3 but NO new parking, and the installation of appropriate perimeter fencing to protect wildlife and prevent criminal activities. Additionally, the site must be locked down from dusk to dawn to protect wildlife and prevent crime.</p>	

I-237 Amelia Casanova

COMMENT

RESPONSE

I-237-1 | No estoy de acuerdo con el DEIR. Como pueden pensar en gastar mas de \$260 millones cuando hay comunidades sin un parque.
Mi voto es para Alternativo 1.
Favor de recordar todos de nosotros sin parque.

I-237-1 The comment expresses opposition to the proposed Project and support for Alternative 1. Please see Master Response - Funding and Operations.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-238 Daniel Weidlein

	COMMENT	RESPONSE
I-238-1	<p>The community throughout the years has repeatedly emphasized a desire for the Silver Lake Reservoir to be a quiet place to commune with nature, exercise, and gather as a community. While construction noise is inevitable, amplified noise is not. The notion of amplified noise in the park complex seems antithetical to a plan that otherwise really beautifully restores a beautiful natural resource and finds a great way to allow people to integrate into that. As an advocate for the community, I vehemently urge you to reconsider any plans that would lead to amplified noise around the reservoir.</p>	<p>I-238-1 As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant.</p>
I-238-2	<p>Furthermore, while construction noise is understandable and inevitable, I hope that measures taken to minimize construction noise can be taken to their fullest extent, exceeding legal requirements that are often blind to the reality of a specific situation. One issue in particular is the decibel study published in the draft EIR. While I accept the findings that most of the dB readings were below legal thresholds, it does not take into account that the hills around the reservoir form a natural bowl that reflects sound in a way that it lingers longer and carries further. A sound that is barely below the dB threshold but lasts longer is just as disturbing to neighbors as a sound that crosses the threshold.</p> <p>The community has complained in the past about backup beeps from DWP cars, loud construction noise, and DWP construction traffic. Please look further in to ways to fully minimize the impacts of the construction on the day to day lives of community members, and not just meeting minimum standards.</p>	<p>I-238-2 This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.</p> <p>As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.</p>

I-239 Eric Krikorian

COMMENT

RESPONSE

I-239-1 | My partner and I live nearby and walk our dog around the reservoir weekly. We bring all of our out of town guests on the same walk and we all come to the same conclusion- this would be such a beautiful park. Please move forward with this plan and vision. It would bring our community so much happiness and joy.

I-239-1 | The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-240 Kerry Hannawell

	COMMENT	RESPONSE
I-240-1	"We support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you."	I-240-1 The comment expresses support for the proposed Project. The proposed Project described in Chapter 2 of the Draft EIR would not include a fence. As shown on Figure 2-8 of the Draft EIR, some habitat areas would be closed at night. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-241 Andrew Parker

COMMENT

RESPONSE

I-241-1 | I'm a Silverlake resident writing in support of the master plan and the Draft EIR. I want to see the reservoir turned into a true wildlife space that can also function as a true park and recreation space for the whole community. I believe the master plan delivers on both of these objectives and I support its adoption and implementation.
Sincerely,
Andrew Parker

I-241-1 | The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-242 Lynda Obst

	COMMENT	RESPONSE
I-242-1	<p>We support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you."</p>	<p>I-242-1 Please see Master Response - Fence Removal. In addition, as described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.</p>

I-243 Tanya Peacock

COMMENT

RESPONSE

I-243-1 I strongly support the Silver Lake Master Plan and the Draft EIR. I have lived in Silver Lake for the last 29 years and run or walk around the reservoir almost every day. The naturalized banks and floating islands envisioned by the Master Plan will create a bird and wildlife habitat and sanctuary that will benefit the environment, the community, and the entire City of Los Angeles for generations to come. Thank you to the City of LA and LA DWP for their support for the Master Plan process and for preparing the DEIR.

I-243-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-244 Michael Elowitz

	COMMENT	RESPONSE
I-244-1	I am excited about the Silver Lake master plan, which will enhance this amazing resource for the broader community, and help to make the area even more beautiful. I fully support the master plan and the draft environmental impact report.	I-244-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-245 Morgan Blair

COMMENT

RESPONSE

I-245-1 | I support everything EXCEPT FISHING & To keep a fence

I-245-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include fishing activities. Also, please see Master Response - Fence Removal. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-246 Suzanne Obdrzalek

		COMMENT	RESPONSE
I-246-1	Please keep the fence up and close the area from dusk until dawn. If possible, replace the fence with a more attractive fence. This is a quiet residential neighborhood near an elementary school, and it is very important to keep the neighborhood safe and clean. Thank you!	I-246-1	Please see Master Response - Fence Removal.
I-246-2			<p>As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.</p> <p>The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.</p>
		I-246-2	Please refer to Master Response – Public Safety.

I-247 Steven Klein

COMMENT

RESPONSE

I-247-1 | Our family – long-term residents, homeowners, attendants to the local public schools, board members of local nonprofits, etc. – support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community as they are now. Thank you.

I-247-1 The comment expresses support for the proposed Project. As discussed in Chapter 2, Project Description, the proposed Project includes removal of the perimeter fence as park zones are constructed. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-248 James Cory

	COMMENT	RESPONSE
I-248-1	I 100% SUPPORT the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you.	I-248-1 The comment expresses support for the proposed Project. Thank you for the additional suggested uses, the proposed Project is described in Chapter 2 of the Draft EIR and does not include these uses. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-249 Julia Grant

COMMENT

RESPONSE

I-249-1 | I'm voting for Less is More.

I-249-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-250 Peter Benoit

COMMENT		RESPONSE
I-250-1	I support the master plan process and the Draft EIR, and hope for expedited approval as soon as possible. I think the existing chain link fence around the rim of the reservoirs should remain functionally, but be replaced with a well designed black metal fence (black recedes into shadows and is easier on the eyes to look through than a bright or light colored fence). I think it's important to have the option to close off the internal paths inside the reservoir from dusk to dawn for community safety.	I-250-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-250-2		I-250-2 Please see Master Response - Fence Removal.
I-250-3		I-250-3 Please refer to Master Response – Public Safety. As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public. The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.

I-251 Peter Benoit

COMMENT

RESPONSE

I-251-1 | I support the master plan process and the Draft EIR, and hope for expedited approval as soon as possible. I think the existing chain link fence around the rim of the reservoirs should remain functionally, but be replaced with a well designed black metal fence (black recedes into shadows and is easier on the eyes to look through than a bright or light colored fence). I think it's important to have the option to close off the internal paths inside the reservoir from dusk to dawn for community safety.

I-251-2 |

I-251-3 |

I-251-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-251-2 Please see Master Response - Fence Removal.

I-251-3 Please refer to Master Response – Public Safety.

I-252 Christi Moore

I-252-1 | I am a SilverLake resident. I support Less is More.

COMMENT

I-252-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-253 Suvi

COMMENT

RESPONSE

I-253-1

I-253-2

We recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you.

I-253-1

I-253-2

Please see Master Response - Fence Removal.

Please refer to Master Response – Public Safety.

I-254 L Cohn

COMMENT

RESPONSE

I-254-1	Our Hamlet already has much more destination traffic than years prior due to the meadow and trail. These things have already negatively effected our quality of life, and therefore we are vehemently opposed to this plan for the reasons below:	I-254-1	This comment discussed current conditions and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Master Response - Traffic/Transportation.
I-254-2			
I-254-3	(b) (7) Significant Environmental effects on Wildlife	I-254-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-254-4	(b) (7) Massive influx of visitors to our small community - increasing traffic congestion around the reservoir and into residential streets		
I-254-5	(b) (7) Lack of public parking - placing the burden on nearby residential street		
I-254-6	(b) (7) Removal of the perimeter fence will cause issues on wildlife - also Security problems for neighborhood	I-254-3	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-254-7	(b) (7) Noise nuisances caused by random events and amplified music		
I-254-8	(b) (7) Construction noise for years		
I-254-9	(b) (7) Congestion and crime - no plan for nightly security		
I-254-10	(b) (7) Disruption of the quality of life for residents living within in neighborhood nearest to the reservoir	I-254-4	Please see Master Response - Traffic/Transportation.
I-254-11	(b) (7) Maintaining the facility - prevention from falling into disrepair		
I-254-12	(b) (7) Silver Lake is not "Park Poor" as are other areas within the city of Los Angeles. Parks within a close proximity to the community are Silver Lake Recreation Complex including Silver Lake Meadow, Griffith Park, Elysian Park, Echo Park to name a few.	I-254-5	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.
I-254-13	(b) (7) Cost of project - \$268 million ? Where are the funds coming from ?		
	Thank you for your time and possible understanding in what would further deteriorate the community.	I-254-6	Please see Master Response - Fence Removal.
I-254-14	Thank you, L. Cohn 2340 Deane Street Los Angeles, CA 90039		This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
			Please see Master Response - Public Safety.
		I-254-7	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Please see Master Response - Noise .
		I-254-8	As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for

I-254 L Cohn

COMMENT

RESPONSE

purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. For example, the Ivanhoe Overlook and Eucalyptus Grove would need to be constructed before the East and West Narrows to avoid potential damage to any of the new facilities (e.g., new pathways). For the purposes of the environmental analysis, a two-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

This comment expresses concern regarding construction noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.

I-254-9 As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Police Department. LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. Also, please see Master Response - Public Safety.

I-254-10 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-254-11 Please see Master Response - Funding and Operations.

As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance,

I-254 L Cohn

COMMENT

RESPONSE

and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

- I-254-12 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

- I-254-13 Please see Master Response - Funding and Operations.

- I-254-14 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-254 L Cohn

COMMENT

RESPONSE

I-254-15 Please see responses to Comments I-254-1 through I-254-14.

Draft Environmental Impact Report (EIR) and the Silver Lake Reservoir Complex Master Plan Project

Our Hamlet already has much more destination traffic than years prior due to the meadow and trail. These things have already negatively effected our quality of life, and therefore we are vehemently opposed to this plan for the reasons below:

- Significant Environmental effects on Wildlife
- Massive influx of visitors to our small community - increasing traffic congestion around the reservoir and into residential streets
- Lack of public parking - placing the burden on nearby residential street
- Removal of the perimeter fence will cause issues on wildlife - also Security problems for neighborhood
- Noise nuisances caused by random events and amplified music
- Construction noise for years
- Congestion and crime - no plan for nightly security
- Disruption of the quality of life for residents living within in neighborhood nearest to the reservoir
- Maintaining the facility - prevention from falling into disrepair
- Silver Lake is not "Park Poor" as are other areas within the city of Los Angeles. Parks within a close proximity to the community are Silver Lake Recreation Complex including Silver Lake Meadow, Griffith Park, Elysian Park, Echo Park to name a few.
- Cost of project - \$268 million ? Where are the funds coming from ?

Thank you for your time and possible understanding in what would further deteriorate the community.

Thank you,
L. Cohn
2340 Deane Street
Los Angeles, CA 90039

I-254-15

I-255 Jason Filipow

	COMMENT	RESPONSE
I-255-1	<p>My family and I are very excited at the prospect of enjoying more natural spaces in and around the Silver Lake Reservoir complex. We really enjoy the Ivanhoe Reservoir path and benches as well as the Meadow. I'd love to see additional and similar paths thru the Eucalyptus groves and other appropriate areas. We also support changes or enhancements that harmonize the natural space and wildlife. It's amazing to witness the nesting of Great Blue Herons every spring!</p>	<p>I-255-1 The comment expresses support for the proposed Project and makes suggestions for additional uses. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-255-2	<p>While I understand the need (and certainly support) to have the perimeter of the Silver Lake Reservoir Complex fenced off, I do wish that the chain link and barb wire could be replaced by something less industrial/less visually abrasive. The green metal fencing around the Rowena Reservoir is very handsome and it would be great to have something similar to that around Silver Lake Reservoir Complex.</p> <p>Thank you!</p>	<p>I-255-2 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a fence around the perimeter of the SLRC. Please see Master Response - Fence Removal. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-256 Aaron Burrows

COMMENT

RESPONSE

I-256-1 We support the master plan process and the Draft EIR. We would like to see a
I-256-2 border fence remain but recommend replacing the fence for improved
I-256-3 aesthetics. We also believe closing the internal paths from dusk to dawn, as
they are now, would be beneficial to the community.
Thank you!

I-256-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-256-2 Please see Master Response - Fence Removal.

I-256-3 Please refer to Master Response – Public Safety.

I-257 Quyen Tran

		COMMENT	RESPONSE
I-257-1	We support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. As long time residents of Silverlake, and living as close to the reservoir as we do, we don't mind the noise and construction it will take to improve our community. We support and love the wildlife around here, and love what the master plan will bring to the neighborhood we love so much. Thank you.	I-257-1	The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-257-2		I-257-2	Please see Master Response - Fence Removal.
I-257-3		I-257-3	Please refer to Master Response – Public Safety.
I-257-4		I-257-4	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-258 Jenna Schoenefeld

COMMENT

RESPONSE

I-258-1 | Hello, I'm writing to say that I'm in support of this plan. It looks beautiful and nature-forward, which I think is most important in a city, and we should be doing more in Los Angeles where we can.

| Thank you.

I-258-1 | The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-259 Josh Warner

	COMMENT	RESPONSE
I-259-1	I strongly oppose the current DEIR plan which would require millions of tax payer dollars and years of construction disruptions to residents and relocation of wildlife. And for what end? I live walk the Reservoir and don't see any sense of need or urgency to what is being proposed. People and wildlife flock to Reservoir now not because of what it is lacking - as the plan suggests - they enjoy it for what is already.	I-259-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-260 Laura Gowen

		COMMENT	RESPONSE
I-260-1	I'm writing to express my support for the Master Plan. Having participated in some of the early planning events, putting stickers on proposed ideas I liked and discussing these issues with neighbors, I'm pleased with how the Plan incorporates the preferences of Silver Lake residents and concerns for wildlife. While I agree that the current fence needs to be replaced, I'm in favor of considering a new fence so that dusk-to-dawn access could be restricted. Doing so would address local safety concerns and protect wildlife.	I-260-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-260-2		I-260-2	Please see Master Response - Fence Removal and Master Response - Public Safety.

I-261 Alan Berman

	COMMENT	RESPONSE
I-261-1	<p>It's not too late to use a different approach. Instead of hiring a firm to come up with multiple possibilities and then attempting to force those through at "workshops" that didn't really allow for much true input, what would work better would be a true citizens assembly. Petaluma had a similar divisive issue: a large fairgrounds that brought the city council to a standstill when it came to renegotiating their contract with the fairgrounds commission. Finally the city council was persuaded to put their money, instead of to a commercial firm, to a citizens assembly project that saw participation from community members and true input that was compiled into a report that was delivered to the city council. Full transparency was enforced and the community was involved in a positive, non-political approach. It's not too late! And it would be a way better use of funds than dealing with the problems that the current proposal is going to create. The org that delivered the training and resources is Healthy Democracy: https://healthydemocracy.org/ Here's a brief video about the process at Petaluma: https://youtu.be/a2lR8oIeUYE</p>	<p>I-261-1 Comment noted. Please see Master Response - Community Engagement Process. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-262 Joseph Hogg

COMMENT

RESPONSE

I-262-1 | Please see the attached file: slproject.pdf

I-262-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-262 Joseph Hogg

COMMENT

RESPONSE

	Response to the LA Department of Engineering on the Proposed Silver Lake Reservoir Complex Master Plan
	1 Personal
I-262-1 Cont.	My name is Joe Hogg and I live at 2467 Hidalgo Avenue, Los Angeles, CA 90039. My email address is: joseph.hogg@gmail.com . I have lived in the Silver Lake area for more than forty-five years and walked the streets and paths around the Reservoir. I can see the Reservoir from my house and have enjoyed the beauty and peace of the neighborhood.
	2 Recommendation
I-262-2	I recommend a very scaled-back project closer to a Maintenance Alternative to the current Silver Lake Complex with no new buildings and no Reservoir access.
	2.1 Specifics
I-262-3	Fencing Replace the current fencing with a sturdier, more attractive fence that keeps the public away from the Reservoir.
I-262-4	Meadow Plant trees to provide shade, no new construction, and enforce the no-dogs rule for the Meadow. Maintain the lawn and native shrubs.
I-262-5	Walking and Bike Paths Improve the safety of both waking paths and bike paths around the Reservoir.
I-262-6	Recreation Center Maintain the play structures, the grassy area next to the basketball court, and consider planting trees for shade. Add no new parking.
I-262-7	Dog Parks Maintain the dog parks. Do not plant grass. Dogs will destroy it quickly. Plant trees for shade. Dogs like trees.
I-271-8	LADWP LADWP should continue to maintain the Reservoir.

1

I-262-2	The comment expresses support for a scaled back version of the proposed Project. Please see Master Response - Alternatives Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-262-3	Please see Master Response - Fence Removal.
I-262-4	As described in the Project Description, Section 2.5.5 of the Draft EIR, the planting design for the proposed Project would be aligned with the City's New Green Deal goals of increasing tree canopy and protecting native biodiversity. The proposed Project would include eight planting zones ranging from gardens within the promenade, ornamental gardens, and embankment slope planting, to habitat areas. All habitat plant communities would be composed of native species representative of four distinct regional ecological zones: southern oak woodland; riparian woodland; coastal sage scrub; and freshwater wetland. The ornamental garden areas would be a combination of native and drought-tolerant species appropriate to the Los Angeles region to provide a plant palette adapted to climate change. Lawn would be used sparingly and strategically distributed where needed to support multifunctional cultural and recreational uses. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-262-5	As described in the Project Description, Section 2.5.6 of the Draft EIR, the promenade would be a 2.5-mile continuous walking/running loop connecting all the park zones to one another and the reservoirs. The promenade is envisioned as both place and connector. On average, it would be 25 feet wide with seating and 5-foot-wide ornamental planting bands along its edges. These would double as rain gardens during winter months. At a minimum, the promenade would maintain a 15-foot clear pathway for LADWP maintenance and operations. The commenter is also referred to Master Response - Parking/Bike Option.

I-262 Joseph Hogg

COMMENT

RESPONSE

- I-262-6 The proposed Project, described in Chapter 2 of the Draft EIR. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. The commenter is also referred to Master Response - Parking/Bike Option.
- I-262-7 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-262-8 Please see Master Response - Funding and Operations.
- The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-262 Ryan Parmenter

		COMMENT	RESPONSE
I-262-9	3 Traffic 1. Silver Lake and Glendale Boulevards are congested with cars during rush hours and busy streets throughout the day. 2. These streets, along with Rowena, funnel into a bottle-necked Fletcher. They are essentially on-ramps to the 5 and 2 freeways. 3. Additional traffic in and around Silver Lake should be discouraged.	I-262-9 Please see Master Response - Parking/Bike Option and Master Response - Traffic/Transportation.	
I-262-10	4 Nearby Resources 1. Griffith Park and The Los Angeles Zoo and Botanical Gardens. 2. The Los Angeles River between Fletcher and Figueroa has several excellent small parks with parking, a bike path, and viewing of a variety of ducks, cormorants, egrets, and Great Blue Herons that feed in the river and nest in trees around the Silver Lake Reservoir. 3. Vista Hermosa Natural Park at 100 N. Toluca Street 4. Bellevue Recreation Center at 826 Lucile Avenue 5. Elysian Park 6. Echo Park and Lake	I-262-10 The comment identifies nearby recreational resources identified in Figure 3.15-1 Map of Neighborhood, Community, and Regional Parks, in the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. I-262-11 Please see Master Response - Funding and Operations and Master Response Homelessness. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.	
I-262-11	5 Conclusion I mention nearby resources above that are established, easily available, and worthy of support. And, in view of the size of the homeless population, housing affordability, food shortages, and the general financial condition of the the City, I would be ashamed to support a \$300m, multi-year Silver Lake Complex Master Plan Project until some of these more urgent challenges are being resolved.		

I-263 Larry Bamberger

COMMENT

RESPONSE

I-263-1

I have lived across from the eucalyptus grove since 1948 in a house my Dad built. I see the lake thru the trees. Keep people out of the grove. No artificial islands that replace the water. No bleachers. Fence off the grove. Keep out the homeless.

Larry Bamberger
2201 W. Silver Lake Dr.
Los Angeles, CA 90039-3114
(323) 661-8735

I-263-1

Please see Master Response – Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-264 Joseph Hogg

	COMMENT	RESPONSE
I-264-1	I submitted my comments in pdf file, slproject.pdf, this morning. How will I know that you have received my comments? Thank you, Joe Hogg	I-264-1 Please see response to Comments I-262.

I-265 Marlys Gilgen

COMMENT

RESPONSE

I-265-1	I have lived in Silverlake for 55 years and have enjoyed the beauty and serenity of this neighborhood every day. Walking around the reservoir, through the hills, enjoying the migrating birds, ducks and geese flying towards the lake. I SUPPORT a much scaled down version of the proposed plan:	I-265-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-265-2	<ol style="list-style-type: none"> 1. Plant trees in the meadow for shade and add a much needed Bathroom. 2. Replace the Reservoir fence with a more attractive one. 3. MAINTAIN the beautiful amenities we have now. 	I-265-2	The comment expresses support for a scaled down version of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-266 Leigh Jacoby

COMMENT

RESPONSE

I-266-1	I support elements of alternatives 2 and 3 to the Master Plan which would create a wildlife sanctuary and migratory bird refuge, establishing a permanent protected habitat for them, with fencing retained. As recommended by the Audubon Society.	I-266-1	The comment expresses support for elements of Alternative 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-266-2	The Master Plan would remove the Reservoirs' Perimeter Fence. This will have major impacts on wildlife welfare and neighborhood safety. Vandalism, vagrancy and crime have been documented as serious problems in other unfenced parks in Los Angeles. There is no Public Safety mitigation for the loss of the Perimeter Fence suggested in this DEIR.	I-266-2	Please refer to Master Response – Public Safety.
I-266-3	Alternative 3 of the Master Plan specifies a perimeter fence of the same height of the present fence, open during daylight hours and closed at night. Hence, the presence of park visitors during the day, and the activity around neighboring homes would deter much illegal incursion.	I-266-3	The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-266-4	The proposed floating islands, wetland terraces and fish stocking will do nothing to preserve wildlife. Dan Cooper, Chief Conservation Biologist of the Santa Monica Mountains Conservancy states: This DEIR is "lacking in both rigor and specificity.... Without current, accurate, and credible data on the biological resources ..., efforts at restoration will either fall short, or could actually result in further degradation of the site."	I-266-4	Please see Master Response - Alternatives Analysis. This comment expresses a general opinion concerning floating islands, wetland terraces, and fish stocking and the effectiveness of these types of habitats are preserving wildlife. The comment continues by referencing Dan Cooper's letter in which he states that the Draft EIR is inadequate in analyzing and summarizing existing baseline conditions and that restoration efforts will fail. Responses to portions of this comment pertaining to Dan Cooper's letter are presented in Comment Letter L-1. The Draft EIR baseline conditions were analyzed and summarized consistent with the CEQA statutes and the State CEQA Guidelines. Additionally, the Draft EIR Section 3.4, Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. Lastly, the comment states the opinion that the construction of the education center will destroy natural habitat. The proposed location of the education center is located in a portion of land that is currently vegetated with non-native trees and understory.
I-266-5	Another urgent concern is construction of an education center which will destroy precious natural habitat and would violate several Historic-Cultural Monument Standards (our Reservoir is HCM #422); - Would propose a bus parking lot along SL Blvd for intended visitors; - Duplicates other indoor resources already built (Recreation Center); - Does not comply with the Open Space Zoning directives to preserve open space as a balance to urban density; - And is promoted by some as necessary because it would provide restrooms (which could easily installed without building an Education Center).	I-266-5	As described in Section 3.5.1, Cultural Resources, the SLRC itself is a Los Angeles Historic Cultural Monument (#422), designated in 1989. The SLRC has also been previously recorded by SurveyLA with a status code of 5S1, meaning that it is a designated City landmark. Further analysis of historical resources and impacts analysis is based on the Silver Lake Reservoir Complex Master Plan: Supplemental Historical Report and Impacts Analysis (2022) (Historical Report) provided within Appendix F of the Draft EIR.

I-266 Leigh Jacoby

COMMENT

RESPONSE

The Draft EIR is the most extensive description, analysis, and catalog of the features and history of the SLRC written to date. While the SLRC was evaluated as a district, rather than a Historic Cultural Landscape, that is merely a difference in terminology and organizational tools. The characterization of the SLRC as a “district” versus a “landscape” did not originate with the Draft EIR; it dates to its listing as a LAHCM and therefore predates the Draft EIR. The Draft EIR confirms that the SLRC is a historical resource for the purposes of CEQA and includes numerous character-defining features that are landscape features. The original HCM nomination form is short and limited on details and does not contain an inventory or description of what the contributing and/or non-contributing resources are contained within the district, let alone inventory, categorize, and analyze its character-defining features. The Draft EIR contains an extensive history of the SLRC, including categorizing and prioritizing the character-defining features of the SLRC, which previously had not been analyzed, including landscape features that previously had not been identified and/or included in analysis. In addition to the ESA report and analysis, consultant GPA clearly states on page 11 of their 2020 memorandum that “The Complex is a historic designated landscape.” Their 2019 report provided a description of the Site, a summary of its development and history, an illustrated inventory of landscape characteristics and character defining features of the SLRC, and an analysis of its status as a historical resource. Per *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (National Park Service, 1996), organizational elements of a historic cultural landscape can include spatial organization, topography, vegetation, circulation, and water features; all of these are included and addressed within the Draft EIR.

Additionally, with the number of buildings, structures and physical infrastructure associated with the SLRC, a district is not an inappropriate organizational tool. Landscape features can and are considered character defining features in historic districts, including the SLRC, and do not necessarily require separate evaluation as “cultural landscape.” More importantly, the landscape features of the SLRC that would be defined, inventoried, and evaluated for impacts in a cultural landscape evaluation are all defined, inventoried, and evaluated within the Draft EIR, including various landscaping and landscape areas, the knoll, and the meadow. The resulting analysis of impacts more than adequately addresses the potential impacts of the project, and an analysis of impacts under the auspices of a “cultural

I-266 Leigh Jacoby

COMMENT

landscape” would be no different. More importantly, the Draft EIR acknowledges that the Master Plan will have an impact on the historic features of the SLRC; it simply states that these impacts do not reach the level of a “substantial adverse change.”

Please see Master Response - Alternatives Analysis for details on the differing alternatives regarding open space.

RESPONSE

I-267 Diana Nitchman

COMMENT

RESPONSE

I-267-1 | The scope of the entire project is too large for this reservoir, a few smaller changes would enhance the neighborhood without these extreme updates.

I-267-2 | 1. The fencing should be replaced with an updated version, opening the area is not desirable.

I-267-3 | 2. The facility should be closed at the end of each day, only open during daylight hours.

I-267-4 | 3. No viewing areas that would destroy the knoll at the eastern border of the reservoir.

I-267-5 | 4. Provide parking as the neighborhood has insufficient areas to accommodate anyone coming to the park by car from a distance.

I-267-1 | The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-267-2 | Please see Master Response - Fence Removal.

I-267-3 | Please refer to Master Response – Public Safety.

I-267-4 | Comment noted. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-267-5 | Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.

I-268 John Butcher

COMMENT

RESPONSE

- I-268-1 I support the master plan process and the Draft EIR..., EXCEPT
- I-268-2 1. I INSIST on keeping a fence but replacing the fence with one like the Rowena Reservoir. KEEP A FENCE IN PLACE.
- I-268-3 2. I also believe closing the internal paths from dusk to dawn is absolutely necessary and beneficial to the community, as they are now.
- I-268-4 3. The construction needs to be closer to 5 years instead of some 20 years.
- I-268-4 Thank you.

- I-268-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-268-2 Please see Master Response - Fence Removal.
- I-268-3 As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.
- I-268-4 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

I-269 Matthew Brown

COMMENT

RESPONSE

I-269-1 | I support a new SL Reservoir Park! High time we had some change and the new design looks incredible. Can't wait to bring my family!

I-269-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-270 Terrence Jackson

COMMENT

RESPONSE

Attached is a PDF of my comments regarding the Draft EIR

I-270 Terrence Jackson

COMMENT

RESPONSE

Response to Draft Environmental Impact Report on the Silverlake Master Plan:

I-270-1

My name is Terry Jackson, and I was a board member of the Silverlake Neighborhood Council (SLNC) for three years and was co-chair of the Reservoir Complex Committee. The SLNC engaged the Loyola Marymount Center for Urban Resilience to design and implement a survey of the people's use of the reservoir complex. This study involved nearly 300 in person interviews of people as they were at the reservoir complex and over 1,000 additional responses obtained from the online survey. Most of the respondents were Silverlake residents, and they were in favor of better maintenance of the existing facility.

I-270-2

The Draft EIR lacks a clear comparison of the range of alternatives. There need to be tables that show the time frame and the amount of work involved in each phase—amount of excavation, number of trucking hauls, areas of new asphalt paving, traffic impacts, time for which areas impacted will not be available for public use, etc. For each phase there needs to be an estimate of the costs. Without the side-by-side comparison, the less impactful alternatives have been relegated to a brief section at the end of the report.

I-270-3

The draft EIR fails to provide a fair presentation and analysis that supports the general conclusions of "no significant mitigation required". Without a side-by-side comparison of alternatives the Los Angeles City Council will not be able to make informed decisions regarding the scale of the proposed project.

I-270-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-270-2 Per Section 15126.6 of the CEQA Guidelines, the Draft EIR has fulfilled its obligations with regard to selecting a range of reasonable alternatives to the project. As mentioned within that section, an EIR need not consider every conceivable alternative to a project. Additionally, under CEQA, alternatives do not need to be described or analyzed at the same level of detail as the proposed Project (CEQA Guidelines Section 15126.6(d)).

Please also see Master Response - Alternatives Analysis for further details.

I-270-3 Please see response to Comment I-270-2.

I-271 Joseph Hogg

COMMENT

RESPONSE

I-271-1 | Please see the attached file: slproject.pdf

I-271-1 Please see responses to Comment I-262.

I-271 Joseph Hogg

COMMENT

RESPONSE

I-271-1
Cont.

Response to the LA Department of Engineering on the Proposed Silver Lake Reservoir Complex Master Plan

1 Personal

My name is Joe Hogg and I have lived in the Silver Lake area for more than forty-five years and walked the streets and paths around the Reservoir. I can see the Reservoir from my house and have enjoyed the beauty and peace of the neighborhood.

2 Recommendation

I recommend a very scaled-back project closer to a Maintenance Alternative to the current Silver Lake Complex with no new buildings and no Reservoir access.

2.1 Specifics

Fencing Replace the current fencing with a sturdier, more attractive fence that keeps the public away from the Reservoir.

Meadow Plant trees to provide shade, no new construction, and enforce the no-dogs rule for the Meadow. Maintain the lawn and native shrubs.

Walking and Bike Paths Improve the safety of both waking paths and bike paths around the Reservoir.

Recreation Center Maintain the play structures, the grassy area next to the basketball court, and consider planting trees for shade. Add no new parking.

Dog Parks Maintain the dog parks. Do not plant grass. Dogs will destroy it quickly. Plant trees for shade. Dogs like trees.

LADWP LADWP should continue to maintain the Reservoir.

I-271 Joseph Hogg

COMMENT

RESPONSE

I-271-1
Cont.

3 Traffic

- 1. Silver Lake and Glendale Boulevards are congested with cars during rush hours and busy streets throughout the day.
- 2. These streets, along with Rowena, funnel into a bottle-necked Fletcher. They are essentially on-ramps to the 5 and 2 freeways.
- 3. Additional traffic in and around Silver Lake should be discouraged.

4 Nearby Resources

- 1. Griffith Park and The Los Angeles Zoo and Botanical Gardens.
- 2. The Los Angeles River between Fletcher and Figueroa has several excellent small parks with parking, a bike path, and viewing of a variety of ducks, cormorants, egrets, and Great Blue Herons that feed in the river and nest in trees around the Silver Lake Reservoir.
- 3. Vista Hermosa Natural Park at 100 N. Toluca Street
- 4. Bellevue Recreation Center at 826 Lucile Avenue
- 5. Elysian Park
- 6. Echo Park and Lake

5 Conclusion

I mention nearby resources above that are established, easily available, and worthy of support.

And, in view of the size of the homeless population, housing affordability, food shortages, and the general financial condition of the City, I would be ashamed to support a \$300m, multi-year Silver Lake Complex Master Plan Project until some of these more urgent challenges are being resolved.

I-272 Kathleen Johnson

COMMENT

RESPONSE

SL Reservoirs Master Plan DEIR Comments

December 1, 2022

Dear City of LA,

I write in support of the Master Plan for the Silver Lake Reservoirs Complex. I'm a long-term homeowner who has lived across from the reservoir for nearly 30 years, since 1994, and I am 100% behind the Master Plan!

Further developing and naturalizing the reservoir and surrounding property for wildlife and passive recreation, and walking at the water's edge!, has been a dream of mine for 25 years - a once in a generation opportunity to create a climate resilient urban wetland oasis for Silver Lake and all of Northeast LA! This is a jewel of a city asset and should be put into service as urban green space!

I'm particularly passionate about these aspects:

I-272-1

Habitat Islands. Adds 3.5 acres of floating islands to provide undisturbed nesting and foraging for birds (2.5.1, p. 2-22) - though I think these should be significantly increased in size to maximize the type of shadow water areas needed for wetland habitat.

500 new trees (Urban Ecosystems and Resilience, 2-33)

50% increase in tree canopy coverage (Urban Ecosystems and Resilience, 2-33)

Improved maintenance and security (2-5, 2.7.1 p. 2-49)

Native plants (2.5.5)

Rain gardens and 1 acre of new wetland planting (2.3.2)

Surface Stormwater Drainage, runoff to be treated by various landscape features before draining into the Reservoirs. (2.7.3, p. 2-57)

I-272-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-272 Kathleen Johnson

COMMENT

RESPONSE

	Areas for Concern or Reconsideration:		
I-272-2	1) Having founded and tended the Meadow Native Garden for years, we also ask that in the redesign of the Meadow section (& protected during construction), you preserve the northern bed of the Meadow Native Garden. This area is now a vibrant, mature native ecosystem of interconnected toyons, ironwoods, fairy dusters, coyote bush, milkweed, ceanothus, sages, western redbuds, elderberry and more, hosting an array of wildlife, from birds, owls, & bees, to rabbits and the recently endangered monarchs. The native trees in this bed are now well beyond 4" in diameter and thus deserving protection. Even a 4:1 remediation scheme for these specimens, if lost, is insufficient and cannot replace a mature landscape of interconnected species.	I-272-2	The comment states that the Meadow Native Garden should be preserved since it is a mature habitat. The City's Protected Areas for Wildlife & Wildlife Movement Report found that no documented sensitive natural plant communities were found within SLRC. Additionally, the Draft EIR and SLRC Master Plan have stated that the upland habitat areas (12 acres) will be planted with site appropriate native plant species. The Draft EIR identifies trees that meet the City ordinance criteria for special protections or replacement ratios. As pointed out in the comment, replacement may result in temporary impacts to complex habitat assemblages. The proposed Project includes a Tree Succession Plan to maintain some existing mature vegetation while new vegetation is maturing to reduce the impact of temporal losses in specific areas. Also, please see Master Response – Biological Resources.
I-272-3	2) Native plants and tree species should be given priority over non-native plants, in habitat areas and "Ornamental Gardens." This will better align it with section 2.5.5 Planting (2-30) with PDF-UTIL-1: Drought-Tolerant Landscaping (2-39).	I-272-3	The comment states that native plants existing on site should be given priority over non-native plants. The proposed Project outlines an impact footprint that will affect existing vegetation in specific areas. These areas will be revegetated with native plants to enhance the habitat values in the SLRC.
I-272-4	3. Additionally, the suggested planting of a "single tree species" along the Promenade should be further reviewed. Given recent invasive insect infestations, climate change, and improved scientific understanding of forest resilience, planting a variety of Riparian and Oak Woodland tree species would be more beneficial. Further, we reject the list of non-native species proposed in the Master Plan (5.6.1 p. 182) when several locally native species would provide significantly better habitat function and climate resilience. We instead propose Coast Live Oak (<i>Quercus agrifolia</i> , and variety <i>agrifolia</i>), California Laurel (<i>Umbellularia californica</i>), and California Walnut (<i>Juglans californica</i>). Yellow Willow (<i>Salix lasiandra</i> var. <i>lasiandra</i>) and Red Willow (<i>Salix laevigata</i>) are both fast growing (to 50' within 10 years) and can be planted along the permeable banks, in conjunction with stormwater infiltration. Smaller, understory trees should also be mixed into this planting and can include Hollyleaf Cherry (<i>Prunus illicifolia</i> ssp. <i>illicifolia</i>), Black & Blue Elderberry (<i>Sambucus nigra</i> , <i>Sambucus nigra</i> ssp. <i>caerulea</i>) and Toyon (<i>Heteromeles arbutifolia</i>). proposed in the Master Plan (5.6.1 p. 182) when several locally native species would provide significantly better habitat function and climate resilience. We instead propose Coast Live Oak (<i>Quercus agrifolia</i> , and variety <i>agrifolia</i>), California Laurel (<i>Umbellularia californica</i>), and California Walnut (<i>Juglans californica</i>). Yellow Willow (<i>Salix lasiandra</i> var. <i>lasiandra</i>) and Red Willow (<i>Salix laevigata</i>) are both	I-272-4	The comment provides suggestions for plant pallets. The City appreciates the thoughtful suggestions. The Draft EIR and SLRC Master Plan have stated that the upland habitat areas (12 acres) will be planted with site appropriate native plant species. Baselines conditions for trees located along the Promenade consist primarily of non-native trees species planted and maintained by the Bureau of Street Services. Street trees are not proposed for removal or replacement at this time. Areas in which the Promenade enters the proposed native habitat areas will be planted with native species. The City will consider the suggested plant pallet.

I-272 Kathleen Johnson

COMMENT

RESPONSE

	fast growing (to 50' within 10 years) and can be planted along the permeable banks, in conjunction with stormwater infiltration. Smaller, understory trees should also be mixed into this planting and can include Hollyleaf Cherry (<i>Prunus illicifolia</i> ssp. <i>illicifolia</i>), Black & Blue Elderberry (<i>Sambucus nigra</i> , <i>Sambucus nigra</i> ssp. <i>caerulea</i>) and Toyon (<i>Heteromeles arbutifolia</i>).	I-272-5	The comment states that the Draft EIR is deficient in its analysis of Southern California black walnut woodland. The Draft EIR Section 3.4, Biological Resources, states that Southern California black walnuts and coast live oaks observed onsite are not likely naturally occurring. As stated in Section 3.4, the entire Knoll and Silver Lake Meadow Park is overlaid with Urban land-Dapplegray-Soper complex soils resulting from human-transported material. Additionally, remnants of an irrigation system were observed adjacent to the Southern California black walnut and coast live oak trees. These two tree species need to be dominant or co-dominant in the tree canopy and attain 30% to 50% relative cover (Keeler-Wolf and Evens 2006). As stated in Section 3.4, neither of these species acquire that level of dominance or co-dominance as all woodlands present within the project site are dominated by non-native species (see Impact 3.4-2). The occurrences of these two species are not related to a remnant stand of native woodlands but rather likely planted trees in an urban ruderal landscape. Additionally, the City's Protected Areas for Wildlife & Wildlife Movement Report found that no documented sensitive natural plant communities were found within SLRC.
I-272-5	4. Walnut habitat assessment (4.3, p. 22). I wholly disagree with the statement that "the BSA does not support black walnut woodland" and the subsequent decision to "not consider Southern California Black Walnut a special-status species for the project site." As black walnut woodlands are found in the nearby neighborhood and extensively in both Mount Washington and Griffith Park, we agree with horticultural assessment that establishing a black walnut plant community on the Knoll would benefit and help to maintain this most endangered local tree species, allowing wind pollination to connect separate communities and preserve genetic diversity of wild populations, while also offering significant habitat value.	I-272-6	The comment expresses the opinion that the stormwater capture projects should be returned to the project description. The comment does not address the adequacy of the Draft EIR analysis. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-272-6	5. Further, I strongly encourage the LADWP to reconsider its decision to halt plans to implement the Stormwater Capture Projects (3.10-20, 2.7.4). These plans will qualify for many stormwater-related funding grants, and the costs associated with their implementation could be greatly reduced if undertaken in conjunction with the various stormwater capture and wetland remediation elements proposed herein. Specifically relevant are the Rain Gardens, Reservoir Edge Treatments, Meadow, and Ivanhoe Reservoir projects proposed for phase 1 construction. This will allow for a more stable, if variable, source of water given Emergency Drought Contingencies and curtailed groundwater pumping to replace annual evaporation.		
	Sincerely, Kathleen Johnson 2365 Edgewater Terrace LA, CA 90039		

I-273 Bill Spater

		COMMENT	RESPONSE
I-273-1	Alternative #1, no project. Why are we continuing to plan a fifteen year water based project in the midst of an historic drought and looming water crisis in the western United States and Mexico.? We'll be lucky to keep it filled for another 5 years. We only need a "drop" to fill it, but risk a bad case of entitled hubris to ask. It's time to stop, and maybe put the effort into reclaiming the eastside of Silverlake Boulevard from nature and the Meadow from the gophers.	I-273-1	The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-273-2		I-273-2	Please see Master Response – Drought Conditions.
I-273-3		I-273-3	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-274 Ryan Parmenter

COMMENT

RESPONSE

I-274-1 | It seems clear that the community supports moving forward with the Master Plan. The three alternatives to the Master Plan considered in the DEIR fall short of the goals residents identified during the planning process. The Master Plan provides real benefits, with only minimal temporary impacts limited to the construction process itself. Doing nothing to the Reservoir would have severe negative impacts on our community and on our wildlife.

I-274-2 |

I-274-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-274-2 Please see Master Response - Alternatives Analysis.

I-275 Rattanawadee Salukkam

	COMMENT	RESPONSE
I-275-1	<p>I am a CD4 resident that has loosely followed the community engagement around this project. A main point of controversy surrounding the approval seems to be the addition (or lack of) new parking.</p> <p>I see that there are design plans for a “no parking” and “parking” option. I would like to voice my support for the NO PARKING option and my reasoning is as follows;</p> <p>It seems to me that most of the loudest voices in the community engagement process are local property owners who are concerned that the “no parking” option will drive traffic into their precious neighborhoods. It is understandable why this opinion seems to be most prevalent, because only property owners are SO investing in the issue that they are motivated to participate in the community engagement process and speak up.</p> <p>But I think there is also a quieter, yet significant, group of residents that admire the ambition to make the Silverlake Renewal Project a project that does not induce traffic with new parking and also provides safe and protected bike accommodations. I myself am one of these people, but I am too busy to contend with the loud voices trying to protect their property interests.</p> <p>I am hopeful that my voice will be heard during the EIR process, and that the city realizes that there are some residents that are willing to support the “no parking” option.</p>	<p>I-275-1 The commenter expresses support for no parking. As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.</p>

I-276 Lorraine Sarles

COMMENT

RESPONSE

I-276-1 | I think the plan is amazing. I am a home owner that lives a block from the north side of the reservoir and fully support this plan. Thank you!

I-276-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-277 Joseph Sarles

	COMMENT	RESPONSE
I-277-1	I am a homeowner who lives less than half a mile from the reservoir and I fully support this plan and would love to see it proceed with all haste.	I-277-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-278 Rattanawadee Salukkam

COMMENT

RESPONSE

I-278-1

I hope there is still a good path for running and please install lights to keep it safer at night.
The reservoir is very popular for both runners and walkers so I hope the new design can accommodate both comfortably. Thank you.

I-278-1

Please refer to Master Response – Public Safety.

In addition, as described in Chapter 2, Project Description, of the Draft EIR, the proposed promenade would be a 2.5-mile continuous walking/running loop connecting all the park zones to one another and the reservoirs. Further, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety (see Figure 2-8 in the Draft EIR). High-level lighting (2 foot-candle [fc]) would only be used at the park facilities in the South Valley, where lighting already exists. Medium-level lighting (0.5 fc) would be implemented along the proposed Promenade, on select primary paths and within the proposed seating terraces at the water's edge. Low-level lighting (0.25 - 0.5fc) would be introduced along many of the proposed paths between the park and neighborhood. No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public. All lighting would be shielded and pointed away from the surrounding neighborhood or wildlife areas.

I-279 Paul Tzanetopoulos

	COMMENT	RESPONSE
I-279-1	<p>As a 40-year resident and property owner directly adjacent to the reservoir, I have lived through the transformation of the reservoir and the addition of recent Meadow improvements, and want to recommend, with extreme urgency, that only Alternative #1 - NO PROJECT - be implemented.</p> <p>All the recent work has impacted my family and neighbors negatively and I hope that no more of this type of renovation, construction and negative traffic impacts will be considered.</p>	<p>I-279-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-280 Kim Fisher

COMMENT

RESPONSE

I-280-1	I am writing to express my disapproval of the proposed Silver Lake Reservoir Complex Master Plan. I am a resident in the immediate area that will be affected by this project. I do not want more congestion, street parking issues, loud public events, an "enhanced" native nature experience. The reservoir is beautiful as it is and it doesn't need "improving". I live in the immediate area and do not want the reservoir turned into a destination or major attraction that invites crowds in. Why don't propose this for Griffith Park instead. Not to mention the millions of dollars this project will cost. All funds should be used to address the ever growing homeless issue. Shelter, medical care, food and basic living needs I would think are a priority over constructing built in seating areas in an already beautiful outdoor area. Take it somewhere else!	I-280-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-280-2		I-280-2	Please see Master Response - Traffic/Transportation and Master Response - Noise.
I-280-3		I-280-3	Please see Master Response - Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
<p>The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.</p> <p>As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.</p>			

I-281 Donald Parker

	COMMENT	RESPONSE
I-281-1	I am a 40+ year resident of this area and have always enjoyed the reservoir as it is. The idea of radically changing it to what is proposed is appalling to me. I have been against the proposed changes from the plan's inception and continue to reject any plan other than leaving the reservoir just as it is. Please consider the massive disruption to residents and nature these changes will cause and vote to stop the plan now!	I-281-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-282 Mara Kuge

COMMENT

RESPONSE

I-282-1

The proposed changes to the Reservoir are a much-needed upgrade that will benefit those in the community and beautify the area. It will increase property values surrounding it. It will look better and the wildlife will be happier.

Please do not let the nuts who are afraid of increased traffic and crime overrule the beautiful plan you have put together.

I-282-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-283 Elsie Acevedo

	COMMENT	RESPONSE
I-283-1	<p>Keep the park as it is. I am not for this at all as this will create a lot of issues. I oppose this master plan and don't want this to be approved. iT is a terrible idea.</p> <p>Elsie Acevedo 2372 edgewater terrace LA 90039</p>	<p>I-283-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-284 Ramon Chi

COMMENT

RESPONSE

- I-284-1 I have been a Silver Lake resident and Home Owner for over 30 years and love this area because of the diversity of people from all part of the world and economic back ground. I am totally against a development project (Silver Lake Reservoir Complex Master Plan) that will transform the Silver Lake area into a Theme Park. We need to keep our community and environment as peaceful and well maintained as possible. Currently we can't even maintain and repair the reservoir areas that needs improvement and maintenance. It's also unclear to me, where the funding will come from, and I will not vote for an increase in our property taxes to fund a project that most of the residents do not support!
- I-284-2 The Draft EIR references many areas of concerns for the environment and the disruptions of the community area during construction. The wildlife that have settled around the lake after the construction of the Pipe Project will leave due to all the noise and disruption. This project is estimated to take over five years to complete, and meanwhile there's no guarantee the wildlife will return to Silver Lake. People already come to Lovely Silver Lake to walk, jog, picnic, exercise, walk their dogs, etc. I highly recommend to leave the Silver Lake area as is, and make small improvements while repairing and maintaining the current needs.
- I-284-3

- I-284-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- The commenter is also referred to Master Response - Funding and Operations.
- I-284-2 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
- I-284-3 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-285 Patricia Wong

COMMENT

RESPONSE

I-285-1	I am against spending an estimated \$3M on the Silverlake Masterplan, when that amount is the annual budget of Parks and Recreation. It's also unclear where the funding is coming from, and I will not vote for an increase in our property taxes to fund a project that most of the residents do not support!	I-285-1	Please see Master Response - Funding and Operations. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-285-2	The money could be better spent on creating more green spaces in poor communities that have none. Our community already has a lake with wildlife, a meadow for family gatherings, a recreation center and park. However, the meadow and the jogging/walking pathways have fallen in disrepair. The meadow is covered with gopher holes, the plants have not been cared for, and people walk their dogs there in spite of the "No dogs allowed" signs. The pathway in the southern area has roots that create uneven pavements making it dangerous to maneuver. The cost to maintain the existing area would be a fraction of the cost of creating this "wonderland". Griffith Park, the LA River and Echo Park Lake are all within reach. This is not a community lacking in green space or recreation.	I-285-2	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-285-3		I-285-3	Please see Master Response - Funding and Operations. The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-285-4	The wildlife that have settled around the lake will leave with all the noise and disruption. This project will take years to complete, and meanwhile there's no guarantee the wildlife will return to Silverlake. People already come here to jog, picnic, exercise, etc. I say leave the lake area as is, and just maintain it.	I-285-4	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-285-5		I-285-5	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-286 James Martin

COMMENT

RESPONSE

I-286-1 Looks cool, please start the improvements asap.

I-286-2 Please encourage improved bus access to the area so neighbors from echo park, koreatown and ateater can access the area easily.

I-286-3 Please set aside a parking area near the rec center/dog parks for food trucks.

Thank you.

I-286-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-286-2 The proposed Project, described in Chapter 2 of the Draft EIR does not include changes to bus access. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-286-3 The proposed Project, described in Chapter 2 of the Draft EIR does not include a designated parking area for food trucks. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-287 Amanda Lasher

COMMENT		RESPONSE
I-287-1	Please do not do any of this. Leave it alone. We have plenty of green spaces and resources in this neighborhood. Allocate the money for another neighborhood that could benefit from it. The situation with the unhoused could use funding. Community food banks. Neighborhoods with no green spaces. And if that is not possible, then do the cheapest, least disruptive version. There are so many more communities that could use these resources. Our city and the issues happening here have changed dramatically since this project was first introduced. I get that is a painful reality and it is hard to let this go, but have some humility. Please do not do this.	I-287-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-287-2		I-287-2 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic. As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents. The commenter is also referred to Master Response - Funding and Operations.
I-287-3		

I-288 Vivien Kotler

COMMENT

RESPONSE

I-288-1 | Hi,
I am voting for #1- No Project.
I-288-2 | We live right in front of the Reservoir. Traffic and parking are already difficult,
this would make it much worse.

I-288-1 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-288-2 Please see Master Response - Traffic/Transportation.

I-289 Courtney Allen

		COMMENT	RESPONSE
I-289-1	I support the master plan process and the Draft EIR. I greatly enjoy walking	I-289-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-289-2	around the reservoir. Please consider replacing the fencing and closing at dark for safety reasons. Thank you!	I-289-2	Please refer to Master Response – Public Safety. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-290 Eli Bonerz

COMMENT

RESPONSE

I-290-1 | I'm voting for #1- No Project. Thanks.

I-290-1 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-291 Chris Hogan

		COMMENT	RESPONSE
I-291-1	Thank you for taking the time to read this. I am a 15 year resident of Angus Street right by the lake, I have been aware of this conversation about a master plan for many years now. Including a meeting back in the day, when we had just moved into the house, with local architects who were trying to figure out a plan for the lake. I say that so you don't think I'm just responding reflexively. I also attended many of your meetings, and I am grateful to you and the hard work that went into this plan.	I-291-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-291-2	That said, we endure a lot of hazardous traffic in the mornings and afternoons especially on Angus Street - when we didn't before. If that sounds NIMBY it's not meant to be, we just have so many kids within houses around the intersection of Angus and Kenilworth. When I was a parent at Ivanhoe a couple of years ago for three years around the walking bike to school events in the fall and spring with the help of LAPD stopping traffic. This is a walkable neighborhood and many of those streets don't have sidewalks and are also the walk to school route for Ivanhoe.	I-291-2 I-291-3	 This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Please also see Master Response - Traffic/Transportation. The comment expresses support for Alternative 2 or 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-291-3	What we really need is an updated rec center. I said that as a parent and former coach. I'm so, I am in favor of alternative three, but I could live with alternative two.		

I-292 David Magid

COMMENT

RESPONSE

I-292-1 To Whom it May Concern;
I support the DEIR for the proposed Silver Lake Reservoir Complex Master Plan Project. It will be a fantastic renovation of a gemstone in our community!
Please get it going!

I-292-2 (However, please DO NOT have the same contractors who created the Silverlake Meadow project (6 to 10 years ago) work on this new project. The drainage of that Meadow is horrible; soggy for days after sprinklers or rain, with sinkholes everywhere!)

Thank you,
David Magid

I-292-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-292-2 The comment expresses opposition to previous contract work on the Project site. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-293 Susan Simon

		COMMENT	RESPONSE
I-293-1	Leave the perimeter fence! Access to promenade only to dusk. Leave the concrete embankments. No educational center. No floating islands. The less invasive the better. No grand lawn. No seating areas close to the water. Too much money being proposed for changes that are unwanted. Where will the money come from?	I-293-1	Please refer to Master Response – Public Safety.
I-293-2		I-293-2	The comment expresses opposition to specific components under the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-293-3		I-293-3	Please see Master Response - Funding and Operations.

I-294 Ja Lu

COMMENT

RESPONSE

I-294-1	The adjacent areas of the reservoir are mostly single family residential. The current sound levels are not much over standard noise levels of 60dBA mainly from traffic. The maximum sound level allowed at anytime of day should remain 60dBA for any events. Amplified sound should not be permitted.	I-294-1	As shown in Table 3.12-21 in Section 3.12 of the Draft EIR, noise impacts from operational noise would be less than significant and the maximum increase in noise levels would be 0.1 dBA over current ambient noise levels. This represents a change in noise levels that is imperceptible to the human ear. Further, the comment represents an opinion of what noise standards should be. Section 3.12.3, <i>Significance Thresholds</i> , states the thresholds used to assess operational noise per the City of Los Angeles' <i>LA CEQA Threshold Guide</i> .
I-294-2	Shouting and singing should not be permitted. Everyone has different music preferences, and to have to live with night club dance music with cursing, or loud live music of ethnic music would not be conducive to a single family residential neighborhood, especially for families with young children up to high school children who need quiet, peaceful study environments, elderly, working professionals that need to wake up early for work.	I-294-2	Please see Master Response - Noise.
I-294-3	If people would like loud events they should reserve spaces at Griffith Park that is less than a mile away. Griffith Park is large enough to buffer the noises of many events, and is able to separate residential neighborhoods that are close by.	I-294-3	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.
I-294-4	All events should end one hour before sunset to allow for people and event equipment to leave the premises by dark. This will also limit light pollution. All set up and removal of equipment should be done on the same day.	I-294-4	As described in the Project Description Section 2.7. 2, special events would require a permit from the City and allowable event hours would be from noon to 10:00 p.m. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
i-294-5	Events should have a maximum of three hours in on day, and a maximum of events per month, such as only one event per month maximum, or two events per year. I suppose a very small event of 20 persons could have more frequency of maybe one event per week. These are details that should be figured out on the number of people at an event including staff.	I-294-5	The proposed Project, described in Chapter 2 of the Draft EIR, would not include these requirements. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-294-6	These events will affect the current use of the reservoir with joggers, walkers, and pets who use the spaces for the routine exercise. Events will undoubtedly create a bit more stress in the environment.	I-294-6	Please see Master Response - Traffic/Transportation.
	Parking for event goers should not interfere with residential parking, which currently is an issue in the area I live on in Silverlake. For example, during Halloween, many people drive to Silverlake to go trick or treating plus parties, and there is no street parking available for residents that are coming back home from work. The streets on the hills are narrow and windy with some sections only having enough space for one moving vehicle to pass parked cars. So, this will be an issue, and more parked cars will have car damage.		As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.
			As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. Operations would not require additional fire or hazard services such that substantial

I-294 Ja Lu

	COMMENT	RESPONSE
I-294-7	There is also a potential for more crime with having an area that is more exposed and populated by non residents using the idyllic neighborhood of Silverlake.	<p>adverse physical impacts associated with the provision of new or physically altered governmental facilities would occur. LAFD would be able to serve the proposed Project and would not result in the need for new or altered fire facilities. In addition, the proposed Project was designed in order to allow LAFD to continue to use the reservoir for water for emergency purposes.</p>
I-294-7		<p>LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. The proposed Project is being designed to include wetland habitat and other edge treatments, where feasible, around the reservoir that would allow separation from the public to the water’s edge. In the unlikely event that someone would enter the reservoir water, these wetland areas and edge treatments would also provide places where one could exit the reservoir (as opposed to the current smooth surface and slope of the concrete walls). During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.</p> <p>The commenter is also referred to Master Response - Public Safety.</p>

I-295 John Paul Drayer

	COMMENT	RESPONSE
I-295-1	<div>I oppose creating an Olympic destination that will negatively impact neighboring streets with overflow parking, traffic, & noise. Let's reduce the size & cost ⁰¹⁴₄₈₂ of this project especially before the recession hits us on top of all the inflation. Sensible improvements Yes.</div> <div>No to oversized & costly projects that don't have the consensus of Silverlake neighbors.</div> <div>Reduce. Rethink and consult with us and the new council & mavor.</div>	<div>I-295-1</div> <div>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</div>

I-296 Judith Serlin

COMMENT

RESPONSE

I-296-1 I have lived in Silverlake for upwards of 25 years and am very concerned about the impact of the master plan. Although Silver Lake is in the midst of the City, we have animal and bird life that says otherwise. It's magical to hear the hoot of an owl or the caw of crows or see geese flying in formation overhead....and coyotes ... yes, they too are magical. This project will have a significant impact and I believe, negative impact, on bird and animal life.

I-296-2 This project is focused on our species. It shouldn't be. This project should be about creating a living space for those who live in Silver Lake ...and that should include the birds and animals and P22. ... the balance between people and the natural world.

The fence is important -- it keeps the two leggeds out.

I-296-3 The space is small - and I have concerns that it is being built out as a destination area. This is a neighborhood. I want a park that serves the neighborhood. Plans for this space - size appropriate, neighborhood appropriate, and which takes into account the residents (inc. herons, coyotes, and coots, ducks, and hawks, etc.)

I-296-4 Traffic hasn't been taken into consideration and there is considerably more now than ever before. There is a lack of public parking The cars also create more noise as will the "activities" planned for the space. If I am not at the park to hear music, I should not be forced to hear it.

I-296-5 Everything echoes in this community.

Lately there are more homeless living in the park or in their cars around the park. I would rather see money spent on housing for the homeless and care for the mentally challenged. We can also spend some of those millions on purchasing green space in other parts of the district or City for areas that need a pocket park or additional green space.

I-296-6 I have attended several meetings and have continually raised these concerns. Many of my neighbors have done the same. I hope the City listens.

Judith Serlin

I-296-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-296-2 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-296-3 Please see Master Response - Fence Removal.

I-296-4 This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.

I-296-5 This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.

I-296-6 Please refer to Section 3.13, Population and Housing of the Draft EIR, for a discussion on homeless strategies within the City. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - Funding and Operations.

I-297 Jasmin Miller

COMMENT

RESPONSE

I-297-1 | Love it! Please move forward

I-297-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-298 Jonathan Gluckman

	COMMENT	RESPONSE
I-298-1	Does every winner here represent one or more losers? The situation is nowhere near well enough now, but certainly well enough to be left alone. Koreatown is next to MacArthur Park. Clean it up instead of busing people to Silver Lake. Griffith Park has plenty of recreation facilities and hiking trails. Who invented the term "park-poor", and who created its criteria? If the city has no plan but to grow like Topsy, then the loudest will, as always, prevail. Those who want to live quietly in this city will increasingly be up against negative forces, and those imposing the latter will soon find themselves in the same position. Ask not for whom the bell tolls, density-lovers.	I-298-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-299 Benjamin Stilp

COMMENT

RESPONSE

I-299-1 I fully support the plan as presented and proposed. I am a resident of the area and I vote. I also frequently use the park in the area around the reservoir.

I-299-2 I support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you

I-299-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-299-2 Please see Master Response - Fence Removal.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.

I-300 Janet Carol Norton

COMMENT		RESPONSE
I-300-1	Thank you for all of the ideas and work that have gone into this plan. While I am a supporter of improvement, I OPPOSE the scope of this project. Let's focus on restoring what we have, and not add more parking and lake access. While I love the idea of being able to go near water, this is a reservoir we all live around and not a real lake. I am greatly concerned that access to the reservoir would lead to unnecessary activity and put children and wildlife in danger. We do not need parking and access which will attract more cars and traffic. We have lots of parks nearby and the meadow and grass area near the community center are lovely...but let's focus on it and add more shade. Thank you.	I-300-1 The comment expresses opposition to the scale of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-300-2		I-300-2 Please refer to Master Response – Public Safety. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-300-3		I-300-3 Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.
I-300-4		I-300-4 This comment is conclusory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-301 Sascha Rice

COMMENT

RESPONSE

I-301-1	<p>Hello My husband I moved to silverlake 22 years ago and we've raised our two children here.</p> <p>We've watched the reservoir go through updates and we support the master plan process and the Draft EIR.</p> <p>If they need to drain the reservoir we'd like assurance that it will be filled.</p> <p>I've appreciate your transparent process and your ability to take community input. The designs are beautiful.</p>	<p>I-301-1 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-301-2 Please refer to Master Response – Public Safety.</p> <p>I-301-3 The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-301-2	<p>We hope the fence will be replaced with one that is more aesthetically pleasing. closing the internal paths from dusk to dawn would be beneficial to the community.</p>	
I-301-3	<p>Keep up the good work. Thank you. Sascha Rice and Joe Mellis</p>	

I-302 Dana Balkin

	COMMENT	RESPONSE
I-302-1	I, without hesitation recommend: Alternative #1 – No Project on the Silver Lake Recreation Master Plan. Thank you, Dana Balkin, Silver Lake resident	I-302-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-303 Juliann Budimir

COMMENT

RESPONSE

	<p>Overall, I am for limited improvements as I love the wild urban nature of our Silver Lake</p> <p>As for things that have already been done and are in the works:</p>	
I-303-1	<p>It's a shame the LADWP(?) erected those 3 new boxes right in front of the meadow, blocking the best view of the lake from the meadow. They're about 5 feet tall and should have been placed even 15 feet to the left or right. I hope the wonderful new bathroom is not blocking the view of the lake. I look forward to a bathroom near the meadow, but hope the building is small and tucked away out of view. Also, if the top portion could be open air for freshness and light (similar to those along Ocean Ave. in Santa Monica, but with the sinks inside each individual bathroom), that would be great</p>	<p>I-303-1 The comment expresses support for limited improvements at the Project Site and discusses current improvements to the SLRC. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-303-2	<p>Also, why was the cement sidewalk removed on W. Silver Lake near the curves along the park near the Recreation Center? I hope the sidewalk will be replaced with cement again.</p> <p>Speaking of this, is there any way to make the dirt portions more stable with less billowing dirt? I have no problem walking on soil; however, it gets incredibly dirty (with big clouds of dust billowing from the Dog Park across the street to the apartments). The sidewalk on the east side of Silver Lake Blvd. is particularly dirty, with the dirt from the area between the curb and the sidewalk covering most of the cement sidewalk. Is there something we can do about this? Either plant something and/or add some kind of divider so that the existing cement sidewalk can remain clean, safe, and attractive?</p>	<p>I-303-2 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.</p> <p>The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-304 John Southern

		COMMENT	RESPONSE
I-304-1	As a local stakeholder in the area and a licensed architect in the State of California, I whole-heartedly support this master plan. However, my professional recommendation is that, in recognition of the dry-future facing our region, that a better solution would be to arrive at a design where a majority of the SL Reservoir be re-imagined as dry ground with native habitat, rather than the present body of water, which is subject to evaporation. If the engineering intent is to retain the current storage of non-potable water, then it should be stored in a covered cistern, like the one's being constructed near Griffith Park, and leave only a small body of water for pleasure seekers and the aesthetic comfort of property owners. Having an ornamental lake, such as the current reservoir, is not only insulting to the future of our children in a more arid California, but also an ongoing slight to the residents of the Owens Valley- one of the many faraway places that L.A. has exploited in order to maintain the water needs of it's residents.	I-304-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-304-2		I-304-2	Please see Master Response – Drought Conditions. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-305 Andras Kanegson

COMMENT

RESPONSE

I-305-1	<p>The Silver Lake Reservoir Complex is a precious asset just as is. It grounds and undergirds a peaceful and natural environment for residents, wildlife and natural habitat. The Master Plan as submitted would utterly wreck that peace and is a far cry from what's actually needed.</p> <p>Living within 500 feet of the reservoir, I am one of a large number of local area residents who have attended meetings and submitted comments throughout all the years of the SLRCMP design and review process including at recent well attended DEIR-specific meetings. While taking every opportunity to offer comments and finding myself among the overwhelming majority voicing serious concerns, our input has nevertheless gone largely ignored. The overwhelming majority of public comments have consistently focused on how the plan is ill-suited and overblown, how it would be damaging to the quality of life for residents and wildlife habitat, and how astronomically and misguidedly expensive it would be. Yet somehow an unidentified constituency seems to have steamrolled Hargreaves Jones' plan through based on pie-in-the-sky public enticements disconnected from all proportion, fiscal reality, and majority resident input.</p>	<p>I-305-1 Please see Master Response - Community Engagement Process.</p> <p>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-305-2	<p>While some of the DEIR's findings seem highly questionable (little to no traffic and parking impact? Really?) what it actually confirms is that our concerns are well-founded. The DEIR clearly states that the Master Plan would have long</p>	<p>I-305-2 Please see Master Response - Traffic/Transportation.</p>
I-305-3	<p>lasting negative impacts including years of construction noise, public disturbance and facility closures. Many commenters agree based on their</p>	<p>I-305-3 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-305-4	<p>intimate familiarity with the local roadways that there's simply no way that traffic and parking would not be negatively impacted. The DEIR also clearly states that the Master Plan is environmentally unsound. Instead it</p>	<p>I-305-4 Please see Master Response - Traffic/Transportation.</p>
I-305-5	<p>suggests ALTERNATIVE 1 (maintain the reservoir complex as is) and ALTERNATIVE 3 (the Natural Lands and Open Space Preserve Alternative) as more environmentally and fiscally responsible plans.</p>	<p>I-305-5 Please see Draft EIR Chapter 5.7 for an explanation on the purpose of selecting an "Environmentally Superior Alternative" as it pertains to CEQA and decision making.</p>
I-305-6	<p>Most importantly, THERE MUST CONTINUE TO BE A NON-SCALABLE SECURITY FENCE CONTROLLING ACCESS to the reservoir complex. Whether we maintain the existing chain link as with ALTERNATIVE 1 or replace it with a more esthetic option as an a la carte item from ALTERNATIVE 3, there can be no other option.</p>	<p>Please see Master Response - Alternatives Analysis.</p>
I-305-7	<p>Having no such fence would invite chaos similar to the homeless encampment debacle at nearby Echo Park and the street takeovers and vandalism at the newly rebuilt 6th Street Bridge, as just two analogous examples.</p>	<p>I-305-6 Please see Master Response - Fence Removal.</p> <p>I-305-7 Please refer to Section 3.13, Population and Housing of the Draft EIR, for a discussion on homeless strategies within the City. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-305 Andras Kanegson

	COMMENT	RESPONSE
I-305-8	The Master Plan blows out of all proportion what should ideally be a simple maintenance and upkeep project. It would likely inflict more than a decade of construction disturbance and noise and thereafter would decimate a rare and naturally peaceful neighborhood. While a possibly entitled minority may	I-305-8 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-305-9	<want> a massively expensive boondoggle the huge majority of participants in this process have been clear that they do not <need> it. The resulting de facto urban camping ground would be terribly damaging to our quality of life. The overwhelming majority agree that the exorbitant resources necessary for this Master Plan would be far better used elsewhere.	<p>As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.</p> <p>The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-305-9 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-306 Michael Mahler

COMMENT

RESPONSE

I-306-1 | NO PROJECT

I-306-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-307 Gorgi Angelkovski

I-307-1 | NO PROJECT!

COMMENT

I-307-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-308 Michael Sweeney

COMMENT

RESPONSE

I-308-1 | As a resident of Los Angeles and a licensed architect in the State of California, I whole-heartedly support this master plan. However it fails to adequately acknowledge and plan for our drier future in Southern California. Instead of looking backwards and focusing on the preservation the current aesthetics of the -man-made- reservoir, we should be looking forwards and preserving Silverlake as a livable, equitable community. Instead using Owens Valley runoff for pure aesthetics, this space should be reimagined as a space of conservation and recreation. A better solution is to return the majority of the original Canyon Reservoir to native habitat, instead of maintaining the fiction of it as a natural body of water.

I-308-2 | The water we see is not ours and is not natural. If it is required to nourish the City of Angels, then it should be stored in a covered cistern, like the one's being constructed near Griffith Park, and leave only a small body of water for recreation. If the purpose is ornamental, then this is an insult to the future of our children, an insult to the more arid parts of California, and also an ongoing slight to the residents and First Nations of the Owens Valley.

As a city, we can and must do better.

I-308-1 | The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-308-2 | Please see Master Response – Drought Conditions.

I-309 Anil Baral

COMMENT

RESPONSE

I-309-1 I appreciate the master plan and think Silverlak Reservoir could become a world-class park and augment many strengths already present in the neighborhood. I particularly like the increased number of trees, the increased habitats, increased public spaces, the education centers, added fields and recreation centers, the fitness centers, and the floating dock Battery Park in NYC was redesigned and improved the life of the residents and this could do the same. My only comments are: 1) It would be great if a park for kids was installed that is more interactive for older kids. The current park in the south is more for young kids. Something akin to Zipline park at Riverside and Los Feliz Blvd, or Bellvue Park, or even something super ambitious with lots of layers for kids to play and let their imaginations run wild. The Washington Dc Area has some incredible parks. See: <https://www.beauvoirschool.org/about/visit-our-playground#> - Too much of Los Angeles is structured and a nice environmental park that allows older kids to meet up and play together would be great. 2) Please incorporate as much new parking as possible 3) It would be great if kayak access is open to the public, at least during certain hours? 4) Please make sure there are enough restrooms.

I-309-2 There are currently no restrooms in the meadow and I've seen young kids use the bushes because there is not alternative. This shouldn't be the case. Thanks for all the hard work!

I-309-3

I-309-4

I-309-5

I-309-1 The comment expresses support for the proposed Project, This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-309-2 The proposed Project, described in Chapter 2 of the Draft EIR. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-309-3 As described in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would include offsite improvements along areas surrounding the SLRC in areas shown on Figure 2-15 of the Draft EIR. One improvement would include the addition of 90-degree parking along the north side of West Silver Lake Drive, east of Redesdale Avenue adjacent to the Silver Lake Recreation Center. Trees would be avoided along this area and parking would be added in a way that it would not encroach on existing trees. Currently, there are 10 parallel parking spaces along this segment of West Silver Lake Drive. By converting to 90-degree parking, a total of approximately 25 parking spaces would be added, resulting in a net increase in parking of 15 spaces at this location.

Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

I-309-4 As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.

I-309 Anil Baral

COMMENT

RESPONSE

I-309-5 As described in the Project Description, Section 2.5.1 of the Draft EIR, public restrooms would be included and would be directly accessible from the promenade to serve the proposed Project area as a whole.

I-310 Susie Fukuhara

	COMMENT	RESPONSE
I-310-1	NO PROJECT! Richard Neutra built our home for us 60 yrs. ago. NO PROJECT!	I-310-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-311 Joyce Peyton

COMMENT

RESPONSE

I-311-1

One of my Red Fags associated with this project is probably the most important issue to me... Silver Lake is in a RED ALERT FIRE ZONE with narrow streets and few unclogged exits during peak traffic hours! We will be greatly increasing human exposure from the current small area of the Meadow to the entire Reservoir. Humans do human things, they tend to set off fireworks, smoke/dispose of their cigarettes and build fires. LAFD is consistently extinguishing these fires daily in our surrounding areas. Los Feliz homeowners discovered the dangers when a homeless person built a fire near the Griffith Park golf course on a windy afternoon, fires spread quickly and they are unpredictable. Fortunately, their homes and the Observatory were saved! Silver Lake is surrounded by many palm & mature trees, vegetation and grasses. Our terrain is like the Oakland Fire disaster hills. Griffith Park is also a Red Fire Alert Zone, but because of the vast area, it has a large buffer zone before fires spread to homes... Silver Lake does not!

I-311-1

As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. Operations would not require additional fire or hazard services such that substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities would occur. LAFD would be able to serve the proposed Project and would not result in the need for new or altered fire facilities. In addition, the proposed Project was designed in order to allow LAFD to continue to use the reservoir for water for emergency purposes as outlined in Section 3.14.5, of the Draft EIR.

I-312 Casey Wollenberg

	COMMENT	RESPONSE
I-312-1	<p>The master plan sounds great, but it's impact on both foot and car traffic in our already busy neighborhood will be catastrophic.</p> <p>Neighbors should be guaranteed support and assistance with designating the area permit-only parking.</p>	<p>I-312-1 Please see Master Response - Traffic/Transportation.</p> <p>The proposed Project, described in Chapter 2 of the Draft EIR, would not include permit only parking. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-313 Christopher Rogers

COMMENT

RESPONSE

I-313-1

Hello, I am a homeowner and parent living across from the reservoir. I strongly oppose the full master plan, especially the taking down of the fence and additional seating on West Silverlake Drive. While I would urge the council to expand wildlife sanctuaries and existing green space, I feel additional parking, and bringing outside vendors and an events space and programming into the reservoir complex is wildly at odds with preserving the functional, natural tranquility that makes it so special. Please do not approve the "full" master plan - there is no need to fix something that isn't broken.

I-313-1

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-314 Paul Byrne

	COMMENT	RESPONSE
I-314-1	<p>I live right above the reservoir and have lived in the neighborhood for 22 years! I can't tell you how excited I am about the future plan of the Reservoir. It looks dynamite we desperately need it. I have three kids ages 9,5 and 2 and I really hope you can get started working on it so they can enjoy it in their youth!! You crushed it!!</p> <p>Now do secure the funds and make LA beautiful!!</p>	<p>I-314-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-315 Gerry Hans

COMMENT

RESPONSE

December 2, 2022

RE: SLRCMP Draft EIR**Support for No Project or Alternative 3 Natural Lands/Open Space Preserve**

I am not a resident of the Silver Lake area, but am a resident of Los Angeles who wants to do everything possible to fend off the precipitous loss of biodiversity in a City striving to retain it for a livable and healthy environment.

Just as the public comment ends for this proposed Project, California is being represented at the COP15 Conference of Biodiversity in Montreal by members of the California Global Biodiversity Working Group, many from the Los Angeles Area. California is the UN's first and only official state (non-country) observer, as California makes a strong stand for biodiversity, which is inseparably connected to the climate change issue.

I-315-1 Silver Lake's local residents remain divided on the proposed Project. When there is controversy, it is best to error on the side of NOT losing what we have by doing nothing. Why take the risk? Why suffer through a relentless construction period? It seems much of the community is happy with the present condition, short lack of maintenance and a fence that's an eyesore.

I'm sure some residents are swayed with the far-fetched renderings in an EIR which show lush habitat, birds perching within reach, and children with hip-waders at the water's edge. This is all unrealistic marketing brought to the public by those who will benefit the most: the planners, consultants and construction contractors. Over-selling and over-promising the public with only result in the community's later disappointment and discontent, should the Project proceed.

I-315-2 Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment, Appendix A, clearly shows this area as a "Very Low" needs community. The focus of park improvements should be directed to "Very High" and "High" needs areas, of which there are many. The Assessment recognizes the abundance of nearby parks and recreational facilities. Passive recreation should remain the focus for Silver Lake Reservoir, without building out new active sports infrastructure, and certainly not yet another special events venue.

I-315-3 **Most importantly**, from a biodiversity perspective, fencing is essential in order to preserve the tremendous and important function these waters now serve migratory birds. This should absolutely be the highest priority. Along the same thinking, the addition of any lighting is adverse to bird migration. For these reasons, only No Project (Alternative 1) or Alternative 3 should be on the table for further consideration.

I have a preference for Alternative 3, since the fence would be improved aesthetically. And along with this improvement, enhanced mobility for small wildlife could be addressed.

Gerry Hans
Los Angeles

I-315-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-315-2 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-315-3 Please see Master Response - Fence Removal.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

I-315 Gerry Hans

COMMENT

RESPONSE

The comment expresses support for Alternative 1 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-316 Jeremy Benjamin

COMMENT

RESPONSE

I-316-1 | Protect wildlife, thank you.

I-316-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-317 Alessandra Franco

COMMENT

RESPONSE

I-317-1	Why makes spend time going to meetings and sending you our feedback if you're now ready to dismiss and ignore it all? Do you want to turn the reservoir into another underpass encampment? Because that IS what is going to happen if you remove the perimeter fencing. It will be hugely detrimental to all of us who live here as well as to all the wildlife that depend on the reservoir for their survival. I beg you to PLEASE reconsider this.	I-317-1	Please see Master Response - Fence Removal and Master Response - Community Engagement Process.
I-317-2	Vandalism, vagrancy and crime have been documented as serious problems in other unfenced parks in Los Angeles. There is no Public Safety mitigation for the loss of the Perimeter Fence suggested in this DEIR.		Please refer to Section 3.13, Population and Housing of the Draft EIR, for a discussion on homeless strategies within the City. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-317-3	The horrific noise, vibration, mess and traffic blockages caused by massive construction could last from five to fifteen years. Nevertheless, this DEIR calls this, incredibly, a "Less Than Significant Impact." As to noise and vibration mitigations: "None Required." The DEIR predicts an "average of 390 additional visitors per day", as well as higher attendance with proposed monthly "Special Events" with amplified sound. Neighborhoods packed with visitors' cars plague the Reservoirs area even now. And with the DEIR's plan to cut down lane widths to add parking spots on these already congested and gridlocked streets, traffic will enormously increase and become more dangerous. Yet, DEIR's Transportation Study claims "Less than Significant Impact." and "No mitigation measures are required."		This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-317-4	The DEIR also claims, "significant irreversible changes to our community have been deemed acceptable."	I-317-2	Please refer to Master Response – Public Safety.
	They are not!	I-317-3	As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
I-317-5	The DEIR claims the negative impacts of construction, the years of disturbance, and when finished, the increased daily noise, crowds, traffic, and harm to our wildlife will be worth it.		This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant.
	It is not!		The commenter is also referred to Master Response - Traffic/Transportation.
	The community's ideals of "Peaceful," of "Nature," and "Wildlife" will be destroyed. It must not.	I-317-4	Please see Master Response - Traffic/Transportation.

I-317 Alessandra Franco

COMMENT

RESPONSE

- I-317-5 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-318 Donna Barstow

COMMENT

RESPONSE

	<p>Hello!</p> <p>I'm on the Housing Committee of the SLNC. I was on the Griffith Park Neigh Council until it disbanded. I also wrote about coyotes and wildlife for the LA Weekly and was a reviewer for a scientific journal. I've been a birdwatcher since I was 7, and I'm a naturalist. I know more about trees than the unlicensed workers LADWP uses.</p>	<p>I-318-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-318-1	<p>I have the unique experience of observing evening activity by running around the Silver Lake reservoir for the last 25 years, at 1 AM or later. I know all about the traffic (none, most nights) and any animal or bird activity.</p> <p>Before DWP turned Silver Lake into a construction zone for 6 years and drained it, I observed: great horned owls, coyotes, bats, skunks, raccoons, mice, herons, canada geese, grebes, geckos...and this is just what I have seen myself at night. I also wrote a blog on what happened there (including DWP malfeasance with the water) which, in fact, caused the empty lake to be refilled a month before the DWP original date.</p> <p>In my observations, after the construction and drought, and DWP's failure to keep the reservoirs full, all life is gone. Not a sighting nor a peep.</p>	<p>I-318-2 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>I-318-3 As discussed in Project Description, Section 2.5.5 of the Draft EIR, the planting design for the proposed Project would be aligned with the City's New Green Deal goals of increasing tree canopy and protecting native biodiversity. Figure 2-8 of the Draft EIR includes a preliminary planting diagram.</p>
I-318-2	<p>This is when a qualified naturalist or field manager should step in, before it really is too late. I haven't seen any reptiles in 2 years - the city of LA has reported that they have been missing for a few years, and now they are endangered.. They can't just fly or run away, and they at least did have water here. If you had had an EIR done - as we did for Griffith Park - you would already know this. And as the small animals disappeared, including mice and rats, so do the owls and coyotes and raccoons leave.</p>	<p>I-318-4 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-318-3	<p>This "Master Plan " adds no habitat. Trees planted like an English garden, spaced so many feet apart, don't create shade for people (most common complaint about the Silver Lake Meadow), and don't allow pollinating insects to get from one tree to another, or create safety for any small creature. They don't even allow safe places for birds to build nests. Whoops, there goes another songbird, leaving Silver Lake!</p>	
I-318-4	<p>Of course, just as importantly, the infrastructure of the Reservoirs as a source</p>	

I-318 Donna Barstow

COMMENT

RESPONSE

<p>I-318-4 Cont. of emergency water for fire management can't be underestimated. For decades, the LAFD has been using the reservoirs for water drop helicopters to tamp out fires in the Burbank and Glendale mountains. Not to mention the destructive Griffith Park fire!! And we shouldn't forget about possible earthquakes...</p>		
<p>You already have the perfect test case: Silver Lake Meadow. A complete Fail. No one goes. It's almost empty. Lots of signs for no dogs, but lots of dogs there anyway. Acres of muddy grass, because grass needs so much water, and there's DWP, pouring millions of water into keeping it alive. Go there yourself, and be sure to read the Yelp reports</p>		<p>I-318-5 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
<p>What we need in LA are green spaces, not extended public sidewalks, which is what all these plans look like. What happened to the wetland plan?</p>		<p>I-318-6 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
<p>Other observations: Our honored forefathers built a reservoir in this ravine so the water wouldn't evaporate. The houses act as walls. It's as still as bathtub water. That's why it (and the Meadow) are so hot.</p>		<p>I-318-7 Please refer to Section 3.13, Population and Housing of the Draft EIR, for a discussion on homeless strategies within the City. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
<p>Did you know Silver Lake is part of a Migratory Bird Path? We have federal protections for these waterfowl Griffith Park, the 2nd biggest urban park in the country, is only 1.2 miles away for those looking for green. It's terribly underused.</p>		<p>I-318-8 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
<p>Is Silver Lake the next Echo Park for the homeless, with food, bathroom facilities, and lots of empty spaces?</p>		<p>Please see Master Response - Parking/Bike Option.</p>
<p>Food deliveries and storage adds another problem: tree rats. That would be great if we had any predators left. That would be terrible if they put out poison. There is also the problem of pollution and smoke from cooking food that will drastically lower the valuation of houses surrounding the lake, which again, gets no breeze.</p>		<p>Please see Master Response - Traffic/Transportation.</p>
<p>Parking. Parking. Parking. Question: since Mia Lehrer is now on the Board of LADWP, is there a conflict of interest with her own business on the Master Plan?</p>		<p>I-318-9 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
<p>Don't do this, I beg you. You won't be able to pay money, to get everything back that you will lose for the city, the green and the environment.</p>		
<p>I am available and happy to talk with anyone looking for information and</p>		

I-318 Donna Barstow

	COMMENT	RESPONSE
I-318-10	<p>answers about the usability and protection of this area.</p> <p>Attachments:</p> <p>Nail in Silver Lake running path. There are several pieces of metal sticking up through the dirt, waiting to trip walkers and runners. I know where most of them are, since I've almost fallen on my face on them.</p> <p>Tree molested by LADWP a few days ago. They keep cutting them in half. This is propped up by a stick in the roadway</p> <p>Migrating birds at 2AM. They fly in in the middle of the night, have a rest for a few hours, then go on their way. Do not destroy this important habitat</p> <p>My Silver Lake blog: https://donnabarstow.com/park_blog/</p> <p>Very Sincerely, Donna Barstow</p>	<p>I-318-10 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>Please see Section 2.5 of the Draft EIR for details on pathway resurfacing and planting.</p>

I-318 Donna Barstow

COMMENT

RESPONSE

I-318-11



I-318-11 Attachment noted.

I-318 Donna Barstow

COMMENT

RESPONSE

I-318-11
Cont.



I-318 Donna Barstow

COMMENT

RESPONSE

I-318-11
Cont.

I-319 Kristen Gutoskie

		COMMENT	RESPONSE
	Hi there,		
	The meadow / field area that is currently at the reservoir is a good size and an important place for people to commune, picnic, play frisbee, and hang out, especially on the weekends. It has been a special place for my friends and I to get together, kids to run around or to hang on a blanket. People even come to do yoga, or sit with book there. It looks here like you have significantly shrunk that meadow area down the fit other things. Please don't shrink it. It would become over packed and therefore inaccessible to a lot of people wanting to sit out on blankets or have picnic birthday gatherings, etc. It is one of the only areas to do that near water on the east side, that is flat (unlike much of echo park reservoir, which slants). Please keep the meadow size the same and keep it open and accessible for many spacious, and not crowded with too other things, etc. It's simple beauty is what we love and do not want it to create overcrowding. Also we don't want it to create extra traffic in the already heavily trafficked area, so keeping it simple, rather than attracting hundreds more people a day would be ideal. Thank you!	I-319-1 The proposed Project, described in Chapter 2 of the Draft EIR. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.	
I-319-1			
		I-319-2 Please see Master Response - Traffic/Transportation.	
I-319-2			

I-320 Jake Grandchamp

COMMENT

RESPONSE

I-320-1 | I am a resident currently in favor of Alternative #1 - No Project.

I-320-1 The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-321 Rocky Collis

		COMMENT	RESPONSE
I-321-1	Very excited about the prospect for much needed renovations of the Reservoir, and hopeful that they will happen!!	I-321-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-322 Howard Foon

		COMMENT	RESPONSE
I-322-1	We are in favor of perimeter fencing to keep the Coyotes from browsing our neighborhood, similar to the fencing at the Rowena Reservoir.	I-322-1 Please see Master Response - Fence Removal.	

I-323 Fredrik Lidskog

	COMMENT	RESPONSE
I-323-1	Having reviewed the "master plan" materials and the draft EIR, as well as browsed some of the arguments for and against, I am firmly in favor of moving forward with the Silver Lake Reservoir Complex initiative and would consider it a welcome addition to the neighborhood.	I-323-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-324 Barbara Hoff

COMMENT

RESPONSE

There are alternatives to provide a bathroom at the S L Reservoir if it's determined that it's really needed. Here is information about the Award-winning self-cleaning restrooms at the North Hollywood Recreation Center. This is preferable to constructing another building that we don't need or want.

"Award-winning, self-cleaning, stand-alone restrooms - already here at North Hollywood Recreation Center

Some have said they want the Education Center built because it'll give them restrooms, which many would like.

Instead - how about just the restrooms?

These were:

I-324-1

- voted a FINALIST in 2022's Best Public Restrooms (USA).
<https://www.bestrestroom.com/other-finalist/?finalist=3307&bryear=2022>

- Installed by LA Recreation and Parks with Councilmember Krekorian,

- Cost under \$200,000 in 2019,

"The self-cleaning restrooms at North Hollywood Recreation Center are holding to its promise in a community with a large homeless population. They cut maintenance cleaning times considerably. The restrooms' interior is sanitized automatically after a set number of flushes. Touchless features include toilet tissue dispenser, soap dispenser, faucet and hand dryer. Exiting the restroom is also touchless. Graffiti is easily removed from the stainless steel and porcelain interior. An alarm will sound off if someone attempts to stay inside for too long and the door will open."

These restrooms will actually be used.

I-324-2

They are a far less impactful mitigation for the negative impacts of the proposed Education Center, a building that:

- Would destroy already scant land habitat for both wildlife and education;

I-324-1

The proposed Project, described in Chapter 2 of the Draft EIR, would not include self-cleaning bathrooms. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-324-2

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-324 Barbara Hoff

COMMENT

RESPONSE

I-324-3

As described in Section 3.5.1, Cultural Resources, the SLRC itself is a Los Angeles Historic Cultural Monument (#422), designated in 1989. The SLRC has also been previously recorded by SurveyLA with a status code of 5S1, meaning that it is a designated City landmark. Further analysis of historical resources and impacts analysis is based on the Silver Lake Reservoir Complex Master Plan: Supplemental Historical Report and Impacts Analysis (2022) (Historical Report) provided within Appendix F of the Draft EIR.

I-324-3 | - Would violate several Historic-Cultural Monument Standards (our Reservoir is HCM #422);

I-324-4 | - Is also called an 'event space' or 'community space' which implies the noise, crowds and traffic that come with those;

I-324-5 | - Would propose a bus parking lot along SL Blvd for intended visitors;

I-324-6 | - Duplicates other indoor resources already built (Recreation Center);

I-324-7 | - Does not comply with the Open Space Zoning directives to preserve open space as a balance to urban density;

- And is promoted by some as necessary because it would provide restrooms.

Really? An entire building just for its restrooms? No need!

I-324-8 | Let's get what we need - restrooms - rather than what we don't need - another building.

Let's SAVE THE GREEN for the wildlife that need it!

....the fence is the single most important conservation management tool at the site after the presence of water."

I-324-9 | - LA Audubon Society: Statement on the Future Management of Silver Lake Reservoir."

Also a Perimeter Fence 8' - 12' MUST be in place to protect wildlife, prevent encampments, prevent criminal activities, and prevent people and children from going into the water.

The Draft EIR is the most extensive description, analysis, and catalog of the features and history of the SLRC written to date. While the SLRC was evaluated as a district, rather than a Historic Cultural Landscape, that is merely a difference in terminology and organizational tools. The characterization of the SLRC as a "district" versus a "landscape" did not originate with the Draft EIR; it dates to its listing as a LAHCM and therefore predates the Draft EIR. The Draft EIR confirms that the SLRC is a historical resource for the purposes of CEQA and includes numerous character-defining features that are landscape features. The original HCM nomination form is short and limited on details and does not contain an inventory or description of what the contributing and/or non-contributing resources are contained within the district, let alone inventory, categorize, and analyze its character-defining features. The Draft EIR contains an extensive history of the SLRC, including categorizing and prioritizing the character-defining features of the SLRC, which previously had not been analyzed, including landscape features that previously had not been identified and/or included in analysis. In addition to the ESA report and analysis, consultant GPA clearly states on page 11 of their 2020 memorandum that "The Complex is a historic designated landscape." Their 2019 report provided a description of the Site, a summary of its development and history, an illustrated inventory of landscape characteristics and character defining features of the SLRC, and an analysis of its status as a historical resource. Per *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (National Park Service, 1996), organizational elements of a historic cultural landscape can include spatial organization, topography, vegetation, circulation, and water features; all of these are included and addressed within the Draft EIR.

Additionally, with the number of buildings, structures and physical infrastructure associated with the SLRC, a district is not an inappropriate organizational tool. Landscape features can and are considered character defining features in

I-324 Barbara Hoff

COMMENT

RESPONSE

historic districts, including the SLRC, and do not necessarily require separate evaluation as “cultural landscape.” More importantly, the landscape features of the SLRC that would be defined, inventoried, and evaluated for impacts in a cultural landscape evaluation are all defined, inventoried and evaluated within the Draft EIR, including various landscaping and landscape areas, the knoll, and the meadow. The resulting analysis of impacts more than adequately addresses the potential impacts of the project, and an analysis of impacts under the auspices of a “cultural landscape” would be no different. More importantly, the Draft EIR acknowledges that the Master Plan will have an impact on the historic features of the SLRC; it simply states that these impacts do not reach the level of a “substantial adverse change.”

I-324-4 This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant.

This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.

I-324-5 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a bus parking lot along Silver Lake Boulevard. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-324-6 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-324-7 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.

I-324 Barbara Hoff

COMMENT

RESPONSE

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-324-8 As described in the Project Description, Section 2.5.1 of the Draft EIR, public restrooms would be included as part of the proposed Education Center and would be directly accessible from the promenade to serve the proposed Project area as a whole.

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-324-9 Please see Master Response - Fence Removal.

I-325 Nicole Antoine

COMMENT

RESPONSE

I-325-1 The DEIR Biological Resources section is inaccurate and ill-researched.. The Master Plan's "Floating Islands," the "Wetland Terraces" and "fish stocking" that are supposed to benefit birds, will not do so! The expert opinion of Dan Cooper, Chief Conservation Biologist of the Santa Monica Mountains Conservancy: This DEIR is "lacking in both rigor and specificity.... Without current, accurate, and credible data on the biological resources ..., efforts at restoration will either fall short, or could actually result in further degradation of the site."

I-325-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. A detailed Biological Technical Report was provided as Appendix D of the Draft EIR. The comment does not state what is lacking from the analysis. As noted, beginning on page 2-49 of the Draft EIR, the proposed Project would include preparation of a Wildlife Management Plan, a Wetlands Management Plan, a Tree Succession Plan, and a Brush Clearing Plan. The habitat improvement elements of the proposed Project would be installed under the direction of these plans to ensure successful implementation. All impacts were concluded to be less than significant with implementation of mitigation measures. Please see Master Response – Biological Resources.

I-325-2 Ironically, the massive excavation, grading and construction of much-touted "nature trails," the "scenic overlooks," and "nature education" structures will instead uproot and destroy Nature.

I-325-2 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. The proposed Project would increase native vegetation at the site. The Tree Succession Plan would ensure that habitat values of mature trees are replaced over time. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response – Biological Resources. Please see Master Response – Biological Resources.

I-325-2 The Knoll's lost natural forest is now vital habitat for an ecosystem of ground-dwelling animals and local birds that will lose nests, burrows and food. Disruption of the open waters drives away migratory flocks we love. The DEIR fails to even mention the loss of these birds and animals. I have been up on The Knoll and I saw coyote homes, and other critters up there that do not come around on the path. The owls live in that area as well.

I-325-3 Please see Master Response - Fence Removal.

I-325-3 The Master Plan would remove the Reservoirs' Perimeter Fence. This will have major impacts on wildlife welfare and neighborhood safety. Vandalism, vagrancy and crime have been documented as serious problems in other unfenced parks in Los Angeles. Look at every other park, including the LA River, there is no way to control the graffiti and destruction of property. There is no Public Safety mitigation for the loss of the Perimeter Fence suggested in this DEIR.

LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. The proposed Project is being designed to include wetland habitat and other edge treatments, where feasible, around the reservoir that would allow separation from the public to the water's edge. In the unlikely event that someone would enter the reservoir water, these wetland areas and edge treatments would also provide places where one could exit the reservoir (as opposed to the current smooth surface and slope of the concrete walls). During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.

I-325-4 The horrific noise, vibration, mess and traffic blockages caused by massive construction could last from five to fifteen years. Nevertheless, this Deir calls this, incredibly, a "Less Than Significant Impact." As to noise and vibration mitigations: "None Required." [DEIR 3.16-18]

Please see Master Response - Public Safety

I-325-5 The DEIR predicts an "average of 390 additional visitors per day", as well as higher attendance with proposed monthly "Special Events" with amplified sound. Neighborhoods packed with visitors' cars plague the Reservoirs area even now. And with the DEIR's plan to cut down lane widths to add parking spots on these already congested and gridlocked streets, traffic will enormously increase and become more dangerous.

I-325 Nicole Antoine

COMMENT

RESPONSE

I-325-6

Yet, DEIR's Transportation Study claims "Less than Significant Impact." and "No mitigation measures are required." [DEIR Table 3.16-3]

The DEIR also claims, "significant irreversible changes to our community have been deemed acceptable." [DEIR 4.3]

They are not!

The DEIR claims the negative impacts of construction, the years of disturbance, and when finished, the increased daily noise, crowds, traffic, and harm to our wildlife will be worth it.

It is not!

The community's ideals of "Peaceful," of "Nature," and "Wildlife" will be destroyed. It must not.

I-325-4

Section 3.12 of the Draft EIR analyzes the construction noise impacts from on- and off-site construction noise in Section 3.12.5, *Impacts and Mitigation Measures*. As analyzed, the Draft EIR determined that construction noise and vibration would have potentially significant impacts prior to implementation of mitigation measures. Section 3.12 outlines four mitigation measures intended to reduce construction noise and vibration impacts (NOISE-1, NOISE-2, NOISE-3, and NOISE-5). After implementation of all feasible mitigation measures, construction noise would be significant and unavoidable, construction vibration related to structural vibration would be less than significant with mitigation, and construction vibration related to human annoyance would be significant and unavoidable. A summary of impacts can be found in Table 3.12-26 of the Draft EIR.

I-325-5

As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant. Also, please see Master Response – Traffic/Transportation

I-325-6

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-326 Sara Greene

COMMENT

RESPONSE

I-326-1 Ecstatic to see this project moving forward. Absolutely thrilled we will be within walking distance of such a wonderful, sustainable park for both humans and wildlife to enjoy! Thank you for all of your work towards expanding more usable green space for our neighborhood. It's so exciting!

I-326-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-327 Julie Cash

COMMENT		RESPONSE
I-327-1	I wholeheartedly support the reservoir master plan. The reservoir belongs to all of Silver Lake and Los Angeles and we are a park poor area. I hope that traffic reducing measures will be implemented to promote walking biking and public transportation because I remember the bus that went here for removed recently. Thank you.	I-327-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-327-2		I-327-2 As discussed in Project Description, Section 2.5.2 of the Draft EIR, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response – Parking/Bike Option. As discussed in the Project Description, Section 2.5.6 of the Draft EIR, bike parking or bike share stations will be located at all key pedestrian connection points shown on Figure 2-17 of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-328 Clare Crespo

COMMENT

RESPONSE

I-328-1 | I fully support the master plan for the silver lake reservoir! I think its a fantatrsic idea to make a beautiful green space for animals and humans in this beautiful neighborhood! LET'S DO IT!

I-328-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-329 Alyssa Reponen

	COMMENT	RESPONSE
I-329-1	As a 16-year resident of Silverlake, I fully support the plan and eagerly anticipate construction. Prioritizing natural restoration is important and should be the first phase we tackle. I also vote for rehabbing the dog park sooner rather than later. It is widely used and has been underserved for decades. Also prioritizing bathrooms by the meadow. Let's make it happen!	I-329-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-330 Peter Breitmayer

COMMENT

RESPONSE

I-330-1 | I am very excited about the master plan for the Silver Lake Reservoir! The addition of this balance between recreational and natural space is a wonderful addition to our neighborhood. Let's get it started!

I-330-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-331 Cam Shaw

	COMMENT	RESPONSE
I-331-1	Commenting to voice support of the planned upgrades to the Silver Lake Reservoir. I walk or run my dog around the reservoir daily and the Silver Lake Master Plan would be an enormous improvement.	I-331-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-332 James Speed

COMMENT

RESPONSE

- I-332-1 I support the master plan process and the Draft EIR.
The three alternatives to the Master Plan considered in the DEIR each fall short of the goals the community identified during the planning process!
- I-332-2 I do recommend replacing the fence, but keeping one in place.
I also believe closing the internal paths from dusk to dawn, the same way that it is now will be beneficial to the community.
Thanks

- I-332-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-332-2 As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Portions of the Knoll and Eucalyptus Grove habitat areas would not include lighting, and these paths would be closed at night (refer to Figure 2-8 in the Draft EIR). Also, please see Master Response - Fence Removal.

I-333 Ward Wolff

	COMMENT	RESPONSE
I-333-1	I am proud to support the master plan and environmental review. This is a once in a generation opportunity to transform an outdated piece of urban infrastructure into a vibrant community space that will be enjoyed by families and generations to come. Yes there will be short term disruptions. But the legacy we will be leaving for our kids and future generations of neighborhood residents is something we can all be proud of and should rally behind.	I-333-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-334 Erik Reponen

COMMENT

RESPONSE

I-334-1

As someone who has lived in this neighborhood for over 15 years, I cant wait for this long-awaited opening up of the lake to the public.

Extending the pathways, adding the meadow, opening the path across the dam - every project to date has shown how these improvements are just that - improvements.

The latest proposal is incredible. It's tasteful, sustainable, and accessible. Seeing the reservoir transformed from an asphalt pit surrounded by chainlink fences to what's in this proposal will make the most of a special place with so much potential.

Thank you for moving this forward in the way that you have. I can't wait to see it in real life.

Thank You,
Erik Reponen

I-334-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-335 Olga Lexell

	COMMENT	RESPONSE
I-335-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-335-1 Please see Master Response - Parking/Bike Option.</p>

I-336 Hillary Mushkin

COMMENT

RESPONSE

I-336-1 I strongly support moving forward with the Master Plan, which reflects the consensus reached at the culmination of a comprehensive two-year planning process. The three alternatives to the Master Plan considered in the DEIR each fall short of the goals the community identified during the planning process. Doing nothing to the Reservoirs would have severe negative impacts on our community and on our wildlife. The Master Plan provides real benefits, with only minimal temporary impacts limited to the construction process itself.

I-336-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-337 Lane Mcfaddin

	COMMENT	RESPONSE
I-337-1	I live very close to the reservoir and would love bike lanes around it. I believe Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-337-1 Please see Master Response - Parking/Bike Option.

I-338 Aaron Small

	COMMENT	RESPONSE
I-338-1	<p>Hello. Here are my thoughts.</p> <p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p> <p>Please highly highly consider option 2 and stop more needless cyclist and pedestrian murders.</p>	<p>I-338-1 Please see Master Response - Parking/Bike Option.</p>

I-339 Michael Schneider

	COMMENT	RESPONSE
I-339-1	Between these two, option 2 is a no brainer. However, the traffic lanes should be narrowed to 10.5 feet to curtail speeding. Use the extra 3' of space to increase the buffer between the cycletrack and moving cars. Secondly, you need to raise the cycletrack to sidewalk level. There are very dangerous grates in the road that really are a hazard for cyclists; raising the cycletrack to sidewalk level would fix this. Lastly, please plant trees in the buffer! In addition to more protection, this would add shade and beautify the street.	I-339-1 Please see Master Response - Parking/Bike Option.

I-340 Adam Linder

COMMENT

RESPONSE

I-340-1	Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-340-1	Please see Master Response - Parking/Bike Option.
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I-341 William Wilbur

		COMMENT	RESPONSE
I-341-1	I want to have a peaceful reservoir. Not one with special events, learning centers and kayak/canoe facilities. I am opposed to the current EIR plan for extensive building and disruption	I-341-1	The comment expresses opposition to the proposed Project. The proposed Project would include the addition of an Education Center within the SLRC. As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR. In addition, as discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant.

I-342 Neale Stokes

COMMENT

RESPONSE

I-342-1 | I support option two—it's the safest option for cyclists. I use this corridor to bike for recreation and transportation and would feel most comfortable with option 2.

I-342-1 | Please see Master Response - Parking/Bike Option.

I-343 Natalie Karic

	COMMENT	RESPONSE
I-343-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-343-1 Please see Master Response - Parking/Bike Option.</p>

I-344 Natalie Chyba

COMMENT

RESPONSE

I-344-1

Comments on bike facility options -
I support Option 2 as it's the safest option for cyclists. Please consider narrowing the traffic lanes to 10.5 feet to utilize the ROW for a 3 foot buffer with landscaping/bioswales and a raised concrete median (no more plastic bollards please!) In the final design, consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area.

I-344-1 Please see Master Response - Parking/Bike Option.

I-345 Elias Platte Bermeo

	COMMENT	RESPONSE
I-345-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-345-1 Please see Master Response - Parking/Bike Option.</p>

I-346 Peter Abraham

		COMMENT	RESPONSE
I-346-1	Safe areas for bikes are important for any city, including Los Angeles, where I've lived for 40 years. Please approve Option 2 of the Silver Lake Reservoir bike lanes. Thank you!	I-346-1	Please see Master Response - Parking/Bike Option.

I-347 Aida Ashouri

	COMMENT	RESPONSE
I-347-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p> <p>Whenever there's an option to make it safer for cyclists that should be taken. Alternatively traffic can get slowed down so streets can be multi use as they were originally. The goal ultimately is to create the safest options for all road users and make our streets safer. Thanks.</p>	<p>I-347-1 Please see Master Response - Parking/Bike Option.</p>

I-348 Nick Cron-Devico

COMMENT

RESPONSE

I-348-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-348-1 Please see Master Response - Parking/Bike Option.

I-349 Kyle Traynor

	COMMENT	RESPONSE
I-349-1	Please please please use option 2 for the bike lanes. Protected bike lanes make a MASSIVE difference to riders. I live and work in the area and a protected bike lane would make all the difference in the world to me and to many other cvclists in the citv. Thank vou!	I-349-1 Please see Master Response - Parking/Bike Option.

I-350 Diego Tamayo

COMMENT

RESPONSE

I-350-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant shade trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area. This is a very necessary asset to improve accessibility to and from Silver Lake Park/Reservoir.

I-350-1 Please see Master Response - Parking/Bike Option.

I-351 Henric Nieminen

	COMMENT	RESPONSE
I-351-1	<div>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</div>	<div>I-351-1 Please see Master Response - Parking/Bike Option.</div>

I-352 Stephen Schaller

COMMENT

RESPONSE

I-352-1	As an avid bicycle commuter, often with my two young children on the back of our cargo bike, I much prefer Option 2, which offers the greatest protection for bicyclists. Ideally these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city should also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area.	I-352-1	Please see Master Response - Parking/Bike Option.
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I-353 Jesse Brown

	COMMENT	RESPONSE
I-353-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-353-1 Please see Master Response - Parking/Bike Option.</p>

I-354 Kelsey Stefanson

COMMENT

RESPONSE

I-354-1

I'm so excited that the reservoir and surrounding area are continuing to be improved— it is one of my favorite places in LA. We should ensure we are choosing the right method for improvements and that's why I'm writing about these proposed options. Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

Thank you!

I-354-1 Please see Master Response - Parking/Bike Option.

I-355 Preston Melbourneweaver

	COMMENT	RESPONSE
I-355-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-355-1 Please see Master Response - Parking/Bike Option.</p>

I-356 Jesse Paster

COMMENT

RESPONSE

I-356-1 | Cyclists of all sorts deserve safe places to ride. This type of location is perfect for families and kids. Option 2 protects the most vulnerable ride uses the best with buffets and barriers from speeding cars driven by distracted drivers. Lets give our kids a safe place to ride. There are so few opportunities to get them a started ridina in verv safe environments.

I-356-1 Please see Master Response - Parking/Bike Option.

I-357 Nolan Thomas

		COMMENT	RESPONSE
I-357-1	Protected bike lane please! There's plenty of room. A concrete curb with bollards would be awesome and really encourage families to ride around the lake.	I-357-1	Please see Master Response - Parking/Bike Option.

I-358 Lindsay Kerby

COMMENT

RESPONSE

I-358-1

I bike around the reservoir almost weekly for exercise and for daily errands. A protected bike line around the entire reservoir would significantly improve safety.

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-358-1 Please see Master Response - Parking/Bike Option.

I-359 Joseph Gawor

	COMMENT	RESPONSE
I-359-1	<p>For the potential Silver Lake Reservoir bike lanes, Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes and add extra buffer space. The city should also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-359-1 Please see Master Response - Parking/Bike Option.</p>

I-360 James Hernandez

COMMENT

RESPONSE

I-360-1	<p>Hello,</p> <p>I live along the Silver Lake Reservoir and I am strongly supportive of true protected cycling infrastructure. That would be option 2 which is the safest option by far for cyclists (safety should be your top priority).</p> <p>Some detailed feedback as well: The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars.</p> <p>Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area. These features can be dangerous for cyclists.</p>	I-360-1 Please see Master Response - Parking/Bike Option.
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I-361 Reed Alvarado

	COMMENT	RESPONSE
I-361-1	Option 2 is the safest option for cyclists. As a car-free Angeleno, I depend upon safe corridors to cycle to where I need to go. Option 2 will provide me and my neighbors the safety to access this landmark. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-361-1 Please see Master Response - Parking/Bike Option.

I-362 Elizabeth Korelitz

COMMENT

RESPONSE

I-362-1	We just visited Silverlake for the first time last weekend. While we really loved the city and all that had to offer I was kind of surprised that there was such a disconnect between the reservoir and humans. I'm so excited that you're planning a re-design. Cities always do best when people can feel safe and away from cars. That's why people love Europe so much.	I-362-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-362-2	Please consider Option 2 as it's the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-362-2	Please see Master Response - Parking/Bike Option.
	Thank you!		

I-363 Joel Weinberger

	COMMENT	RESPONSE
I-363-1	<p>I'm really excited about Option 2 because of what it affords cyclists. In a perfect world, these bike lanes would narrow traffic lanes to 10.5 feet and add an extra 3 feet as buffer. And there's no reason the buffer can't be beautiful in its own right! It can have trees and plants on top of concrete protection for bikers. An additional raised cycle track that shoots stormwater into the gutter would make this an amazing experience to boot.</p> <p>Thank you for considering option 2!</p>	<p>I-363-1 Please see Master Response - Parking/Bike Option.</p>

I-364 Michael T

COMMENT

RESPONSE

I-364-1 | Option 2 for the silver lake reservoir! I ride my bike around there and always worry about the speeding cars.

I-364-1 Please see Master Response - Parking/Bike Option.

I-365 Mollie Goldberg

	COMMENT	RESPONSE
I-365-1	<p>Option 2 is the safest option for cyclists. Whatever is safest for cyclists also inherently makes things safer for runners as well and i am a long time reservoir runner. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area.</p>	<p>I-365-1 Please see Master Response - Parking/Bike Option.</p>

I-366 Trevor Reed

COMMENT

RESPONSE

I-366-1	Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-366-1	Please see Master Response - Parking/Bike Option.
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I-367 Robert Brown

	COMMENT	RESPONSE
I-367-1	<p>The Silverlake reservoir is a great place to run and take my dog however it would greatly benefit by having protected bike lanes as well. I had a friend that was hit by a car while riding their bike around the lake and it has discouraged me and some of my friends from riding our bikes around that area. A protected bike lane would be beneficial to riders and pedestrians by closing the total street width and making it more obvious of any potential motor vehicle danger to cvclists.</p>	<p>I-367-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.</p>

I-368 Nicole Antoine

COMMENT

RESPONSE

I-368-1 I would love to see two bike lanes in both directions closer to the lake, what I don't understand is how you will cross the street when you get to Glendale Blvd. See map of crosswalks that exist now at this intersection.

I do agree that Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. I believe cars will slow down with these new barriers because now they go over the lines in the road when cars are speeding.

I-368-2 I think the crossing at Glendale and SLB should be addressed first because if not it will be at a bikers expense in how to cross the street safely at Glendale Blvd. I hope this intersection has been considered in the new plan. Thank you for your time in reading my comment.

Happy Holidays,
Nicole Antoine

I-368-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-368-2 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-368 Nicole Antoine

COMMENT

RESPONSE

I-368-3



I-368-3 Attachment noted.

I-369 Ayelet Ifrah

COMMENT

RESPONSE

I-369-1

Hi! I'm super excited to hear the reservoir redesign will support bike lanes. I sincerely hope they are designed to separate the lane from cars. Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that cutters or stormwater features fall outside of the cycling area.

I-369-1 Please see Master Response - Parking/Bike Option.

I-370 Jeff Hallstead

	COMMENT	RESPONSE
I-370-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p> <p>Please support adding bike lanes so people who live a short distance from the reservoir complex can safely bike there and thereby reduce car trips.</p>	<p>I-370-1 Please see Master Response - Parking/Bike Option.</p>

I-371 Tieira Ryder

COMMENT

RESPONSE

I-371-1 | We must have protected bike infrastructure across Los Angeles county. Pedestrians and cyclists MUST have access to equitable land usage. It's a matter of public safety. it's a matter of climate change!

I-371-1 | Please see Master Response - Parking/Bike Option.

I-372 Zeke Wapner

	COMMENT	RESPONSE
I-372-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area</p>	<p>I-372-1 Please see Master Response - Parking/Bike Option.</p>

I-373 Fred Le

COMMENT

RESPONSE

I-373-1

I support the implementation of protected bike lanes around Silverlake. As someone who uses the streets several times a week for cycling, it is much too dangerous as it is. I often have to barge into the auto lanes to keep myself safe which frequently results in honking and increased animosity between LA's drivers and cyclists.
Thank you.
Fred Le

I-373-1 Please see Master Response - Parking/Bike Option.

I-374 Ryan Leifield

	COMMENT	RESPONSE
I-374-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-374-1 Please see Master Response - Parking/Bike Option.</p>

I-375 Kevin Massoudi

COMMENT

RESPONSE

I-375-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-375-1 Please see Master Response - Parking/Bike Option.

I-376 Joseph O

	COMMENT	RESPONSE
I-376-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-376-1 Please see Master Response - Parking/Bike Option.</p>

I-377 Ross Cussen

COMMENT

RESPONSE

I-377-1 Hello,
I am supportive of turning the reservoir into a recreation area, however I strongly feel that it should include a food and beverage use such as a cafe or restaurant.

I-377-2 Please also provide two-way protected bikeways all the way around the reservoir and narrow adjacent vehicle lanes as much as possible to keep speeds down. When measuring the widths of bike lanes, do not include the concrete gutter.

I-377-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include food and beverage use, such as a cafe or restaurant. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-377-2 Please see Master Response - Parking/Bike Option.

The comment to provide two-way protected bikeways around the reservoir and adjacent vehicle lanes is noted for the record and will be forwarded to the decision-makers for their review and consideration. The proposed Project is described in Chapter 2 of the Draft EIR and would not include these suggested project components. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR.

I-378 John Farren

	COMMENT	RESPONSE
I-378-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-378-1 Please see Master Response - Parking/Bike Option.</p>

I-379 Kyle Kramer

COMMENT

RESPONSE

I-379-1

I would love to see the city install option 2! Protected bike lanes are the best option for cyclists and for safety. Additionally, the city should consider installing concrete protectors and landscaping while narrowing the traffic lanes. Bike infrastructure would be a huge asset here, and we should make it as safe as possible while also slowing traffic.

I-379-1 Please see Master Response - Parking/Bike Option.

I-380 Mike Royce

	COMMENT	RESPONSE
I-380-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area</p>	<p>I-380-1 Please see Master Response - Parking/Bike Option.</p>

I-381 Jeffrey Hawkins

COMMENT

RESPONSE

I-381-1	Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-381-1	Please see Master Response - Parking/Bike Option.
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I-382 Robert Funke

	COMMENT	RESPONSE
I-382-1	This city is menacing towards cyclists and pedestrians. Any effort to make any roads safer should be vigorously pursued.	I-382-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-383 Steven Massey

COMMENT

RESPONSE

I-383-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-383-1 Please see Master Response - Parking/Bike Option.

I-384 Claire Levinson

	COMMENT	RESPONSE
I-384-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-384-1 Please see Master Response - Parking/Bike Option.</p>

I-385 Gabriel Marcus

COMMENT

RESPONSE

I-385-1 | Bike Lanes are needed to further segment vulnerable cyclists from fatal traffic!

I-385-1 As discussed in Chapter 2, Project Description, the proposed Project would include the addition of a protected bike lane along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

I-386 Steven Stanton

	COMMENT	RESPONSE
I-386-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-386-1 Please see Master Response - Parking/Bike Option.</p>

I-387 Christina Fan

COMMENT

RESPONSE

I-387-1 | I bike multiple times a week along silver lake reservoir instead of driving. It's an essential entry point for me to get on the river path and I would greatly value better paved roads (my bike often risks sliding into the road cracks) and also protected lanes on this high-traffic street. Thank you so much for considering bikers!

I-387-1 | As discussed in Chapter 2, Project Description, the proposed Project would include the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-388 Gina Kosty

	COMMENT	RESPONSE
I-388-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area. The paved surface of the roads is in bad shape and needs to be resurfaced.</p>	<p>I-388-1 Please see Master Response - Parking/Bike Option.</p>

I-389 Hannah Gray

COMMENT

RESPONSE

I-389-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area

I-389-1 Please see Master Response - Parking/Bike Option.

I-390 Sarah Gray

	COMMENT	RESPONSE
I-390-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-390-1 Please see Master Response - Parking/Bike Option.</p>

I-391 Le Wang

COMMENT

RESPONSE

I-391-1

To Whom it May Concern,

I'm commenting regarding the new proposed Silver Lake renovation project. I am in favor of option of the off site improvement bikelane option. We do not need more parking around the lake. More parking would encourage more traffic and more people to drive to enjoy the lake. We want to nudge people to walk, bike, or use public trasnit to the lake. It is already an area of high congestion. Giving more space for bikes and vehicle traffic, as well as a buffer would help keep evervthina flowina and make SL safer for everyone to eniov.

I-391-1 Please see Master Response - Parking/Bike Option.

I-392 Nik Syam

		COMMENT	RESPONSE
I-392-1	I'm raising children in the area and the number one priority for me is safe bike	I-392-1	As discussed in Chapter 2, Project Description, the proposed Project would include implementation of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.
I-392-2	lanes, protected! More green, open space would be great for the little ones to play and feel safe.		
		I-392-2	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-393 Mark Saul

COMMENT

RESPONSE

I-393-1

Option 2 would be a dream come true. I ride my kids to Micheltorena from Glendale Blvd and am tired of cars speeding by, utility trucks blocking the bike lane, trying not to hit joggers, and lastly the debris that falls off cars getting in the way. I recently picked up 50 rusty nails from the bike lane after getting a flat tire on the way to school. God forbid a jogger should step on one. I just think having a buffer there would make everyone feel much safer.

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-393-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-393 Mark Saul

I-393-2



COMMENT

I-393-2 Attachment noted.

RESPONSE

I-394 Auguste Miller

	COMMENT	RESPONSE
I-394-1	Go with Option 2 for the bike lanes.	I-394-1 Please see Master Response - Parking/Bike Option.

I-395 Leslie Ridings

	COMMENT	RESPONSE
I-395-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-395-1 Please see Master Response - Parking/Bike Option.</p>

I-396 Robert Kinsfather

COMMENT

RESPONSE

I-396-1 As someone within driving distance of Silver Lake Blvd. who has had to drive through the area multiple times, I support a version of Option 1 that does not include the extra parking and instead uses the 8' to grant each bike lane an extra 4' . Having a physical barrier between bikes and cars helps keep cyclists safe & narrow lanes help slow down drivers. Not putting up any physical barrier between the bikes and cars had lead to cars blocking bike lanes regardless of the visual markers used to separate the two.

I-396-2 Many soft bollards/pylons end up ran over as drivers know there's no risk to them for running them over. Additionally a lack of physical barriers would run the risk of drivers cutting into the bike lane to bypass any perceived traffic/obstacles putting all cyclists at risk.

Attached are examples around the LA metro area (including some from the recent Venice Boulevard bike lane additions) that display the use of bike lanes by cars despite clear markings not to. One LA resident (@EntitledCycling) has compiled 340 examples of divers blocking cycling lanes and sidewalks as of 12/5/2022. Physical barriers are a must for cyclists to feel safe!

I-396-1 Please see Master Response - Parking/Bike Option.

I-396-2 The comment identifies examples of bike lane obstructions. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-396 Robert Kinsfather

COMMENT

RESPONSE

I-396-3 Attachment noted.

I-396-3



I-396 Robert Kinsfather

COMMENT

RESPONSE

I-396-3
Cont.

I-396 Robert Kinsfather

COMMENT

RESPONSE

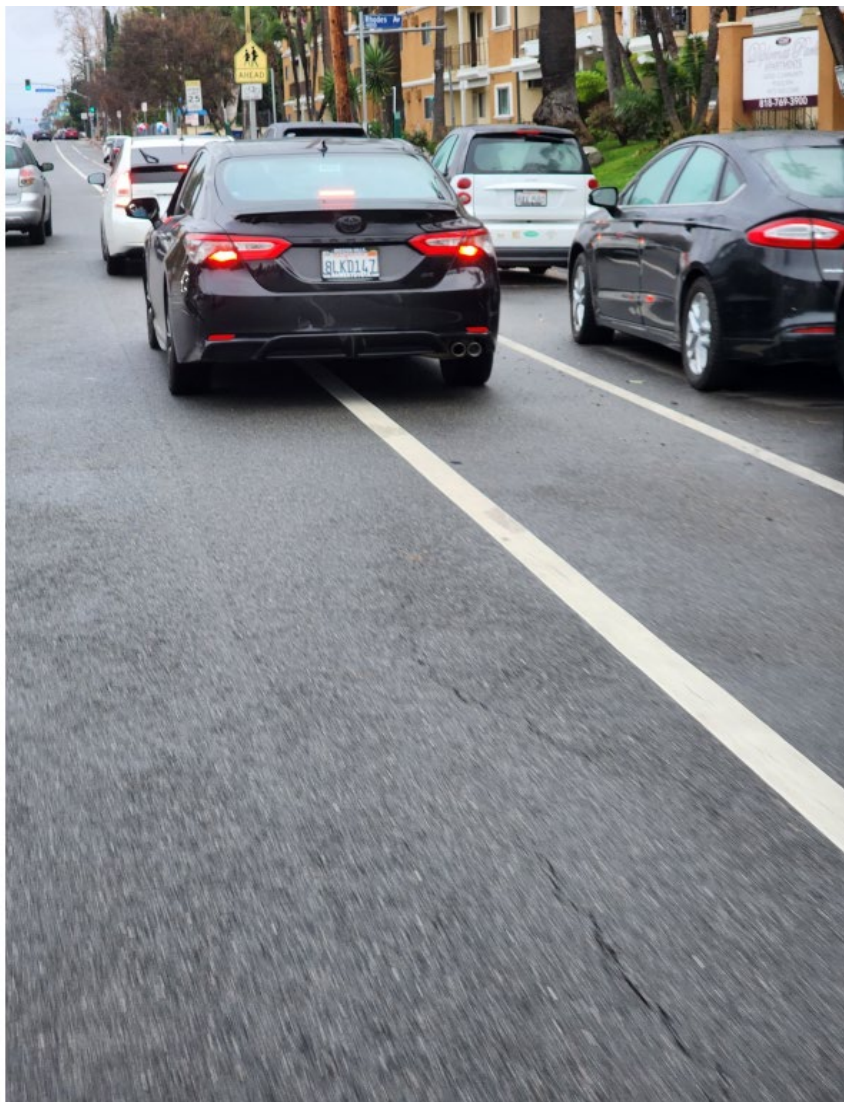


I-396-3
Cont.

I-396 Robert Kinsfather

COMMENT

RESPONSE

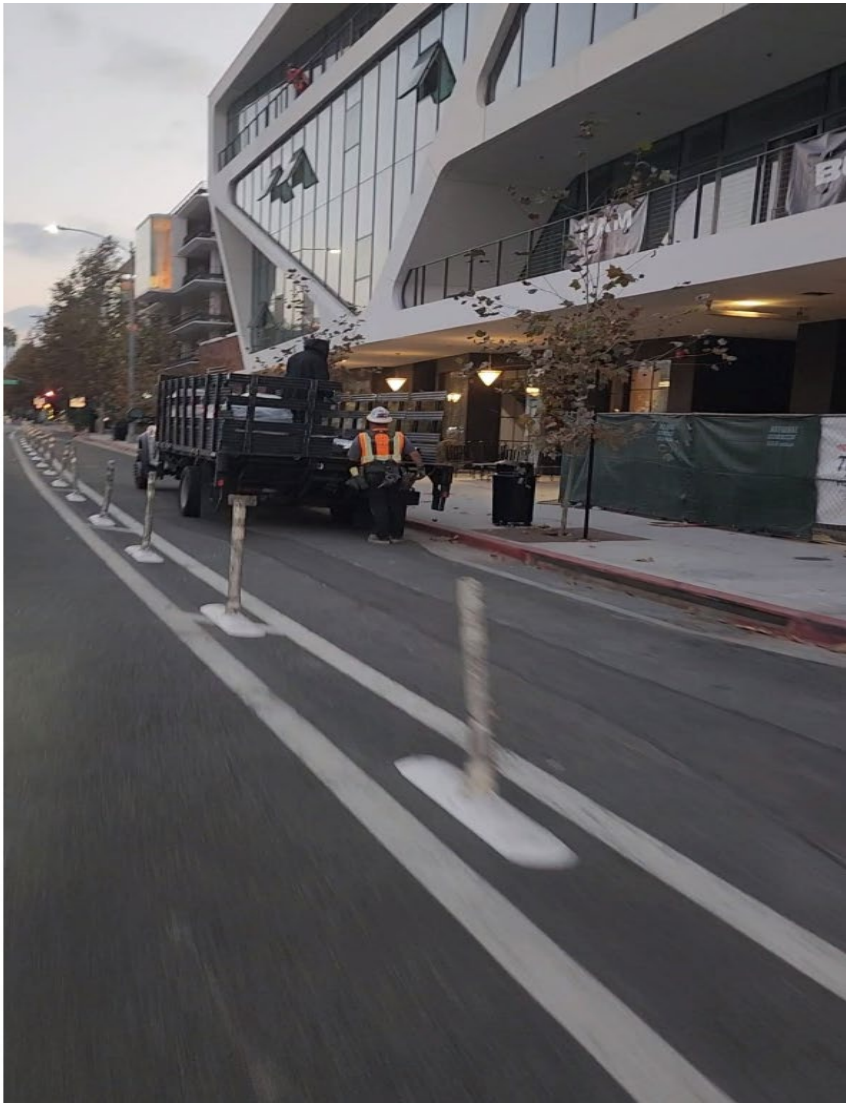
I-396-3
Cont.

I-396 Robert Kinsfather

COMMENT

RESPONSE

I-396-3
Cont.



I-397 John Carrera

COMMENT

RESPONSE

I-397-1

I love to cycle as a mode of transportation and exercise but hardly ride anymore because a lack of safe routes. Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area.

I-397-1 Please see Master Response - Parking/Bike Option.

I-398 Bradley Bain

	COMMENT	RESPONSE
	I live right in the area, PLEASE proceed with the option that has safest bike lanes. This is the crown jewel of the neighborhood, as the success of the Meadows shows, and bike lanes would be absolutely amazing and used so much.	I-398-1 Please see Master Response - Parking/Bike Option.
I-398-1	Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	

I-399 Colin Kronholm

COMMENT

RESPONSE

I-399-1

Hi! Love to visit the Silverlake Reservoir. Would LOVE option 2 to allow for biking around the area (which would also hopefully inspire protected lanes down the main BLVD's in the future).

Thank you for this option!

I-399-1 Please see Master Response - Parking/Bike Option.

I-400 Colin Kronholm

	COMMENT	RESPONSE
I-400-1	<p>Hi! Love to visit the Silverlake Reservoir. Would LOVE option 2 to allow for biking around the area (which would also hopefully inspire protected lanes down the main BLVD's in the future).</p> <p>Thank you for this option!</p>	<p>I-400-1 Please see response to Comment I-399.</p>

I-401 Michael Schafner

COMMENT

RESPONSE

I-401-1

I have lived in Silverlake since 2005. I go to the reservoir not less than 75 times per year. I love it and enjoy it so much, but not could be improved and made better. My comment focuses on how it could be better for cyclists, like myself.

Option 2 is the best and safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area. This would be an important improvement that would benefit this wonderful public space.

I-401-1 Please see Master Response - Parking/Bike Option.

I-402 Marius Facktor

	COMMENT	RESPONSE
I-402-1	The second option is the safest option for bicycles. If we truly want bicycles to be a legit mode of transportation we need a network of bike lanes to be separated or protected from fast moving cars.	I-402-1 Please see Master Response - Parking/Bike Option.

I-403 Patrick McNally

COMMENT

RESPONSE

I-403-1

Option 2 is the safest option for cyclists. The best option for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-403-1 Please see Master Response - Parking/Bike Option.

I-404 Steve Skripnik

	COMMENT	RESPONSE
	Option 2 is the safest option for cyclists, cars, and pedestrians. It will encourage biking and reduce the reliance on cars and parking for those cars around Silver Lake.	I-404-1 Please see Master Response - Parking/Bike Option.
I-404-1	The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area.	

I-405 Nathan Fan

COMMENT

RESPONSE

I-405-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-405-1 Please see Master Response - Parking/Bike Option.

I-406 Aryeh Cohen

	COMMENT	RESPONSE
I-406-1	<p>Hello,</p> <p>As a resident of Silver Lake, bike commuter, and frequent visitor of the reservoir, I strongly support Option 2 as the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p> <p>Can't wait to see this project implemented! Thank you.</p>	<p>I-406-1 Please see Master Response - Parking/Bike Option.</p>

I-407 Taylor Tobin

COMMENT

RESPONSE

Please pick option 2, it's much safer. I love the reservoir and already bike it a lot and I want to feel safer, please!

I-407-1 Please see Master Response - Parking/Bike Option.

I-407-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-408 Riley McNair

		COMMENT	RESPONSE
I-408-1	Biking infrastructure is vital to the livability and sustainability of a world class city like Los Angeles!	I-408-1	As described in Chapter 2, Project Description, the proposed Project includes bike improvements along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

I-409 Laura Michet

COMMENT

RESPONSE

I-409-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-409-1 Please see Master Response - Parking/Bike Option.

The city must prioritize cycling, walking, and other human powered transport in order to minimize climate crisis and ensure we all survive into the next generation. Protecting cyclists isn't just about saving our lives as vulnerable travelers but also about saving the life of everyone on the planet. This is absolutely not an exaaderation.

I-410 Matthew Wehner

	COMMENT	RESPONSE
I-410-1	<p>Please choose option 2 for the bike lanes. It is critical that these bike lanes are built well, with full protection from cars, and WIDE lanes for lots of bicycle traffic. Angelenos living in the area have few options for safe cycling, and this route could attract thousands of cyclists like the beach paths in Venice, the Beach Cities, Long Beach, etc.</p> <p>It would be even better if the travel lanes could be narrowed to 10.5 feet. This would allow for a wider buffer for enhanced protection for cyclists, and also calm traffic on the road. A park like this needs to prioritize the needs of cyclists over drivers since it is the green and equitable solution.</p>	<p>I-410-1 Please see Master Response - Parking/Bike Option.</p>

I-411 Arnav Patel

COMMENT

RESPONSE

I-411-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-411-1 Please see Master Response - Parking/Bike Option.

I-412 Elliott Hanson

	COMMENT	RESPONSE
I-412-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area. Thank you!</p>	<p>I-412-1 Please see Master Response - Parking/Bike Option.</p>

I-413 Andrew Yeo

COMMENT		RESPONSE
I-413-1	Option 2 seems like a great place to start with bike lanes. The 4' buffer should include a protective barrier, many cars speed around those turns after they come out of traffic in the surrounding areas. I would be much more likely to cycle through here from Glendale/Los Feliz to get to the eating or shopping destinations on Sunset!	I-413-1 Please see Master Response - Parking/Bike Option.

I-414 Katharine Towne

COMMENT

RESPONSE

I-414-1 | I support the installation of a protected bike lane.

I-414-1 Please see Master Response - Parking/Bike Option.

I-415 Sean Gilbreath

COMMENT

RESPONSE

I-415-1

Any protected bike lanes are a step further in making our city bikeable. We need this now more than ever. This city is a capable city for bike infrastructure and it will help to encourage bike commute and will Ultimately be better for the environment. Please build more protected bike lanes

I-415-1 Please see Master Response - Parking/Bike Option.

I-416 Arjun Kolachalam

	COMMENT	RESPONSE
I-416-1	Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-416-1 Please see Master Response - Parking/Bike Option.

I-417 Michelle Fink

COMMENT

RESPONSE

I-417-1 | option 2 is the safest ab best choice for all of us! protected bike lanes make the city safer and more accessible. please approve what we all so desperately want!!

I-417-1 Please see Master Response - Parking/Bike Option.

I-418 Nathan Adair

	COMMENT	RESPONSE
I-418-1	Bikes don't have to only be a means of commute for middle aged, single men who have a death wish. If we make bike lanes safe by building protections around them then we can entice teenagers and grandparents to join in on all the fun! This will eventually result in less cars being on the road which will reduce traffic issues while also reducing our emissions and fighting climate change!	I-418-1 As discussed in Project Description, Section 2.5.2 of the Draft EIR, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-419 Samuel Shapiro-Kline

COMMENT

RESPONSE

I-419-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-419-1 Please see Master Response - Parking/Bike Option.

I-420 Matt Barnes

	COMMENT	RESPONSE
I-420-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-420-1 Please see Master Response - Parking/Bike Option.</p>

I-421 Garrett Smith

COMMENT

RESPONSE

I-421-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-421-1 Please see Master Response - Parking/Bike Option.

I-422 Peter Foster

	COMMENT	RESPONSE
I-422-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-422-1 Please see Master Response - Parking/Bike Option.</p>

I-423 M. David Lopez

COMMENT

RESPONSE

I-423-1 Please go with Option 2!

It's the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars.

Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area.

I-423-1 Please see Master Response - Parking/Bike Option.

I-424 Giovanni Ramirez

	COMMENT	RESPONSE
I-424-1	Please go with option 2 for silver lake reservoir, our outdoor spaces should not be reliant on a car. If possible anything being re-done in LA should always carry an open ended approach for different forms of transportation.	I-424-1 Please see Master Response - Parking/Bike Option.

I-425 Kevin Ferguson

COMMENT

RESPONSE

I am an East LA resident who uses a bicycle for about 50% of my transportation needs and option 2 would help me not die and would encourage me to use sustainable transit more.

I-425-1 Please see Master Response - Parking/Bike Option.

I-425-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-426 Brett Max Kaufman

	COMMENT	RESPONSE
I-426-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-426-1 Please see Master Response - Parking/Bike Option.</p>

I-427 Rebecca Snavelly

	COMMENT	RESPONSE
I-427-1	<p>As a local who walks the reservoir often, I vote for Option 2 as the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p> <p>Thank you, Rebecca</p>	<p>I-427-1 Please see Master Response - Parking/Bike Option.</p>

I-428 Kevin Cao

	COMMENT	RESPONSE
I-428-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-428-1 Please see Master Response - Parking/Bike Option.</p>

I-429 Jessica Warren

COMMENT

RESPONSE

I-429-1	So excited about the idea of protected bike lanes around Silverlake Reservoir! I live on Rowena, a block from the reservoir. I cycle regularly (against all odds) and these improvements would help bikes, pedestrians, and frustrated motorists! This would make the area even more beautiful and livable.	I-429-1	The commenter's support for protected bikes lanes around Silver Lake Reservoir is noted. Please see Master Response - Parking/Bike Option.
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I-430 Russell Bates

	COMMENT	RESPONSE
I-430-1	<p>In Figure 2-16 of the Project Description (page 27) I strongly support Option 2, labeled "Silver Lake Boulevard Bike Lane." In fact, the car traffic lanes in this scenario should be narrowed to 10.5' and the extra space given to a larger buffer between the bike lane and car traffic.</p> <p>The bicycle lane should also be a raised track so that water from storm runoff does not collect on the riding surface.</p>	<p>I-430-1 Please see Master Response - Parking/Bike Option.</p>

I-431 Jessica Warren

	COMMENT	RESPONSE
I-431-1	I forgot to add that option 2 is significantly safer! The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-431-1 Please see Master Response - Parking/Bike Option.

I-432 Amy Seidenwurm

	COMMENT	RESPONSE
I-432-1	Hi - I ride my bike around the reservoir often and feel strongly that option 2 is the best and safest solution. In addition, it would be great to have a way to maintain those lanes better - they are very uneven and rutty and quite dangerous with cars zipping by. Thank you!	I-432-1 Please see Master Response - Parking/Bike Option.

I-433 Katie Edgerton

COMMENT

RESPONSE

I-433-1 | Include protected bike lanes!! We need more bike infrastructure. Thank you!

I-433-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-434 Lionel Mares

	COMMENT	RESPONSE
I-434-1	I've bicycled in Silverlake Reservoir, and I think it would be great to have protected bicycle lanes. A lot of motorists drive way too fast. Which makes me feel unsafe and fearful. Installing protected bicycle lanes would add a sense of safetv and securitv for all.	I-434-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-435 Declan Kamonka

COMMENT

RESPONSE

I-435-1 | Bikes provide multiple benefits to a city and are often overlooked, don't be one of those cities. Make the right choice and provide a safe space for cyclists

I-435-1 Please see Master Response - Parking/Bike Option.

I-436 Heather Hoffman

	COMMENT	RESPONSE
I-436-1	I'm writing in support of option 2; dedicated, protected bike lanes will ensure cyclists can safely commute in this area. It is crucial for the city to implement road design that will protect cyclists and pedestrians from drivers, and this is the way to do it!	I-436-1 Please see Master Response - Parking/Bike Option.

I-437 James Ingram

COMMENT

RESPONSE

I-437-1	The city should absolutely install protected bike lanes around the Silver Lake Reservoir. Study after study shows the effectiveness of such infrastructure, and the city needs to commit to healthy, green, intermodal infrastructure at every choice possible in order to address affordability and climate goals.	I-437-1	As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.
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I-438 Geoffrey Booth

COMMENT

RESPONSE

I-438-1

Hi, I live two blocks from Ivanhoe Reservoir and I bike with my children in the area. I read that the city is considering fully protected bike lines around the reservoir. I strongly support such improvements, and anything that can increase safety and separation between cars and cyclists.

I-438-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-438-2 Attachment noted.

I-438-2



I-439 Peter Norwood

COMMENT

RESPONSE

- I-439-1 Silver Lake blvd has okay bike infrastructure now. Still, there are some spots that are severely lacking, notably a spot near the dog park going towards sunset where the lane hits a dangerous gutter and forces cyclists to either risk getting stuck in the gutter or go out into traffic unexpectedly.
- I-439-1 There is no reason this street should serve as a fast cut-through for cars, they have Hyperion and Glendale for that. It's for people accessing a park in a densely populated part of town, so we should make it safe for everyone to access it with or without using a car.
- I-439-2 We also need much better pedestrian crossings, especially on Silver Lake blvd.
- I-439-3 I think option 2 is definitely the best.

- I-439-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.
- I-439-2 Please see Master Response - Traffic/Transportation.
- I-439-3 Please see Master Response - Parking/Bike Option.

I-440 Alex Guillemette

	COMMENT	RESPONSE
I-440-1	I bike around Silverlake Reservoir almost every day and would greatly appreciate a protected bike lane. Currently the small bike lane on Silverlake Blvd is riddled with cracks and bumps that are problematic to bike on. Plus cars offer drive fast around the windv corners. often meraina into the bike lake	I-440-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-441 Benjamin Feldman

COMMENT

RESPONSE

I-441-1

Please, Class IV bike lanes. Also, please connect the lanes to the Sunset 4 All plan with Metro's Sunset/ Cesar Chavez BRT, and and extension of West Hollywood's Fountain Blvd Class IV bike lanes to Sunset. It would create a true network of bike lanes. I've been cycling in the area for awhile now. And it's obvious that the number of bikes have increased. Let's keep folks safe and promote sustainable transportation

I-441-1 Please see Master Response - Parking/Bike Option.

I-442 Gregory Kay

	COMMENT	RESPONSE
I-442-1	I'm writing to support option 2 which is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The buffer should be a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-442-1 Please see Master Response - Parking/Bike Option.

I-443 Ilana Saul

COMMENT

RESPONSE

I-443-1 | Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-443-1 | Please see Master Response - Parking/Bike Option.

I-444 Brendan Cheng

	COMMENT	RESPONSE
I-444-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-444-1 Please see Master Response - Parking/Bike Option.</p>

I-445 Alex Marchinski

COMMENT

RESPONSE

I live 1 mile away from the reservoir and run and bike around it regularly. The pedestrian spaces can get crowded and I often run in the road to avoid people on the sidewalks. When I bike, people are often double-parked in the bike lanes and it feels that there isn't enough space for cyclists.

The reservoir is a unique and friendly place for people. It already attracts people who walk and bike. The best option would increase this capacity to not only keep people safe but to continue this legacy and build upon it.

I-445-1 Please see Master Response - Parking/Bike Option.

I-445-1

People should feel more separated from cars to feel safer, more peaceful, and more engaged with the natural world that is being designed. To do so, the car lanes should narrow to 10.5 feet in order to add an extra 3 feet as a buffer and carbon-sequestering shade trees should be planted for further separation. In addition, the bike lanes often get cluttered and unusable, so the city should raise the bike lanes to keep all stormwater infrastructure cleared. Let's make this as good, dare I say better, than parks being designed in every other American city - pro-pedestrian and cyclist! Thanks!

I-446 Carter Moon

	COMMENT	RESPONSE
I-446-1	Save lives, put in protected bike lanes. LA needs as many safe alternatives to cars as possible. One traffic death is too many.	I-446-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-447 Giancarlo Marayag

COMMENT

RESPONSE

I-447-1 | Hi, I am a local cyclist who frequents this route. From my understanding me and my fellow bike riders agree that Option 2 is the best possible option that safety considers pedestrians, cvclists, and drivers. Thank you

I-447-1 | Please see Master Response - Parking/Bike Option.

I-448 Matt Stewart

	COMMENT	RESPONSE
I-448-1	<p>Please prioritize Option 2 for protected bike lanes on Silver Lake Boulevard. The Silver Lake Master Plan envisions amazing improvements to the reservoir, and it's important to encourage people to walk, bike, or take transit to the reservoir. 4' bike lanes are too narrow. especiallv on a hillv and curvv road.</p>	<p>I-448-1 Please see Master Response - Parking/Bike Option.</p>

I-449 Margaret Douridas

COMMENT

RESPONSE

I-449-1

Hi, I am a resident of Silver Lake and a local bicycle infrastructure advocate who is writing in support of option 2. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that cutters or stormwater features fall outside of the cyclina area.

I-449-1 Please see Master Response - Parking/Bike Option.

I-450 Susannah Lowber

	COMMENT	RESPONSE
I-450-1	I bike commute through here daily and Option 2 is the safest option for cyclists. Currently it is not super safe but there aren't really any great options. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area. Thanks.	I-450-1 Please see Master Response - Parking/Bike Option.

I-451 Lambda Moses

COMMENT

RESPONSE

I-451-1 | Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-451-1 Please see Master Response - Parking/Bike Option.

I-452 Kyeong Hoon Jung

COMMENT

RESPONSE

I-452-1

Please choose option 2 which is the safest option for cyclists. I have had a crash on Silverlake Blvd. not too far from the reservoir because a car cut me off the in bike lane. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area.

I-452-1 Please see Master Response - Parking/Bike Option.

I-453 John English

COMMENT

RESPONSE

I-453-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-453-1 Please see Master Response - Parking/Bike Option.

I-454 Joe Linton

	COMMENT	RESPONSE
I-454-1	My family and I live just down the hill from the Silver Lake Reservoir. My daughter went to pre-school there, and played on basket ball teams at the Rec Center. We bicycle on Silver Lake Blvd and West Silver Lake Blvd often. I encourage the city to include protected bike lanes in the design. Kids and their families need a safe all-ages bikeway - make it protected.	I-454-1 Please see Master Response - Parking/Bike Option.

I-455 Charles Mulford

COMMENT

RESPONSE

I-455-1 | Bike lanes around the silver lake reservoir would be amazing! I hope this can come to pass!

I-455-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-456 Cristina Jung

COMMENT

RESPONSE

I-456-1

We are so excited for the protected bike lanes around the reservoir!

Option 2 is the safest option for cyclists. The best plan for these bike lanes would be to narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The barrier should be built out of concrete & the city should consider planting trees on the buffer as well. This plan gives cyclists the greatest protection from cars and would add to the neighborhood's beauty.

It would be wonderful if the city would also consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

My husband was in a collision with a car in this area while cycling and we want to ensure that never happens to him again or anyone else in the future.

I-456-1 Please see Master Response - Parking/Bike Option.

I-457 Nate Koller

COMMENT

RESPONSE

I-457-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-457-1 Please see Master Response - Parking/Bike Option.

I-458 Aaron Stein-Chester

COMMENT

RESPONSE

I-458-1 Please see Master Response - Parking/Bike Option.

I-458-1

Option 2 is the safest option for cyclists because it offers a spacious two way cycle track, but I'd like to see it go further. We have the opportunity to build a world class bike facility from scratch, so I'm surprised the city is considering 12 ft car lanes and no physical protection. Wide car lanes encourage vehicle speeding, and this is the main driver of bike/ped fatalities. They should be narrowed to 10.5 ft as in Option 1 to ensure vehicle traffic drives slowly in areas like this with a lot of non-vehicle traffic.

Likewise, any comfortable bike lane needs physical protection from cars. I doubt anyone would feel comfortable letting a child ride in these bike lanes without some kind of substantial barrier between them and vehicle traffic. We need to design these bike facilities with the most vulnerable users and the worst drivers in mind (that is, imagining the worst possible circumstances, how do we physically prevent one from coming into contact with the other?). I would love to see either a concrete barrier or a wider cement median with trees or shrubbery.

Finally, I'd also like to see the cycle track raised. This is an additional level of protection from vehicles, and it prevents the phenomenon that I've observed recently in LA bike lanes where riders are forced to ride in gutters (that is, they are included measuring the width of a bike lane). This is uncomfortable for cyclists.

Thank you! Excited about the improvements being considered.

I-459 Nick Robinson

COMMENT

RESPONSE

I-459-1

Los Angeles is a beautiful city, a complex city, a unique city. Covering a vast amount of space the best way to see LA is on a bike. Fast, but not too fast, can stop and explore spaces, it's a great city to bike. However, bikers are not protected enough! Bikes need space, they need barriers, they need lanes of their own that are protected! Even as a driver, I wish that bikes weren't put so close to traffic lanes - every bike lane next to the road adds an extra degree of worry that a cyclist may be in your blind spot and a quick accident can leave somebody dead. Barriers of trees and other greenery would beautify our spaces and protect our cyclists and our drivers. Option 2 is a clear way to do.

I-459-1

As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-460 Todd Munson

COMMENT		RESPONSE
I-460-1	We just across the river from Silver Lake in Glassell Park and as a person who choses to ride a bike whenever possible, Silver Lake Blvd is a route I often take when heading west and the addition of protected bike lanes can't be added soon enough. Thank you.	I-460-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-461 Robert Goldberg

COMMENT

RESPONSE

I-461-1

As a resident who lives within walking distance of the Silver Lake Reservoir, frequently visits it on foot, and would like to visit it by bike but does not feel safe doing so, I am commenting to urge the city to implement Option 2 for the bike lanes surrounding the lake.

Option 2 is the better and safer option for the bike lanes, giving cyclists sufficient space to ride side-by-side and also providing a buffer space that can house trees or other decorative elements. Silver Lake Boulevard is a busy automobile artery. Placing parking spaces on the lake side of the street will cause endless issues as drivers search for parking and attempt to parallel park in front of cars that come racing around the curves.

I am very excited to have protected bike lanes around the Reservoir and eagerly await their completion, along with that of the full Silver Lake Master Plan, which I wholeheartedly support.

I-461-1

As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-462 Jason Couse

	COMMENT	RESPONSE
I-462-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-462-1 Please see Master Response - Parking/Bike Option.</p>

I-463 Akeem Street

COMMENT

RESPONSE

I-463-1 | These bike lanes are absolutely necessary. A friend of mine was sideswiped there by someone texting and driving. In order for us all to be safe we need these lanes. This area is a gem in Silver Lake. This would be a huge improvement for the community.

I-463-1 | Please see Master Response - Parking/Bike Option.

I-464 Stefani Manger

I-464-1 | Please plant more trees

COMMENT

I-464-1 The proposed Project as described in Chapter 2 of the Draft EIR would include the planting and replacement of trees. The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

RESPONSE

I-465 Richard Burnam-Fink

	COMMENT	RESPONSE
I-465-1	<p>Hi there,</p> <p>I'm a bike-commuter who takes Silverlake Blvd often by the reservoir. I strongly believe that option 2 is the better bike-line layout. Having the full barrier from cars and wider bike lanes (especially since it carries 2 line bike traffic) will be a much better and safer cvclina experience.</p>	<p>I-465-1 Please see Master Response - Parking/Bike Option.</p>

I-466 Eric Chu

	COMMENT	RESPONSE
I-466-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-466-1 Please see Master Response - Parking/Bike Option.</p>

I-467 Ben Bressette

COMMENT

RESPONSE

- I-467-1 | I support option 2 - the addition of bike lanes. This is a great spot to work towards getting people out of cars and using more active transportation.
- I-467-2 | Existing conditions lead to vehicles traveling at unsafe speeds, especially considering how many people/children/animals are around.
- I-467-3 | I support any and all improvements to the dog park -- some grass and shade would be nice.

- I-467-1 | Please see Master Response - Parking/Bike Option.
- I-467-2 | Please see Master Response - Traffic/Transportation.
- I-467-3 | This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-468 Ethan Stockwell

	COMMENT	RESPONSE
I-468-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-468-1 Please see Master Response - Parking/Bike Option.</p>

I-469 Andrew Reich

COMMENT

RESPONSE

I-469-1

As a cyclist who rarely feels safe biking in Los Angeles, I think Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-469-1 Please see Master Response - Parking/Bike Option.

I-470 Patrick Cleary

	COMMENT	RESPONSE
I-470-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-470-1 Please see Master Response - Parking/Bike Option.</p>

I-471 Stuart Selonick

COMMENT

RESPONSE

I-471-1

Option 2 is by far the safest option for cyclists. The ideal setup for these bike lanes would definitely narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Also, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area. We need protected bike lanes!!!

I-471-1 Please see Master Response - Parking/Bike Option.

I-472 Nicholas Bottomley

	COMMENT	RESPONSE
I-472-1	I am fully in support of this plan. I love to ride my bike around LA, and Silver Lake's proximity to the LA River Path makes it a great place to do a loop around. The roads, however, do not feel safe or maintained well enough for biking on. Having a protected lane is ideal for this location.	I-472-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-473 Anonymous Street

COMMENT

RESPONSE

I-473-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-473-1 Please see Master Response - Parking/Bike Option.

I-474 Sherin Bennett

	COMMENT	RESPONSE
I-474-1	<p>Option 2 is the safest option for bike riders. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city should also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should raise the cycle track so that gutters or stormwater features fall outside of the biking area.</p> <p>I am concerned about bike rider safety around the reservoir because I bike there often. I've seen a friend get hit by a car near the south end of the reservoir - something must be done, and segregated, protected bike lanes are the best option for all road users.</p>	<p>I-474-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.</p>

I-475 Annie Zaruba

COMMENT

RESPONSE

I-475-1 | Option 2 is the best option for our neighborhood! The ideal setup would include a buffer for cyclists and pedestrians, perhaps the city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Very hopeful for this project and making LA a safer city for pedestrians and cyclists!

I-475-1 | Please see Master Response - Parking/Bike Option.

I-476 Michael Salazar

	COMMENT	RESPONSE
I-476-1	<p>Hi,</p> <p>I feel that Option 2 is the safest and best option for everyone. Using this option allows for narrowing the car lanes to 10.5' with an added 3' as a buffer. Please also plant trees as a buffer and place a concrete barrier for protection from cars. Finally, please raise the cycle track so that gutters and etcetera fall outside of the cycling area.</p> <p>Thank you!</p>	<p>I-476-1 Please see Master Response - Parking/Bike Option.</p>

I-477 Walid Bizri

COMMENT

RESPONSE

I-477-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-477-1 Please see Master Response - Parking/Bike Option.

I-478 Jason Knoll

COMMENT

RESPONSE

I-478-1 | I support option 2

I-478-1 Please see Master Response - Parking/Bike Option.

I-479 Byron Smith

	COMMENT	RESPONSE
I-479-1	Cycling is a growing activity and way of life for commuters. Giving pedestrians and traffic a break, more people are utilizing bicycles than ever before. We need more bike lanes, this plan is a great opportunity to strengthen our community.	I-479-1 Please see Master Response - Parking/Bike Option.

I-480 Sarah Lippai

		COMMENT	RESPONSE
I-480-1	Option 2 would provide the best protection for bicyclist. I've seen people run on the current bike lane and I find it to be hazardous since it's so curvy. It would protect bicyclist and pedestrians.	I-480-1	Please see Master Response - Parking/Bike Option.

I-481 Austin Chase

COMMENT

RESPONSE

I-481-1	Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-481-1	Please see Master Response - Parking/Bike Option.
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I-482 Erial Tompkins

		COMMENT	RESPONSE
I-482-1	Greetings, thank you for this platform. It's imperative that we provide safe passage for citizens, young and old, through the streets of Los Angeles. With gas prices, environmental concerns, and neighborhood safety, we must start thinking about the future. California is often the shining example for the rest of the nation -- let's lead safe streets.	I-482-1	Please see Master Response - Public Safety and Master Response - Traffic/Transportation.

I-483 Eric Pierce

	COMMENT	RESPONSE
I-483-1	I am submitting this comment in favor of protected bike lanes around Silverlake Reservoir. I am a cyclist and ride my bike to work daily. I also live near Silverlake Reservoir and take my West Silverlake Blvd to Trader Joes and Silverlake Blvd. to Whole Foods and CVS. Trash days are hard for a cyclist because the cans are often blocking the existing bike line. Finally I will be much safer in a protected bike lane from cars and their distracted drivers. Please put these protected bike lane in asap. Thank You	I-483-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-484 John Baierl

	COMMENT	RESPONSE
I-484-1	<p>While I do not live in the immediate area, I am a frequent visitor for recreation in the Silver Lake area. I feel that Option 2 is clearly the best option being considered. Narrower traffic lanes (10.5 ft) calm traffic, making a safer environment for both cyclists and pedestrians. Additionally, the 4 ft buffer between the cycling lanes and traffic is essential for safety and comfort, since most cyclists only feel comfortable with a clear barrier between traffic and cycling space. A further improvement would be to elevate the cycling lanes to the same grade as the sidewalk, creating a grade separation to enhance the physical and psychological barrier with car travel lanes. This would also allow gutter and drainage to be moved off of the cycling lanes and onto the street.</p>	<p>I-484-1 Please see Master Response - Parking/Bike Option.</p>

I-485 Anastasia Baran

COMMENT

RESPONSE

I-485-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-485-1 Please see Master Response - Parking/Bike Option.

I-486 Mason Makram

	COMMENT	RESPONSE
I-486-1	2.5.2 Offsite Improvements - Option 2 for cyclists please! We don't need more parking and traffic, especially as bike paths improve for the neighborhood. And make that buffer CONCRETE. not paint on a road	I-486-1 Please see Master Response - Parking/Bike Option.

I-487 Michael Chen

COMMENT

RESPONSE

I-487-1 | the city should install protected bike lanes around Silver Lake Reservoir if they care about children and protecting their safety.

I-487-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-488 Karen Canady

	COMMENT	RESPONSE
I-488-1	<p>Thank you for considering improvements to the bike lanes for Silver Lake Blvd! Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area. See photo for example of unsafe bike lane design (current bike lane around Silver Lake Reservoir).</p>	<p>I-488-1 Please see Master Response - Parking/Bike Option.</p>

I-488 Karen Canady

COMMENT

RESPONSE



Silver Lake Reservoir

I-488-2 Attachment noted.

I-488-2



I-489 Mark Jacobsen

	COMMENT	RESPONSE
I-489-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-489-1 Please see Master Response - Parking/Bike Option.</p>

I-490 Andy Wong

COMMENT

RESPONSE

I-490-1

Option 2 is the safest option for cyclists. Slowing car traffic around the reservoir and this area in general is worth the benefits. A separated lane is ideal especially because of the curved road. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-490-1 Please see Master Response - Parking/Bike Option.

I-491 Sidney Sherland

	COMMENT	RESPONSE
I-491-1	I think the whole project is just beautiful, it's great for the community and wildlife as well, Great job!!!	I-491-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-492 Ben M

COMMENT

RESPONSE

I-492-1	Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-492-1	Please see Master Response - Parking/Bike Option.
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I-493 Johnathan Cahill

	COMMENT	RESPONSE
I-493-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or storm-water features fall outside of the cycling area.</p> <p>The city is in the midst of a traffic death crisis with pedestrians, in particular pedestrians of color, being effected the most; the city MUST take action on making the built environment more walkable. safe. and healthier.</p>	<p>I-493-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.</p>

I-494 Michael Velarde

COMMENT

RESPONSE

I-494-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-494-1 Please see Master Response - Parking/Bike Option.

I-495 Ian Lundy

	COMMENT	RESPONSE
I-495-1	<p>Please support safe options for all travelers. In the same way we design streets to be safe for drivers they should be safe for walkers and bikers as well.</p> <p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-495-1 Please see Master Response - Parking/Bike Option.</p>

I-496 Benjamin Morris

	COMMENT	RESPONSE
	<p>Please choose Option 2!</p> <p>I would love to bike more in Los Angeles and help take cars off the road. To do that, we need to prioritize safe bike infrastructure!</p>	<p>I-496-1 Please see Master Response - Parking/Bike Option.</p>
I-496-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer or make a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	

I-497 Andrew Soto

	COMMENT	RESPONSE
I-497-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-497-1 Please see Master Response - Parking/Bike Option.</p>

I-498 Philip Labes

COMMENT

RESPONSE

I-498-1 | I live near the reservoir and bike this area often. It's dangerous! We need protected bike lanes to help improve this area badly!

I-498-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-499 Philip Labes

	COMMENT	RESPONSE
I-499-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-499-1 Please see Master Response - Parking/Bike Option.</p>

I-500 Adam Kearney

COMMENT

RESPONSE

I-500-1

As a frequent cyclist around the Silver Lake Reservoir, I strongly support Option 2 as the safest option for cyclists. Ideally, the bike lanes would narrow the traffic lanes to 10.5 feet, and add an extra 3 feet as a buffer. The narrower lanes for cars would also incentivize drivers to travel slower and more thoughtfully, thus protecting drivers and the numerous pedestrians and cyclists in the area. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars and providing shade. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area. The downhill section of Silver Lake Boulevard, adjacent to the dog park, currently features a bike lane that (a) narrows while going downhill and (b) goes over drainage gutters, necessitating cyclists to pull out into traffic to avoid crashing on the slatted gutters. A raised cycle track, particularly in this portion of Silver Lake Boulevard, would increase the safety of both cyclists and drivers in this currently dangerous segment.

I-500-1 Please see Master Response - Parking/Bike Option.

I-501 Haley Thompson

	COMMENT	RESPONSE
I-501-1	As someone who frequents this area on my bicycle, Option 2 is the one that seems the safest by far. I hope you seriously consider implementing Option 2!	I-501-1 Please see Master Response - Parking/Bike Option.

I-502 Daniel Kwan

	COMMENT	RESPONSE
I-502-1	<p>I love the Silver Lake Reservoir. Love taking my kid there, love walking around the park and watching the dogs.</p> <p>But if we have a chance to make it safer for bikers, children, and pedestrians then I think we have to at least try. Any chance to make our city a little less car dependent, and little more human-centric, the better. It makes us healthier, happier. and is better for the environment. Thank you!</p>	<p>I-502-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.</p>

I-503 Renata Keck

	COMMENT	RESPONSE
I-503-1	<p>Silver Lake Boulevard is currently a hostile environment for cyclists, who are often competing for space with cars who are driving significantly faster than the posted speed limit, cars using the bike lane as a dropoff zone, and pedestrians who use it as overflow when the trails are too busy. Having green spaces in the city of Los Angeles, particularly a green space that serves many communities on the East side of LA, needs to have proper infrastructure for safe travel. Prioritizing a car-first design will only serve to create a barrier for those who are able to use and enjoy the reservoir.</p> <p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-503-1 Please see Master Response - Parking/Bike Option.</p>

I-504 Nancy Hoven

COMMENT

RESPONSE

I-504-1	Please do not remove mature trees along the shoreline of the reservoir. Those trees along West Silverlake Boulevard have been proven nesting sites for great blue herons. They also provide shade, food, and nesting habitat for numerous Birds, small mammals, and invertebrates. Additionally minimizing Wildlife disturbances, such as large public events should be a priority. Large masses of people, loud noises and or music is not only deserving to Wildlife but to a completely residential area. Finally, where are people supposed to park when they visit the reservoir? And increase in human activity will certainly create traffic noise, pollution, and impact neighboring residential areas.w	I-504-1	This comment expresses concern regarding impacts to mature trees and wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Mitigation measures and project design features specific to mature trees include Mitigation Measures BIO-4, BIO-5, and Project Design Features PDF-BIO-13 and PDF-BIO-14. Mitigation measures and project design features specific to blue herons, nesting birds, small mammals, and invertebrates include Mitigation Measures BIO-1, BIO-2 Mitigation for Crotch's Bumble Bee and Monarch Butterfly, and BIO-3 Special-Status Bats, and Project Design Features PDF-BIO-2 and PD-BIO-3. Also, please see Master Response – Biological Resources.
I-504-2		I-504-2	Please see Master Response - Biological Resources, and Special Events Impacts.
I-504-3		I-504-3	Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.
I-504-4		I-504-4	This comment expresses concern regarding noise and traffic impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant.

I-505 Andy Kadin

	COMMENT	RESPONSE
I-505-1	Please choose option 2 for bike lanes! We should have the absolutely best safe riding options for cvclists in this city!	I-505-1 Please see Master Response - Parking/Bike Option.

I-506 Jamie Farrell

COMMENT

RESPONSE

I-506-1	I'm very exited for the Silver Lake reservoir upgrades! This is such an underutilized resource and will make for a great park and community resource. I strongly support adding protected bike lanes around and leading up to the reservoir. Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclino area.	I-506-1	As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.
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I-507 Pat Chow

COMMENT

RESPONSE

I-507-1 The comment expresses opposition to the proposed Project. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

From: christopher.adams@lacity.org on behalf of [Eng SLRCMP](#)
To: [Jan Green Rebstock](#); [Wendy Delgado](#); [Nicolle Janelli Steiner](#)
Subject: Fwd: Silver lake project
Date: Tuesday, December 6, 2022 8:11:47 AM

----- Forwarded message -----
From: **Pat Chow** <pchow828@yahoo.com>
Date: Thu, Dec 1, 2022 at 4:12 PM
Subject: Silver lake project
To: eng.slrcmp@lacity.org <eng.slrcmp@lacity.org>

I-507-1 I have lived in Silverlake for over 40 years and oppose this project!

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The Silver Lake Reservoir Complex Master Plan Project Team
Bureau of Engineering | Department of Public Works
1149 S. Broadway
Los Angeles, CA 90015



I-508 Samuel Digiovanni

	COMMENT	RESPONSE
I-508-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-508-1 Please see Master Response - Parking/Bike Option.</p>

I-509 Samuel Digiovanni

	COMMENT	RESPONSE
I-509-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-509-1 Please see Master Response - Parking/Bike Option.</p>

I-510 Caro Vilain

COMMENT

RESPONSE

I-510-1 | This is such an exciting opportunity for a protected bike lane! A truly protected one with trees, bell bollards, concrete, or maybe even a truly creative sturdy form of protection? Concrete bollards or planters painted by local artists? We all know that a stripe of paint alone does not offer any protection, so let's do this right!

I-510-1 | Please see Master Response - Parking/Bike Option.

I-511 Toni Wells

	COMMENT	RESPONSE
I-511-1	<p>Hello, Thank you for planning bike paths in Silver Lake, and accepting comments on the design. Of the two options I've seen, I believe Option 2 would be ideal if it also included elevating the bike path from the street, adding a curb with storm-water management, and planting trees in the buffer zone to provide protection from fast-moving cars. Please see attached jpg for a mock-up. Best regards, Toni</p>	<p>I-511-1 Please see Master Response - Parking/Bike Option.</p>

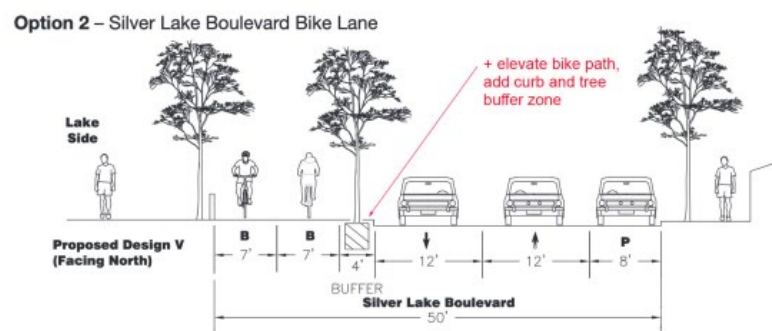
I-511 Toni Wells

COMMENT

RESPONSE

I-511-2 Attachment noted.

I-511-2



I-512 David Matsu

	COMMENT	RESPONSE
I-512-1	<p>As someone who regularly visits and rides through this area, I would like to recommend Option 2 as the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or storm water features fall outside of the cycling area.</p> <p>I would also like to emphasize that it is important that any cycle facilities in the reservoir area be linked up to lane and trails nearby so that they are useful as part of the city wide transport network.</p> <p>Thank you</p>	<p>I-512-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.</p>

I-513 Charlie Sponsel

COMMENT

RESPONSE

I-513-1 | Please go with option 2 and give Silver Lake Reservoir protected bike lanes all the way around. Let's move LA into the 21st century and give our residents safe access to their streets, to recreation, and beyond. We want safe streets for everyone!

I-513-1 | As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-514 Dani Gonzalez

	COMMENT	RESPONSE
I-514-1	<p>Option 2 would be the best option. Cyclists need space to feel safe considering much of the bike lane is right where cars open their doors after parking. many people, myself included use their bikes as the main form of transportation. Creating a physical barrier will protect people, as cyclists die often in Los Angeles because of improper bike lanes. Additionally diverting the gutters or raising the bike lane will allow for bikers to feel safe after storms or surges. Thank you.</p>	<p>I-514-1 Please see Master Response - Parking/Bike Option.</p>

I-515 Ithyle Griffiths

COMMENT

RESPONSE

I-515-1 | I strongly support bike lanes at the reservoir!!

I-515-1 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-516 David Fenn

COMMENT

RESPONSE

I-516-1 Please see Master Response - Parking/Bike Option.

I-516-1

As a downtown resident and frequent visitor to the Silverlake Reservoir, I am happy to see that bike lanes are being considered as part of the project. While that is a great start, these lanes really need to be protected bike lanes, ideally with planted concrete barriers and street trees rather than flex posts or bollards. Metro bike share stations should also be included around the reservoir.

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-517 Suzana Ajib

COMMENT

RESPONSE

I-517-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-517-1 Please see Master Response - Parking/Bike Option.

I-518 Stephen Messer

	COMMENT	RESPONSE
I-518-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-518-1 Please see Master Response - Parking/Bike Option.</p>

I-519 Malia Schilling

COMMENT

RESPONSE

I-519-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-519-1 Please see Master Response - Parking/Bike Option.

I-520 Dustin Ebert

COMMENT

RESPONSE

Hello! As a cyclist who often enjoys riding along the reservoir, I'd like to comment on the options for the Silver Lake Blvd offsite improvements.

Option 2 is best. It increases total bike lane width available from ~12' (including buffer) to 14'. This will help users maneuver around the large cement cracks and potholes that currently occupy the bike lane on this stretch of Silver Lake Blvd (I don't know how preventable these road deformations are but it should be a major concern in planning). As well, converting this unidirectional bike lane to bidirectional definitely justifies the increase in width. Please, please, please do not shrink the bike lane width to 4' each way (as option 1 proposes)! This just makes the challenge of avoiding cracks with riders traveling the opposite direction even more dangerous and stressful.

Another great thing about Option 2 is it avoids Option 1's adding of parking to the western side of Silver Lake Blvd. If Option 1 were implemented, it would encourage more car traffic (since parking is more likely to be available) and then double the number of times cars will stop traffic in order to parallel park. New parking on this side will also invite pedestrian/bicyclist conflicts as pedestrians leaving their parked car to walk to the reservoir can wander unimpeded across the new sidewalk into the bike lane. Groups especially like to spread out side-by-side across all available space (hard to blame them, feels natural), which would include the bike lane.

I'd also like to suggest these improvements to option 2:

1. Add a solid barrier like trees or a concrete wall inside the buffer. With the scenic reservoir and the curvy shape of the street, the probability of a vehicle veering into the bike lane is high. We know this will happen at some point and so we should physically separate the driving lanes from vulnerable bicyclists.
2. Decrease the driving lane width from the current 12' to 10.5' and add the extra 3' to the bike lane buffer. The tighter driving lanes will slow car traffic, which will increase safety for bicyclists, pedestrians, and drivers. This also reduces noise pollution from vehicles, improving the experience for park goers and residents. From my experience, faster driving speeds do not even pay off here as cars tend to pile up around intersections at Duane St, Armstrong Ave, and the ped crossing in between.
3. Another great improvement would be to raise the bike lane to avoid these lanes running through gutters, manholes, or other destabilizing road features. This might also solve that problem with large cracks and potholes.

Thank you!

Dustin

I-520-1 Please see Master Response - Parking/Bike Option.

I-521 Erik Abriss

COMMENT

RESPONSE

I-521-1 | Please consider Option 2, which is by and large the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-521-1 | Please see Master Response - Parking/Bike Option.

I-522 Amanda Gail Plott

	COMMENT	RESPONSE
I-522-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-522-1 Please see Master Response - Parking/Bike Option.</p>

I-523 Rosie Dwyer

COMMENT

RESPONSE

I-523-1

PLEASE ADOPT OPTION 2. Our streets are deadly, and people are killed every day simply walking or biking to access basic necessities, employment and family. We know that striped bike lanes do next to nothing to protect cyclists, and the longer we wait to install fully protected lanes, the more people (mothers, fathers, children, family) will be killed. We know that reducing traffic lanes and narrowing lanes are proven to make streets safer (for people inside and outside the cars). The beautiful silverlake reservoir deserves truly safe, stress-free streets for families and children to bike, walk and play on.

I STRONGLY support Option 2. It is the safest option. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area.

I-523-1 Please see Master Response - Parking/Bike Option.

I-524 Katherine Harrison

	COMMENT	RESPONSE
I-524-1	Please don't cut down mature trees to create parking especially along Silverlake Boulevard where traffic backs up daily.	I-524-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in the Project Description, Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-525 Danny Vega

	COMMENT	RESPONSE
I-525-1	Option 2 is a great way forward for Los Angeles. Cycling needs to be safe and encouraged. I am not a cyclist because of how dangerous it is, and this would be a great step forward.	I-525-1 Please see Master Response - Parking/Bike Option.

I-526 Jonah Roth-Verity

		COMMENT	RESPONSE
I-526-1	Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-526-1 Please see Master Response - Parking/Bike Option.	

I-527 Sun Yu

COMMENT

RESPONSE

Please build option 2.

We need protected bike lanes at sidewalk height(with bollards).

We need protected bike lanes that are part of a connected network throughout the city so that riding a bike for transportation (school, work and recreation-to enjoy a park etc) is a safe viable option for kids, seniors, women and not just the brave.

Narrow the width of travel lanes for cars. The road infrastructure should support/encourage car drivers to drive at the ideal safe legal speed limit vs a speed limit sign that gets ignored.

I-527-1

Wide roads encourage car drivers to speed (highways have wide lanes) making it dangerous for people outside.

Please add trees/greenery.

We have an opportunity to make a safe pleasant welcoming calming sustainable option prioritizing public use for the Park visitors over car drivers speeding through putting Park users in danger.

Please choose Option TWO.

Thank you.

I-527-1 Please see Master Response - Parking/Bike Option. Additionally, the replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in the Project Description, Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-528 Ross Rivas

	COMMENT	RESPONSE
I-528-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-528-1 Please see Master Response - Parking/Bike Option.</p>

I-529 Paula Outon

COMMENT

RESPONSE

I-529-1

Bike lanes are a necessity in our city, they not only present great opportunities for exercising but they also transport, more efficiently than cars, a lot of people, to and from work. The city of Los Angeles has 70% of its land covered in spaces dedicated to cars. From streets to parking structures and junk yards. It's unsustainable to keep giving space to cars when in 2020, the least deadly year of the decade in Los Angeles, 3,500 people lost their lives on car related accidents. We need spaces free of cars and bike lanes should be one of them. Bike lanes should not be used as disabled vehicle alternatives, or as temporary parking spots for quick errands, we need to have secluded and protected bike lanes that show the commitment of Silverlake to its residents and visitors and to lead the way into the future of mobility.

I-529-1 Please see Master Response - Parking/Bike Option.

I-530 Jay Helberg

	COMMENT	RESPONSE
I-530-1	I am worried about homelessness. Please have security to prevent homelessness in the new open park.	<div>I-530-1</div> <div>Please see Master Response - Homelessness and Master Response - Public Safety.</div> <div>This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</div>

I-531 Addie Daddio

COMMENT

RESPONSE

I-531-1

Please don't cut down the trees on Sliver Lake Blvd to make room for "visitor parking!" Trees are so important to our environment and for healthier living. I sure I don't need to list the benefits of trees in an Urban area but to name a few, they improve air quality, create cooler temps for our scorching summers, provide habitat for birds/wildlife. It takes years for trees to reach maturity. Visitor parking is a huge issue for the changes being made at the reservoir. A huge reason to leave it as is.

I-531-1

The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in the Project Description, Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-532 Benjamin Climer

	COMMENT	RESPONSE
I-532-1	I don't live in LA, but I ride my bike in Silver Lake all the time. Please, use option 2 that gives the most protection for cyclists and make us all happy and safe!	I-532-1 Please see Master Response - Parking/Bike Option.

I-533 Rick Corsini

COMMENT

RESPONSE

I-533-1 | Yes, protected bike lanes should be installed around Silver Lake and extend south to Sunset Blvd and north to Riverside Drive along Fletcher Drive and Glendale Blvd. and connect to the LA River bikeway.

I-533-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-534 Kristen Studard

	COMMENT	RESPONSE
I-534-1	<p>I'm excited to see more bike lanes around the reservoir.</p> <p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-534-1 Please see Master Response - Parking/Bike Option.</p>

I-535 Luke Allen

COMMENT

RESPONSE

I-535-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-535-1 Please see Master Response - Parking/Bike Option.

I-536 Laurie Pepper

	COMMENT	RESPONSE
I-536-1	I have seen the maps for the master plan. I strongly object to the removal of so many of our trees in order to create a parking lot off Silver Lake Blvd. Please do not destroy our trees, our neighborhood.	I-536-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-537 Katelan Cunningham

COMMENT

RESPONSE

I-537-1 | Protected bike lanes around the park would foster a great destination for cyclists. The city needs more support for carless activity and this would be a great way to encourage that.

I-537-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-538 Chelsea M

	COMMENT	RESPONSE
I-538-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-538-1 Please see Master Response - Parking/Bike Option.</p>

I-539 Matthew Feige

	COMMENT	RESPONSE
I-539-1	<p>Please select option 2!</p> <p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-539-1 Please see Master Response - Parking/Bike Option.</p>

I-540 Khaia Brogan

COMMENT

RESPONSE

I-540-1 | Go with option 2 for the bike lanes (bike lanes protected by a barrier)

I-540-1 Please see Master Response - Parking/Bike Option.

I-541 Sam Junio

COMMENT

RESPONSE

I-541-1 | Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-541-1 Please see Master Response - Parking/Bike Option.

I-542 Valerie Veg

COMMENT

RESPONSE

I-542-1 | Please add these on! Would be huge for the safety of our community!

I-542-1 Please see Master Response - Public Safety.

I-543 Jodhan Fine

COMMENT

RESPONSE

November 29th, 2022

Prepared by Jodhan Fine
Undergraduate Biology Student, Occidental College

Thank you for the opportunity to review and voice concerns regarding the Silver Lake Reservoir Draft Environmental Impact Report (DEIR).

I am an undergraduate at Occidental College with relevant experience in avian behavior and biology. Beyond many years of experience as an avid birder observing and studying birds, I've published articles in *North American Birds Magazine*, *Birding Magazine*, and *Western Birds* and volunteer for the Cornell Lab of Ornithology reviewing rare bird records and ensuring quality data on the citizen science database eBird (<https://ebird.org/home>). Additionally, I'm on the board of my local Audubon Chapter, have experience in museum-based science at the Moore Lab of Zoology, and receiving funding from the National Science Foundation, studied Bell's Vireo populations in southern New Mexico.

With 204 recorded species on eBird, Silver Lake Reservoir is ranked 54th in Los Angeles County for number of species per location. This is an impressive ranking in a county with 17.5 thousand eBird users, 478 thousand user submitted checklists, and 541 recorded species. Beyond high numbers of taxa, like 25 different waterfowl species, the Silver Lake Reservoir hosts extremely high numbers of individual birds. During winter, thousands of ducks, gulls, and coots can be found on the reservoir and hundreds of wintering songbirds can be found throughout surrounding terrestrial habitat. During spring and fall migration, hundreds of swifts and swallows can be found flying overhead, and on the right day almost a hundred individual migratory warblers can be seen.¹ In the summer months, several raptor nests have been denoted by the Los Angeles Raptor Study in trees surrounding the reservoir.

With an undeniably high counts of birds, I have several concerns regarding the lack of attention avifauna received in several elements of the DEIR. First, the proposal to add an education center brings the potential for window caused bird deaths. In the United States, up to one billion birds die because of window strikes and collisions.² A building with windows erected in the middle of the meadow, a popular area for many birds, could be a death trap for the species that use the reservoir as a migration stop over, as a wintering ground, or a breeding ground. The plan proposes restoration and habitat that could bring in even more birds at risk of fatal collisions with the proposed building. With such an inherent danger, I hoped to see mention of mitigation efforts that would make the windows safe for birds, however I saw no acknowledgment of this risk, and certainly no possible solutions in the DEIR.

Regarding bird numbers, the Biological Technical Report neglected to mention many waterbirds present at the reservoir, only listing with five of the 25 waterfowl species and ignoring the gull, coot, grebe, and heron species present. The aforementioned raptor nests found by the Los Angeles Raptor Study also were never brought up in the DEIR. Raptors like the Red-tailed Hawks nesting around Silver Lake Reservoir are susceptible to abandoning their territories when

¹ <https://ebird.org/checklist/561891522>

² <https://www.allaboutbirds.org/news/why-birds-hit-windows-and-how-you-can-help-prevent-it/>

I-543-1 The comment asserts the analysis of birds that occur within SLRC is inadequate. The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA. Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

Draft EIR Section 3.4.4 Project Design Features and 3.4.5 Impacts and Mitigation Measures, includes preconstruction surveys for nesting birds and other special-status wildlife in PDF-BIO-2 and Mitigation Measures BIO-2 and BIO-3 which offer additional opportunities for wildlife protection during construction. The Draft EIR concludes that the proposed project would increase the native habitats and vegetation on site compared with existing conditions and increase the ecological values and diversity of wildlife at the site. As a result, the Draft EIR concludes that construction and operation of the proposed project would not result in significant impacts to biological resources including birds.

I-543-2 The comment asserts that the Draft EIR fails to analyze and mitigate the potential for window bird strikes at the Education Center. Section 3.1, Aesthetics of the Draft EIR identifies mitigation measure AES-2 which requires that all new structures and buildings shall be designed to include non-glare exterior materials and coatings to minimize glare or reflection. The use of these non-glare materials would result in less than significant impacts to birds.

I-543-3 The comment asserts the analysis of birds that occur within SLRC is inadequate. The Draft EIR was drafted consistent with the CEQA statutes and the State CEQA. Guidelines. The Draft EIR Section 3.4 Biological Resources is consistent with the City of Los Angeles 2006 CEQA Thresholds Guide, Section C Biological Resources. In addition, Draft EIR Section 3.4 Biological Resources was prepared using industry standards for biological analysis.

The Draft EIR includes a species list observed on site during site visits that includes raptor species. The Draft EIR also provides mitigation for nesting bird avoidance that includes raptors. Draft EIR Section 3.4.4 Project Design Features and 3.4.5 Impacts and Mitigation Measures, includes preconstruction surveys for nesting birds and other special-status wildlife in PDF-BIO-2 and Mitigation Measures BIO-2 and BIO-3 which offer additional opportunities for wildlife protection.

I-543 Jodhan Fine

COMMENT

RESPONSE

I-543-4

in the presence of human disturbance.³ The DEIR does not acknowledge this risk even though the proposed plans would likely drastically increase disturbance.

To prevent raptors from abandoning their nests project Alternative 1 (no project) and project Alternative 3 (open space preserve) would be most ideal as they are the least likely to attract high recreational traffic to the park. To prevent window strikes, the three alternatives suffice, as none include the construction of an education center. In the event the proposed park plan is implemented, bird safe windows must be adopted and the plan for these windows should be added to the DEIR. Furthermore, I believe the DEIR should make an effort to include better data on the bird density and species diversity at Silver Lake Reservoir, and to acknowledge the posed risks to the nesting population of Red-tailed Hawks.

I-543-4 The comment prefers Alternative 3 and would like more assessment of the density of birds using the site. The Draft EIR provides an assessment of potential impacts to nesting birds on site and provides mitigation measures to minimize effects. The Draft EIR concludes that the proposed project would increase native habitats and vegetation and increase ecological values and diversity of wildlife using the site. Please see Master Response – Alternatives Analysis. Please see Master Response Biological Resources.

³ <https://extension.unh.edu/goodforestry/html/6-10.htm>

I-544 Nelson Flores

COMMENT

RESPONSE

I-544-1 | please. it is a no brainer to install bike lanes around silver lake. please make sure they are protected and cars wont be able to park in them.

I-544-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-545 Patrick Lewis

	COMMENT	RESPONSE
I-545-1	<p>I support the Silver Lake Blvd Bike Lane Option 2, which is the safest option for cyclists!</p> <p>The best-designed bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer between bikes and motor vehicles. The city of LA should also plant trees along the buffer and make it a concrete barrier for added protection from motor vehicles. Additionally, the city of LA should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p> <p>Please make the Silver Lake Reservoir bicycle facilities best-in-class examples of how the city should build spaces for bikes and pedestrians going forward. Let's not cut corners or give in to outdated car parking requests when most people visit or travel through the reservoir area on foot, on scooter, on bike, in mobility devices, etc.</p> <p>Thanks!</p>	<p>I-545-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.</p>

I-545 Patrick Lewis

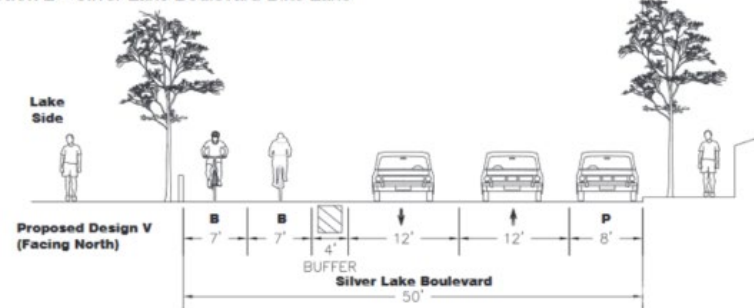
COMMENT

RESPONSE

I-545-2 Attachment noted.

I-545-2

Option 2 – Silver Lake Boulevard Bike Lane



I-546 Jennifer A. Gill

COMMENT

RESPONSE

I-546-1

I am writing to voice enthusiastic support for protected bike lanes around the Silver Lake Reservoir. I firmly believe that creating a safe cycling network is essential to this vision. I specifically advocate for Option 2 of the plan's offsite improvements, which calls for protected bike lanes and a 4-foot physical barrier to safely separate cyclists and vehicle traffic. This physical barrier would ensure that the reservoir area offers a safe space for people to ride bikes, whether they're commuting or riding for leisure.

While I am happy to see protected bike lanes represented in this option, I also want to encourage the City to ensure that gutters and/or stormwater features are designed to not impact the rideability of the bike lanes in order to make this infrastructure truly safe and accessible to all kinds of cyclists from 8 to 108. I know that safe, protected bike lanes around the reservoir will encourage more Angelenos and tourists to ride bikes, in turn helping reduce traffic congestion and improving air quality in Silver Lake in particular and for the greater region as a whole. And as active streets are good for businesses, the many shops, restaurants and bars on Silver Lake Boulevard would also reap meaningful economic benefits, with more people coming to the area on bike to shop, dine and play.

Thank you for moving forward with the Silver Lake Master Plan and for including options for bike lanes in the plans. I hope to see Option 2, without stormwater features inside the lanes. selected in the final option

I-546-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-547 Daniel Weidlein

COMMENT

RESPONSE

I-547-1 Any development project in our city is a golden opportunity to increase accessibility and alternative transportation methods. Having protected bike lanes around the reservoir seems like a no-brainer if the reservoir is going to be redeveloped and I sincerely hope you can work this into the plans. On a similar track, having an easily accessible bus from one of the nearby metro stops (Hollywood or Koreatown) would make the new park more accessible for our community at large.

I-547-2

I-547-1 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.

I-547-2 As described in Section 3.16.1, Transportation of the Draft EIR, the SLRC is currently connected to the Metro bus system via lines #201 that runs West Silver Lake Drive with multiple stops adjacent to the Complex and #92 which runs on Glendale Boulevard with multiple stops which are a short walking distance from the SLRC (Figure 3.16-1 of the Draft EIR). Line #92 connects to Burbank, Glendale and downtown LA. According to LA Metro's NextGen Bus Plan, Line # 201 will be discontinued. Portions of Line #182 and #603 will stop in the project vicinity and connect to Hollywood and Echo Park. The Vermont/Sunset Metro Station is approximately 1.45 mile west of the Project Site and the Vermont/Santa Monica Metro Station is approximately 1.42 miles southwest of the Project Site.

I-548 Kevin Rutkowski

	COMMENT	RESPONSE
I-548-1	The ideal setup for bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.	I-548-1 Please see Master Response - Parking/Bike Option.

I-549 Nicole Antoine

COMMENT

RESPONSE

	<p>The DEIR provides no research comparing crime statistics after drastic changes to urban environments such as opening up 116 acres to easy public access, all night, and all day within residential neighborhoods near two freeways.</p> <p>The current perimeter fence provides a baseline condition of safety and protection from criminal incursion into the Reservoirs area. All DEIR projected policing needs are derived from this baseline condition. There is no discussion at all of changes in opportunistic criminal activity that certainly will be brought by the alteration of these critical variables: removal of the fence, opening so wide a land area within an urban setting, enabling incursions around the clock.</p>	<p>I-549-1 As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. Operations would not require additional fire or hazard services such that substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities would occur. LAFD would be able to serve the proposed Project and would not result in the need for new or altered fire facilities. In addition, the proposed Project was designed in order to allow LAFD to continue to use the reservoir for water for emergency purposes as outlined in Section 3.14, of the Draft EIR.</p>
I-549-1	<p>The DEIR provides only an undetailed description with very general statistics about current citywide LAPD numbers and anti-crime activity. They are not specific to the Project area, or of parks as a special public environment.</p> <p>"An increase in visitorship of approximately 390 park visitors daily is anticipated. However, these visitors and the new proposed full-time employees would not reside in or permanently occupy the project site and service demands per person within the area would not increase." [Impact 3.14-13]</p> <p>This obtuse statement ignores the fact that crime in parks is often a problem due to the difficulty of policing a wide land area containing MANY freely-moving people and the ease, for criminal elements, of escape.</p>	<p>LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. The proposed Project is being designed to include wetland habitat and other edge treatments, where feasible, around the reservoir that would allow separation from the public to the water's edge. In the unlikely event that someone would enter the reservoir water, these wetland areas and edge treatments would also provide places where one could exit the reservoir (as opposed to the current smooth surface and slope of the concrete walls). During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily in the proposed Project area.</p>
I-549-2	<p>I believe that we should KEEP the fence. This is the only way to PROTECT the wildlife and keep the reservoir SAFE.</p> <p>The gate to the reservoir should be artistic as the new gardens COULD ALLOW this. We can update the fence and make it more welcoming without having it open for 24 hr access.</p> <p>See photo attached of the LA River gate that is beautiful. https://earthiron.net/los-angeles-river-gate</p>	<p>Please also see Master Response - Public Safety and Master Response - Fence Removal.</p> <p>I-549-2 Please see Master Response - Fence Removal.</p>

I-550 Ann Phillips

	COMMENT	RESPONSE
I-550-1	After going over the Silver Lake Reservoir plans, I see no consideration for a small slice of neighborhood being turned into multipurpose free for all without adequate parking, traffic patterns (which are already inadequate and congested) impacting the immediate neighborhood as well as the entire Silver Lake area. As a reminder we have the largest city park 3 miles away! This is a TERRIBLE PLAN!	I-550-1 As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard (please see Master Response - Parking/Bike Option). In addition, please see Master Response - Traffic/Transportation for a discussion on parking evaluations related to CEQA.

I-551 John Butcher

COMMENT

RESPONSE

I-551-1 | I support the master plan process and the Draft EIR. However, I object to the
 I-551-2 | fence coming down. It MUST be replaced with a fence like the one at Rowena
 I-551-3 | Reservoir. A fence MUST be kept one in place in order to close the internal
 paths from dusk to dawn. It would make the community safer. I also think the
 construction must be reduced from 12 years to a few years. Get the damned
 job done!

I-551-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - Fence Removal.

I-551-2 Please see Master Response - Fence Removal.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change under implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.

I-551-3 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

I-552 Howie Goldklang

		COMMENT	RESPONSE
I-552-1	I support the proposed plan as is. Especially if public restrooms are available near the meadow / great lawn.	I-552-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-553 Jennifer Mirabile

COMMENT

RESPONSE

I-553-1 I support the master plan process and the Draft EIR. I recommend replacing the
I-553-2 fence, but keeping one in place.

I-553-3 I also believe closing the internal paths from twilight to sunrise would be helpful
for the community, as they are now.

Thank you.

I-553-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-553-2 Please see Master Response - Fence Removal.

I-553-3 As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with the implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-554 Jim Pfenninger

	COMMENT	RESPONSE
I-554-1	We fully support this Master Plan!! Thank you all for your dedication to our neighborhood with your time and commitment to enhance living in Silverlake.	I-554-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-555 Lynda Obst

COMMENT

RESPONSE

I-555-1

This is a intensively studied and extremely well conceived plan for our reservoir. It was written by denizens of silver lake— our neighbors and friends- not business or commercial interests. It seems to maintain and develop the reservoir as a haven for birds and animals as well as something beautiful to spark our pride in our neighborhood and all of our walking paths and views. I'm proud of the work the drafters have done and support it unqualifiedly.

I-555-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-556 Roanne Wahba

		COMMENT	RESPONSE
I-556-1	We support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you.	I-556-1	Please see Master Response - Fence Removal. The comment expresses overall support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-556-2		I-556-2	As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public. The comment is noted for the record and will be forwarded to the decisions-makers for review and consideration. Please see Master Response - Public Safety.

I-557 Laura Kruper

COMMENT

RESPONSE

I-557-1 | My main concern is that these plans are overly "idealistic"....just like the plans
 I-557-2 | for Echo Park. And we know what happened with Echo Park: homeless
 I-557-3 | encampments, drugs, and increased lack of sanitation. We do NOT want this to
 happen to Silverlake. All of the people suggesting these changes have
 rose-colored glasses on. A minority of people are making decisions for the
 majority.

I-557-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-557-2 Please see Master Response – Homelessness This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - Fence Removal.

I-557-3 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-558 Jordan Wilson

	COMMENT	RESPONSE
I-558-1	It's absolutely unacceptable to destroy and remove so many mature trees to put in a parking lot! They beautify and provide so much life to our street. Devastating! DO NOT CUT DOWN THE TREES.	I-558-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. As described in Project Description Section 2.5.2, parking would be added in a way that it would not encroach on existing trees. Please see Master Response – Biological Resources.

I-559 Sydney Simmering

COMMENT

RESPONSE

I-559-1 | Please don't cut down mature trees for parking.

I-559-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. As described in Chapter 2, Project Description of the Draft EIR, trees would not be removed to create parking. Please see Master Response – Biological Resources.

I-560 Lucy Spriggs

COMMENT		RESPONSE
I-560-1 I-560-2 I-560-3	I support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you.	<p>I-560-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-560-2 Please see Master Response - Fence Removal.</p> <p>I-560-3 Please see Master Response - Public Safety.</p> <p>As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.</p> <p>The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with the implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.</p>

I-561 Susan Matranga

COMMENT

RESPONSE

I-561-1 I am strongly against your plan. I am very concerned about the noise and lack
I-561-2 of adequate parking. Silver Lake Blvd is already congested at rush hour. If you
I-561-3 don't replace fence immediately, people will be swimming in the reservoir.
I-561-4

I-561-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-561-2 Please see Master Response – Noise.

I-561-3 Please see Master Response - Traffic/Transportation.

I-561-4 Please see Master Response - Fence Removal and Master Response - Public Safety.

I-562 David Warren

	COMMENT	RESPONSE
I-562-1 We support the master plan and the DEIR as is. Let's get it done!	I-562-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-563 Amanda Lasher

COMMENT

RESPONSE

I-563-1 | I do not think we should be spending another dime on this project. We should walk away. It was conceived during a very different time in our community and it is no longer appropriate to move forward with this plan. Silver Lake has plenty of resources, we do not need this too. Please divert the funds to building out a green space in a neighborhood with more acute needs than Silver Lake.

I-563-1 The comment expresses opposition to the proposed Project. Please see Master Response - Funding and Operations. The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-564 Guy Vidal

		COMMENT	RESPONSE
I-564-1	We support the Master Plan and the DEIR as is. Thank you." We want the fence down now !!!	I-564-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Master Response - Fence Removal.

I-565 Donna Zweig

COMMENT

RESPONSE

I-565-1

Silverlake has been a safe space for families to walk around, the Neighborhood Nursery School where my now 46 year old went is revered by so many families for decades. This area should not become a parking lot for any reason. It has been a picturesque spot to be viewed by the surrounding homes that people now have to pay huge mortgages and deserve to have the view they paid for. Not to mention the animals and birds that rely on what is left to this property. I hope that the lake is left the way it is, and not reconstructed into the project that can only bring disaster to this long loved space. Thank you

I-565-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-566 Raff Rushton

I-566-1 | We support the Master Plan and the DEIR as is. Thank you."

COMMENT

I-566-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-567 Andrew Takeuchi

COMMENT

RESPONSE

567-1 | I support the master plan which I believe will offer benefits for both the human residents of the area as well as the wildlife.

567-2 | I also support replacing the fence, but keeping one in place. I believe that closing the internal paths from dusk to dawn would be beneficial to the community, as they are now.

567-3 | Thank you!

567-1 | The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

567-2 | Please see Master Response - Fence Removal.

567-3 | Please see Master Response - Public Safety.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with the implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.

I-568 Marisa Miller

	COMMENT	RESPONSE
I-568-1	I support the master plan. It is beautiful and will benefit the environment. I believe closing the internal path from dusk to dawn will be safer for the community.	I-568-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-568-2		I-568-2 Please see Master Response - Public Safety. As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public. The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with the implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.

I-569 Jango Sircus

COMMENT

RESPONSE

I-569-1 | We support the master plan process and the Draft EIR. If anything, we
 I-569-2 | recommend replacing the fence, but keeping one in place. We also believe
 closing the internal paths from dusk to dawn would be beneficial to the
 community, as they are now. Thank you.

I-569-1 | The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The commenter is also referred to Master Response - Fence Removal

I-569-2 | Please see Master Response - Public Safety.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with the implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.

I-570 Helmi Hisserich

	COMMENT	RESPONSE
I-570-1	I support the Silverlake Masterplan DEIR as it is. The process for developing the plan involved extensive community outreach and the proposed plan does reflect a community consensus. I took part in several meetings and was impressed with the extensive community participation and with the professionalism of the design team's final master plan proposal. I think this plan balances the goals of supporting natural habitat for nesting birds with the goal of creating a community amenity that will be accessible to all Los Angeles residents.	I-570-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-571 Ralph Sanchez

COMMENT

RESPONSE

I-571-1 | Your going to cut down all these trees for a parking lot?! Please don't do this just for a parking lot. This is insane!!!

I-571-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-572 Andrew Wenzlaff

I-572-1 | PLEASE don't cut down mature trees to put in a parking lot!

COMMENT

I-572-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. The proposed Project description is described in Chapter 2 of the Draft EIR and does not include the addition of a parking lot. Please see Master Response – Biological Resources.

RESPONSE

I-572 Andrew Wenzlaff

COMMENT

RESPONSE

I-572-2 Attachment noted.

I-572-2



I-573 Polly Estabrook

COMMENT

RESPONSE

Please choose OPTION 2 in Fig. 2-16 for the bike lane design!

I-573-1 Please see Master Response - Parking/Bike Option.

Congratulations on this beautifully designed and carefully thought through Silver Lake Reservoir Complex Master Plan Project Description (Chapter 2). You have incorporated so many user desires (info centers, shade, bike lanes, gathering spaces ..) and ecological considerations (water, habitat islands, ...), I can't wait till you start work on this!

I do have ONE COMMENT regarding the two options for bike lanes (figure 2-16).

I believe Option 2 is the best solution. Here is why:

- Wider bike lanes. Since so many wheeled structures, like skateboards & Ebikes, are included on bike paths, all with varying speeds, we need wide bike lanes so vehicles can pass each other. I've bicycled a lot in NYC and this is a definite issue there. Please don't make it an issue for us. Let's learn from their experimentation.
- 4 ft buffer is IMPORTANT for bicycle safety given car speed. Let's not re-create the bike safety issue on LA's new 6th Street Bridge where I understand the city is requesting \$30M to fix the bike path designs through the state's Active Transportation Program.
- I understand there will be less parking for cars. HOWEVER Section 2.5.2 talks about additional parking and 2.5.8 PDF-TRA-5 about public parking at nearby facilities.
- Finally, I understand that vehicle speed on Silver Lake Blvd may be reduced. THAT IS FINE. This is a RECREATIONAL SITE not a drive through. Drivers can use Glendale Blvd to access highways.

Please keep us in touch and let us know when building will begin. I am happy to advocate for FUNDING!!!!

THANK YOU !!!!!

I-574 Josh Logan

	COMMENT	RESPONSE
I-574-1	Regarding cycling infrastructure, Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cvclina area	I-574-1 Please see Master Response - Parking/Bike Option.

I-575 Marilyn Oliver

		COMMENT	RESPONSE
I-575-1	I like the master plan, but would prefer some kind of fence . Perhaps remove the present one and put up something more esthetic to keep the area safe during night time hours.	I-575-1	Please see Master Response - Fence Removal.

I-576 Janelle Brown

COMMENT

RESPONSE

I-576-1 | I support the Master Plan and the DEIR as is. Thank you.

I-576-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-577 Sam Riegel

	COMMENT	RESPONSE
I-577-1 I support the Master Plan and the DEIR as is. Let's make this park!	I-577-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-578 Ida Dambrauskas

COMMENT

RESPONSE

I-578-1 | Please stop ruining all of our neighborhoods. Work on reducing crime and encampments and the filth you have caused with your policies. No. No. No.

I-578-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-579 Indu Subaiya

		COMMENT	RESPONSE
I-579-1 I-579-2		Please do not cut down any trees at the meadow to create space for a parking lot. We should be promoting healthy behaviors like walking and biking and certainly not inviting more traffic into an already congested part of the neighborhood.	I-579-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.
			As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.
		I-579-2 Please see Master Response - Parking/Bike Option and Master Response - Traffic/Transportation.	

I-580 Karen Numme

COMMENT

RESPONSE

I-580-1 We support the master plan process and the Draft EIR. If anything, we
 I-580-2 recommend replacing the fence but keeping one in place. We also believe
 I-580-3 closing the internal paths from dusk to dawn would be beneficial to the
 community, as they are now. Thank you.

I-580-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-580-2 Please see Master Response - Fence Removal.

I-580-3 Please see Master Response - Public Safety.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.

I-581 Christine Weir

	COMMENT	RESPONSE
I-581-1	I support the master plan and draft EIR. We can keep a fence and close it at night but I feel this is a great addition to our neighborhood and is beneficial to the wildlife. Thanks!	I-581-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-581-2		I-581-2 Please see Master Response - Fence Removal. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-582 Daniella Southgate

COMMENT

RESPONSE

I-582-1 We support the master plan process and the Draft EIR. If anything, we
 I-582-2 recommend replacing the fence, but keeping one in place. We also believe
 I-582-3 closing the internal paths from dusk to dawn would be beneficial to the
 community, as they are now. Thank you, Daniella

I-582-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-582-2 Please see Master Response - Fence Removal.

I-582-3 As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with the implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.

Please see Master Response - Fence Removal.

I-583 James Stathas

	COMMENT	RESPONSE
I-583-1	<p>I'm submitting this comment to oppose the cutting of mature trees for the sake of a parking lot. I've had several interactions with the forestry dept. and requesting trimming of trees all with inane and incredibly stupid outcomes.. trees were cut at the stump though not removed only to be replaced with trash needles and endless debris. Mature trees need to be conserved as vital organs for shade climate mitigation, aesthetics, and property value. removal of these trees will result in more trash, pollution, heat and asphalt. I've lived in this area for over 35 years and this would be a big mistake as the meadow and other areas aren't used excessively throughout the year to warrant this permanent degradation and disruption.</p> <p>thx, jas</p>	<p>I-583-1 The proposed Project would not include the addition of a parking lot but would include select tree removal to accommodate Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.</p>

I-584 Jozef Bilman

COMMENT

RESPONSE

I-584-1 | I reject all the proposed work

I-584-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-585 Helen Levenson

	COMMENT	RESPONSE
I-585-1	<p>As a regular cyclist and resident here, I think Option 2 is the safest option for cyclists. The best setup for the bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city should plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area. It would make for a safer experience of the city for all!</p>	<p>I-585-1 Please see Master Response - Parking/Bike Option.</p>

I-586 David Henry

COMMENT

RESPONSE

I-586-1 | Do not cut down trees. Trees are more important than granting parking to further congest our neighborhood.

I-586-1 The proposed Project would include removal of select trees to accommodate the Project design. Please see Master Response – Biological Resources.

The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Also, please see Master Response – Parking/Bike Option.

I-587 Anonymous

		COMMENT	RESPONSE
I-587-1 I-587-2	We support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you.	I-587-1	<p>The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>Please see Master Response - Fence Removal.</p>
		I-587-2	<p>As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.</p> <p>The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with the implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.</p>

I-588 Cailyn Nagle

COMMENT

RESPONSE

I-588-1	I'd love to ride my bike more, but I don't feel safe doing so the way the streets are now. Protected bike lanes around the Silver Lake Reservoir would be a step in the right direction. I would also love to see them on Verdugo Rd and along Eaglerock.	I-588-1	As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option.
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I-589 Dorcas Tokes

		COMMENT	RESPONSE
I-589-1	We support the master plan process and the Draft EIR. However, we strongly recommend fencing around the entire park area.	I-589-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-589-2	We also believe closing the internal paths from dusk to dawn is necessary to protect the area. (as are parks in Paris and other major metropolitan parks and gardens. (universally)		
I-589-3	I would also recommend "no dogs" a restriction that will encourage the presence of wildfowl especially in the internal areas.		The commenter is also referred to Master Response - Fence Removal
		I-589-2	Please see Master Response - Public Safety. As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public. The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with the implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.
		I-589-3	Please see response to comment I-589-2.

I-590 Cheryl Brock

COMMENT

RESPONSE

I-590-1 | I'm not up for all the trees on silverlake blvd.being removed. But i support the rest

I-590-1 The comment expresses support for the proposed Project, except removal of trees along Silver Lake Boulevard. The proposed Project would include select tree removal to accommodate the Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-591 Dan Gordon

	COMMENT	RESPONSE
I-591-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-591-1 Please see Master Response - Parking/Bike Option.</p>

I-592 Traci Yee

COMMENT

RESPONSE

I-592-1 | This would be a shame to cut all the mature and green trees to make way for vehicles. I visit and drive by this park every day. You will leave less homes for natural wildlife and make this park ugly and turn it in to a concrete jungle. I implore you not go thru this urban planning disaster.

I-592-1 | The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-593 Nora Paller

I-593-1 | Please do not cut down all the trees for the parking lot

COMMENT

I-593-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. As described in Chapter 2, Project Description, of the Draft EIR, the proposed Project would not include construction of a parking lot. Please see Master Response – Biological Resources.

RESPONSE

I-594 Alicia Bleier

COMMENT

RESPONSE

I-594-1 | Please don't cut down existing trees for the implementation of the Silver Lake
 I-594-2 | Park project. Please put parking off-site near the Silver Lake Library.
 I-594-3 | Also, please, for the love of g-d, make sure monies are available to upkeep of
 the park and rangers on the ground to make sure it doesn't turn into a
 homeless encampment.

I-594-1 The proposed Project would include some tree removal. The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-594-2 The proposed Project, described in Chapter 2 of the Draft EIR, would not include off-site parking near the Silver Lake Library. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - Parking/Bike Option.

I-594-3 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park.

The commenter is also referred to Master Response - Funding and Operations and Master Response - Homelessness.

I-595 Martin Morales

	COMMENT	RESPONSE
I-595-1	<p>As a resident of over 20 years in Silver Lake, who lives on W Silver Lake Dr, I have always been a supporter for change for the better. I've always thought the chain link fence was very unattractive, but appreciated its purpose. I would love to see a new and more beautiful fence with entrances that would be locked up from dusk til for the sake of safety. I would hate to see the beautiful new work being done, destroyed with graffiti, theft, plant damage, drug paraphernalia being left behind, not to mention the trash because there is no fence to keep people invade and destroy our new community.</p> <p>DO NOT TAKE THE FENCE DOWN, REPLACE WITH A BEAUTIFUL ONE!</p>	<p>I-595-1 Please see Master Response - Fence Removal and Master Response - Public Safety.</p>

I-596 Nancy K

COMMENT

RESPONSE

I-596-1 | Please do not cut down the trees for parking!

I-596-1 The proposed Project would include some tree removal to accommodate Project design. However, no trees would be impacted by the installation of parking spaces in the South Valley along Silver Lake Drive. The City has decided not to add parking along Silver Lake Boulevard. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-597 Gary Williams

I-597-1 | Please do not destroy any trees in your plans.

COMMENT

I-597-1 The proposed Project would include the select removal of trees to accommodate the Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

RESPONSE

I-598 Marsian De Lellis

COMMENT

RESPONSE

I-598-1	I would like for there to be protected bike lanes on all sides of the Silver Lake that incorporate physical barriers. So that there is a sidewalk, then a bike lane, then a physical barrier, then cars or a dedicated bus lane. TBH it would be nice if there were fewer cars. There should be lots of signage for bikes and green stripes on the street to indicate conflict zones.	I-598-1	Please see Master Response - Parking/Bike Option. The Metro Micro line would service the Project area. In addition, as discussed in the Project Description, PDF-TRA-6, the future site operator and other City departments will work together to explore options for expanding public transit connections to the Project site.
	If there was a dedicated bus lane then this could help people from communities who do not have parks to visit the reservoir. I would like our community to be more generous with our resources and sharing public space is one way to do that.	I-598-2	The proposed Project, described in Chapter 2 of the Draft EIR, would not include a community pool. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	We could also use a community pool and this would be an excellent location for that.	I-598-3	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-598-2	We need some self cleaning bathrooms in the meadow. The bathrooms in the recreation center are hard to access especially for older and disabled folks. The sidewalks must be repaired and made to be compliant with the ADA. The recreation center could be more robust- with more than one room and a pool. The voting center could use some upgrades. We could have more of a place for us to assemble as a community. We need more public art, like the names people tied to the fence and a process to propose works to display. There could be a gallery. There needs to be more and safer places to cross the street on the meadow end.	I-598-4	The proposed Project, described in Chapter 2 of the Draft EIR, would not include a shower, room for those experiencing homelessness, and no area particularly designated for yoga. Please see Master Response - Homelessness. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-598-3	I'm glad the animals who live at the Silver Lake will have islands and prey to eat. I'm glad they won't have to cross the street into traffic to get food. I'm glad that there will be an education center for children. We could bolster that with an arts and crafts room.	I-598-5	The comment proposes dust and noise mitigation. Dust and noise mitigation are outlined in Section 3.3, Air Quality and Section 3.12, Noise and Vibration, of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-598-4	There could be a shower for anyone experiencing homelessness and a room with extra food and clean socks. There could be a process for people who want to use areas for yoga classes.		
I-598-5	Construction harm mitigation: If the neighbors experience more sound, perhaps a compromise could be that the city could purchase some sound proof windows and/ or white noise machines. If construction causes dust, perhaps the city could purchase the immediate neighbors air filters. I look forward to progress at the silver lake		

I-599 Vince Meghrouni

	COMMENT	RESPONSE
I-599-1	<p>You can't be serious about ripping out all those mature trees. Those trees are beautiful, they are part of the community, and they take in carbon dioxide and give off oxygen. They shade the ground and keep it from warming. Are you crazy?</p>	<p>I-599-1 The proposed Project would include removal of select trees to accommodate the Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.</p>

I-600 Stephanie Brown

COMMENT

RESPONSE

I-600-1

Do not cut down Silver Lakes Trees to put in a parking lot. The City has enough parking lots. A parking lot will ruin the charm of this area. This is a place for people to walk, relax, and enjoy a bit of Nature. A parking lot will destroy why people would want to come in the first place. Not to mention the trees are alive and older than most of us. Leave the trees alone. There is already enough pavement.

I-600-1

The proposed Project would not include the addition of a parking lot but would include removal of select trees to accommodate the Project design that may include enhanced street parking. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-601 Kora Brown

COMMENT		RESPONSE
I-601-1	Don't cut down the trees. Find an alternative way in the plan to keep the trees.	I-601-1 The proposed Project would include removal of select trees to accommodate the Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-602 Kelly Sharbaugh

COMMENT

RESPONSE

I-602-1 | please don't cut down any trees that are healthy! Leave the living spaces that exist for a nature habitat!!

I-602-1 The proposed Project would include removal of select trees to accommodate the Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-603 Charlton Mcmillan

	COMMENT	RESPONSE
I-603-1	<p>The extensive tree removal indicated by this plan is a travesty, certainly counterproductive to the creation of a “park”. You should leave the mature and healthy trees and add more if needed. For the sake of our climate, our health, and sake of the many creatures that depend on this life giving resource, rethink this park renovation to incorporate the existing canopy of nature trees.</p>	<p>I-603-1 The proposed Project would include removal of select trees to accommodate the Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.</p>

I-604 Karen Mccluskey

COMMENT

RESPONSE

I-604-1 Oh. There are some wonderful ideas for this plan, but removing a significant number of mature trees is a detriment to the environment. Planting saplings as replacements is shortsighted. Please figure out how to make the plan work without cutting down mature trees. The trees protect our environment and health by cleaning the air. Save our mature trees.

I-604-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-605 Joshua Stamberg

		COMMENT	RESPONSE
I-605-1	We support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you.	I-605-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-605-2			Please see Master Response - Fence Removal.
		I-605-2	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
			Please see Master Response - Public Safety.

I-606 Kerry Hannawell

COMMENT

RESPONSE

I-606-1 | I am a longtime Silverlake resident and support the new SilverLake reservoir plan with enthusiasm!

I-606-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-607 Diane Zurn

	COMMENT	RESPONSE
I-607-1	I support a PARK, with TREES, and an already beautiful place for the residents to enjoy. A parking lot here doesn't make sense... it wouldn't be big enough to alleviate street parking, would it?	I-607-1 The proposed Project would include removal of select trees to accommodate the Project design that may include enhanced street parking. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-608 Robin Raida

COMMENT

RESPONSE

I-608-1 | I oppose the removal of more than 40 mature trees around the existing silver lake meadow and Silver Lake Blvd! Planting new trees is not a substitute for mature trees. There should be a way to preserve more than half of the trees and still accomplish the proposed plan.

I-608-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-609 Janet Wolsborn

	COMMENT	RESPONSE
I-609-1	<p>Please, please, please do not cut down the mature trees slated for removal from Silver Lake Blvd at the end of the Meadow (figure 8B from SL Master Plan). We've few enough trees in this city as it is and it will take decades for anything planted as a replacement to reach maturity and provide a similar shade canopy.</p>	<p>I-609-1 The proposed Project would include some tree removal. The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-610 Tamara Braun

COMMENT

RESPONSE

I-610-1 I strongly oppose the proposal for the project for the Silver Lake and Ivanhoe reservoirs. There is already too much traffic, not enough parking, lots of dog feces everywhere because people do not clean up after their dogs. We do not have the infrastructure to support this project. And cutting down mature trees? Nope. Not a fan at all.

I-610-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources. The comment expresses opposition to the proposed Project.

Please see Master Response - Traffic/Transportation. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-611 Kelly Donahue

	COMMENT	RESPONSE
I-611-1	<p>I am contacting you to say I think we should NOT take down the trees outlined in red on the Silver Lake Blvd street line. These trees are extremely charming, they are a home to wildlife, and it gives much needed shade in a city that has a lot of sunlight. Plan to g new trees will take decades to come to fruition. There is nothing wrong with the current trees. They are all beautiful and different and make Silver Lake Reservoir area what it is today. Please keep the mature trees in place and beautify the area in other ways.</p>	<p>I-611-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-612 Laura Burhenn

COMMENT

RESPONSE

I-612-1

I'm elated for the proposed renovation plan and support it 100%! As a resident of the neighborhood who enjoys the reservoir and dog park daily, I can't wait to see the space transformed into a more environmentally friendly watershed that will support wildlife, encourage biodiversity, migrating bird visits and provide more natural habitat for animals, plants, and insects. Any increased traffic in the neighborhood to spend time in our updated parks system will be worth it — to be a model of what a neighborhood can and should be, to leave a lasting legacy for future generations to enjoy (that will inspire environmental stewardship!), and to welcome others to enjoy the same thing on their daily walks and dog parks adventures and picnics. I'm all for it!! Ps no doubt this will also be great for property values. Silverlake is already the jewel of the east side. and this renovation will make it even more special and desirable.

I-612-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-613 Kristian Martinez

COMMENT		RESPONSE
I-613-1	Why are you planning to remove mature trees? Planting new ones that will take decades to grow is counter productive to proving a peaceful retreat for residence. You are doing more harm than good!!!	I-613-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-614 Hope Arnold

COMMENT

RESPONSE

I-614-1

I whole heartedly support the silver lake master plan as do all my neighbors and friends. I'm not sure what NIMBYS or special interests are trying to bad mouth it but Silver Lake needs this. Our children, the community, the property values, wildlife and for beautification.
This plan is extremely conscience, well thought out and helpful to all of the above.
We only stand to benefit!
Let's move forward and make our home a joyous place to congregate and celebrate. I want to utilize the lake as it's always been meant to be used.
Cheers. thank you

I-614-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-615 Adriana Leal

		COMMENT	RESPONSE
I-615-1	Increased traffic without a workable plan to deal with it make this a no vote.	I-615-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-615-2	Residents that live near the reservoir will be impacted even more by the construction. Our city infrastructure can not accommodate this plan.		Please see Master Response - Traffic/Transportation.
I-615-3		I-615-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-615-3	As described in Utilities and Services Systems, Section 3.18 of the Draft EIR, impacts associated with infrastructure would be less than significant with implementation of mitigation measure UTIL-1 which would ensure during design and prior to construction of Project facilities, the City would conduct an underground utilities search and coordinate with all utility providers that operate in the same public rights-of-way impacted by construction activities.

I-616 Robert Szeles

COMMENT

RESPONSE

I-616-1 | "I support the Master Plan and the DEIR as is. Thank you."

I-616-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-617 Cathy Thornburn

	COMMENT	RESPONSE
I-617-1	<p>Please do not cut down mature trees for this project. There is no point in cutting mature trees to then replant young trees to replace them. Please, revise this plan around these valuable trees. The city needs to consider matures a valuable asset to be protected in the current climate crisis/ drought.</p>	<p>I-617-1 The proposed Project would include the removal of trees to accommodate the Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.</p>

I-618 Diana Wagman

COMMENT

RESPONSE

I-618-1

Please do not cut down any of the mature, healthy trees surrounding Silver Lake Reservoir. Trees are important, good for the environment, offer shade and shelter, and are hosts to birds and squirrels. Plant a new tree and it won't be able to do any of that for many years.

Improvement doesn't mean destruction. Like a great architect, work around the existing trees, incorporate them into your design, let them enhance your plan.

I-618-1

The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-619 Melissa Libertelli

	COMMENT	RESPONSE
I-619-1	I support the Master Plan and the DEIR as is and would like to see this project finally break ground. Particularly the renovation and expansion of the dog park. Thank you, Melissa Libertelli	I-619-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-620 Dylan Jones

COMMENT

RESPONSE

I-620-1

hello, my name is Dylan, I am a filipinotown resident who bikes around the reservoir regularly to access the bike network along the LA river. I am writing to voice support for protected bike lanes around the reservoir for the sake of cyclist safety and also for the sake of motorists, who will no longer have to worry about sharing the road with cyclists. Specifically I am in favor of option 2 because it offers more robust protection for cyclists and pedestrians and allocates more road space to people who are not in cars, which is something the city needs to do quickly, on as many streets as possible, if we are ever going to reach vision zero. I hope that the final plan, however, does not include the stormwater infrastructure inside the bike lane. Metal grates and vents are not a big deal for cars to roll over, but for cyclists they can cause serious accidents. Its a small but important detail that I hope is not overlooked.

sincerely,

Dylan

I-620-1 Please see Master Response - Parking/Bike Option.

I-621 Kathy Tardy

		COMMENT	RESPONSE
I-621-1	✓The fencing should remain in order to prevent what happened at Echo Park Lake (homeless encampments).	I-621-1	Please see Master Response - Fence Removal and Master Response - Homelessness.
I-621-2	✓Loud music will disrupt the tranquility of the neighborhood and nocturnal wildlife.	I-621-2	Please see Master Response - Noise.
I-621-3	✓Silver lake does not have good enough (easy access) surrounding streets to bring in more traffic and parking.	I-621-3	Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.
I-621-4	✓Adjacent parks on Riverside & Griffith Park have the infrastructure to accommodate cars and traffic for sports & music events. —— Kathy Tardy	I-621-4	Comment noted. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-622 Linda Guthrie

COMMENT

RESPONSE

I-622-1 | We need oxygen to breathe n these trees provide that cutting down releases more Co2intothe air. Get with the program n stop destroying shit. Do something radical for a change

I-622-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

I-623 Rhonda Casper

	COMMENT	RESPONSE
I-623-1 Please don't cut down mature trees around the Hollywood Reservoir.	I-623-1	The proposed Project would include the removal of trees to accommodate Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-624 C Ellis

COMMENT

RESPONSE

I-624-1 | Do not remove these trees. Parking should be the least of your concerns. This is unbelievably backward thinking.

I-624-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-625 Denise Miyakawa

I-625-1 | Don't cut the tree please!!

COMMENT

I-625-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

RESPONSE

I-626 Rose Aleman

COMMENT

RESPONSE

I-626-1 | Please do NOT cut down the wonderful mature trees along the reservoir or anywhere in Silver Lake. They give shade, oxygenate our air and are beautiful to look at. I walk around there and it would be a crime to remove them.

I-626-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-627 Gwen F

COMMENT

RESPONSE

I-627-1 | Please consider passing Option 2, it would be a great step in the direction of progress! I love LA and know it could be even greater with more viable cycling options. Let's be a city of the future!

I-627-1 Please see Master Response - Parking/Bike Option.

I-628 Julia DiFrancesco

COMMENT

RESPONSE

I-628-1 | We need to keep the reservoir natural. This proposal is too much for the neighborhood.

I-628-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-629 Alisia Stone


	COMMENT	RESPONSE
I-629-1	We support improvements add SL/Ivanhoe. We do believe that traffic, parking and lighting have not been sufficiently addressed.	I-629-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-630 Noelle Armand

COMMENT

RESPONSE

I-630-1

I just read in the Nextdoor that you are planning to cut down over 50 trees!!! This is unacceptable. What do you think absorb a all the carbon dioxide and pollution that is emitted in our neighborhood? You guessed it; TREES . You can't get back the growth of 50 year old trees. Once you chop them down they are gone forever and your tiny trees will take forever to grow, certainly not in my lifetime or yours. That's more than 2 generations of lost time. Please be kind to the environment and to your neighbors and Don't eliminate these god given trees for Pete's sake. They can't talk but all trees are useful and are selfless and giving.

I-630-1

The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-631 Wendy Yao

		COMMENT	RESPONSE
I-631-1	Do not cut down the trees as noted in the current plan by the meadow! I'm very concerned about the Silverlake reservoir plans. Please leave our existing beautiful trees. Thanks	I-631-1	The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-632 Alvina Louie

COMMENT

RESPONSE

I-632-1 | Please do not cut those beautiful trees. They're part of the reservoir charm

I-632-1 The proposed Project would include some tree removal to accommodate the Project design. The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-633 Mike McGill

		COMMENT	RESPONSE
I-633-1	Please find it in your hearts to improve this HORRENDOUSLY UGLY silver lake reservoir! It needs change and for the prices we pay to live here we frankly deserve it!	I-633-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-634 Jennifer McGill

COMMENT

RESPONSE

I-634-1

Hello I am a property owner in the area on Panorama Terrace Neighbor above the Silverlake reservoir and want to voice my opinion to improve this ugly Reservoir. I know there is a lot of pushback and I for one am all for moving this project forward, please do your best and get it done. Thank you for your consideration!

I-634-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-635 Ron McGill

	COMMENT	RESPONSE
I-635-1	I wholeheartedly support the improvements to the Silverlake reservoir and surrounding area. Right now it looks like a concrete pit, flanked by a dirt lot where the dogs can run around. So many amazing improvements are in the works and I think it's time for all of these. Thanks for taking my comment.	I-635-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-636 Dana Buchanan

COMMENT

RESPONSE

I-636-1

I support the improvements to the Silver Lake Reservoir! I think more nature, more greenery, more facilities for people to use and an improved dog park will be amazing!

Thank you! Dana

I-636-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-637 Amie Farquhar

I-637-1 | This looks amazing! I strongly support it!

COMMENT

I-637-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-638 Adam Mekrut

COMMENT

RESPONSE

I-638-1

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-638-1 Please see Master Response - Parking/Bike Option.

I-639 Judie Itzin

COMMENT		RESPONSE
I-639-1	Please do not destroy the trees surrounding the meadow! These are mature trees that provide habitat for squirrels hawks - shelter for other wildlife and generally part of the sanctuary that is this reservoir !!! What arborist would recommend this extreme measure?	I-639-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities and other wildlife use, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-640 Dylan Campbell

	COMMENT	RESPONSE
I-640-1	<p>Prioritize bike lanes please!</p> <p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-640-1 Please see Master Response - Parking/Bike Option.</p>

I-641 Brian Latimer

	COMMENT	RESPONSE
I-641-1	Not a fan. We already have enough congestion and crime without creating Silver Lake as a theme park destination point.	I-641-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-642 Charles Mack

COMMENT

RESPONSE

I-642-1 This is a very nice plan. However Many of the improvements will worn out,
 I-642-2 broken, dead or in need of repair in less than two years. Then who pays for the
 I-642-3 repairs. Also since LADWP will no longer be the responsible entity for the lake,
 I-642-4 current security and safe surroundings will disappear. Too many users will avoid
 any rules posted (current example The Meadow). There are already runners
 who run on the street in traffic so how many more will there be after all the
 improvements that will attract more people. Finally who will clean out all the
 trash and refuse from the lake from the increase in use of lake facilities. Who
 will clean the water when it becomes too polluted and the visitors complain
 about the smell? Phase 1 and maybe Phase 2 should be completed but the rest
 no. Thank you for taking my opinion into account.

I-642-1 As described in the Project Description Section 2.7 of the Draft EIR, an
 Operations and Maintenance plan would be prepared for the proposed
 Project prior to construction. This plan would include a section on Wildlife
 Management, Wetlands Management, Tree Succession Plan, Brush Clearance,
 and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR
 for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would
 include the routine cleaning and maintenance of park spaces and park
 facilities, clearing paths and walkways, trash removal, graffiti removal, and
 cleaning of park facilities. RAP would continue to operate and manage the
 Silver Lake Recreation Center including the proposed Multi-Purpose Facility
 similar to existing conditions, as well as the enhanced Dog Park. The comment
 is noted for the record and will be forwarded to the decision-makers for their
 review and consideration.

The commenter is also referred to Master Response - Funding and Operations.

I-642-2 Please see Master Response - Public Safety.

I-642-3 As described in the Project Description Section 2.7 of the Draft EIR, an
 Operations and Maintenance plan would be prepared for the proposed
 Project prior to construction. This plan would include a section on Wildlife
 Management, Wetlands Management, Tree Succession Plan, Brush Clearance,
 and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR
 for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would
 include the routine cleaning and maintenance of park spaces and park
 facilities, clearing paths and walkways, trash removal, graffiti removal, and
 cleaning of park facilities. RAP would continue to operate and manage the
 Silver Lake Recreation Center including the proposed Multi-Purpose Facility
 similar to existing conditions, as well as the enhanced Dog Park. The comment
 is noted for the record and will be forwarded to the decision-makers for their
 review and consideration.

The commenter is also referred to Master Response - Traffic/Transportation
 regarding pedestrian safety.

I-642 Charles Mack

COMMENT

RESPONSE

I-642-4 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-643 Jacqueline Sloan

I-643-1 | Please see attached .pdf comments.

COMMENT

RESPONSE

I-643-1 The comment expresses support for Alternative 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The commenter is also referred to Master Response - Alternatives.

I-643 Jacqueline Sloan

COMMENT

RESPONSE

December 11, 2022

Re: Silverlake Reservoir Complex Master Plan Project, Draft Environmental Impact Report

I have been a Silverlake resident since 1996. My family and I regularly walk around the reservoir, and use the existing reservoir complex for recreation. I offer my comments on the Draft Environmental Impact Report (DEIR) and **urge you to adopt Alternative 3 of the DEIR, with elements of Alternative 2.** Alternatives 2 and 3 are environmentally superior in that they both meet the community's needs for recreation, and still preserve and protect wildlife habitat and the environment.

Both Alternative 2 and Alternative 3:

- 1) eliminate the years of extensive grading, heavy construction, noise pollution and invasive traffic necessitated by the proposed Project. It is doubtful that the migratory birds and ground animals that now live in the park would withstand this.
- 2) do not despoil the landscape with concrete pavement and structures nor obstruct the lake.
- 3) would preserve the Complex's integrity as a recognized Historic-Cultural Monument.
- 4) would preserve a unique and precious wildlife habitat of serenity within an increasingly congested Los Angeles.

Alternative 3 - the Silver Lake Natural Lands and Open Space Preserve, is an Environmentally Superior Alternative which encompasses the positive attributes of Alternative 2 while adding essentials such as perimeter gated fencing for community access dawn to dusk and wildlife privacy at night.

This Open Space Alternative also welcomes additional public participation elements including:

- a Knoll-top viewing platform
- shore side viewing platforms for enjoyable educational bird-watching in a few strategic locations
- free public telescopes on the platforms.

In addition, I offer these specific comments about the DEIR:

I-643-1
Cont.

I-643 Jacqueline Sloan

COMMENT

RESPONSE

I-643-2

1. **RETIAN the PERIMETER FENCE:** The Master Plan would remove the Reservoirs' Perimeter Fence. This will have major impacts on wildlife welfare and neighborhood safety. Vandalism, vagrancy and crime have been documented as serious problems in other unfenced parks in Los Angeles. There is **no Public Safety mitigation for the loss of the Perimeter Fence** suggested in this DEIR.

I-643-3

2. **SCALE BACK CONSTRUCTION:** The horrific noise, vibration, mess and traffic blockages caused by massive construction could last from five to fifteen years. Nevertheless, this DEIR calls this a **"Less Than Significant Impact."** As to noise and vibration mitigations: **"None Required."** [DEIR 3.16-18]

I-643-4

The DEIR predicts an **"average of 390 additional visitors per day"**, as well as higher attendance with proposed monthly **"Special Events"** with **amplified sound**. Neighborhoods packed with visitors' cars plague the Reservoirs' area even now. And with the DEIR's plan to cut down lane widths to add parking spots on these already congested and gridlocked streets, traffic will enormously increase and become more dangerous.

I-643-5

Yet, **DEIR's Transportation Study claims "Less than Significant Impact."** and **"No mitigation measures are required."** [DEIR Table 3.16-3]

The DEIR also claims, **"significant irreversible changes to our community have been deemed acceptable."** [DEIR 4.3] They are not.

I-643-6

The DEIR claims the negative impacts of construction, the years of disturbance, and when finished, the increased daily noise, crowds, traffic, and harm to our wildlife will be worth it. It is not.

The community's ideals of "Peaceful," of "Nature," and "Wildlife" will be destroyed. It must not.

I-643-7

3. **DELETE the Environmental Education Center:** The Education Center proposed for the base of the Knoll immediately stands out for possible negative impacts.

Constructing this building would require extensive regrading and habitat destruction that could **not** be restored. Maintaining the possibility of restoration is mandatory under the rules of the Reservoir's Historic-Cultural Monument designation.

It makes no sense to talk about environmental education when you're destroying the very environment you want to study. As many have said, Nature is the classroom.

I-643-2

Please see Master Response - Fence Removal and Master Response - Public Safety.

I-643-3

As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

I-643-4

Please see Master Response - Noise.

I-643-5

Please see Master Response - Traffic/Transportation.

I-643-6

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-643-7

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response – Alternatives Analysis.

I-643 Jacqueline Sloan

COMMENT

RESPONSE

I-643-8

Instead of the Environmental Education Center, please consider these alternatives:

At the base of the Knoll could be an **outdoor creative free-play area** for children and an **onshore educational bird-viewing platform** with free telescopes, instead of a kayak launch site. Why bring kids from one indoor location to another? And why build a kayak launch site when the community has been clear about not wanting boating of any kind on our waters?

These alternatives would have very little impact and could free up education money for birding and wildlife docents, for nature trips with LAUSD's Office of Outdoor and Environmental Education

4. **ADD Freestanding Self-Cleaning RESTROOMS** – Some residents are in favor of the Education Center because it would provide restrooms near the Meadow. Instead of building an entire Education Center, simply build **freestanding self-cleaning restrooms** such as the one Councilmember Krekorian installed in the North Hollywood Recreation Center. *They are well-designed, and have automatic limited time use.*

5. The **DEIR Biological Resources section is inaccurate and ill-researched.** The Master Plan's "Floating Islands," the "Wetland Terraces" and "fish stocking" that are supposed to benefit birds, will not do so. The expert opinion of Dan Cooper, Chief Conservation Biologist of the Santa Monica Mountains Conservancy: This DEIR is **"lacking in both rigor and specificity.... Without current, accurate, and credible data on the biological resources ..., efforts at restoration will either fall short, or could actually result in further degradation of the site."**

I-643-9

Ironically, the massive excavation, grading and construction of much-touted "nature trails," the "scenic overlooks," and "nature education" structures will instead **uproot and destroy Nature.**

The Knoll's lost natural forest is now vital habitat for an ecosystem of ground-dwelling animals and local birds that will lose nests, burrows and food. Disruption of the open waters drives away migratory flocks we love. The DEIR fails to even mention the loss of these birds and animals.

Thank you for considering my ideas.

Yours,



Jacqueline Sloan
2330 Moreno Drive
Los Angeles, CA 90039

I-643-8

As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.

Please see Master Response – Alternatives Analysis.

The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-643-9

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

Please see Master Response – Biological Resources.

I-644 Benjamin Decter

I-644-1 | See .pdf comments attached.

COMMENT

RESPONSE

I-644-1 The comment expresses support for Alternative 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-644 Benjamin Decter

COMMENT

RESPONSE

December 11, 2022

Re: Silverlake Reservoir Complex Master Plan Project, DEIR


My wife and I have been Silverlake residents for 2 and a half decades, since 1996. I regularly run around the reservoir with my daughter. **I urge you to adopt Alternative 3 of the DEIR, with elements of Alternative 2.** Alternatives 2 and 3 are environmentally superior in that they both meet the community's needs for recreation, and still preserve and protect wildlife habitat and the environment.

Alternative 3 - the Silver Lake Natural Lands and Open Space Preserve is an Environmentally Superior Alternative which encompasses the positive attributes of Alternative 2 while adding essentials such as perimeter gated fencing for community access dawn to dusk and wildlife privacy at night.

In addition, I offer these specific comments about the DEIR:

1. **RETAIN the PERIMETER FENCE.**
2. **SCALE BACK CONSTRUCTION** to preserve the community's ideals of "Peaceful," of "Nature," and "Wildlife."
3. **DELETE the Environmental Education Center.**
4. **ADD Freestanding Self-Cleaning RESTROOMS** such as the ones installed in the North Hollywood Recreation Center.

Thank you for your time.

Yours,

Benjamin Decter
2330 Moreno Drive
Los Angeles, CA 90039

- I-644-2 Please see Master Response - Fence Removal.
- I-644-3 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
- This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
- I-644-4 The proposed Project, described in Chapter 2 of the Draft EIR, would not include self-cleaning restrooms. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- Please see Master Response - Alternatives.

I-645 Rick Marshall

COMMENT

RESPONSE

I-645-1 I think this new plan looks good. I'd just like something to happen to make the lake better.

Question about the map....what is the orange line? Is that a fence? Why isn't there an explanation in the key?

I-645-1 As shown in the legend on Figure 2-2, Existing Conditions, in the Draft EIR, the perimeter fence is illustrated as a dashed line. Also, as shown in the legend of Figure 2-4, Proposed Park Zones, the dashed orange line represents the proposed LADWP fence.

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-646 Jennifer Hickson

	COMMENT	RESPONSE
I-646-1	Please do finish with this project. It has been in planning phase for something like 6 years?!?? What is going on? We NEED THIS. Thank you!	I-646-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-647 David Garfinkel

COMMENT

RESPONSE

I-647-1 | I believe option 2 will be the best and safest option for all. LA needs to drastically improve its safety for pedestrians and cyclists, as it's currently one of the deadliest cities in the country. This is an easy project to give at least some respite for cyclists and pedestrians in this city, and would greatly increase the usability and beauty of the park.

I-647-1 | Please see Master Response - Parking/Bike Option.

I-648 Mark Mcgonigle

	COMMENT	RESPONSE
I-648-1	<p>We participated in some of the meetings where various options for the complex were discussed. The plan as it stands now does a good job of blending much of the community input. This project will be a vast improvement over what is there now. The complex sits in a central location in Silver Lake and is used by hundreds of residents every day. To have an area that is so vital to Silver Lake look as shabby as it does now is a disservice to the community. In addition to beautifying the area, the project will make improvements for wildlife and provide educational opportunities. Yes, it may draw more people, but the tradeoffs in terms of beautification and encouraging better use of a public resource make that worth it.</p>	<p>I-648-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-649 Dogan Ozkan

COMMENT

RESPONSE

	<p>Support for No Project or Alternative 3 Natural Lands/Open Space Preserve</p> <p>I am not a resident of the Silver Lake area, but am a resident of Los Angeles who wants to do everything possible to fend off the precipitous loss of biodiversity in a City striving to retain it for a livable and healthy environment.</p>	I-649-1	<p>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-649-1	<p>Just as the public comment ends for this proposed Project, California is being represented at the COP15 Conference of Biodiversity in Montreal by members of the California Global Biodiversity Working Group, many from the Los Angeles Area. California is the UN's first and only official state (non-country) observer, as California makes a strong stand for biodiversity, which is inseparably connected to the climate change issue.</p> <p>Silver Lake's local residents remain divided on the proposed Project. When there is controversy, it is best to err on the side of NOT losing what we have by doing nothing. Why take the risk? Why suffer through a relentless construction period? It seems much of the community is happy with the present condition, short lack of maintenance and a fence that's an eyesore.</p>	I-649-2	<p>The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.</p>
I-649-2	<p>I'm sure some residents are swayed with the far-fetched renderings in an EIR which show lush habitat, birds perching within reach, and children with hip-waders at the water's edge. This is all unrealistic marketing brought to the public by those who will benefit the most: the planners, consultants and construction contractors. Over-selling and over-promising the public will only result in the community's later disappointment and discontent, should the Project proceed.</p> <p>Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment, Appendix A, clearly shows this area as a "Very Low" needs community. The focus of park improvements should be directed to "Very High" and "High" needs areas, of which there are many. The Assessment recognizes the abundance of nearby parks and recreational facilities. Passive recreation should remain the focus for Silver Lake Reservoir, without building out new active sports infrastructure, and certainly not yet another special events venue.</p>	I-649-3	<p>As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.</p> <p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
I-649-3	<p>Most importantly, from a biodiversity perspective, fencing is essential in order to preserve the tremendous and important function these waters now serve migratory birds. This should absolutely be the highest priority. Along the same</p>	Please also see Master Response - Fence Removal.	

I-649 Dogan Ozkan

COMMENT

RESPONSE

I-649-4

thinking, the addition of any lighting is adverse to bird migration. For these reasons, only No Project (Alternative 1) or Alternative 3 should be on the table for further consideration.

I have a preference for Alternative 3, since the fence would be improved aesthetically. And along with this improvement, enhanced mobility for small wildlife could be addressed.

Gerry Hans

Support for No Project or Alternative 3 Natural Lands/Open Space Preserve

I am not a resident of the Silver Lake area, but am a resident of Los Angeles who wants to do everything possible to fend off the precipitous loss of biodiversity in a City striving to retain it for a livable and healthy environment.

Just as the public comment ends for this proposed Project, California is being represented at the COP15 Conference of Biodiversity in Montreal by members of the California Global Biodiversity Working Group, many from the Los Angeles Area. California is the UN's first and only official state (non-country) observer, as California makes a strong stand for biodiversity, which is inseparably connected to the climate change issue.

Silver Lake's local residents remain divided on the proposed Project. When there is controversy, it is best to err on the side of NOT losing what we have by doing nothing. Why take the risk? Why suffer through a relentless construction period? It seems much of the community is happy with the present condition, short lack of maintenance and a fence that's an eyesore.

I-649-5

I'm sure some residents are swayed with the far-fetched renderings in an EIR which show lush habitat, birds perching within reach, and children with hip-waders at the water's edge. This is all unrealistic marketing brought to the public by those who will benefit the most: the planners, consultants and construction contractors. Over-selling and over-promising the public will only result in the community's later disappointment and discontent, should the Project proceed.

Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment, Appendix A, clearly shows this area as a "Very Low" needs community. The

I-649-4

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

This comment also expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

Please also see Master Response - Alternatives Analysis.

I-649-5

Please see responses to Comments I-649-1 through I-649-4.

I-649 Dogan Ozkan

COMMENT

RESPONSE

I-649-5
Cont.

focus of park improvements should be directed to "Very High" and "High" needs areas, of which there are many. The Assessment recognizes the abundance of nearby parks and recreational facilities. Passive recreation should remain the focus for Silver Lake Reservoir, without building out new active sports infrastructure, and certainly not yet another special events venue.

Most importantly, from a biodiversity perspective, fencing is essential in order to preserve the tremendous and important function these waters now serve migratory birds. This should absolutely be the highest priority. Along the same thinking, the addition of any lighting is adverse to bird migration. For these reasons, only No Project (Alternative 1) or Alternative 3 should be on the table for further consideration.

I have a preference for Alternative 3, since the fence would be improved aesthetically. And along with this improvement, enhanced mobility for small wildlife could be addressed.

Dogan ozkan
Fairbanks

I-650 Allison Morse

	COMMENT	RESPONSE
I-650-1	The Silverlake reservoir is a natural refuge for many in LA and these renovations would be happily embraced by my family and friends. I hope to see these changes implemented so that individuals can enjoy this space even further.	I-650-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-651 Geneva Robertson-Dworet

COMMENT

RESPONSE

I-651-1 | I love the plan! More green spaces and nature for LA = fantastic!!
I live in Silver Lake and I am not concerned about the "parking" issues at all.
Please make our reservoir more beautiful for our children and community
Thank you!

I-651-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-652 Christopher Covella

I-652-1 | Hello,
I support No Project or Alternative 3 Natural Lands/Open Space Preserve.
Thank you,
Chris Covella

COMMENT

I-652-1 The comment expresses that no project be construction or provides support for the Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-653 Judy Sloan

COMMENT		RESPONSE
I-653-1	See attached comments as a .pdf	I-653-1 The comment expresses support for Alternative 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-653 Judy Sloan

COMMENT

RESPONSE

I-653-1
Cont.

December 12, 2022

Re: Silverlake Reservoir Complex Master Plan Project, DEIR

I have lived in Los Angeles since 1991. I regularly walk around the reservoir with my family. **I urge you to adopt Alternative 3 of the DEIR, with elements of Alternative 2.** Alternatives 2 and 3 are environmentally superior in that they both meet the community's needs for recreation, and still preserve and protect wildlife habitat and the environment.

Alternative 3 - the Silver Lake Natural Lands and Open Space Preserve is an Environmentally Superior Alternative which encompasses the positive attributes of Alternative 2 while adding essentials such as perimeter gated fencing for community access dawn to dusk and wildlife privacy at night.

In addition, I offer these specific comments about the DEIR:

I-653-2

1. **Retain the perimeter fencing**, to allow reasonable daytime access for humans, and to protect wildlife and the neighboring community at night.
2. **Scale back construction** to preserve the community's stated ideals for this project of "Peaceful," "Nature," and "Wildlife."
3. **Delete the Environmental Education Center.**
4. **Add Freestanding Self-Cleaning restrooms (instead of an Education Center)** such as the ones installed in the North Hollywood Recreation Center.

I-653-3

I-653-4

I-653-5

Thank you for your time.

Yours,

Judy Sloan
2252 Cheswic Lane
Los Angeles, CA 90027

I-653-2 Please see Master Response - Fence Removal and Master Response - Public Safety.

I-653-3 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-653-4 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-653-5 As described in the Project Description, Section 2.5.1 of the Draft EIR, public restrooms would be included and would be directly accessible from the promenade to serve the proposed Project area as a whole.

The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-654 William Sloan

COMMENT

RESPONSE

	<p>December 12, 2022</p> <p>Re: Silverlake Reservoir Complex Master Plan Project, DEIR</p> <p>My wife and I have lived in Los Angeles since 1991. For many years, my walking group regularly walked around the reservoir together. I also took walks with my grandchildren who live in Silverlake, and attended my grandson's basketball and sports activities at the Silverlake Reservoir Complex.</p>	<p>I-654-1 The comment expresses support for Alternative 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-654-1	<p>I urge you to adopt Alternative 3 of the DEIR, with elements of Alternative 2. Alternatives 2 and 3 are environmentally superior in that they both meet the community's needs for recreation, and still preserve and protect wildlife habitat and the environment.</p> <p>Alternative 3 - the Silver Lake Natural Lands and Open Space Preserve is an Environmentally Superior Alternative which encompasses the positive attributes of Alternative 2 while adding essentials such as perimeter gated fencing for community access dawn to dusk and wildlife privacy at night.</p> <p>In addition, I offer these specific comments about the DEIR:</p>	<p>I-654-2 Please see Master Response - Fence Removal and Master Response - Public Safety.</p> <p>I-654-3 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.</p>
I-654-2	<p>1. Retain the perimeter fencing, to allow reasonable daytime access for humans, and to protect wildlife and the neighboring community at night.</p>	<p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
I-654-3	<p>2. Scale back construction to preserve the community's stated ideals for this project of "Peaceful," "Nature," and "Wildlife."</p> <p>3. Delete the Environmental Education Center.</p> <p>4. Add Freestanding Self-Cleaning restrooms (instead of an Education Center) such as the ones installed in the North Hollywood Recreation Center.</p>	
I-654-4	<p>Thank you for your time.</p> <p>Yours,</p> <p>William R. Sloan, MD, FACS 2252 Cheswic Lane Los Angeles, CA 90027</p>	<p>I-654-4 The proposed Project, described in Chapter 2 of the Draft EIR, would not include self-cleaning restrooms. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-655 Paul Franceschi

COMMENT

RESPONSE

I-655-1	<p>We are grateful for the draft EIR. It raises many of the concerns that we and many of our neighbors that would be directly impacted by the proposed large footprint development of the reservoir raised in the design review meetings. The master plan designers never fully addressed those concerns and encouraged the public to "dream big", but never responsibly, and never with any discussion about the impacts of the proposed development. The few minor concessions that the designers did make are not enough. The DEIR is an important step in giving voice to very significant design issues and impacts.</p>	I-655-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-655-1	<p>However, we see several issues with the draft EIR. We agree with Silverlake Wildlife Conservancy, LA Audubon, and Dan Cooper of the Santa Monica Mountains Conservancy that the draft EIR does not go far enough in review of impacts and that the draft EIR INCORRECTLY STATES THAT "the irreversible impacts to our community have been deemed acceptable" That is an absolutely false statement - the great majority of residents in close proximity to the reservoir do want this large footprint development for the reservoir. That has been stated in the design meetings, in on line forums and in comments and feedback to the design team.</p>	I-655-2	Please see Master Response - Fence Removal and Master Response - Public Safety.
		I-655-3	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Please see Master Response - Noise.
I-655-2	<p>() Besides the massive destruction of habitat and the massive impact on a quiet neighborhood with small secondary streets, there are significant safety and noise concerns by removing the fences, allowing large events allowing 24/7</p>		The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with the implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.
I-655-3	<p>access and large events. Removal of the fence will also have significant</p>		
I-655-4	<p>impacts on wildlife welfare.</p>		
I-655-5	<p>() The present reservoir plan is a massive development that relies heavily on public transportation and cars to bring visitors to the park. That would decimate the character of this quiet neighborhood and the current wildlife ecosystem. There are already several other existing facilities in close proximity that are better served by public transportation, have better parking, and do not require massive development for infrastructure, including Griffith Park, Riverside Park, and Glassell Park, and the proposed future development of the LA River Park in Frogtown. We feel the current public facilities including the Meadow, walking path, picnic area, rec center and dog park are sufficient.</p>	I-655-4	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Fence Removal.
	<p>() A 10-15 yr project scope is totally unacceptable to us. That is generations in terms of impacts to migrating birds and other wildlife. Many species will leave and never come back. It is a totally unacceptable impact on quality of life of our community.</p>	I-655-5	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.
			The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-655 Paul Franceschi

COMMENT

RESPONSE

I-655-6

The Communities ideals of "Peaceful", of "Nature" and "Wildlife" will be destroyed by the proposed reservoir development plan. It must not!

Every version of the Silver Lake Master Plan presented to date is unacceptable, and unnecessary, especially considering the close proximity of the several other facilities we noted above. The only development plan we support is a wildlife sanctuary, completely fenced that is not accessible to the public. At this time there have not been any project proposals that meet that criteria so we support the "No Project" option.

Respectfully submitted,
Paul Franceschi & Allison Amon
2388 Kenilworth Ave.
Los Angeles. CA 90039

I-655-6

The comment expresses support for Alternative 1 and concern for wildlife.

Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-656 Ryan Perella

	COMMENT	RESPONSE
I-656-1	As a resident of the reservoir community, I strongly support moving forward with the master plan and DEIR as is. I support all endeavors to improve access and increase naturalization of the reservoir complex.	I-656-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-657 Ted Marsden

COMMENT

RESPONSE

I-657-1 Please please please go with Option 2. Option 2 is the safest option for all bike riders. Please make it grade separated so it can be and feel as safe as it needs to be. This is a park for a community and should consider all ages when incorporating bike routes.

I-657-2 Also please make efforts to connect this park to the LA river, they are so close, but in terms of biking they are so far.

I-657-1 Please see Master Response - Parking/Bike Option.

I-657-2 As discussed in Chapter 2, Project Description, the proposed Project includes the addition of a protected bike lane along Silver Lake Boulevard. Also, please see Master Response - Parking/Bike Option. The proposed Project would not include improvements beyond Silver Lake Boulevard. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-658 Georgette Pillen

		COMMENT	RESPONSE
I-658-1	I walk the Silverlake reservoir daily along with many other residents and enjoy the beautiful eucalyptus trees. Please keep these trees and all trees - our green canopy safe. Please do not cut down these historic trees. Please do not cement our neighborhood with parking lots and more concrete, leading us to increased heat and global warming! We need to preserve this beautiful green area .	I-658-1	The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.
I-658-2		I-658-2	Please see Master Response - Parking/Bike Option. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-659 Inta Krukke

COMMENT

RESPONSE

I-659-1 | I would agree to additions exclusively related to the reservoir itself and the
 I-659-2 | wildlife such as a fence and habitat islands and resurfacing the sides . No
 I-659-3 | buildings and classrooms and viewing decks. etc. etc. I'm tired of all the
 I-659-4 | construction and do not wish 15 yrs of it on our neighborhood. So if it is all or
 nothing then I will have to say 'No Project.'

I-659-1 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-659-2 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Master Response - Fence Removal.

I-659-3 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

I-659-4 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-660 Jim Royce

COMMENT		RESPONSE
I-660-1	I am fully in SUPPORT of the Silverlake Master Plan. It's a solution to a blighted and much needed improvement. I can't wait to join my neighbors to celebrate its opening in a few years.	I-660-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-661 Jeff Carr

COMMENT

RESPONSE

I-661-1 | Please minimize or do not at all cut down existing mature trees. Thank you

I-661-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-662 D Wood

I-662-1 | Looks wonderful. Can't wait.

COMMENT

I-662-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-663 Mark Phillips

COMMENT

RESPONSE

I-663-1 | Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I-663-1 | Please see Master Response - Parking/Bike Option.

I-664 Brendon Bolin

	COMMENT	RESPONSE
I-664-1	<p>Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The city could also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the city should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.</p>	<p>I-664-1 Please see Master Response - Parking/Bike Option.</p>

I-665 Adrianna Decter

COMMENT

RESPONSE

I-665-1	<p>December 13, 2022</p> <p>Re: Silverlake Reservoir Complex Master Plan Project, DEIR</p> <p>I have lived in Silverlake my entire life, since 1996. As a kid, I played in the playground at the Rec Center. And as an adult, I run around the reservoir at least 3 times a week.</p> <p>I urge you to adopt Alternative 3 of the DEIR, with elements of Alternative 2. Alternatives 2 and 3 are environmentally superior in that they both meet the community's needs for recreation, and still preserve and protect wildlife habitat and the environment.</p> <p>Alternative 3 - the Silver Lake Natural Lands and Open Space Preserve is an Environmentally Superior Alternative which encompasses the positive attributes of Alternative 2 while adding essentials such as perimeter gated fencing for community access dawn to dusk and wildlife privacy at night.</p> <p>In addition, I offer these specific comments about the DEIR:</p> <ol style="list-style-type: none"> 1. Retain the perimeter fencing, to allow reasonable daytime access for humans, and to protect wildlife and the neighboring community at night. 2. Scale back construction to preserve the community's stated ideals for this project of "Peaceful," "Nature," and "Wildlife." 3. Delete the Environmental Education Center. 4. Add Freestanding Self-Cleaning restrooms (instead of an Education Center) such as the ones installed in the North Hollywood Recreation Center. <p>Thank you for your time.</p> <p>Yours,</p> <p>Adrianna Sloan Decter 2330 Moreno Drive Los Angeles, CA 90039</p>	<p>I-665-1 The comment expresses support for Alternative 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>I-665-2 Please see Master Response - Fence Removal and Master Response - Public Safety.</p> <p>I-665-3 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.</p> <p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>I-665-4 The proposed Project, described in Chapter 2 of the Draft EIR, would not include self-cleaning restrooms. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
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I-666 Jim Shippee

COMMENT		RESPONSE
I-666-1 I-666-2	Overall, I think the master plan looks awesome. Can anyone elaborate on the expanded dog park? Will it be level? Will it have grass rather than being a dirty dustbowl? Any details would be amazing. Thank you! Jim Shippee	<div>I-666-1</div> <div>I-666-2</div> <p>The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>As described in Project Description Section 2.5.1 of the Draft EIR, the existing Dog Park covers approximately 48,790 sf of space and would be expanded to approximately 56,400 sf of space and renovated to include two separate spaces for both small and large dogs. The area would be regraded and surface materials would be updated from decomposed granite to synthetic turf or other dog-friendly surfacing. Integrated seating, benches, lighting, and shade structures would be added to provide dog owners and visitors with shaded seating areas. Refer to Figure 2-14 in the Draft EIR for a rendering of the proposed Dog Park.</p>

I-667 Virginia Watson

COMMENT

RESPONSE

I-667-1 Please do not remove oxygen producing trees to create a parking lot for pollution producing autos. Considering climate change, of which many geographic areas are experiencing the negative effects, plus pollution from our continuing efforts to increase economies via industrialization, killing trees is counterintuitive to any future H. sapiens might hope to have on this planet. Bottom line: very bad idea.

I-667-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-668 M Choy

		COMMENT	RESPONSE
I-668-1	I am concern on the loss of biodiversity in City and particularly around the Silverlake Reservoir and tremendous amount of traffic this new over development would bring. Are you planning to widening the streets to accommodate the heavier traffic? It's already difficult to get around, now. This unrealistic development will make the area less livable environment for our families. It was good news to discover at less a third of the users of the Reservoir are from outside the immediate area, I surveyed this in 2016 over two weekends to assess who really uses it.	I-668-1	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-668-2		I-668-2	Please see Master Response - Traffic/Transportation.
I-668-3	We have through the years, evolved and built out the Reservoir with walking paths, viewing stations, parklet, large meadow area, dog parks and bigger offerings at the recreation center. With all these developments, we kept a good balance with safe fenced areas for migratory animals and wildlife and needs of the community. We are doing just fine, Keep the fence up and I vote for NO project at this time. Thank you.	I-668-3	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-669 Thomas Parnell

COMMENT

RESPONSE

I-669-1 | I would recommend keeping the fence in place, but replacing it so the internal paths can be closed from dusk to dawn. Thank you.

I-669-1 Please see Master Response - Fence Removal and Master Response - Public Safety.

I-670 Christopher Covella

		COMMENT	RESPONSE
I-670-1	I support a revised and recirculated DEIR - because this one has demonstrably failed at its job.	I-670-1	Please see Master Response - EIR Recirculation Requirements.
I-670-2	I also support Alternative Hybrid 3+2. Thank you, Chris Covella	I-670-2	The comment expresses support for Alternative 2 and 3. Please see Master Response - Alternatives Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-671 Freda Shen

COMMENT

RESPONSE

I support Silver Lake Wildlife Sanctuary's
 * Alternative Hybrid 3+2 as defined in their SLWS DEIR Comment, to be submitted by the Dec. 16, 2022, 5pm deadline.
 As shown in DEIR Ch. 5, Table 5-1, this Alt. Hybrid 3+2 would be:
 Most of Alternative 3 choices except for in the South Valley which would instead be Alternative 2's choices but without any new lighting.
 In addition, Alt. Hybrid 3+2 would feature these individual exceptions that would override any choices in Alt. 3 as featured in DEIR CH. 5, Table 5-1:

NO ornamental or rain gardens in the Meadow due to drought
 NO wetland terraces in the Meadow without reevaluation
 NO habitat fences in the Knoll
 ALL walking paths/ promenades to have an effective buffer zone from the water's edge for safety
 NO habitat terraces in the Eucalyptus Grove without reevaluation
 NO new lighting anywhere
 Bike improvements should be provided but NO new parking

I-671-1 The comment expresses support for a hybrid Alternative 3+2 and additional suggestions for the proposed Project. The proposed Project is described in Chapter 2 of the Draft EIR. Also, please see Master Response – Alternatives Analysis.

I-671-1

There are Environmental Impacts, if the Master Plan Project were to move forward, that cannot be mitigated and may cause lasting harm to both the community and the wildlife that shares our land.
 Alternative Hybrid 3+2 is an Environmentally Superior Alternative that is feasible and still meets the Project objectives, with open habitat as an irreplaceable educational resource.
 In addition, I advocate for::
 - 2 or 3 wood viewing platforms with free public telescopes, at strategic locations on the shore, able to be closed off by gated fencing which, if opened, would be open only dawn to dusk, to view the birdlife that comes to the Reservoir. Construction of these would be contingent upon collaboration with ecological design group such as Urban Wildlands;
 - 24-hr trail cameras, to be accessible to all online, and to be installed strategically and maintained by either Natural History Museum or informed naturalist/ photographers such as Miguel Ordenana or Johanna Turner.
 - perimeter fencing to remain or to be replaced in total with wildlife-friendly perimeter fencing of equal height featuring gates designed by Tongva and Silver Lake artists, to be opened only at times determined by LAAS or similar organization as non-intrusive for wildlife;
 - any pathways to be permeable, to promote groundwater recharging and

I-671 Freda Shen

COMMENT

RESPONSE

I-671-1
Cont.

reduce runoff.
Furthermore, all changes made are dependent upon the City ensuring sufficient financing to provide:
- maintenance of all trees and plants on the grounds
- consistent litter and food clean-up
- no use of rodenticides, pesticides or other toxic maintenance products detrimental to the health of the SLRC's flora and fauna and to children, now and in the future.

I-672 Freda Shen

COMMENT

RESPONSE

I-672-1	I support the Silver Lake Wildlife Sanctuary's finding that this DEIR is inadequate and that the proposed Project under CEQA must revise and recirculate a far better DEIR based upon comprehensive analysis and scientific data.	I-672-1	Please see Master Response - EIR Recirculation Requirements
I-672-2	Without such a revised and recirculated DEIR, this proposed Project cannot go forward and must select an alternative.	I-672-2	The comment expresses support for Alternative 2 and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-672-3	That alternative should be SLWS's Alternative Hybrid 3+2. Refer Change.org Update https://www.change.org/p/let-s-establish-a-silver-lake-wildlife-sanctuary/u/31162660 called FIRST, DO NO HARM, on the Change.org Petition, LET'S ESTABLISH A SILVER LAKE WILDLIFE SANCTUARY.	I-672-3	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-673 Freda Shen

	COMMENT	RESPONSE
I-673-1	<p>Love dogs, love wildlife, but they cannot be in the same location. Dogs must not be allowed within the perimeter fence onto the Reservoir grounds. Signage is not enough. There's signage at the Meadow but people bring their dogs in anyway. There MUST be a perimeter fence that can be closed and there MUST be enforcement of No Dogs Allowed.</p> <ul style="list-style-type: none">• humans and pets, in particular dogs, have been shown to have definite adverse impacts on birds.• A study by Banks and Bryant published in Biology Letters, discovered that allowing dog walking in a woodland environment led to a 35% reduction in bird diversity and a 41% reduction in bird abundance.• We have the dog park on the south bank OUTSIDE the fence. Let's improve that dog park! We have over 2 miles of walking path for dog walks OUTSIDE the fence. In fact, we have the whole Silver Lake neighborhood which we are lucky is beautiful for dog walking. I've walked my dog and explored all over the Silver Lake hills. Let's leave the contained space within the fence for the birds and wildlife, and leave the fence up for the protection of all. I love dogs, I'm a dog owner, and I love wildlife - we have room for both if the fence stays up. Good fences make good neighbors!	<p>I-673-1 Please see Master Response - Fence Removal. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-674 Karen Cusolito

COMMENT

RESPONSE

- I-674-1 The current DEIR has failed to take many items into account.
- I-674-1 With much less money and alterations, we can meet the objectives of this Open Space's future by supporting its unique character and strengths, not by destroying that singularity.
- I-674-2 We are a "Very Low" needs community for parks and recreation as evaluated by LA County. The focus of park improvements should be directed to "Very High" and "High" needs areas, of which there are many.
- I-674-3 The Alternative Hybrid 3+2* is in harmony with the City's forward thinking on environment, wildlife biodiversity, and climate issues in general rather than going against it.
- I-674-4 The DEIR should be revised and recirculated.

- I-674-1 The comment expresses opposition to the proposed Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-674-2 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic. Also, please see Master Response - Funding and Operations.
- I-674-3 The comment expresses support for Alternative 3+2 (hybrid alternative). Please see Master Response - Alternatives Analysis.
- I-674-4 Please see Master Response - EIR Recirculation Requirements.

I-675 Joseph Hogg

COMMENT

RESPONSE

I-675-1 Please see responses to comment I-262.

I-675-1

Response to the LA Department of Engineering on the Proposed Silver Lake Reservoir Complex Master Plan

1 Personal

My name is Joe Hogg and I live at 2467 Hidalgo Avenue, Los Angeles, CA 90039. My email address is: joseph.hogg@gmail.com. I have lived in the Silver Lake area for more than forty-five years and walked the streets and paths around the Reservoir. I can see the Reservoir from my house and have enjoyed the beauty and peace of the neighborhood.

2 Recommendation

I recommend a very scaled-back project closer to a Maintenance Alternative to the current Silver Lake Complex with no new buildings and no Reservoir access.

2.1 Specifics

Fencing Replace the current fencing with a sturdier, more attractive fence that keeps the public away from the Reservoir.

Meadow Plant trees to provide shade, no new construction, and enforce the no-dogs rule for the Meadow. Maintain the lawn and native shrubs.

Walking and Bike Paths Improve the safety of both waking paths and bike paths around the Reservoir.

Recreation Center Maintain the play structures, the grassy area next to the basketball court, and consider planting trees for shade. Add no new parking.

Dog Parks Maintain the dog parks. Do not plant grass. Dogs will destroy it quickly. Plant trees for shade. Dogs like trees.

LADWP LADWP should continue to maintain the Reservoir.

I-675 Joseph Hogg

COMMENT

RESPONSE

I-675-1
Cont.

3 Traffic

- 1. Silver Lake and Glendale Boulevards are congested with cars during rush hours and busy streets throughout the day.
- 2. These streets, along with Rowena, funnel into a bottle-necked Fletcher. They are essentially on-ramps to the 5 and 2 freeways.
- 3. Additional traffic in and around Silver Lake should be discouraged.

4 Nearby Resources

- 1. Griffith Park and The Los Angeles Zoo and Botanical Gardens.
- 2. The Los Angeles River between Fletcher and Figueroa has several excellent small parks with parking, a bike path, and viewing of a variety of ducks, cormorants, egrets, and Great Blue Herons that feed in the river and nest in trees around the Silver Lake Reservoir.
- 3. Vista Hermosa Natural Park at 100 N. Toluca Street
- 4. Bellevue Recreation Center at 826 Lucile Avenue
- 5. Elysian Park
- 6. Echo Park and Lake

5 Conclusion

I mention nearby resources above that are established, easily available, and worthy of support.

And, in view of the size of the homeless population, housing affordability, food shortages, and the general financial condition of the City, I would be ashamed to support a \$300m, multi-year Silver Lake Complex Master Plan Project until some of these more urgent challenges are being resolved.

I-676 Robert Moore

		COMMENT	RESPONSE
I-676-1	I'm writing to express my opinion that the DEIR should be withdrawn and	I-676-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Master Response - EIR Recirculation Requirements.
I-676-2	reevaluated. Please consider adhering to the recommendations of Alternative	I-676-2	
I-676-3	Hybrid 3+2. The maintenance of the perimeter fencing is essential to the protection of reservoir wildlife. Thank you. Robert Moore	I-676-3	
		I-676-2	The comment expresses support for Alternative a hybrid alternative. Please see Master Response - Alternatives Analysis.
		I-676-3	The proposed Project includes removal of the perimeter fence. Please see Master Response - Fence Removal.

I-677 Pamela Dreyfuss

COMMENT

RESPONSE

	<p>Thank you for the chance to comment.</p> <p>I've read the EIR and my concern is the amount of time residents living around the site will be exposed to the high levels of "significant and unavoidable noise." Mobil noise barriers are likely not any kind of solution.</p>	<p>I-677-1 This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.</p> <p>Please see Master Response – Noise.</p>
I-677-1	<p>Living around the reservoir is already a noisy proposition, with the DWP building activity and "backup noise/beeping of trucks" ongoing for long periods of time. This alone can drive anyone crazy and many people now work at home. An improved construction worker safety alert should and must be developed for this type of ongoing project; one that is not so disturbing to those exposed to the sounds for hours on end.</p> <p>The significant level of noise for such a long period will be intolerable. Since we don't know how long the project will take, this could have a negative, life-altering impact on those homes and the people who live there, closest to the construction.</p> <p>The EIR doesn't seem to have accounted for the noise carried across the water/bowl lake, which will likely impact far more areas/people than is indicated and will unquestionably amplify noise levels that already appear to be a terrible burden to those around the lake.</p>	<p>I-677-2 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>Also, as described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.</p>
I-677-2	<p>Finally, I don't see any mention of provisions for the coyote population who has made the reservoir their habitat. Also, I don't see any provisions for the many owls who use the tallest trees to spot their prey and to nest.</p> <p>Thank you, Pamela Dreyfuss</p> <p>See their description below</p>	

I-678 Alan L

	COMMENT	RESPONSE
I-678-1	I think this is a fantastic idea. Los Angeles could use more green space, an amenity for everyone!	I-678-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-679 Dogan Ozkan

COMMENT

RESPONSE

I-679-1

Alternative Hybrid 3+2 =
 Most of Alternative 3 except for the South Valley which would instead be
 Alternative 2's choices but without any new lighting.
 In addition, Alt. Hybrid 3+2 would feature these individual exceptions that
 would override anything in Alt. 3:
 NO ornamental or rain gardens in the Meadow due to drought
 NO wetland terraces in the Meadow without reevaluation
 NO habitat fences needed in the Knoll without trails
 ALL walking paths/ promenades to have an effective buffer zone from the
 water's edge for safety
 NO habitat terraces in the Eucalyptus Grove without reevaluation
 NO new lighting anywhere
 Bike improvements should be provided but NO new parking

...the fence is the single most important conservation management tool at the
 site after the presence of water."

- LA Audubon Society: Statement on the Future Management of Silver Lake
 Reservoir

<http://www.silverlakewildlifesanctuary.org>
<https://www.instagram.com/silverlakewildlife/>
<https://www.change.org/p/let-s-establish-a-silver-lake-wildlife-sanctuary>

I-679-1 The comment expresses support for a hybrid alternative. Please see Master
 Response - Alternatives Analysis. Also, please see Master Response - Fence
 Removal.

I-680 Susan Murphy

COMMENT

RESPONSE

I-680-1	<p>NO Silver Lake Reservoir Complex Master Plan</p> <p>The residents of Silver Lake say NO! I am extremely concerned about the Silver Lake Reservoir Complex Master Plan.</p>	I-680-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-680-1	<p>I'm insanely frustrated. The outcome of the last two public Silver Lake Master Plan meetings resulted in resounding "NO's", (Alternative #1) to the DEIR. Silver Lake residents have expressed their opposition over and over again over the past 3 years, yet the Bureau of Engineering, and certain special interest groups, continue to ignore us.</p>	I-680-2 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. For the purposes of the environmental analysis, the 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
I-680-2	<p>How long will this take...10 or 15 years? And at what expense? After enduring the three year LADWP Bypass Project with endless trucks and dirt and noise I can't imagine another endless interruption of this quiet community. I have lived here over 25 years and I feel the improvements of upgrading the walking path, the meadow and new fencing have been great additions. But this is a</p>	
I-680-3	<p>neighborhood of small narrow streets where only one car can pass at a time. There are already huge issues with traffic and parking. This isn't Echo Park by a freeway and 4 lane road. This quiet but congested neighborhood cannot absorb 300 to 400 new daily visitors.</p>	
I-680-4	<p>The blue herons just started to come back to nest but that won't last with what looks like an enormous amount of construction. The extensive removal of</p>	
I-680-5	<p>mature trees along Silver Lake Blvd will guarantee they will not return. Replacing trees with saplings does not equal mature trees.</p>	This comment expresses concern regarding trucks, dirt, and noise impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. Impacts related to air quality are analyzed in Section 3.3, Air Quality, of the Draft EIR. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.
I-680-6	<p>Please reconsider. It is ridiculous to spend this kind of money on a community that doesn't need it and doesn't want it. I imagine that there are many, many parts of Los Angeles and even Silver Lake that could use this funding for essential improvements.</p>	I-680-3 Please see Master Response - Traffic/Transportation.
		I-680-4 This comment expresses concern regarding impacts to blue herons. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Mitigation measures and project design features specific to blue herons include Mitigation Measure BIO-1 and PDF-BIO-2.
		I-680-5 This comment expresses concern regarding impacts to mature trees. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Mitigation measures and project design features specific to mature trees include Mitigation Measures BIO-4,

I-680 Susan Murphy

COMMENT

RESPONSE

BIO-5, and Project Design Features PDF-BIO-13 and PDF-BIO-14. Please see Master Response – Biological Resources.

I-680-6 Please see Master Response - Funding and Operations. Also, the 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.

I-681 Rebecca Ruben

	COMMENT	RESPONSE
I-681-1	I reside and work in Silver Lake and have been very disappointed by the DEIR. I believe the DEIR needs revising and recirculating. Important environmental considerations about biodiversity and protection of it are absent from this report. Do not move forward with this report- it puts a critical habitat and resource for Angelenos and our wildlife in grave danger.	<p>I-681-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>Please see Master Response - EIR Recirculation Requirements.</p>

I-682 Marnie Aulabaugh

COMMENT

RESPONSE

I-682-1 | We love every aspect of the plan and can't wait to enjoy it!

I-682-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-683 Tony Michaelis

COMMENT

RESPONSE

I-683-1	<p>As a 30+year resident of Silver Lake, I believe the Reservoir Master Plan Alternative 1 is the best option to maintain the historic character of our neighborhood and avoid years long construction and ongoing parking and traffic increases which will irreparably damage our neighborhood's quality of life. The current state of the Reservoir complex allows for reasonable usage of the area without damaging the quality of life and unique character of this neighborhood. To think that traffic and parking increases will not damage quality of life and that removing fences or adding additional open space will not result in increased homelessness occupancy and overuse of this area is naive at best. I think the EIR misses an important issue which is the Reservoir was built to supply water to our City and it should remain an example of historic usage of our City. Many proponents of the Master Plan talk of the need for more City park space but in our area of Los Angeles we have the largest park in the City right next door to us in Griffith Park. I strongly urge the City to rethink the Master Plan and adopt Alternative 1 as part of the EIR process.</p>	I-683-1	The comment expresses support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-683-2		I-683-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-683-3		I-683-3	Please see Master Response - Traffic/Transportation and Master Response - Parking/Bike Option.
I-683-4		I-683-4	Please see Master Response - Fence Removal and Master Response - Homelessness.
I-683-5		I-683-5	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.
I-683-6			As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
		I-683-6	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing

I-683 Tony Michaelis

COMMENT

RESPONSE

the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-684 Keith Schofield

		COMMENT	RESPONSE
I-684-1	We wholeheartedly back the master plan process and the Draft EIR. We suggest that a fence should remain, but should be replaced. Additionally, we think it would be advantageous to the community if the internal paths were closed from dusk till dawn, as is the current situation. Thank you.	I-684-1	The comment expresses support for the Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-684-2		I-684-2	Please see Master Response - Fence Removal.
I-684-3		I-684-3	Please refer to Master Response – Public Safety.

I-685 Mike McGill

COMMENT

RESPONSE

I-685-1 We support the master plan process and the Draft EIR. If anything, we recommend replacing the fence, but keeping one in place. We also believe closing the internal paths from dusk to dawn would be beneficial to the community, as they are now. Thank you

I-685-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - Fence Removal. In addition, as described in Project Description, Section 2.5.3 of the Draft EIR, the proposed park hours would be from 5:00 a.m. to 10:30 p.m. Please see Master Response – Public Safety for further information regarding park safety.

I-686 Ron McGill

	COMMENT	RESPONSE
I-686-1	I support the master plan process and the Draft EIR. If anything, I think replacing the fence, but keeping one in place is a good idea. We also believe closing the internal paths from dusk to dawn would be beneficial to the safety of the community, as they are now. Thank you	I-686-1 Please see response to Comment I-685-1.

I-687 Joshua Stamberg

COMMENT

RESPONSE

I-687-1 | Plan looks Fantastic

I-687-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-688 Jeremy Lubin

		COMMENT	RESPONSE
I-688-1	I-688-2	Who will be maintaining this? Keeping the paths clean, caring for all these new plants, cleaning the restrooms and locking them up at night, etc. And what will be the costs of maintenance per year?	<div>I-688-1 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</div> <div>I-688-2 Please see Master Response - Funding and Operations.</div>

I-689 Kevin Droke

COMMENT

RESPONSE

I-689-1

We would like to see generous diagonal parking along Silver Lake Boulevard. It would provide the parking that will be needed but not create inconvenience that will surely occur if the spaces are Maxed Out (in terms of numbers). If the spaces are ample and generous people should be able to move in and out quickly and safely
Thanks

I-689-1

As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

I-690 Rachelle Arslan

COMMENT

RESPONSE

I-690-1	<p>I am writing as a resident of Silver Lake who lives within walking distance of the Reservoir Complex. I have enjoyed visiting the Reservoir for the past 25 years that I have lived here. The most special part of the Reservoir to me is the biodiversity of bird species. Whether it is watching a great blue heron raising its chicks in the eucalyptus grove or spotting a hooded merganser or a bufflehead swimming quietly on the water, I am always amazed that we get to enjoy such a varied array of winged wonders in the middle of one of the largest urban areas of the country.</p>	I-690-1	<p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-690-2	<p>With the rapid expansion of commercial development and the planned “reimagining” of the L.A. River, we are at great risk of losing major habitat for migratory birds. The Silver Lake Reservoir Complex is an extremely important environment for these birds as it is a stop between the L.A. River and the Pacific Ocean. Developing the Reservoir for human recreation is not a necessity, especially in an area that the Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment Appendix A designates as a “Very Low” needs community. There are plenty of other “High” and “Very High” needs areas that are better suited to park development that do not threaten to strip away valuable wildlife habitat. It would be a huge mistake to take away such an important natural wildlife habitat in a city that is in desperate need of preserving such areas.</p>	I-690-2	<p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.</p>
I-690-3	<p>The removal of old growth trees to be replaced with “four new saplings” is an insulting and unacceptable proposal. It doesn’t take a world-class ornithologist to know that a sapling is no replacement for a mature, established tree when it comes to nesting birds. Even the removal of one mature tree is detrimental to birds in a city that is well below average when it comes to tree population. The DEIR’s proposal of the destruction of two rare California walnut trees overlooks the fact that their valuable root systems prevent soil erosion and help to stabilize a hillside. These trees not only benefit our wild bird populations but our neighborhoods too.</p>	I-690-3	<p>As discussed in Project Description, Section 2.5.5 of the Draft EIR, the planting design for the proposed Project would be aligned with the City’s New Green Deal goals of increasing tree canopy and protecting native biodiversity. Figure 2-8 of the Draft EIR includes a preliminary planting diagram. The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. The proposed Project would also comply with the City Tree Ordinance and RAP Tree Policy as discussed in the Project Description, Section 2.5.8, PDF-BIO-13 and PDF-BIO-14. Please see Master Response – Biological Resources.</p>
I-690-4	<p>Allowing public access to protected areas is another DEIR proposal that will drive away birds and other wildlife who now call these areas home. Unsupervised children, off-leash dogs and careless visitors who will inevitably leave trash behind are all realities to consider when it comes to protecting all wildlife at the Reservoir Complex. To permit public access to these areas is inviting disaster.</p>		

I-690 Rachelle Arslan

COMMENT

RESPONSE

I-690-4
Cont.

One of the most important factors in protecting birds and other wildlife at the Reservoir is the issue of fencing. According to the Los Angeles Audubon Society "...the fence is the single most important conservation management tool at the site after the presence of water." To remove or reduce the size of the current fence will force out migratory birds and other wildlife permanently. The whole reason the Reservoir Complex has been such a successful site for migratory birds is that it has been protected for all these years by fencing, keeping birds safe from the public and the undeniable noise and trash that follows. This is the most significant factor in preserving our reservoir and the magnificent biodiversity it supports.

I am urging you to revise and recirculate the current DEIR to address the many failings contained in the first draft. The most responsible thing to do in regard to the Reservoir Complex would be to leave it alone, as is, with the exception of possibly upgrading the fence to something more aesthetic and improving the site's maintenance. The only other acceptable possibility is to adopt Alternative Hybrid 3+2 as it is in consistency with protecting the site's biodiversity rather than destroying it.

Rachelle Arslan
Rowena Avenue for Conservation

I-690-4 This comment expresses concern regarding impacts to wildlife and support for Alternative 3+2. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

Please see Master Response - Fence Removal, Master Response - Biological Resources, and Master Response - Alternatives Analysis.

Also please see Master Response - EIR Recirculation Requirements.

I-691 Joy Boyajian

	COMMENT	RESPONSE
I-691-1	<p>I am a resident of the area and I was at all the community meetings and have been reading all comments of people and interested groups. It seems like the plan was initiated prior to any Independent evaluation and recommendations from wildlife experts . So, it begs the question what is the goal here?...to reinvent the reservoir or preserve the wildlife . I believe that preservation of the wildlife should be the priority. Once it's gone it may never return. This elaborate plan will also send more coyotes into neighborhoods causing more residents distress. I would ask that this plan be reevaluated with independent wildlife officials PRIOR to finalizing any decision. Thank you</p>	<p>I-691-1 As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.</p> <p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p> <p>Please see Master Response – EIR Recirculation Requirements.</p>

I-692 Freda Shen

COMMENT

RESPONSE

I am commenting in support of this article and in support of Mr. Kenny's suggested plan to plant those 500 saplings now and later, in a few years after we see how the young ones are cared for and grow, to cull older trees only if necessary.

Who is Getting the Ax in Silver Lake?

By Hugh Kenny, Resident and Silver Lake Green Committee Member

The Silver Lake Reservoirs Draft Environmental Report claims that only a few mature trees would be destroyed for the Reservoirs Master Plan. And that those trees would be replaced by 500 trees.

I count almost 100 going down. Look for yourself at the map above. You will see eighty-five trees, right there. Each blood red circle represents a stump. Young, old, ill, healthy, "protected," native or exotic, tidy or rowdy. If they are in the path of a landscape designer's pencil, they will be erased.

Thirty trees on this same path were destroyed when it was built in 2008. Several trees were re-planted, half died. The rest have been mangled by incompetent pruners. One of them leans o'er the path, like Damocles Sword, waiting to fall. (I let 311 know and spoke to Mr. Dupree of Rec and Parks, urging them to cut it down)

I'

ll go for a park. The laid-back park that the community agreed upon. One that supports nature and does no harm to her.

What we have now is an odd-ball ecosystem that works

s
I welcome the 500 trees. We all adore youth. But it's going to be decades before we see much of a tree. Why not plant the "500 trees," and if a considerable amount of them survive and mature, THEN start looking at culling the herd? It may not wind up being as ideal as the designer's conception, or maybe it will. It may cause some inconvenience. But as planned, it's like cutting away sections of our lungs to provide slick venues

I-692-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-692 Freda Shen

COMMENT

RESPONSE

I-692-1
Cont.

to view ourselves in the pages of Los Angeles Magazine.

somehow. The trees get along. The birds seem to like it as do the bees and the insects. Our neighbors and visitors stroll by it—in turn, oblivious or delighted. People are subdued, cooled, oxygenated, and shielded from the fumes and the clamor of Silver Lake Blvd. I don't doubt that I will enjoy the "amenities" in whatever award winning place of repose is invented as a replacement. But I will always know that we have been cheated.

I-693 Mike Krose

COMMENT

RESPONSE

I-693-1 The infrastructure at, and around, the Silver Lake Reservoirs Complex, cannot support the over development that this Master Plan includes. This is a closed residential community, with no major streets on its perimeter. Recent increases in cut-through traffic have made things worse.

I-693-2 In the Construction section of Chapter 2, Project Description, the DEIR states, with respect to the 19,000+ truck trips for this project, this truck traffic will be kept off residential streets, if possible. This is such a ridiculous statement, as anyone familiar with the community knows, all streets are residential streets. At the beginning of this process, I asked the Design Team if they have ever done a project in a totally enclosed residential community, and the answer was no! And it is obvious that this Master Plan shows that point, as this project will adversely affect the residents, both human and animal, more than I could imagine. One of my neighbors lives on W. Silver Lake Drive, across the street from the Complex. He is under 75' away from a major construction area. That is unconscionable, selfish, unmitigatable, and cruel. There will be lengthy loud noise, construction vibrations, poor air quality, and traffic for a project many do not want, the community does not need, and unfairly affects those living the closest to the site.

As the attached picture shows, this is a residential community that should not be exposed to these conditions.

I-693-1 Please see Master Response - Traffic/Transportation. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

I-693-2 This comment expresses concerns with impacts during construction. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

I-693 Mike Krose

COMMENT

RESPONSE

I-693-1 Attachment noted.

I-693-3



I-694 Mike Krose

COMMENT

RESPONSE

I-694-1

I am writing in opposition to the new parking proposal, described in DEIR 2.5.2 and Figure 2-16.

I feel the proposed new parking on Silver Lake Blvd. introduces new traffic hazards to this busy street, that is gridlocked every morning and evening, already, and has forced turning restrictions on Earl St. and Duane St. Option 1 with 2 bike lanes, buffer, new south bound parallel parking, 2 traffic lanes, and north bound parallel parking, seriously crowds the street. Further, this will cause extremely dangerous conditions as drivers attempt to pull into the parking spots on both sides of the street. This configuration will also add to the traffic situation as drivers will have to stop while waiting for parkers to complete their parking. And those seeing a space about to be vacated, will stop for the spot, stopping traffic. This is such poorly thought-out proposal, that you had to, simultaneously, propose Option 2.

An equally dangerous and traffic-exacerbating proposal is the 25 90-degree parking spots at the Grassy Knoll on W. Silver Lake Drive. The street is approximately 48' wide. Let's do the math. Subtract 8' for the parallel parking across the street, and 22' for two lanes of parking, that leaves 18' for the 90-degree parking, with no buffers. Most cars, these days, are 17'+, and trucks and SUVs even more. Now think about how much danger and traffic you will cause, even if the math allowed. If you couldn't have imagined it from the start, one trip to CVS on Glendale Blvd. or a drive down Brand Blvd. in Glendale, will easily tell you the problems produced by these parking spots. Drivers can't see oncoming cross traffic, and drivers must stop waiting for parkers to park, or worse, those who are double-parked waiting for a spot to open.

You are creating a mess. You are creating dangerous conditions for drivers and pedestrians. You are creating worse traffic conditions than already exist (the traffic that you, amazingly, claim is not significant). The infrastructure surrounding the SLR Complex already will not support the overdevelopment the plan presents, and these parking proposals would make it worse.

I-694-1

As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

I-695 Mirelle Lindquist

COMMENT

RESPONSE

I-695-1	<p>These are the aspects that I support</p> <ul style="list-style-type: none"> - 43 acres of new useable space, including 10 acres of active and passive recreation and 22 acres of new and restored habitat and wetlands to support local wildlife - 5.5 miles of walking paths and trails - Reservoir edge treatments (aesthetic and functional) - 500 new native trees and plans for succession of aging tree stock - Nesting birds monitored and protected during construction and maintenance - Invasive plant species removed, and pesticide-free maintenance planned - Wildlife, Wetlands Management, Maintenance and Security Plans - Rain gardens and wetlands to filter stormwater and replenish reservoir water - Zero Waste: recycling and compost receptacles throughout the park - Ecosystem Resilience: creating a cooler city with 50% increased tree canopy coverage - Mobility and Public Transit: bike lanes, EV charging, public transit service - Bathrooms accessible from the Meadow, in the new education center - Dog park and Recreation Center improvements south of the South Dam - On-site bicycle parking spaces and improved, protected bike lanes along Silver Lake Boulevard. - Increased parking along Silver Lake Blvd (Option 1) 	<p>I-695-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>Also, please see Master Response - Parking/Bike Option.</p>
I-695-2	<p>These are the items that I think require further evaluation and analysis</p> <ul style="list-style-type: none"> - Proposed regrading of the native gardens in the Meadow and along Armstrong Ave. 	<p>I-695-3 As discussed in Project Description, Section 2.5.5 of the Draft EIR, the planting design for the proposed Project would be aligned with the City's New Green Deal goals of increasing tree canopy and protecting native biodiversity. Figure 2-8 of the Draft EIR includes a preliminary planting diagram. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-695-3	<ul style="list-style-type: none"> - Establishment of specific habitat and wildlife goals 	<p>I-695-4 The proposed Project, described in Chapter 2 of the Draft EIR, would not include non-plastic dog park surface material options. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-695-4	<ul style="list-style-type: none"> - Assessment of wildlife movement and corridors from habitat areas to water 	<p>I-695-5 Please see Master Response - Parking/Bike Option.</p>
I-695-5	<ul style="list-style-type: none"> - Reconsider single-tree species along promenade - Explore non-plastic dog park surface material options - Assess 90-degree parking proposal -vs- angled parking for safety - Reassess large-scale grading, soil disturbance and tree removal in the Meadow 	<p>I-695-6 The comment requests that grading and disturbance in the meadow be minimized. The Draft EIR concludes that the proposed project would increase the native habitats and vegetation on site and enhance ecological values and wildlife diversity compared with existing conditions. Several project design features and mitigation measures have been developed that minimize impacts</p>
I-695-6	<p>Sustainability and wildlife preservation should be the main focus of this master plan and I really hope you will reconsider the few aspects that I mentioned here to ensure that you are doing everything you can to protect our native ecosystems and create better integration between human-centered spaces and natural ones.</p>	

I-695 Mirelle Lindquist

COMMENT

RESPONSE

to biological resources during construction and operation. The Draft EIR concludes that the removal of the perimeter fence would increase access to the water for wildlife compared to existing conditions. Please see Master Response - Biological Resources.

I-696 Jiyoung Carolyn Park

		COMMENT	RESPONSE
I-696-1	I live in Silver Lake and use the Reservoir walking path and meadow frequently. I am a Silver Lake Neighborhood Council Governing Board Member and Liaison to the Neighborhood Council Sustainability Alliance, but submit this comment as an individual.	I-696-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-696-2	I support the proposed Master Plan, and strongly support the installation of protected bike lanes. Cars drive at high speeds on the streets adjacent to the Reservoir, so the painted lanes do not provide the safety that people need to feel comfortable using the bike lanes. Only experienced cyclists ride on the roads adjacent to the Reservoir when there should be families, children, and casual cyclists using safe, protected bike lanes.	I-696-2	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-696-3	I support the Plan's increase of tee canopy by nearly 50%. The thousands of people who provided input over the years and years of work by civil servants should not be disregarded because a few dozen opponents of the Plan are vociferously claiming there has not been a meaningful process over the years.	I-696-3	Also, please see Master Response - Parking/Bike Option. The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-697 Jamie York

COMMENT

RESPONSE

I-697-1 | I support the plan. We need more parks. This comment is made in my capacity as an individual.

I-697-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-698 Barbara Ringuette

COMMENT

RESPONSE

I-698-1	<p>Stop – do no harm. Unfortunately, the Draft EIR for the Silver Lake Master Plan Project fails in a number of areas.</p>	I-698-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-698-2	<p>First let me speak on something I have knowledge of. As a Neighborhood Council Budget Advocate for 10 years, I have met with the Mayor, Los Angeles City Council members and 18 separate Departments, some many times. Because City funds are limited, priorities for various projects must be set. The proposed options cost hundreds of millions, and then there is ongoing maintenance to pay for.</p>	I-698-2	Please see Master Response - Funding and Operations.
I-698-3	<p>This project does not meet the test of a priority need, not for my Silver Lake neighbors and not for the City of Los Angeles. These funds could be better spent on building over 400 units of housing maybe a thousand when matched with other sources of funds; repairing sidewalks to prevent injuries; or even building a park in an under-served community.</p> <p>Next, residents of Silver Lake by and large do not want a Reservoir project. Residents state they were never given an option of “no project” until now.</p>	I-698-3	<p>The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.</p>
I-698-4	<p>Nonetheless, most Silver Lake residents including myself, would like to see an upgraded, more attractive fence which we believe is essential for the protection of wildlife as well as to prevent vandalism and entry into the water.</p> <p>The Draft EIR does not accurately reflect traffic conditions. I served as co-chair of the Silver Lake Transportation Committee for four years, and am familiar with the concerns of the community.</p>		<p>As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.</p>
I-698-5	<p>The Draft EIR does not accurately reflect traffic conditions. I served as co-chair of the Silver Lake Transportation Committee for four years, and am familiar with the concerns of the community.</p> <ul style="list-style-type: none"> Silver Lake Blvd. is a major transportation artery. For several hours in each of the morning and evening commutes, streams of traffic on Silver Lake Blvd. wait through the change of several signal lights. To add to existing traffic is to add to pollution in our community. Should diagonal parking be installed, there would be further disruption of traffic as vehicles park coupled with more collisions. Reducing the width of traffic lanes would result in more collisions. Especially concerning would be colliding with an 18-wheeler that provides supplies to local markets and other local businesses. Installing diagonal parking on the West side of Silver Lake Blvd. would add to the hazard. 		Please see Master Response - Alternatives Analysis and Master Response - Funding and Operations.
		I-698-4	Please see Master Response - Fence Removal, Master Response – Biological Resources, and Master Response - Public Safety.
		I-698-5	<p>Please see Master Response - Traffic/Transportation.</p> <p>As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.</p>

I-698 Barbara Ringuette

COMMENT

RESPONSE

I-698-6	<ul style="list-style-type: none"> It should be noted that the previously existing Metro bus line 92 that ran along Silver Lake Blvd. West was terminated a few years ago for lack of riders. There is no bus line that goes near the Silver Lake Recreation Center. 	I-698-6	As discussed in Section 2.5.8 of the Draft EIR, the project would require that the future site operator and relevant City departments work together to explore options for expanding public transit connection to the project site as outlined in PDF-TRA-6.
I-698-7	<p>The Draft EIR does not reflect the protections required to protect wildlife. Quoting from the Silver Lake Wildlife Sanctuary Newsletter:</p> <p>"The DEIR Biological Resources section is inaccurate and ill-researched. The Master Plan's "Floating Islands," the "Wetland Terraces" and "fish stocking" that are supposed to benefit birds, will not do so! The expert opinion of Dan Cooper, Chief Conservation Biologist of the Santa Monica Mountains Conservancy: This DEIR is "lacking in both rigor and specificity.... Without current, accurate, and credible data on the biological resources ..., efforts at restoration will either fall short, or could actually result in further degradation of the site."</p>	I-698-7	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources.
I-698-8	<p>Ironically, the massive excavation, grading and construction of much-touted "nature trails," the "scenic overlooks," and "nature education" structures will instead uproot and destroy Nature.</p> <p>The Knoll's lost natural forest is now vital habitat for an ecosystem of ground-dwelling animals and local birds that will lose nests, burrows and food. Disruption of the open waters drives away migratory flocks we love. The DEIR fails to even mention the loss of these birds and animals.</p> <p>The Master Plan would remove the Reservoirs' Perimeter Fence. This will have major impacts on wildlife welfare and neighborhood safety. Vandalism, vagrancy and crime have been documented as serious problems in other unfenced parks in Los Angeles. There is no Public Safety mitigation for the loss of the Perimeter Fence suggested in this DEIR.</p>	I-698-8	<p>Please see Master Response - Fence Removal and Master Response - Public Safety.</p> <p>LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. The proposed Project is being designed to include wetland habitat and other edge treatments, where feasible, around the reservoir that would allow separation from the public to the water's edge. In the unlikely event that someone would enter the reservoir water, these wetland areas and edge treatments would also provide places where one could exit the reservoir (as opposed to the current smooth surface and slope of the concrete walls). During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.</p>
I-698-9	<p>The horrific noise, vibration, mess and traffic blockages caused by massive construction could last from five to fifteen years. Nevertheless, this Deir calls this, incredibly, a "Less Than Significant Impact." As to noise and vibration mitigations: "None Required." [DEIR 3.16-18]</p>		
I-698-10	<p>The DEIR predicts an "average of 390 additional visitors per day", as well as higher attendance with proposed monthly "Special Events" with amplified sound. Neighborhoods packed with visitors' cars plaque the Reservoirs area</p>	I-698-9	As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available. Please see Master Response Noise and Master Response - Traffic/Transportation.

I-698 Barbara Ringuette

		COMMENT	RESPONSE
I-698-10 Cont.	even now. And with the DEIR's plan to cut down lane widths to add parking spots on these already congested and gridlocked streets, traffic will enormously increase and become more dangerous. Yet, DEIR's Transportation Study claims "Less than Significant Impact." and "No mitigation measures are required." [DEIR Table 3.16-3]	I-698-10	Please see Master Response – Noise and Master Response - Traffic/Transportation.
	The DEIR also claims, "significant irreversible changes to our community have been deemed acceptable." [DEIR 4.3]	I-698-11	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-698-11	They are not!		
	The DEIR claims the negative impacts of construction, the years of disturbance, and when finished, the increased daily noise, crowds, traffic, and harm to our wildlife with be worth it.		
	It is not!		
	The community's ideals of "Peaceful," of "Nature," and "Wildlife" will be destroyed. It must not."		
	Thank you for your attention to the concerns of our Silver Lake community.		
	Barbara Ringuette 816 Parkman Avenue		

I-699 Cristina Perez

COMMENT

RESPONSE

I-699-1	<p>I am in full support of the DEIR plan, minus a few issues that can be easily eliminated. The use of amplified sound in a canyon is a bad idea, so I'd remove that, and let events be done by permit through the department managing the property. That way local schools, conservancy's etc., could hold graduations, or educational talks in the future.</p>	I-699-1	<p>The comment expresses general support for the proposed Project and opposition to amplified speakers during special events. Please see Master Response - Noise.</p>
I-699-2	<p>Like the stakeholder groups that thoughtfully care for the Meadow, and other native areas, I believe that overall the plan increases access to more natural spaces and safe immersion in nature, including:</p> <p>43 acres of new useable space, including 10 acres of active and passive recreation and 22 acres of new and restored habitat and wetlands to support local wildlife</p> <p>Approximately 5.5 miles of walking paths and trails</p> <p>Reservoir edge treatments (aesthetic and functional)</p> <p>500 new native trees and plans for succession of aging tree stock</p> <p>Nesting birds monitored and protected during construction and maintenance</p> <p>Invasive plant species removed, and pesticide-free maintenance planned</p> <p>Wildlife, Wetlands Management, Maintenance and Security Plans</p> <p>Rain gardens and wetlands to filter stormwater and replenish reservoir water</p> <p>Zero Waste: recycling and compost receptacles throughout the park</p> <p>Ecosystem Resilience: creating a cooler city with 50% increased tree canopy coverage</p> <p>Mobility and Public Transit: bike lanes, EV charging, public transit service</p> <p>Bathrooms accessible from the Meadow, in the new education center</p> <p>Dog park and Recreation Center improvements south of the South Dam</p>	I-699-2	<p>The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-699 Cristina Perez

COMMENT

RESPONSE

I-699-2 Cont.	On-site bicycle parking spaces and improved, protected bike lanes along Silver Lake Boulevard.	I-699-3	As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.
I-699-3	Increased parking along Silver Lake Blvd (Option 1) is essential to resolving existing conflicts with park users and residents. The dog park and recreation center alone generate significant traffic issues, with drivers circling the blocks and doing u turns to grab a precious available spot to unload their dogs, baby carriages, bikes, (yes! Bikes), who'd be looney enough to ride a bike up and over Duane street or Micheltorena with their kids & dogs??? Adding the protected lanes, and buffering them with a parking lane, is safe, smart, and in no way in conflict with the current utopian ideals of the city's various transportation plans that do not take into consideration real life situations of peoples day to day lives, rather opt to embrace pie in the sky goals for coffee culture tweeters.	I-699-4	Please see Master Response - Traffic/Transportation. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-699-4		I-699-5	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-699-5	Thank you for the hard work you've done on addressing the real concerns of real residents who treasure this local amenity and want to see it evolve into it's next best version, post decommissioning as a potable source of water. Regards, Cristina		The commenter is referred to Master Response - Parking/Bike Option.

I-700 Albert Chiang

COMMENT

RESPONSE

	I love the vision of this plan, and think it could be improved by considering bike lanes and traffic a little further.	I-700-1 Please see Master Response - Parking/Bike Option.
I-700-1	<p>Bike Lanes First off, I love that there will be bike infrastructure around the lake! And I would highly suggest using the second option on Figure 2-16, but I don't think it goes far enough. There should be some kind of physical separation for the bike lanes from car traffic. Cars move so fast on Silverlake and they cheat through every corner. I bike to and from work daily, along this very stretch of Silverlake, and regularly have close calls. If the plan is to cultivate a space for the community to gather, it must provide a safer option for children and families to bike safely around the lake.</p> <p>Additionally, I did not see any consideration for drain grate management on the bike path. There are several on Silverlake that are dangerously placed and force cyclists to ride in traffic with cars instead of risking a grate-induced crash in the bike lane.</p>	<p>I-700-2 This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Please also see Master Response - Traffic/Transportation.</p> <p>This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-700-2	<p>Traffic I am a resident on Duane St. and it is regularly overwhelmed by gridlock that runs up and over the hill. It functions as the extended offramp of the 2, even though the grade and length of the street doesn't functionally support it. Additionally, the "No Left Turn" where Duane meets Silverlake is virtually unenforceable. My concern is that the improvements around the reservoir will make it even more of a destination than it already is. How can this plan take the surrounding neighborhood streets into consideration? Is there a way to run Duane St. as a one way West to East like Baxter in Echo Park? That would still allow the offloading of traffic pressure from the reservoir but not add to it with new traffic from the 2.</p> <p>Thanks for your time and good luck!</p>	

I-701 Mike Krose

COMMENT

RESPONSE

I-701-1	The cost of the Master Plan, \$268,000,000 is ridiculous by itself. But, our community does not need another park especially in light of the Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment Appendix A that designates Silver Lake as a "Very Low" needs community. They further point out that there are plenty of other "High" and "Very High" needs areas that are better suited to park development. It is also important to note that the high price tag is based on 2020-2021 estimates, pre-inflation. A conservative estimate of 2023 dollars would approach \$400,000,000. And since the actual project, if it is unfortunately approved, is a few years away, so how does a half a billion dollars sound for a "Very Low" Needs Community? And when have you seen a large project stay on schedule? If the City decides to spend all this money on us, will they agree to protect the wildlife, as the BOE and Design Team promises. If so, there will be restrictions on when and where construction can be done, based on the mating/reproduction/fledging cycles of our protected wildlife. All of this will affect the length of time and cost of the project. So, the cost can't be accurately estimated, and the time the project will take cannot, and has not been properly estimated.	I-701-1	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.
I-701-2	Another important issue, if this project is built, is who will pay for its operation and maintenance FOREVER! Despite the poor track record of the City's ability to adequately provide for the upkeep of similar properties, the DEIR has some suggestions, and without specifying the funding source, but have included ideas like local tax districts, asking those residents, many who do not want this project in the first place, to foot part of the cost. Then there are the suggestions of a Conservancy or a non-profit. But, the most sinister of them all has just appeared in Chapter 2, Project Description, Sec. 2.7.2, Routine Operations and Maintenance, pg.2-51, 2-52, where the term VENDOR shows up. During the MP process it was debated that there should be no commercialization of the Complex. The Café, for one, was vigorously discussed and defeated, as well as boating was discussed and defeated (although by some trickery it is back under an educational cloak). But now we are being told an option is to have the Complex run by a VENDOR, "a person or company offering something for sale". So the Silver Lake Reservoirs Complex becomes "for profit" enterprise. It seems to that this might have been the idea all along. This possibility must be thoroughly investigated, and squashed, and reported back to the community, AND TO THE CITY COUNCIL.		As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
I-701-3			Please see Master Response - Funding and Operations.
I-701-4		I-701-2	The comment expresses opposition to the proposed Project. Please see Master Response - Funding and Operations. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-701-5		I-701-3	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-701-6		I-701-4	This comment expresses concern regarding impacts to wildlife as a result of construction. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Compliance with the Migratory Bird Treaty Act would be required, as discussed in Section 3.4 of the Draft EIR.

I-701 Mike Krose

COMMENT

RESPONSE

I-701-5 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction.

I-701-6 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes.

Please see Master Response – Funding and Operations.

I-702 Mike Krose

		COMMENT	RESPONSE
		The following was part of a previous comment I submitted, but it so important, in my opinion, of course, that I am resubmitting it alone. Thank you.	
I-702-1		Another important issue, if this project is built, is who will pay for its operation and maintenance FOREVER! Despite the poor track record of the City's ability to adequately provide for the upkeep of similar properties, the DEIR has some suggestions, and without specifying the funding source, but have included ideas like local tax districts, asking those residents, many who do not want this project in the first place, to foot part of the cost. Then there are the suggestions of a Conservancy or a non-profit. But, the most sinister of them all has just appeared in Chapter 2, Project Description, Sec. 2.7.2, Routine Operations and Maintenance, pg.2-51, 2-52, where the term VENDOR shows up. During the MP process it was debated that there should be no commercialization of the Complex. The Café, for one, was vigorously discussed and defeated, as well as boating was discussed and defeated (although by some trickery it is back under an educational cloak). But now we are being told an option is to have the Complex run by a VENDOR, "a person or company offering something for sale". So the Silver Lake Reservoirs Complex becomes "for profit" enterprise. It seems to that this might have been the idea all along. This possibility must be thoroughly investigated, and squashed, and reported back to the community, AND TO THE CITY COUNCIL.	
	I-702-1		Please see Master Response – Funding and Operations.
	I-702-2		The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
			Please also see Master Response – Funding and Operations.

I-703 Glen Gold

COMMENT

RESPONSE

I-703-1	<p>I might well have accidentally hit "send" on some prior comments, but i wanted to get this all in one place. I work with the Silver Lake Reservoirs Conservancy, and I know our organization has sent you a compendium of our comments. Furthermore a few folks I work with there have shown me what they're going to say, and they are smarter, more industrious, scientific and thorough than I am. So in short, this is a guy piping up to say that his input was in that larger letter. But also as a wayward guy who lives on Silver Lake Blvd, I am in favor of the master plan overall for a few reasons. One being that we can't do nothing - leaving the place as an industrial water storage area where the birds die off from lack of food isn't appealing to me. Further, the alternate options provided, while interesting, don't fulfill the purpose of the transformation we're going for.</p>	I-703-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-703-2	<p>I think the EIR can be improved and made more thoughtful in some places (I don't understand how parking can be added seemingly cavalierly; I think the rec center changes are far more intense -- and as of now vague -- than we reckoned with when having the 2018/19 meetings at Marshall and elsewhere; I don't comprehend why amplified music will be allowed; transit from other neighborhoods is much more important to spell out than is shown in the EIR; paying closer attention to native plantings over the older-school methods of being purely aesthetics-driven would make me happy.) All these and more is expressed, as I say, by my colleagues.</p>	I-703-2 Section 3.16, Transportation, of the Draft EIR discussed impacts of the proposed Project related to traffic and transportation. Also, please see Master Response – Traffic/Transportation and Master Response – Parking/Bike Option.
I-703-3	<p>What I wanted to bring up is that I'm a historian (write the stuff for a living in fact) and a former resident of an apartment on Lake Merritt in Oakland. As I'm sure you know, the first wildlife sanctuary in the USA was established there in 1870 or so - three islands for birds to remain unhunted - in an urban setting that has developed over the last 150 years through all kinds of economic, social and demographic shifts. And the birds have continued to flourish, even when the city might not. There was no roadmap for how nature and humanity might co-exist, no EIRs filed in 1869, no care taken to make sure it worked. And yet it did.</p>	I-703-3 Please see Master Response – Noise and Traffic/Transportation.
I-703-4	<p>That said, we're at a far more crucial crossroads now than 19th century Oakland. This project has a chance to show how cities can continue to exist with nature at a time when climate change is making that balance much more dire. We need to use stormwater capture and to remove the asphalt and so on not just because we think it's going to be prettier (it will be!) but because we have moved from the manifest destiny thing to being stewards of a land that is only ours for a brief moment. It's unconscionable not to see how we can improve flora and fauna's chance at making it through the next century. Let's be good</p>	<p>Additionally, the Tree Succession Plan would include the incorporation of native plants in the understory thus providing food sources and habitat for native wildlife including native sages (<i>Salvia</i> sp.) and milkweeds (<i>Asclepias</i> sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly respectively. The native plant palette would take into account the surrounding habitat quality and site appropriateness.</p>
I-703-5		I-703-4 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-703-6		I-703-5 As described in Hydrology and Water Quality, Section 3.10 of the Draft EIR, the predominant source of water used to fill the reservoirs since 2017 has been a mix of potable water and non-potable treated groundwater from Pollock Well #3, with very little precipitation. The only stormwater that can currently enter the SLRC comes from precipitation that falls on the SLRC.
		<p>As required under DSOD regulations, LADWP would continue to monitor weather and lower the water levels in the reservoirs in advance of an anticipated storm event to prevent overtopping the reservoirs or exceeding the stormwater drainage capacity west of the reservoir. Stormwater falling on the outer boundary of the SLRC would drain southwest to the Ballona Creek watershed similar to existing conditions and routed into the municipal stormwater system. Therefore, the proposed Project would continue to capture stormwater within the proposed Project site.</p>

I-703 Glen Gold

	COMMENT	RESPONSE
I-703-6 Cont.	stewards - carbon sequestration, stormwater capture, making habitat for the birds and animals, 500 new trees (!), etc, etc. For the last few years, anyone paying attention to the future doesn't have a lot of optimism that something good can come of human endeavor. Here is a plan that is clearly ready to do something good. The cynical thing is to promise it won't work. I believe that cities and citizens can actually leave the place better than how we found it. Very excited to see this plan do exactly that.	I-703-6 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-704 Michael Masterson

COMMENT

RESPONSE

I-704-1 I have lived in Silver Lake for 34 years and was the founding co-chair of the Silver Lake Neighborhood Council Reservoir Complex Committee. It was during the time that the DWP was routing the pipeline from the new underground reservoir in Griffith Park to the pumping station at the base of the Silver Lake dam. Although that was a federally required mandatory project, the inconvenience of it impacted our neighborhood for years. Dust, noise, constant truck trips, drilling, removal of trees, etc. caused misery for everyone in the area. I cannot imagine the horrific impact this proposed project will have on us for up to 15 years!

I-704-2 This entire process has been flawed from the beginning. The powers-that-be pushing these proposals never offered the option of doing nothing. It was always, "Which you like better? Option 1, 2 or 3?" There wasn't a choice for the status quo.

I-704-3 I am adamantly opposed to sweeping proposal especially the completely unnecessary "Education Center" which will require parking, driveways, truck access, a dumpster, etc. and completely mar the view and remove much-needed native habitat. It is a boondoggle and I cannot imagine who thinks we need such a thing.

The same goes for the floating dock, shade pavilion, observation platforms, elevated boardwalk, "special events," required additional parking and wetland terraces. And the upheaval that will be caused by the proposed plans around the current rec center will add to further displacement, traffic problems and noise.

All completely unnecessary. We are blessed with a pastoral, quiet refuge in the middle of our lovely community. I am firmly in the camp of Alternative 1 - No Project. If the majority of the community feels that way I would tentatively support Alternative 2 - Reduced Project with some modifications. I am not a NIMBY but I favor the least disruption possible in our bucolic community. Please consider doing nothing.

I-704-1 The comment expresses opposition to the proposed Project. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

I-704-2 Please see Chapter 5.3.1 of the Draft EIR for a description of Alternative 1. Also, please see Master Response - Alternatives Analysis.

I-704-3 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

As described in the Project Description Section 2.5.1 of the Draft EIR, the proposed Project would include a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.

The comment expresses support for Alternative 1 and 2. Please see Master Response - Alternative Analysis.

I-704 Michael Masterson

COMMENT

RESPONSE

The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-705 Nina Woodson

COMMENT

RESPONSE

I-705-1	<p>Re: Plans to revamp the Silver Lake Reservoir</p> <p>I am gravely concerned about the plans to massively disturb the Silver Lake Reservoir, tear down trees, and institute activities that would draw thousands of people to the area. Moreover, the environmental impact report seems to be faulty, with information withheld from the public.</p>	I-705-1	The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.
I-705-2	It is vital to preserve this extremely rare natural resource in the midst of an urban environment that draws thousands of migratory birds and is home to a		
I-705-3	plethora of wild animals. Any plans to revitalize the area must include provisions to protect the wildlife, which includes -- at the very least -- perimeter fencing.		Regarding impacts to noise, please see Master Response - Noise
I-705-4	<p>I live nearby and use the Silver Lake Reservoir regularly, and it is ALREADY a heavily trafficked space. We do not need more "recreation" here, and this is, on top of it, not an appropriate place for it. People can go to the beaches or the mountains or Griffith Park. We do not need more "entertainment" places: there are plenty of options for that in Los Angeles, from Grand Plaze to the Gene Autry to Hollywood Forever Cemetery and on and on.</p> <p>All this project seems to do is line the pockets and the planners and developers. I beg of you to do the least harm possible. Once a natural resource such as we have there (with, e.g., the eucalyptus grove) is gone, it is gone forever!!!</p> <p>Respectfully, Nina C. Woodson</p>	I-705-2	<p>Please also see Master Response - Traffic/Transportation and Master Response - EIR Recirculation Requirements.</p> <p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
		I-705-3	Please see Master Response - Fence Removal. This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
		I-705-4	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
			The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

I-705 Nina Woodson

COMMENT

RESPONSE

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-706 Kamille Mosqueda

COMMENT

RESPONSE

- I-706-1 While I do not have specific comments on the Draft EIR, a copy of which I have seen over time, I will say this:
- I-706-1 ENVIRONMENT: I fully support a plan that would protect the native flora and fauna already native to the area. To the extent that the environment will foster additional visits from animals that may find the place safe enough, that is the essence of the plan I would support. Keep what's already thriving in the area to continue thriving.
- I-706-2 HUMANS: The park belongs to the citizens of Los Angeles and those who visit. While concerns of locals are valid, the park is not for them exclusively. Los Angeles is a global city and we should take that into consideration when planning for the people-friendly access to the park. We deserve this as citizens of the city and our guests deserve to feel welcomed, too.

- I-706-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
- I-706-2 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-707 Anne Johnson

		COMMENT	RESPONSE
I-707-1	Good afternoon: I am against the SLRC DEIR. If I am forced to choose an Alternative, it would be #1. All that is needed is general clean-up, continued and professional maintenance, more staff, more enforcement of LAMC's, and more attention	I-707-1	The comment expresses opposition to the EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-707-2	given to neighborhoods in need of recreation space. Silver Lake is NOT one of those neighborhoods. Please stop the madness and/or greed of a very small minority of people. Based on public comments in the DEIR, comments made during the 2019 workgroups and recent publics meetings hosted by the BOE and other city agencies, the overwhelming majority of those who express an opinion are AGAINST most of what is being presented in the DEIR. Thank you.	I-707-2	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-707-3	Anne Johnson	I-707-3	Please see Master Response - Community Engagement Process. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-708 Ben Louis

COMMENT

RESPONSE

I-708-1 | Full support!

I-708-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-709 Lisa Hart

COMMENT

RESPONSE

I-709-1	Overall, I am supportive of and excited by the proposed project. Below is a list of concerns. <ul style="list-style-type: none"> I was very impressed by the pre-lockdown outreach and underwhelmed by the post-lockdown outreach. Why host forums that do not allow us to see each other or have questions answered? And the technical issues would have been much more easily addressed if we could have seen each other and had more of a dialogue format. 	I-709-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Additionally, please see Master Response - Community Engagement Process.
I-709-2	<ul style="list-style-type: none"> I remain appalled that DWP is taking so much of the park (and some of the most beautiful parts of the park!) for...for what? Why make it inaccessible to us? At the very least, why not let us walk through the area they are keeping for just themselves? While the ground at the dog park clearly needs some love, I was shocked to learn that fake grass has been proposed. Fake grass is horrible for too many reasons to list here. 	I-709-2	As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
I-709-3	<ul style="list-style-type: none"> I was also disappointed to learn that some of the Ivanhoe reservoir banks will remain paved. I don't know the reason, but really really would like it not to be. I grew up in Oregon, and the primary way we capture stormwater there is we let it hit the ground and get absorbed into the soil—a real nature-based solution. For reasons I don't understand, it's gotten so complicated (and expensive!) at the reservoir.... I support the Silver Lake Reservoirs Conservancy's request that DWP reconsider its decision to halt plans to implement the Stormwater Capture Projects. 		This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-709-4	<ul style="list-style-type: none"> I have spent years citing the Echo Park Lake as proof that we don't need a fence at the reservoir. I can't use that argument anymore...sigh. But I would really really really love to not have a fence. I want to be sure the trails are composed of something soft enough to run on. 	I-709-3	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-709-5	<ul style="list-style-type: none"> I also support the Silver Lake Reservoirs Conservancy's recommendation to select only locally native plants for all landscaped areas, including tree planting, throughout the project area, except when no locally native plant species is determined appropriate or available. And I support planting a variety of trees along the Promenade, and suggest (as recommended by the Silver Lake Reservoirs Conservancy) considering the California Black Walnut at the site. 	I-709-4	Please see Master Response - Fence Removal. Additionally, please see Chapter 2, Project Description, of the Draft EIR for details of the proposed pathways.
I-709-6	<ul style="list-style-type: none"> I think we need to be super careful about large public events for so many reasons. 	I-709-5	As discussed in Project Description, Section 2.5.5 of the Draft EIR, the planting design for the proposed Project would be aligned with the City's New Green Deal goals of increasing tree canopy and protecting native biodiversity. Figure 2-8 of the Draft EIR includes a preliminary planting diagram. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-709-7	<ul style="list-style-type: none"> Regarding the bike lane options 1 and 2, I think I prefer option 1—we will need the parking! But let's be sure to keep cyclists safe. 		

I-709 Lisa Hart

COMMENT

RESPONSE

- I-709-6 The proposed Project would allow for 12 special events to occur during the summer months, with an assumed visitorship of up to approximately 600 people per event. Allowable event hours would be from noon to 10:00 p.m. Events occurring during the nighttime would result in increased noise, light and general disruption, but these events would be temporary and infrequent. The Draft EIR concludes that the use of the area for special events would not degrade habitat values and would not significantly impact wildlife using the urban area since any wildlife using the site would be accustomed to an urban environment. Special events would occur at the Meadow, which is an area currently in frequent use by the public. Please see Master Response - Noise.
- I-709-7 Please see Master Response - Parking/Bike Option.

I-710 Andrew Werner

		COMMENT	RESPONSE
I-710-1	As a long time resident that walks to and around the reservoir several times a month, my family and I would highly value the improvements to the complex of reservoirs described in the dEIR. We love the addition of so many trees, accessibility for all members of the community, interpretation and education, bathrooms(!), and connectivity. We also support Option 2 described in the "Offsite Improvements" in Section 2.5.2. These improvements will provide safe alternatives to driving to the Silver Lake Reservoirs, connectivity outside of Silver Lake and alleviate impacts of car traffic.	I-710-1	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-710-2	As residents of multifamily housing nearby, had the dEIR been implemented when our kids were young and had there been a safe way to bike to the area, we would have enjoyed and used the reservoir amenities much more frequently and wish the same for families to come after us particularly as nearby areas densify and more nearby greenspace is in ever greater demand.	I-710-2	The comment expresses support for the proposed offsite improvements - Option 2. The commenter is referred to Master Response - Parking/Bike Option.

I-711 Hollis Sherman-Pepe

COMMENT

RESPONSE

	As a neighbor and frequent user of the Silverlake Reservoir park, I am excited to hear these proposed plans for beautification and renovation of our beloved Reservoir Park.	I-711-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-711-1	In a time where urbanization is consistently cutting down old growth trees in favor of new construction, it is more critical than ever to plant more native habitat for our wildlife brethren.	
	Growing up in small town Pennsylvania, I valued my relationship to nature. I pray for this generation of youth that they too may be filled with the joy, peace, and wonderment of the natural world around us. Creating a more enviting habitat for humans to enjoy and learn and better suited refuge for our delicate wildlife is a win win.	I-711-2 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-711-2	My only concern is for the population of coyotes, hawks and such that currently reside in Silverlake Reservoir area should not be harmed or driven out by these intended renovations.	
H		

I-712 Nicholas Constant

	COMMENT	RESPONSE
I-712-1	I am an attorney that lives directly adjacent to the project and the current "Meadow". The back of my property is on Silver Lake Blvd. and was purchased in 1999.	I-712-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-712-2	I am opposed to any and all further development of the Silver Lake Reservoir Complex. The DEIR is legally deficient according to CEQA. I reserve all legal rights to litigate based on any and all deficiencies, misrepresentations, cost analysis, nuisance, and any and all other legal rights at present or in the future.	I-712-2 Please see Master Response - EIR Recirculation Requirements.
	Looking forward to the challenge presented. Sincerely, Nikos Constant, Esq.	

I-713 Anthony Burton

COMMENT

RESPONSE

I-713-1

As a resident of the Silver Lake Reservoir surrounding neighborhood, I strongly support the redesign and improvement of the reservoir complex to make it more attractive and enjoyable for visitors.

Option 2 is the safest option for cyclists. The ideal setup for these bike lanes would narrow the traffic lanes to 10.5 feet and add an extra 3 feet as a buffer. The City should also plant trees on the buffer and make it a concrete barrier for added protection from cars. Additionally, the City should consider raising the cycle track so that gutters or stormwater features fall outside of the cycling area.

I also support redesign of Silver Lake Boulevard to include features that slow down speeding cars. It is hard to enjoy the reservoir when you are concerned about getting maimed by a speeding car while crossing the street.

I also support expediting the delivery of this project however possible.

I-713-1

Please see Master Response - Parking/Bike Option. The comment also expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-714 Betsy Israelit

COMMENT

RESPONSE

I-714-1	Regrettably, the highly-anticipated Silver Lake Reservoir Complex Master Plan Environmental Impact Report (DEIR) is limited in scope and does not address the needs of the community — or the wildlife that depend on the reservoirs for a safe habitat. I am strongly opposed to the proposed project, the DEIR as written, and can only support Alternative One...No Project Alternative.. My top concerns are removal of the perimeter fence; noise nuisances caused by special events and amplified music; construction noise; negative impacts on wildlife, such as habitat removal and nighttime lighting;; traffic; congestion; duration of the project; and disruption of the quality of life for residents living within 500 feet of the complex. In addition, many of the current Silver Lake Recreation Complex' features, including the dog parks, walking paths, the Meadow, and the recreation center will be CLOSED TO THE PUBLIC for years during the multiphase construction plan. The community and the urban wildlife that live among us cannot stand 180 months of construction, thousands and thousands of truck trips, and multiple closures mentioned in the document with little explanation. Many residents are asking why their strong objections to the original Master Plan and the draft Environmental Impact Report appear to be ignored.	I-714-1	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-714-2			The commenter is also referred to Master Response - Biological Resources.
I-714-3		I-714-2	The comment expresses opposition to the proposed Project and support for Alternative 1. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-714-4		I-714-3	Please see Master Response - Fence Removal.
I-714-5		I-714-4	Please see Master Response - Noise.
I-714-6		I-714-5	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.
I-714-7		I-714-6	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-714-8			The commenter is also referred to Master Response - Biological Resources.
I-714-9	In addition, I am deeply concerned that the DEIR and Master Plan calls for removing almost 100 trees, whether they are young, old, healthy, "protected," native or exotic and replace them with 500 trees, which may or may not grow and will take years if not decades to reach the size of the trees being destroyed. What will happen to the wildlife that live in the destroyed trees? And what will replace the shade and protection the trees offer all of us?	I-714-7	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant.
I-714-10	Finally, Silver Lake is NOT a park poor community and the funding proposed for this project should be put to use in areas of Los Angeles that need and deserve parks and open spaces. As CPA Terry Jackson wrote in a recent community newsletter, "The project, as proposed, is overblown and needs to be scaled back to something achievable and realistic. If we were to ask members of the Park and Recreation department what they would do with a \$300 million capital improvement budget, I don't think they would say, "Let's spend it all in Silver Lake."	I-714-8	As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. This 2-phased approach was developed in order to capture the worst-case scenario, where

I-714 Betsy Isroelit

COMMENT

RESPONSE

the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

- I-714-9 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
- I-714-10 Please see Master Response - Community Engagement Process. The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- I-714-11 The comment expresses concern with tree removal. The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.
- I-714-12 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

I-714 Betsy Isroelit

COMMENT

RESPONSE

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations.

The commenter is also referred to Master Response - Funding and Operations.

I-715 Ianthe Zevos

I-715-1 | Comments attached

COMMENT

I-715-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-715 Ianthe Zevos

COMMENT

RESPONSE

December 16, 2022

RE: the Silver Lake Reservoir Complex Master Plan dEIR

I-715-1
Cont.

I'm writing as a Silver Lake resident to comment on the Silver Lake Reservoir Complex Master Plan dEIR. I support the Plan's goals to create more accessible, natural spaces. Transforming the Reservoir Complex is not a zero sum equation between park space and wildlife habitat.

By the County's own data, Silver Lake is not a park rich community. It is a community with moderate park need in the north, intermediate need north of Sunset Boulevard, high need south of Sunset and includes pockets of very high need in its southern and western corners¹. Directly south of Silver Lake is the densest population in Los Angeles and the area with the highest park need. The transformation of the Silver Lake Reservoir complex is an opportunity to ease some of this need, but must be accompanied by robust public transit options to ameliorate impacts on residents living directly by the complex. Metro has eliminated the 201 bus line that used to run north/south along Silver Lake Boulevard and accessed the Reservoir Complex; restoration of this service should be part of the plan as one component of public connectivity to the complex.

Generally, I support elements of the Complex Master Plan such as the additional walking paths and trails, the creation of new habitat (and wetlands), increasing the tree canopy, adding rain gardens and native plants, and improving the maintenance and security of the overall complex, including removing non-native invasive species.

However, there are areas where the plan needs improvement. Specifically:

I-715-2

- The proposed regrading and tree removals in the Meadow and along Armstrong Avenue must be amended or reconceptualized. Our city has a long history of gaps between its rhetoric and action; by policy and proclamation from public officials and agencies, the Master Plan should be working to preserve the mature trees on the property. It should be adding to the tree canopy rather than destroying what currently exists. The city has spent significant public funds researching the benefits of mature tree canopy (The Dudek Report², et al); these trees have value and should be incorporated into the project design.

I-715-3

- Only native plants and tree species should be planted - and the species of native trees considered for the planting in the Promenade area should be diversified. This is a wonderful opportunity to add native oak trees (*Quercus agrifolia*) and to create a robust supportive ecosystem for birds, pollinators, and insects as well as the more charismatic local animals.

I-715-4

- The use of artificial turf in the dog park area should be reconsidered. Artificial turf has been shown to exacerbate heat island effect and can be a source of PFAS. Introducing persistent plastic into the area is unnecessary and a step in the wrong direction.

I-715-5

¹ <https://www.aarcgis.com/apps/dashboards/ecb3427236194fcb883b28f532693d17> Data source: County of Los Angeles Parks Needs Assessment (updated 2021)

² Dudek Report
https://www.cityplants.org/wp-content/uploads/2018/12/10939_LA-City-Plants_FirstStep_Report_FINAL_rev12-7-18.pdf

Thank you for your time and attention and the opportunity to comment on this dEIR.

Sincerely,

Ianthe Zevos
3015 Marathon Street
Los Angeles, CA 90026

Attachment

I-715-2

The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies and to minimize impacts to habitat values. The Tree Succession Plan would include the incorporation of native plants into the understory thus providing food sources and habitat for native wildlife including native sages (*Salvia* sp.) and milkweeds (*Asclepias* sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly respectively. The native plant species planting palette would take into account the surrounding habitat quality and site appropriateness.

The preparation of a Tree Succession Plan as outlined in Chapter 2, Project Description, calls for the phased removal of trees over 15 years to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Additionally, these trees can be selectively identified for removal thus avoiding trees with active rookeries, nests, and roosts. As the new tree plantings mature, new habitat would be established over time. The successional tree removal practice would ensure that nesting and foraging habitat would not be eliminated during implementation. Please see Master Response – Biological Resources.

See Master Response – Biological Resources.

I-715-3

The proposed Project will result in direct impacts to native shrubs and trees regulated by the City Tree Ordinance, RAP Policy, and the BSS tree permit application. The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies and to minimize impacts to habitat values. The Tree Succession Plan would include the incorporation of native plants into the understory thus providing food sources and habitat for native wildlife including native sages (*Salvia* sp.) and milkweeds (*Asclepias* sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly respectively. The native plant species planting palette would take into account the surrounding habitat quality and site appropriateness. Please see Master Response – Biological Resources.

I-715-4

The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-715 Ianthe Zevos

COMMENT

RESPONSE

I-715-5

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

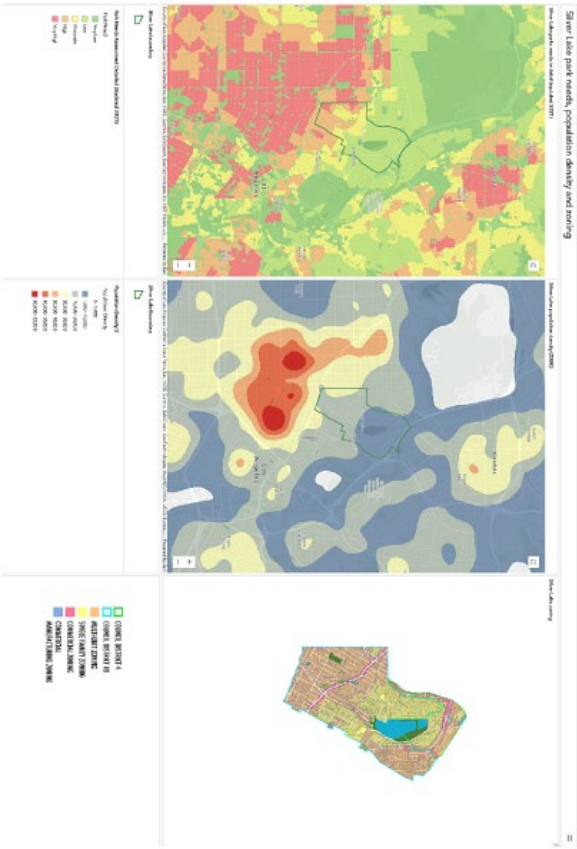
I-715 Ianthe Zevos

COMMENT

RESPONSE

I-715-6 Attachment noted.

I-715-6



I-716 Kristen Egermeier

COMMENT

RESPONSE

I-716-1	I believe the reservoir needs an uplift, and I believe it should be accessible to all. I believe we need to have spaces for leashed dogs, not ban them all together, save for the dog park. I believe we can work with protecting the environment and serving our community with a green space. I do not believe that we should remove any mature trees, and should be planting more, with a plan for their maintenance in place, starting now. I fully support the wetland plan. I do not believe we should ignore other areas for green spaces in the city either. We need our community to have access to restrooms. Can Quimby funds be used for this, as there is so much development happening in this area, which is where those funds come from? I do not wish to pull funds that could serve park poor areas in the city.	I-716-1	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-716-2		I-716-2	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-716-3		I-716-3	The preparation of a Tree Succession Plan as outlined in Chapter 2, Project Description, calls for the phased removal of trees over 15 years to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Additionally, these trees can be selectively identified for removal thus avoiding trees with active rookeries, nests, and roosts. As the new tree plantings mature, new habitat would be established over time. The successional tree removal practice would ensure that nesting and foraging habitat would not be eliminated during implementation. Please see Master Response – Biological Resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-716-4		I-716-4	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-716-5		I-716-5	As described in the Project Description, Section 2.5.1 of the Draft EIR, public restrooms would be included and would be directly accessible from the promenade to serve the proposed Project area as a whole.
I-716-6		I-716-6	Please see Master Response - Funding and Operations.

I-717 Sidney Howard

	COMMENT	RESPONSE
I-717-1	<p>Hello!</p> <p>The plans for the Silver Lake Reservoir look incredible so far! My only comment would be to please consider putting in an outdoor roller rink in the Park & Recs section of the park. There is only one small dedicated space for roller skating in the entire city of LA (Venice Beach Dance Skate Plaza) and it is inaccessible to many LA residents because of traffic and distance. There are city funded and free basketball and tennis courts all over LA and nearly no where to roller skater, many skaters get yelled out and have the police called on them simply for trying to find a place to skate and get some exercise outside in public spaces. There are many other cities that have outdoor roller rinks across the country including Oakland (UMOJA rink), San Francisco (6th Avenue Skate Park in Golden Gate Park), Brooklyn (Lakeside in Prospect Park), and D.C. (Anacostia Park), and Salt Lake City (Millcreek Common). The Silver Lake Reservoir is in the perfect position to be the next destination for an outdoor roller rink to benefit the community and serve the needs of a population that are not currently being met.</p> <p>Thank you for your time, Sidnev</p>	<p>I-717-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-718 Jane Cook

COMMENT

RESPONSE

- I-718-1 ANY TREE LOSS IS UNACCEPTABLE; NO EXPERT ANALYSIS DONE IN DEIR
- BURIED in appendix "D" Biological Technical Services is a map of most of the BELOVED MATURE TREES that will be DESTROYED by this Master Plan Project. This renders the Project entirely UNACCEPTABLE. Some of the trees have PROTECTED STATUS, as part of native Walnut/Oak woodland. Others are Protected Species, i.e. Deodar Cedar, et al. The DEIR Biological Technical Resources utterly FAILS TO ANALYZE THE SEVERE IMPACTS of the loss of these many aesthetically, historically, ecologically prominent trees.
- I-718-2 The DEIR FAILS to analyze the ecological impact of killing these trees. Numerous species of small animals and an entire ecology of smaller creatures make their homes in these trees, and will be displaced and destroyed as a result. Raptors, herons, numerous bird species depend on this existing tree ecology for shelter and food. An accurate depiction would take extensive biological analysis as these dependent communities have developed over the long decades of the trees' existence. The DEIR FAILS TO NOTE THESE TREE-DEPENDENT BIOLOGICAL COMMUNITIES AT ALL. Nor, the effect of all this on the existing thriving bird population of the area. A qualified, authoritative ARBORIST'S report is essential; yet there is NONE IN THIS DEIR. This ecological disaster is ignored by the "Biologic Consultants" engaged for this DEIR, and is a reason it should be disallowed as a reliable description of environmental impacts.
- I-718-3 The loss to Historical and Aesthetic landscape is incalculable. The trees are defining, iconic features of this area, and have been since the 1940's; they are a prominent feature of many photographs. While the Historical Commission vetted this Project, they failed to note this, no doubt because these IMPACTS WERE NOT ADEQUATELY PRESENTED TO THE LOS ANGELES HISTORICAL COMMISSION at the time the Hargreaves Design Team approached them for an approval. This was a gross oversight, and it will not be overlooked by the SL Community.
- The "500 trees" proposed in the "mitigation plan" are INADEQUATE AND UNACCEPTABLE AS A MITIGATION. First, the existing trees have been there for four to six decades. The TINY SAPLINGS that would "replace" this lost

- I-718-1 The proposed Project would include some tree removal. As discussed in Project Description, Section 2.5.5 of the Draft EIR, the planting design for the proposed Project would be aligned with the City's New Green Deal goals of increasing tree canopy and protecting native biodiversity. Figure 2-8 of the Draft EIR includes a preliminary planting diagram. The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. The proposed Project would also comply with the City Tree Ordinance and RAP Tree Policy as discussed in the Project Description, Section 2.5.8, PDF-BIO-13 and PDF-BIO-14. Section 3.4 Biological Resources includes an analysis of tree removal and replacement requirements for the proposed Project. Please see Master Response – Biological Resources.
- I-718-2 The Draft EIR evaluates impacts to ecological resources including trees beginning on page 3.4-27. An assessment of impacts to trees being on page 3.4-35 of the Draft EIR. The Draft EIR concludes that with implementation of mitigation measures and compliance with local ordinances, impacts to the trees and existing ecology at the SLRC would be less than significant. The Project Description includes the implementation of a Tree Succession Plan that would schedule tree removals over time to allow for new trees to mature, reducing the loss of mature trees all at once. The proposed Project would increase the overall acreage of native habitats within the SLRC. Please see Master Response – Biological Resources.
- I-718-3 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-718 Jane Cook

	COMMENT	RESPONSE
I-718-3 Cont.	landscape would take MANY MORE YEARS, DECADES to attain any size approaching theirs. The existing trees were planted in an era of more rainfall that enabled their roots to grow down to the sustaining water table. The excess watering efforts required to get new trees to live may well outstrip city resources, and the new trees will die. The Project will present this Community with a BARREN MOONSCAPE of stunted, undersized trees that fail to provide aesthetics, shade, or biologic support of animal ecologies.	I-718-4 The Draft EIR Project Description includes a Tree Succession Plan that would outline methods to ensure trees are replanted over time to minimize disruptions to ecosystems currently in the SLRC. Successful plantings are assumed in the mitigation strategies that would focus on appropriate soil preparation and management of young vegetation to achieve high survival rates.
I-718-4	<p>Finally, the SOILS REPORT in this DEIR is DANGEROUSLY INADEQUATE. While we know there are no dead Native Americans buried here, there is NO INFORMATION as to how EFFECTIVELY THE SOILS IN THE COMPLEX WILL SUPPORT THE PLANTINGS proposed. Where are the ANALYSES of ORGANIC CONTENT of reservoir soils? Where is there mitigation of the effects of the many cubic yards of FILL that have been dumped there in the course of raising the Reservoir banks? What are the plant nurturance implications of "clayley silt" and "silty clays"? The DEIR FAILS TO DETAIL THE MASSIVE SOILS AMENDMENTS THAT WILL BE CRITICAL to make any of the lush imagined "rain gardens", "great lawns", replacement "tree groves" etc. thrive or even SURVIVE. Again, the FAILINGS OF THIS DEIR will leave the Silver Lake Community with a BARREN MOONSCAPE OF DEAD PLANTINGS.</p> <p>Of this, I speak with experience. I have worked hard at watering and prodding a financially overwhelmed city agency to do mulching to keep the trees along the southwest edge of the Reservoir alive. Several reliable arborists have told me my efforts are doomed. The soil never had the very extensive amendment it needed to support ANY vegetation, let alone trees. It has been a painful experience to see that much of my watering efforts have come to naught. it will be disastrous if this LACK OF EXPERT ANALYSIS IN PLANNING will be extended to the entire Complex.</p>	

I-719 Victor Marquez

COMMENT

RESPONSE

I-719-1 | An outdoor roller rink would be a great addition to the community! So many people have picked up the activity since COVID but there are very few spots in the city to safely skate.

I-719-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-720 David Gross

	COMMENT	RESPONSE
I-720-1	I would love to see a Roller Rink or a nice smooth concrete area to skate in.	I-720-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-721 Amparo Jelsma

COMMENT

RESPONSE

I-721-1

Please consider adding an outdoor rollerskating rink for the community. There are many parks for skateboarders but barely anything exists for the many people who rollerskate. We then wind up trying to skate in the plentiful basketball and tennis courts which always ends up in us getting kicked off the courts.

This is a sport that includes people of all ages, from small children to senior adults. Outdoor rollerskating and blading is not just for trails. Please give us a safe place to skate.

I-721-1

The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-722 Kelsey Guy

	COMMENT	RESPONSE
I-722-1	<p>Hello hello! I am a local skater and creative in Los Angeles and having a safe and local space to skate would be huge for people to have a fun creative outlet. There is a whole community of people in LA and beyond finding new zest for life on their rollerskates. The reservoir is already a great outdoor community space and I truly believe having a dedicated skate space could only elevate the positive effect of this public recreational space. Truly hope it will be considered and hopefully granted! Thank you for your time!</p>	<p>I-722-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a designated place to skate. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-723 Laura Sweet

COMMENT

RESPONSE

I-723-1 | An outdoor roller rink designated for recreational skating and not hockey would be a very useful part of community building activities for healthy families and bodies

I-723-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-724 Nick C

		COMMENT	RESPONSE
I-724-1	Rollerskating is a growing recreational activity loved by all ages young and older. Not constructing a rink would be missing out on an opportunity to be at the forefront of a movement towards the inclusion of all people's and types. Skating is artistic and expressive. Nothing but good energy.	I-724-1	The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-725 Cynthia Brown

COMMENT

RESPONSE

I-725-1 | Outdoor Skating Rink would be great great therapy.. Im 57 and still skate outdoor and in door 3 to 4 times a week. It's very therapeutic..

I-725-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-726 Alfred Bie

	COMMENT	RESPONSE
I-726-1	<p>No there should not be any development or consideration of expanding the Silver Lake neighborhood reservoir. Regardless of the veiled attempts at good faith community outreach and involvement there is nothing put forth in the DEIR or any of the planning, that has ever taken into consideration or made it an option to not exercise any project or pour good money after bad into expanding the Silver Lake neighborhood reservoir and turn it into something that it was never intended to be. There should not be any attractions or spaces for non-residents. At this point after all this nonsense a gated community seems more desirable.</p> <p>Do not build anything. Do not increase traffic. Do not increase pollution. Do not disturb the flora and fauna that already exists. Do not increase noise. Do not build anything.</p> <p>Spend your money where it is more urgent. Silver Lake doesn't need this.</p> <p>Leave the Silver Lake Reservoir Neighborhood reservoir alone.</p> <p>Sincerely, Alfred Bie</p>	<p>I-726-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>Also, please see Master Response - Community Engagement Process.</p>

I-727 Brittney Black

COMMENT

RESPONSE

I-727-1 | I have been born and raised in Los Angeles and have been rollerskating for over 10 years. I believe having an outdoor roller rink would be amazing and so useful to the community. Everyone could utilize from children to adults.

I-727-1 | The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-728 Sunterrah Palmer

		COMMENT	RESPONSE
I-728-1	You should consider putting in an outdoor roller rink in their Park & Rec section of the park.	I-728-1	The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-729 Alli Belli

	COMMENT	RESPONSE
I-729-1	<p>Hello: Please consider adding an outdoor roller skating rink space to this project. The skating community has grown by leaps and bounds and yet there are very few places within Los Angeles where the community can skate outdoors, safely and comfortably. We sincerely appreciate your consideration regarding this request. Kind regards, Alli Belli</p>	<p>I-729-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-730 Emy Christoffersen

	COMMENT	RESPONSE
I-730-1 Please build an outdoor rink for rollerskating	I-730-1	The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-731 Cynthia Hubach

COMMENT

RESPONSE

I-731-1

Silver Lake Reservoirs Master Plan DEIR Comments

December 16, 2022

Dear Bureau of Engineering,

Thank you for this thoughtful reimagining of the Silver Lake Reservoirs Complex as a high-value habitat area with a multiple opportunities for passive enjoyment and immersion in nature by the public, especially those in park-poor surrounding areas.

As a longtime resident of Silver Lake, I have long hoped for the transformation of the "tiger-striped" asphalt banks into wildlife-friendly terraces of native plants and wetlands. Indeed, after observing the failure of countless mallard duck families in the area, the idea of adding floating islands to the vast open water led me to an interest in the future of the reservoirs and increased community involvement.

We are presented here with a unique opportunity to transform what is essentially a decommissioned industrial facility into a natural oasis, a crucial resource for our beleaguered wildlife, and an example for cities around the world.

Elements I especially applaud and support

- Habitat islands and wetlands to provide undisturbed nesting and foraging for birds (2.5.1, p. 2-22), though I would advocate for even greater acreage for both
- 500 new trees (Urban Ecosystems and Resilience, 2-33)
- 50% increase in tree canopy coverage (Urban Ecosystems and Resilience, 2-33)
- Improved maintenance and security (2-5, 2.7.1 p. 2-49)
- Increase in native plants (2.5.5)
- Rain gardens and new wetlands plantings (2.3.2)
- Surface stormwater capture and natural filtration features (2.7.3, p. 2-57)
- Protected bike lanes and increased parking along Silver Lake Blvd (Option 1)
- Removal of invasive species

Elements for Concern or Reevaluation

1. The amount of grading called for in the expanded sloping Meadow is substantial and disruptive (impacts in terms of Soils, GHG, and Noise). A **reduced slope** or reimagined design in this area could preserve dozens of trees and shrubs, particularly those in the well-established native garden at the north end of the meadow. The native trees in this area are now well beyond 4" in diameter and thus deserving of protection. Even a 4:1 remediation scheme for these specimens, if lost, is insufficient and cannot replace a mature landscape of interconnected species. The many mature and significant trees slated for potential removal along Silver Lake Blvd. provide nesting sites for raptors, and

I-731-2

I-731-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-731-2 The proposed Project will result in direct impacts to native shrubs and trees regulated by the City Tree Ordinance, RAP Policy, and the BSS tree permit application. The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies and to minimize impacts to habitat values. The Tree Succession Plan would include the incorporation of native plants into the understory thus providing food sources and habitat for native wildlife including native sages (*Salvia* sp.) and milkweeds (*Asclepias* sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly respectively. The native plant species planting palette would take into account the surrounding habitat quality and site appropriateness.

The preparation of a Tree Succession Plan as outlined in Chapter 2, Project Description, calls for the phased removal of trees over 15 years to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Additionally, these trees can be selectively identified for removal thus avoiding trees with active rookeries, nests, and roosts. As the new tree plantings mature, new habitat would be established over time. The successional tree removal practice would ensure that nesting and foraging habitat would not be eliminated during implementation. Please see Master Response – Biological Resources.

I-731 Cynthia Hubach

COMMENT

RESPONSE

I-731-2 Cont.	shade and beauty for residents, and should also be given strong consideration against removal.
I-731-3	2. Native plants and tree species should be given priority over non-native plants, in habitat areas and "Ornamental Gardens." This will better align it with section 2.5.5 Planting (2-30) with PDF-UTIL-1: Drought-Tolerant Landscaping (2-39).
I-731-4	3. The suggested planting of a " single tree species " along the Promenade should be further reviewed given the susceptibility of any given species to pests and disease.
I-731-5	4. Walnut habitat assessment (4.3, p. 22). Arborists and biologists will document this better than I can, but the assessment of the black walnut population on the knoll in the dEIR downplays the significance of these trees to native fauna, and as a keystone species for the entire ecosystem. They must be protected to the greatest extent possible.
I-731-6	5. The DWP recently scrapped plans to divert stormwater from our surrounding hills into the reservoirs (the high cost was cited) but given the raingardens and biological filtration included in the Master Plan, a reassessment of stormwater diversion would seem to be in order.
I-731-7	6. Eliminate any use of the park as an event venue with amplified sound. Experience has shown us that amplified sound in the meadow is highly disruptive to a surprisingly large area of the surrounding community.
I-731-8	7. Open the park only during daylight hours and to protect wildlife, eliminate or minimize any plans for artificial lighting.
I-731-9	8. Conduct a thorough census of resident birds, mammals, and significant insects with the objective of creating specific habitat and wildlife goals. Do we know that the habitat being planned will benefit the species who live here or could potentially live here? Will we attract or support any endangered species? (useful for funding!)
I-731-10	9. Minimize hardscape to the extent possible (there is a lot of cement in this plan). We need permeable surfaces to recharge groundwater and to add to the atmosphere of an unspoiled habitat for wildlife and a place of passive recreation and contemplation for people.
I-731-11	Thank you for your thoughtful work and for this opportunity to reflect on and respond to it. Best regards, Cynthia Hubach Kenilworth Ave., LA 90039

I-731-3	The comment requests that native vegetation be used. The Draft EIR concludes that the proposed project would increase the native habitats and vegetation on site and enhance ecological values and wildlife diversity compared with existing conditions. Several project design features and mitigation measures have been developed that minimize impacts to biological resources during construction and operation. The Draft EIR concludes that the removal of the perimeter fence would increase access to the water for wildlife compared to exiting conditions. Please see Master Response - Biological Resources.
I-731-4	The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies and to minimize impacts to habitat values. The Tree Succession Plan would include the incorporation of native plants into the understory thus providing food sources and habitat for native wildlife including native sages (<i>Salvia</i> sp.) and milkweeds (<i>Asclepias</i> sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly respectively. The native plant species planting palette would take into account the surrounding habitat quality and site appropriateness. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-731-5	The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies, and to minimize impacts to habitat values. The Tree Succession Plan would include the incorporation of native plants into the understory, thus providing food sources and habitat for native wildlife.
I-731-6	The comment expresses concerns related to stormwater diversion. Stormwater diversions into the reservoirs would be subject to water quality objectives outlined in Table 3.10-2 of the Draft EIR. Stormwater BMPs such as bioswales and the proposed wetlands would assist in maintaining stormwater quality. As described in Section 2.7, Project Operations and Maintenance, and PDF-UTIL-3, decentralized drainage strategies would be incorporated into the design of the proposed Project. The natural bioremediation processes present in the wetland plants and soils would filter out contaminants in water, and are a treatment control BMP as described in the LACDPW LID Standards Manual.

I-731 Cynthia Hubach

COMMENT

RESPONSE

In other areas, stormwater runoff would be treated by infiltration gardens located throughout the SLRC. Stormwater falling on the outer boundary of the SLRC would drain southwest to the Ballona Creek watershed similar to existing conditions and routed into the municipal stormwater system, and would be required to comply with the standards of the MS4 permit and LADPW Hydrology Manual discussed in Section 3.10.2, Regulatory Framework. With implementation of the decentralized drainage strategy and compliance with MS4 and LADPW requirements, the water quality impacts of the proposed Project related to stormwater runoff would remain less than significant.

I-731-7 Please see Master Response - Noise.

I-731-8 As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

The Recreation Center, located in the South Valley is operated from 9:00 a.m. to 9:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, and is closed on Sundays. Operational hours for the South Valley facilities would not change with implementation of the proposed Project. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance. Operational hours for the Dog Park would not change with implementation of the proposed Project.

I-731-9 This comment expresses concern regarding impacts to wildlife species. All wildlife species identified are provided in Appendix D of the Draft EIR. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures and project design features. Mitigation measures and project design features specific to blue herons include: Mitigation Measure BIO-1 and PDF-BIO-2.

I-731 Cynthia Hubach

COMMENT

RESPONSE

- I-731-10 As described in Hydrology and Water Quality, Section 3.10.5 of the Draft EIR, operation of the proposed Project would result in direct alteration of the landscape, including approximately 11.5 acres of asphalt paving that would impact the site's capacity for groundwater recharge. The addition of paving would reduce recharge within the footprint of the new pavement. However, the proposed Project would implement a decentralized drainage strategy to redirect that stormwater into the reservoirs. The existing footprint of the reservoir would continue to be a source of recharge to groundwater at existing levels through seepage as the bottom of the reservoir would not be altered. Any reduction in seepage to the groundwater basin from within the unpaved park areas would be negligible. Further, stormwater on the outer boundaries of the SLRC would runoff into the existing storm drain network to the Ballona Creek Watershed or infiltrate into the ground similar to existing conditions. Site improvements would be required to comply with applicable MS4 regulations.
- I-731-11 This comment is conclusory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-732 Roberto Ramirez-Franco

COMMENT

RESPONSE

I-732-1 I love the new plans for improvements of this public space. With improvements should come considerations of what is needed in the community with changing times. Roller skating has become very popular recently and as a skater myself I can say the rollerskating community isn't going anywhere. With that said, a space for such activity would benefit the community by making rollerskating accessible, keeping the surrounding rollerskate community off the streets, keeping law enforcement focused on their job and not responding to break up a rollerskate session for simply using a space not intended for rollerskating, and many more.

I-732-2

I-732-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-732-2 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller-skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-733 Jane Cook

COMMENT

RESPONSE

THE "EDUCATION CENTER" IS A COST WITH NO BENEFIT

This "Education Center" was first desired by certain people as an Event center, which VIOLATES the City's Open Space plan for the Reservoirs Complex. "Education" facilities, however, are a permitted incursion. In addition, it was pointed out that the truly outsize expense and severe impacts (grading and destabilizing the nose of a hillside, installing a "planted roof") could be covered by grants -- if those grants were for "education." Thus, this is a dishonest, deceptively conceived element in the Project. The DEIR does not address this issue at all.

it is probable that this purported "Education Center" would in fact, devolve to use as an event center (with attendant noise and parking impacts) since few educators would actually use it, let alone justify its cost. The bathrooms it contains can be provided by far less environmentally impactful, costly alternatives. I am a teacher who has assisted in field trips taken by science teachers. THEY DO NOT WANT AN INDOOR FACILITY FOR NATURE EDUCATION. The Audubon Society built a facility for educational use. A perusal of their schedule shows that the building is overwhelmingly used as a rented-out event center. Audubon tours take off from there, but are all conducted OUTDOORS over the expanse of Debs Park. The Nature Study organization at the Ballona Wetlands militated against an offered Annenburg grant for a similar education building, because they said it would cost too much habitat space, and they DID NOT NEED AN INDOOR FACILITY AT ALL FOR NATURE EDUCATION.

in addition, I have queried LAUSD area directors of Outdoor education. None expressed any interest or intention to use such a building as this proposed "Education Center." The DEIR, in anticipating future impacts of this spuriously conceived element, should have conducted a "needs assessment" for such an impactful, environmentally costly building. The DEIR has NOT done this, and in its dereliction, is gravely inadequate.

I-733-1

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents. This includes providing education benefits via the education center.

This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. The commenter is also referred to Master Response – Noise.

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - EIR Recirculation Requirements.

I-734 Gerry Hariton

COMMENT

RESPONSE

December 16, 2022

I-734-1

We are longstanding homeowners in Silver Lake who have participated in the many community meetings and stakeholder workshops during the Master Plan development process. As Production Designers with extensive experience with huge multi-faceted projects, we are trained to see things simultaneously from aesthetic, logistical, and practical viewpoints.

Whereas many of the aspirational ideas in the proposed Master Plan are compelling and desirable, we feel that an essential part of the equation was almost entirely ignored in the Master Plan proposal, and by extension, in the DEIR. We refer to the fact that the SLRC sits in the middle of a quiet residential neighborhood. Much of the charm and allure of the community is how it is closely intertwined with the tranquility and natural beauty of the reservoir.

We admire the beautiful renderings in the Master Plan proposal. We do renderings like these for a living, and are acutely aware of their seductive power. But we also know the risks of overreaching without thoroughly considering all the consequences. We, and most of our neighbors, have concerns that the magnitude of the proposed project has huge potential to permanently diminish or destroy the simple, placid nature of the community.

The DEIR identifies short-term negative impacts of the Master Plan project on the community during construction, but we find the findings to be inadequate.

During construction, the impact and deleterious effects of the noise, dust, vibration, and traffic congestion will be inflicted on the adjacent neighborhood for an indeterminate amount of time. Although the mitigation methods cited in the DEIR would attempt to keep a few of these things within legal limits, we contend that the cumulative, aggregate stress placed on this quiet community will be much more significant than estimated in the DEIR.

I-734-2

We offer an example from our first-hand experience as residents overlooking the SLRC. The reservoir was drained in the summer of 2015 for the bypass pipeline project. It was projected that it would be empty for one year. During the construction process, we observed daily attempts to mitigate the dust by spraying of water on the construction areas. Nonetheless, we were not able to open our windows for the entire duration of construction because of the ever-present and significant dust and noise. As usually happens, the project took longer to complete and the reservoir was not refilled until summer of 2017, twice the original prediction.

There is a lack of clarity in the DEIR as to the potential duration of construction, and we can find no mention of how long the lake would have to be drained. We believe that all environmental impacts of the construction process should be more closely evaluated and considered, as part of the full picture.

1 of 2

I-734-1

This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-734-2

As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

I-734 Gerry Hariton

COMMENT

RESPONSE

I-734-3

The DEIR also identifies potential long-term negative impacts after completion of the project, which, primarily as a result of increased Park attendance, include:

- Increased noise
- Increased traffic, not only on the main thoroughfares adjacent to the park, but in the surrounding residential streets.
- Increased demand for parking, not only on the main thoroughfares adjacent to the park, but in the surrounding residential streets.

I-734-4

I-734-5

However, we find all these findings to be grossly underestimated in the DEIR.

I-734-6

Regarding traffic and parking, we question the sampling methodology, as our daily first-hand observations of traffic and parking patterns on the residential streets adjacent to the SLRC contradict their conclusions. We see the potential for serious problems with increased volume.

I-734-7

Another thing we notably find astounding is the lack of a perimeter fence in the full Master Plan proposal.

I-734-8

We firmly believe that it is naïve and irresponsible to not have enforceable hours of operation and a barrier against crime, vandalism, noise, and homeless encampments within this vast proposed park immediately surrounded by residential streets. We find the research and conclusions of the DEIR team regarding crime in city parks in general, and this location in particular, to be totally insufficient and their conclusions to be severely flawed. More study of this topic is needed.

I-734-9

We maintain that not only is the perimeter fence essential for both the community and the wildlife within the park, but there are enormous creative opportunities for this fence to be an artistic and iconic feature of the park. Referencing the Great Heron Gate at the Fletcher Drive Bridge entrance to the Los Angeles River, we can envision a well-designed fence with each of the various entrances to the park being a sculptural tribute to the various species of wildlife within the park. It would be a visual enhancement as well as providing much-needed security.

I-734-10

The full Master Plan project is overly ambitious. Obviously, one way to ameliorate the negative effects on the residential community, both during construction and after completion, is to reduce the scope of the project.

Therefore, we do not endorse the full Proposed Project, instead preferring a more measured approach. A plan such as *Alternative Hybrid 3+2* as proposed by Silver Lake Wildlife Sanctuary, is closest to our way of thinking. It is not only an environmentally superior plan, but also a more fiscally responsible, more achievable, and certainly more cognizant of, and respectful to, the needs of the surrounding community.

Gerry Hariton and Vicki Baral
1953 Rockford Road
duo@designduo.com

2 of 2

I-734-3

This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. The commenter is also referred to Master Response – Noise.

I-734-4

Please see Master Response - Traffic/Transportation.

I-734-5

As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

I-734-6

Please see Master Response - Traffic/Transportation.

I-734-7

Please see Master Response - Fence Removal.

I-734-8

Please see Master Response - Public Safety.

As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. Operations would not require additional fire or hazard services such that substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities would occur. LAFD would be able to serve the proposed Project and would not result in the need for new or altered fire facilities. In addition, the proposed Project was designed in order to allow LAFD to continue to use the reservoir for water for emergency purposes as outlined in Section 3.14, of the Draft EIR.

LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. The proposed Project is being designed to include wetland habitat and other edge treatments, where feasible, around the reservoir that would allow separation from the public to the water's edge. In the unlikely event that someone would enter the reservoir water, these wetland areas and edge treatments would also provide places where one could exit the reservoir (as

I-734 Gerry Hariton

COMMENT

RESPONSE

opposed to the current smooth surface and slope of the concrete walls). During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.

I-734-9 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Draft EIR section 3.1 for discussion on Aesthetic impacts.

The proposed Project, described in Chapter 2 of the Draft EIR, would not include this use. The comment is noted and does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - Fence Removal.

I-734-10 The comment expresses support for a hybrid alternative. Please see Master Response - Alternatives Analysis.

I-735 Becky Patel

I-735-1 | I would like to make a request for an outdoor roller rink

COMMENT

I-735-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-736 Elisa Cortez

COMMENT

RESPONSE

I-736-1 | Please, we NEED this! If you build it they will come.

I-736-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-737 Sylvia Cziglenyi

		COMMENT	RESPONSE
I-737-1	Please consider building an outdoor roller skating rink in the park. It would be a great use of the space that would encourage physical activity and bring people together.	I-737-1	The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller-skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-738 Gary Byrd

COMMENT

RESPONSE

I-738-1 | you all should consider putting in an outdoor roller rink in their Park & Rec section of the park.

I-738-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-739 Joan Watanabe

COMMENT

RESPONSE

I-739-1	<p>To Whom It May Concern,</p> <p>I'm a long time Silver Lake resident and live a block away from West Silver Lake Blvd. I've experienced many outcomes to the community and wildlife with the creation of the walking path, opening of the meadows, and drainings of the reservoirs. I'm in favor of no improvements to the reservoir or any of the alternatives.</p> <p>The project is the creation of a city park and special events venue for an area that's not in high need of one. There already exists many surrounding parks in nearby areas. The project is a spectacular waste of funds that could better serve the community for things that are more urgent.</p>	<p>I-739-1 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.</p>
I-739-2	<p>I cannot support the scale of the project's construction which will create unwanted noise, dust, and traffic to local residents and for an unknown amount years. After project completion, there will be an increase of traffic and special events noise in the residential area.</p>	<p>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-739-3	<p>Creation of a bike lane and parking on Silver Lake Blvd. will add traffic congestion during high volume traffic times. Silver Lake Blvd. is already backed up during rush hour. It's impacted by rush hour traffic on Rowena and Glendale Blvd. as well.</p>	<p>I-739-2 This comment addresses various construction impacts. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.</p>
I-739-4	<p>The current proposal offers a possible fitness area, new walkways, viewing area, more seating, new landscaping, access to wetlands, lighting, speaker system for special events. Support for wildlife and creating a space for migratory birds are a slim afterthought. More area access for humans, increased human activity, as well as closer access to wildlife habitats will disturb and impact wildlife protection. Construction will disturb and displace existing wildlife. Their habitats will be unnecessarily destroyed for new landscaping. Older trees add to the biodiversity, it's unknown as to what will happen to them.</p>	<p>As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. Table 2-3 of the Draft EIR lists total construction durations for each proposed park zone. For the purposes of the environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.</p>
I-739-5	<p>With increased human activity, what real guarantee will there be for regularly securing the reservoir in the evening? As of now it's very inconsistent.</p>	<p>Please see Section 3.12, Noise of the Draft EIR for a discussion on the proposed Project's noise impacts and Section 3.3, Air Quality, for a discussion on the dust impacts associated with the proposed Project.</p>
I-739-6	<p>Joan Watanabe</p>	

I-739 Joan Watanabe

COMMENT	RESPONSE
I-739-3	Please see Master Response – Noise, Master Response - Traffic/Transportation, and Master Response - Parking/Bike Option.
I-739-4	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-739-5	This comment expresses concern regarding impacts to biodiversity. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. The commenter is also referred to Master Response - Biological Resources.
I-739-6	Please see Master Response - Public Safety.

I-740 Jane Cook

COMMENT

RESPONSE

	NO "MULTIPURPOSE FACILITY" IN SOUTH VALLEY!		
I-740-1	The "Multi-Purpose Facility" planned in the South Valley is potentially a problematically impactful feature of the project. Yet, absolutely no analysis of its "purposes" at all has been conducted in this DEIR! Gatherings of people are implied; the traffic and parking impacts in this congested area would be prohibitive. Would parties and dances be permitted? The noise and litter implications would be profound. This, of course, in addition to all of its construction impacts. Unroofed green space would be far more useful, enjoyed and environmentally harmonious. Look at the numerous people who now love to relax on the green shaded lawn on the west side of the south valley. This is the use this Community wants. More intensive use of this area, of course, has brought a parking plan has been roundly rejected as dangerous and inadequate in previous comments. The DEIR has egregiously failed to assess either the uses, the resultant impacts, and the better ALTERNATIVES that exist for the space devoted to the south valley Multipurpose center.	I-740-1	The comment expresses opposition to the proposed Multi-Purpose Facility. As a component of the proposed project, the Multi-Purpose Facility is analyzed throughout Chapter 3 of the Draft EIR. As discussed in Section 2.7.2 of the Draft EIR, the RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions and closed on Sundays. This comment does not raise any specific issues with respect to the content of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-740-2		I-740-2	As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park.
I-740-3			Please see Master Response – Noise.
I-740-4			The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-740-5		I-740-3	As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. For the purposes of the environmental analysis, a 2-phased approach was developed in order to capture the worst-case scenario, where the maximum amount of construction may be occurring simultaneously. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
			Construction impacts of the proposed Project are analyzed throughout Chapter 3 of the Draft EIR.

I-740 Jane Cook

COMMENT

RESPONSE

This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

I-740-4 The proposed Project, described in Chapter 2 of the Draft EIR, would include lawn areas. Also, please see Master Response - Parking/Bike Option. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-740-5 Please see Master Response - Alternative Analysis.

I-741 Betty Lourie

	COMMENT	RESPONSE
I-741-1	<p>Please, will you consider adding an outdoor roller skating? It is a wholesome activity for all ages, and it really brings people together. There is a community of rollerskaters who represent Los Angeles in all its diversity - end it would be wonderful to have a safe outdoor space for skating on the east side.</p> <p>Thank you for your consideration!</p>	<p>I-741-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a designated rolling skating area. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-742 Rochelle Peterson

COMMENT

RESPONSE

I-742-1 | Please please please. A roller skating rink! Every other sport has access to a space that caters to their needs. We lack safe places to skate. Rinks are beyond limited in this area. There is one rink which is very costly if you skate on a regular basis and there are so many people skating now! There are seven parks dedicated to skate boarding but none for roller skaters. We really need this. It will help out youth have a healthy and fun option as well. Thank you.

I-742-1 | The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-743 Jesse Southern

	COMMENT	RESPONSE
I-743-1	Los Angeles could really use a roller rink for hockey, roller skating, and derby! Many of our rinks shut down in 2020, and with such a huge surge in skating a new rink would offer a safe space for everyone to skate.	I-743-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-744 Jesse Southern

COMMENT

RESPONSE

I-744-1 | Los Angeles could really use a roller rink for hockey, roller skating, and derby! Many of our rinks shut down in 2020, and with such a huge surge in skating a new rink would offer a safe space for everyone to skate.

I-744-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-745 Paige Hubbard

	COMMENT	RESPONSE
I-745-1	<p>Please consider adding a place for roller skaters to peacefully skate. Finding areas to roller skate is very difficult and we would love to be included in the plans. The only designated outdoor roller skating area in all of LA is Venice Beach dance plaza, which is very difficult to get to for some folks. Rollerskating is a wonderful, artistic activity that serves as a great way to meet friends and exercise. Our sport is often overlooked, and given its popularity in recent years, it's an expanding activity that needs attention. Thanks so much for your consideration!</p>	<p>I-745-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a designated area for roller skating. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-746 Laurie Pepper

COMMENT

RESPONSE

Dear Bureau of Engineering

Our tree canopy is vital for a livable Los Angeles .
Please back off on the harm proposed to our trees.

Thank you
Hugh Kenny
Silver Lake Neighborhood Council Green Committee

I-746-1

The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time.

The commenter is also referred to Master Response - Biological Resources, Tree Removals.

The attached table is noted for the record. Furthermore, under the referenced Council File, 15-0499-S2, the City Council has instructed City departments to prepare a report on biodiversity strategies, and no ordinance has been proposed or adopted.

I-746-1

This attached table was taken from Council File
15-0499-S2
Tree Canopy Ordinance Protection

This motion passed City Council and is waiting for a report back for implementation.s

Every Council District is deficient in tree canopy and this Silver Lake project creates no canopy (planted trees take 20 years to catch up to what they remove) . They are diminishing the existing canopy.

Please feel free to use this table and council motion in your comment on the Silver Lake project that will remove trees and create no housing. Plus the building of ADUs causes tree removals and backyard trees were supposed to compensate for the lack of park trees.

--

I-746 Laurie Pepper

COMMENT

RESPONSE

I-746-2 Attachment noted.

The shortage of trees is illustrated by the **very low tree canopy coverage percentages in all Council Districts**. As noted in the *Los Angeles Urban Forest Equity Streets Guidebook* prepared in April 2021 by CAPA Strategies, the following chart provides the tree canopy coverage distribution by Council District, with very low percentages Citywide, as follows:

Council District	Tree Canopy Coverage Percentage
15	10.03%
9	11.71%
8	12.20%
10	15.46%
6	15.68%
14	15.80%
13	18.56%
1	20.36%
12	20.59%
2	24.99%
7	25.16%
3	25.61%
5	35.20%
11	36.43%
4	36.66%

I-746-2

I-747 Elizabeth Fillmore

COMMENT

RESPONSE

I-747-1 | Yes please more outdoor skate spaces

I-747-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a skating area. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-748 Elizabeth Fillmore

	COMMENT	RESPONSE
I-748-1 Yes please more outdoor skate spaces	I-748-1	The proposed Project, described in Chapter 2 of the Draft EIR, would not include a skating area. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-749 Elena Siantz

COMMENT

RESPONSE

I-749-1 | Please utilize some space for roller rink- the skate community (roller hockey/ roller skating/ roller derby) in the area is huge!

I-749-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-750 Elena Siantz

	COMMENT	RESPONSE
I-750-1	Please utilize some space for roller rink- the skate community (roller hockey/ roller skating/ roller derby) in the area is huge!	I-750-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-751 Mike Krose

COMMENT

RESPONSE

I-751-1

Construction vibrations are considered more significant by local residents that BOE. The possible effects on the dams, however, cannot be overlooked, and most definitely, must not be underestimated. The dams are obviously closer to the construction vibrations than the residents, and must be given strong consideration. Despite DSOD's courtesy visit, BOE must develop and publish a regular schedule for DSOD visits to guarantee the safety of the dams and the residents living below.

I-751-1

Please see Geology, Soils, and Mineral Resources, Section 3.7.5 of the Draft EIR for discussion regarding Seismic Ground Shaking and DSOD recommendations.

I-752 Nancy Torres

I-752-1 | For the people 🌱

COMMENT

I-752-1 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-753 Genevieve Lozano

COMMENT

RESPONSE

I-753-1 | Yes please build a rollerrink that would be great!!

I-753-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-754 Mike Krose

		COMMENT	RESPONSE
I-754-1	The Scoping Comments offered for consideration in the preparation of the DEIR offered, I some cases, expert recommendations for the writing of the report. One stunning report was presented by the California Department of Fish and Wildlife. It seems that a good portion of their expert advice was ignored, somehow, not finding its way into your report. Specifically, construction and operational effects on Monarch Butterflies, invasive fish species, fencing, and parameters for raptor and other bird and wildlife species during reproductive cycles seem to be absent or under-considered. Silver Lake Wildlife Sanctuary commissioned several expert contributors who found this DEIR seriously lacking. Their recommendations deserve more respect than the CDFW received.	I-754-1	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. The Draft EIR considers the regulatory authority of the California Department of Fish and Wildlife throughout the analysis. The Draft EIR identifies the monarch butterfly on page 3.4-13 as potentially present and includes Mitigation Measure BIO-2 Preconstruction Surveys and Mitigation for Crotch’s Bumble Bee and Monarch Butterfly to ensure that any potential impacts are avoided, minimized, or compensated. Since the reservoir is not a natural waterbody, invasive fish were not identified as a potential impact of the proposed project. Migratory and nesting birds are assessed on page 3.4-29. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-754-2	It is for this reason that I feel that the BOE needs to redo and recirculate a new Draft Environmental Impact Report for consideration.		Please see Master Response - Fence Removal and Master Response - EIR Recirculation Requirements.
		I-754-2	Please see Master Response - EIR Recirculation Requirements.

I-755 Mike Krose

COMMENT

RESPONSE

I-755-1 Table 2-4 in Chapter 2, Project Description, discusses the Equipment List, which included backhoes, jackhammers, excavators, dozers, graders, cement/mortar mixers, forklifts, cranes, trucks, trenchers, and tractors, among all the others. In Chapter 3, Environmental Setting, Impact Analysis, and Mitigation, Section 3.12, Noise and Vibration, impacts are discussed. This section is an exhausting, selfish, underestimated list of the impacts of noise and vibrations that we will have to endure. We, the local receptors, will be bombarded by this painful, unhealthy barrage of stimuli for years. We are told that the folks living closer, as close as 45', to construction will get it the worst, but it will be worth it. We are told the topography of the area has hills, but the farther away from the construction, the less impact, ignoring the fact that noise travels uphill, which will enlarge the effected area. The impacts that we will endure are unconscionable, and it is unimaginable that you, who do not live here, can tell us this will all be worth it.

I-755-2 With respect to vibrations, the underestimation of effects is no less stunning. But one last comment. The possible effects on the dams cannot be overlooked, and most definitely, must not be underestimated. Despite DSOD's courtesy visit, BOE must develop and publish a regular schedule for DSOD visits to guarantee the safety of the dams and the residents living below.

I-755-1 This comment expresses concern regarding noise and vibration impacts. Noise and vibration impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Also, please see Master Response - Noise.

I-755-2 As described in Geology, Soils, and Mineral Resources, Section 3.7.12 of the Draft EIR, the reservoirs have undergone several seismic stability improvements to ensure safety in the event of an earthquake, including using modern compaction methods based on recommendations of the Division of Safety of Dams (DSOD). As the proposed facilities would be founded on bedrock underlying the proposed Project site, well-designed structures are not anticipated to experience serious damage or collapse.

I-756 Blair Dowis

I-756-1 | Would love to see a roller rink in this space!

COMMENT

I-756-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-757 Oscar Garza

COMMENT

RESPONSE

I-757-1 I have owned my home just off the north end of the reservoir since 1996 and have seen many changes in the neighborhood, which have resulted in a dramatic increase in traffic. The full-scale development of the lake property would make things exponentially worse. Silver Lake is not a "park-poor" neighborhood and doesn't need these so-called "improvements." I am not opposed to modest changes to enhance the reservoir property, but nothing that would add parking or allow noisy events to take place. There's nothing wrong with the reservoir remaining a low-traffic oasis instead of an attraction that would draw hordes of people. I hope the powers that be are sensible about this matter.

I-757-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Section 3.16, Transportation, of the Draft EIR discussed impacts of the proposed Project related to traffic and transportation. Also, please see Master Response - Traffic/Transportation.

I-757-2 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

I-757-3 Please see Master Response - Noise.

I-757-4 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-758 Caroline H Mankey

COMMENT

RESPONSE

I-758-1	I have been a stakeholder and homeowner on West Silver Lake Drive across the street from the Silver Lake Reservoir for over 25 years, since 1997. I am deeply concerned about the failure of the DEIR to adequately address the impacts of the following proposed changes to the Silver Lake Reservoir community:	758-1	This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-758-2	1. Noise: The impact of ANY additional noise cannot be overstated. The area around the Reservoir is a canyon and noise echoes through it at all hours of day and night. During the recent Elton John concerts at Dodger Stadium, the noise was so loud when I was trying to go to sleep that it sounded like it was on my front deck on West Silver Lake Drive. My next door neighbor texted me to ask which of our immediate neighbors was playing the loud music late at night. This negatively impacts both the residents of the community and the wildlife. The prospect of having construction noise and/or noise from events at new facilities around the Reservoir is unfair and deleterious to the neighborhood's residents.	I-758-2	Please see Master Response – Noise.
I-758-3	2. Parking: Adding parking spaces at the south end of the Reservoir on West Silver Lake Drive would have tremendously deleterious effects to the community. As it is, there is too much traffic on West Silver Lake Drive and Van Pelt near the Rec Center and the picnic grove such that cars can't get past, cars are trying to make illegal u-turns, cars consistently run the stop sign at Van Pelt and West Silver Lake Drive, and all of this puts the pedestrians and particularly the children at high risk. There are already too many cars speeding down West Silver Lake Drive, running stop signs, and squealing around the curves at the south end of the Reservoir late at night. These cars hit small animals at night, create noise, congestion, pollution, and a hazard to the many pedestrians. We absolutely should not encourage more of them.	I-758-3	This comment expresses concern regarding parking and traffic impacts. As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option and Master Response - Traffic/Transportation.
I-758-4	3. Necessary services: Adding parking and other new facilities around the Reservoir would require the dedication of substantial additional services, including garbage collection, janitorial services, police patrols, maintenance, and more. These services, too, will add to the congestion and noise that the additional development would bring to the neighborhood.	I-758-4	Please see Master Response - Parking/Bike Option.
I-758-5	4. Crime: As it is, the Reservoir draws people who leave litter on the street and sidewalk in front of my house on West Silver Lake Drive -- and on my front stairs -- every single day. This often includes empty alcohol bottles and drug paraphernalia. My white retaining wall also gets tagged with graffiti several times a year. Attracting more people to the area will attract more littering, graffiti, and other vandalism and crime.		As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.
I-758-6	5. Fencing the Reservoir: The Reservoir absolutely needs a fence. Once every		The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
			Please see Master Response - Traffic/Transportation.
		I-758-5	As described in Public Services Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Police Department. LAPD would be responsible for crime prevention, law enforcement, and apprehension of suspected violators in the

I-758 Caroline H Mankey

COMMENT

RESPONSE

I-758-6
Cont.

few years, someone gets over the fence and goes for a swim in the Reservoir. The last time I am aware of it happening was in the summertime when it was warm and the man still suffered hypothermia within a very short time and had to be rescued, because it is difficult or impossible to get back out of the Reservoir once in. Without a fence, the Reservoir would be a legal nuisance, frequently attracting and inviting people who think a dip in the water would be refreshing or fun, creating both liability for the City for creating a legal nuisance that is hazardous for people, and incurring high costs to the City for rescuing individuals and paying liability claims. The fence must be wildlife friendly in order to satisfy the project objectives and it should also be aesthetically pleasing to satisfy the needs of the community. In summary, many of the aforementioned concerns have not been addressed adequately, or at all, in the DEIR. As the proposed project presently stands, it does not meet numerous project initiatives of preserving the character and integrity of the neighborhood, protecting and enhancing the wildlife habitat, and benefitting the area residents. Please further analyze the impacts of this project and reconsider it in its entirety. Our quiet neighborhood with its narrow streets and peaceful atmosphere cannot accommodate a project of this magnitude.

proposed Project area. The Northeast Community Police Station would be able to serve the proposed Project and would not result in the need for new or altered police facilities. During operation, the proposed Project would incorporate an Operations and Maintenance Plan, which would include security considerations, to address the safety of park visitors. Staff would have a daily presence within the proposed Project area to provide oversight of the proposed Project area. The proposed Project assumes that five full-time staff would be required daily at the proposed Project area.

As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-758-6 Please see Master Response - Fence Removal.

I-759 John Wingler

COMMENT

RESPONSE

I-759-1 I fully support the master plan process and the Draft EIR. If anything, we
I-759-2 recommend replacing the fence, but keeping one in place. We also believe
I-759-3 closing the internal paths from dusk to dawn would be beneficial to the
I-759-4 community, as they are now. Thank you for the great work! Well done.

I-759-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-759-2 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a fence around the perimeter of the site. Please see Master Response - Fence Removal. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-759-3 As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. As shown on Figure 2-8 of the Draft EIR, certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove and these habitat areas would be closed at night.

I-759-4 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-760 Jane Cook

COMMENT

RESPONSE

TRAFFIC ANALYSIS OF DEIR IS GROSSLY INACCURATE

The traffic projections, and parking mitigations proposed in the present DEIR are fundamentally, entirely UNDERCOUNTED, INADEQUATE AND WRONG. At the present time, even with the greater lane widths now enjoyed on Silver Lake Blvd. the gridlock is at the breaking point on weekdays. Adjoining narrow residential streets are even now unsafe for several hours on most days. There was a fatality and several totaled cars on Westerly Terrace, which was once a quiet, narrow back street. Many units of additional housing are in the works on Sunset Blvd. This will impact movement on Silver Lake Blvd. as well. "Mitigating" by narrowing lanes, and attempting to cram more parking onto Silver Lake Blvd. will be disastrous. Putting bike lanes into this mix will invite horrible accidents. Adding to all this, projections of user/auto numbers at the Reservoir park spaces are widely regarded as woefully low. This DEIR fails to see a traffic Armageddon if this Master plan is built out as written. Mass transit and possible bike travel is grossly inadequate to prevent this. Many of the people coming to the park bring dogs and small children. The DEIR must immediately explore the factors of surrounding density, speed of travel and rush times far more thoroughly to protect public safety. Less intensive use Alternatives 1, 2, or 3 are the only possible effective mitigations.

I-760-1 This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Please see Master Response - Traffic/Transportation.

The comment expresses support for Alternatives 1, 2, and 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-761 Edward Songaila

	COMMENT	RESPONSE
I-761-1	<p>Hello!</p> <p>Please consider using the park and rec space for an outdoor roller rink! There is only one small space in Venice Beach for roller skating so it would have a huge impact to have another space on the east side for roller skaters!</p> <p>Thank you, Ed</p>	<p>I-761-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-762 Joan Harrison

COMMENT

RESPONSE

Comments regarding the Silver Lake Project DEIR

I-762-1 After studying the DEIR, and concerns and recommendations by the California Department of Fish and Wildlife, Amanda J. Zellmer, Associate Professor of Biology, Occidental College, Dr. David S. Cooper, PhD of RCDSDMM, the Los Angeles Audubon Society's Statement on the Future Management of Silver Lake Reservoir, and SLWS, I believe that the draft DEIR is inadequate and cannot be accepted under CEPA>.

The DEIR does not provide adequate data on the numbers of existing birds, both migratory, (example, the thousands of Gulls I see each winter) and nesting, (Great Blue Herons, Horned Owls, Red-Tailed Hawks) mammals, and Monarch butterflies.

The report also undercounts, or does not provide adequate data on sensitive, native plant species, especially pollinators.

The DEIR does not adequately address the impact of proposed development on sensitive habitat, native plant community areas, such as the Knoll. The plan does not provide adequate data on the outcomes of human encroachment upon habitat/roosting areas, such as the eucalyptus grove, which is a documented nesting/roosting area for both Red Tailed Hawks and Great Blue Herons.

I-762-2 Also, the use and impact of additional lighting and noise, especially at night, is not adequately addressed in the DEIR. Department of Fish and Wildlife notes this.

The issue of wildlife-friendly fencing is dismissed in the DEIR, which is unacceptable.

I-762-3 While I am not a biologist or botanist, I do not understand how it is acceptable to make claims about proposed alterations to the habitat/nesting/roosting, native plant community areas and open water spaces without citing evidence as to how alterations would be in harmony with existing fauna and flora at the site.

I-762-4 We are in the middle of a massive, decades long, bird and insect die-off. The revisions to the Silverlake Reservoir MUST preserve and increase safe habitat/nesting/migratory resources for wildlife species.

I-762-5 I do not believe that the DEIR is rigorous enough, to be accepted under CEPA. I believe that the DEIR must be revised and re-submitted for comments.

I believe that the City must choose one of the 3 alternatives contained in the DEIR>

I-762-6 I agree with SLWS that their proposed alternative, Hybrid 3=2* would provide human access to the site without causing harm to the rich, diversity of creatures and flora who depend upon the Silver Lake Reservoir Complex for survival, not just recreation.

Thank you,
Joan Harrison

I-762-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. The Draft EIR characterizes the ecological values of the existing conditions at the SLRC and concludes that the proposed project would increase native habitats and vegetation compared to existing condition in an effort to enhance ecological values and increase the diversity of biological resources on the site.

Please see Master Response - EIR Recirculation Requirements and Master Response - Biological Resources.

I-762-2 This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR.

As described in Project Description, Section 2.5.3 of the Draft EIR, new lighting would be added throughout the proposed Project area to allow the public to use the public park spaces after dark and for safety. The proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR). No lighting would be implemented for paths within habitat areas or in areas that are not intended to be used at night by the public.

I-762-3 Please see Master Response - Fence Removal.

I-762-4 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

I-762-5 Please see Master Response - EIR Recirculation Requirements.

I-762-6 The comment expresses support for a hybrid of Alternatives 2 and 3. Please see Master Response – Alternatives Analysis for a discussion on hybrid alternatives. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-763 Jane Cook

	COMMENT	RESPONSE
I-763-1	<p>AUDUBON SOCIETY RECOGNIZES SL RESERVOIR AS ESSENTIAL STOP ON PACIFIC FLYWAY - DO NOT DESTROY IT.</p> <p>All expert, scientifically informed opinion asserts that the noise, disruption, and habitat demolition during construction, the inadequate mitigations, and misconceived "habitat improvements" would be disastrous to this internationally important environmental asset. The Master Plan project should be halted until re-study by qualified wildlife experts. The lack of sound authoritative data and analysis threatens to destroy forever a precious natural resource for both forest habitat (the Knoll) and migratory bird resting place. An irreplaceable, rare place, as the Silver Lake Reservoirs now are, should NOT be destroyed and lost because of inaccurate, inadequate and unauthoritative theorizing motivated by the desires of developers.</p>	<p>I-763-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response - Biological Resources.</p>

I-764 Megan Shaw

COMMENT

RESPONSE

I-764-1

Hi! I would love if we could build an outdoor roller rink central to LA. The LA skate community has grown exponentially over the last few years and we are in need of a safe, smooth, community centered space to continue to build our practices. Skating is so much more than simply rolling - it is used by many as a source of both solace and expansion, for physical and mental health, and as a foundation on which to build social connections. It nourishes the body, mind, and soul, and the skate community is incredibly welcoming of any and all looking to do so.

I-764-1

The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-765 Michelle Luna

	COMMENT	RESPONSE
I-765-1	<p>It would be so beneficial to so many people if we could have an outdoor roller skate rink not only could the area be used for recreational fitness, Having a designated rollerskate area would also lend itself to be multi use could certainly host a variety of different activities not just rollerskating yoga, outdoor cinema night, even holiday bazaar. I would urge you to consider the benefits of creating an outdoor rollerskating rink the daily joy of rollerskating is a great way to stay in shape but also one that families, adults children and all ages can bond together and create community by doing this together any level. . Having been born and raised in Los Angeles I've grown up my entire life since the 70s rollerskating as a recreational activity and there are very few considerations for this group sport when planning a park and or street/ sidewalk area. There are many skate groups in the immediate area with roller skating & roller blading making a huge resurgence in popularity and this would be heaven sent, please consider the benefit for Silverlake when planning. With gratitude.</p> <div><div>01F01F</div><div>64F3FB</div></div>	<p>I-765-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-766 Marianne King

COMMENT

RESPONSE

I-766-1

A greater effort needs to be made to preserve the existing large healthy mature trees in this area even if they are non-native or not classified as protected trees. This is a park project - please build around them and find a way. You can plant other native plants near these trees. The Silver lake Master Plan Design Guidelines specifically state " Preserve existing trees in the Euc. Grove, RAP area, Olive Grove and the Knoll. It will take 20 - 50 years to get newly planted trees of this size and they will need a lot of water, therefore the impact of removal is far greater given than is being noted in the DEIR.. Also, wildlife and humans dont care in these are naturally occurring trees or not - the benefit from the tree is the same.

I-766-1

The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

I-767 Freda Shen

COMMENT

RESPONSE

I-767-1	<p>I am OPPOSED to all elements of the proposed Project's Ivanhoe Reservoir/ Ivanhoe Overlook Zone: habitat terraces, shade pavilion, wetland footpaths and observation platforms, embankment improvements, habitat fences as well as any new lighting.</p>	I-767-1	<p>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-767-2	<p>I am OPPOSED because all these elements pose a threat to our great blue heron rookery, in the NW end of the Ivanhoe Reservoir.</p> <p>The Ivanhoe Reservoir area is the newly established rookery for our Great Blue Herons, who left their historic Eucalyptus Grove rookery at the end of their 2015 nesting season. Their departure most likely was occasioned, because throughout the summer of 2015, the Reservoir was drained and extensive construction and construction truck traffic traversed the herons' territory with noise, vibrations and air pollution.</p> <p>They did not return in 2016 or 2017. The herons only returned in the spring of 2018, with a single nest at Tesla/ Rokeby, the north end of the Ivanhoe Reservoir, outside the perimeter fence.</p> <p>In 2019, 2 nests showed up in the Aleppo pines inside the perimeter fence, at the NW corner of the Ivanhoe Reservoir. Also, the 2018 nest at Tesla/ Rokeby was occupied again.</p> <p>Since then, this rookery has established itself and grown. Any construction of the kind that would be necessary for all these elements to be developed, whatever the timeline schedule, runs the unnecessary risk of once more destroying our iconic herons' roosting and nesting area.</p> <p>Once constructed, the amount of human use and interaction with the birds and other wildlife also poses an unacceptable risk of losing both the herons and other wildlife.</p> <p>We do not need the constructed elements. We do need our wonderful herons to return and be welcomed in a rookery that is one of the few nesting waterbird colonies in the Los Angeles area (Shuford et al., 2020 - referenced by Dan Cooper in his comment on this DEIR Dan_Cooper_RCDSMM_memo_1.2).</p>	I-767-2	<p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>

I-768 Alec Rice

COMMENT

RESPONSE

I-768-1 | Please include a rollerskating rink!

I-768-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller-skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-769 Jane Cook

	COMMENT	RESPONSE
I-769-1	<p>SOIL ANALYSIS OF RESEROVIRS AREAS IS INADEQUATE!</p> <p>Plants DIE if they are planted in inappropriate soil. The soil analysis in this DEIR does not analyze any soil sectors in light of what the Master plan envisions for those areas. The entire Project will look like the dead trees now seen on the southeast portion of the walking path. Instead of lush green, the dusty bare spaces will be all that is left of what we see now. The DEIR MUST be re-done, and all soils analyzed for their real ability to support plantings.</p>	<p>I-769-1 The Draft EIR Project Description includes a Tree Succession Plan that would outline methods to ensure trees are replanted over time to minimize disruptions to ecosystems currently in the SLRC. Successful plantings are assumed in the mitigation strategies that would focus on appropriate soil preparation and management of young vegetation to achieve high survival rates. Also, please see Master Response – EIR Recirculation Requirements.</p>

I-770 Freda Shen

		COMMENT	RESPONSE
I-770-1	I SUPPORT KEEPING AND MAINTAINING A WILDLIFE-FRIENDLY PERIMETER FENCE Such a fence, whether new or old, protects wildlife and the community, and allows both to live peaceably with each other in our small area of the world.	I-770-1	Please see Master Response – Fence Removal.

I-771 Freda Shen

		COMMENT	RESPONSE
I-771-1	Less is more. This proposed Project tries to cram too much into our peaceful space and will end up destroying it for both the City and for all the wildlife and birds who need it.	I-771-1	<p>The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.</p>
I-771-2	Alternative Hybrid 3+2 is the only alternative that is acceptable.	I-771-2	<p>The comment expresses support for a suggested Alternative Hybrid 3 + 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p> <p>The commenter is also referred to Master Response - Alternatives Analysis.</p>

I-772 Freda Shen

COMMENT

RESPONSE

I-772-1

This DEIR is demonstrably inadequate, as so many experts have pointed out. Please revise it and recirculate as so many community members have asked. This is far too important an area to be treated this way. Reconsider, revise, and focus.

I-772-1 Please see Master Response - EIR Recirculation Requirements.

I-773 Sandra Wisot

		COMMENT	RESPONSE
I-773-1	Please keep in mind FIRST DO NO HARM THE DEIR IS ABSOLUTELY INADEQUATE IN ITS RESPONSE TO THE ENVIRONMENTAL EFFECTS THE PROJECT AS PRESENTED WILL HAVE ON BOTH THE RESIDENTS OF The community as well as the wildlife with which we are privileged to share this unique space.	I-773-1	The comment expresses opposition to the proposed Project. Impacts related to the proposed Project are fully analyzed throughout Chapter 3 of the Draft EIR. This comment does not raise any specific issues with respect to the content of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-773-2	The long term disruption on safe passage through the neighborhood of children has not been addressed, the issue of no fenced easy access to water is not addressed regarding safety , animal habitat is not adequately addressed.	I-773-2	As discussed in the Project Description, Section 2.5.4 of the Draft EIR, for safety purposes the proposed project would remove the steep, slippery surface around the reservoir by installing different edge treatments. In addition, the proposed Project design would maintain a consistent 6- to 12- inch curb around the edge of the reservoir to provide a barrier between the walking path and edge of slope, and signage would state public access restrictions, including no swimming. Also, please see Master Response - Fence Removal.
I-773-3	Mitigation of disruptive issues is by no means clearly addressed. The DEIR must be considered for examination.	I-773-3	Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Chapter 3 of the Draft EIR analyzes the proposed Project's impacts. Please see Master Response - EIR Recirculation Requirements. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-774 Freda Shen

COMMENT

RESPONSE

- I-774-1 The South Valley needs maintenance and improvements as dog owners have pointed out for the Dog Parks. It needs the Rec Center refreshed, perhaps remodeled per residents' discussion based on their needs and usage. It does not need a land-gobbling Multi-Purpose Facility - the Rec Ctr can already be remodeled as such. It does not need new land-gobbling sports areas. It does not need picnic tables which take up grassy lawn space, a Grassy Lawn that is one of the HCM #422 elements that is character-defining. It does not need new parking that will cause further congestion.
- I-774-2
- I-774-3 It needs not to be considered a world-destination as part of the Reservoir Complex, it needs to be continued with the peace and neighborhood gatherings it currently has.
- Do not make it into an overloaded facility that becomes an 'attractive nuisance' and a stressed out corner of Silver Lake.

- I-774-1 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Impacts to historic resources are analyzed in Section 3.5 and Appendix F of the Draft EIR.

The comment expresses opposition to several of the South Valley components. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

- I-774-2 The "Grassy Patch" is a character defining feature of the HCM #422 as noted in Appendix F of the Draft EIR. The proposed addition of picnic tables would introduce enhancements for enjoyment of the Grassy Patch, but would not alter the character of the area (Draft EIR, Appendix F page 59).

Further, as discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. These new spaces would be created at the edge of the Grassy Patch, adding to the current use of the street for parking. As noted in Section 2.5.2 of the Draft EIR, trees would be avoided along this area and parking would be added in a way that it would not encroach on existing trees. The area would otherwise maintain its existing use and character consistent with the HCM as noted on page 59 of Appendix F. Please see Master Response - Parking/Bike Option.

- I-774-3 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-775 Jane Cook

	COMMENT	RESPONSE
I-775-1	Overdevelopment of an area DEGRADES property values. The traffic congestion, noise and construction impacts will result in may homeowners losing investment value. This issue has NOT been studied in the hDEIR, though it is critical to the welfare of this community. This MUST be authoritatively analyzed.	<p>I-775-1 This comment expresses concern regarding traffic, noise, and construction impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR. Construction impacts are analyzed throughout Chapter 3 of the Draft EIR.</p> <p>The comment requests an analysis of the proposed Project's impact on home property values which is not an issue analyzed within the purview of CEQA.</p>

I-776 Gregory Borchardt

COMMENT

RESPONSE

I-776-1 | Yes, a roller rink would be amazing for Silverlake!

I-776-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-777 Daisy Lynn Austin

I-777-1 | Outdoor rollerskating rink, please!!!!

COMMENT

I-777-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller-skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-778 Freda Shen

COMMENT

RESPONSE

	<p>Let's take a step back.</p> <p>This proposed Project is a developer's dream, not a neighborhood's desire. It is being sold on unrealistic drawings, very little scientific data and analysis, no baseline conditions for anything anywhere.</p>	<p>I-778-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
I-778-1	<p>It says it seeks to attract and enhance habitat for wildlife when what it's actually doing is converting habitat for one of the rare waterbird nesting areas in LA into habitat that it has not analyzed as attractive to which bird species.</p> <p>You may ask us to dream big, but every dream needs to start with small, thoroughly considered steps. Start small, re-evaluate as we go, and maybe that dream will happen. Otherwise, what we'll have is a nightmare.</p>	

I-779 Diana Lopez

	COMMENT	RESPONSE
I-779-1	Being a Los ángeles roller skater, it's tough to find spaces that cater to us. It's either driving to Mar Vista & being kicked out for hockey practices. Or trespassing on tennis / basketball courts just to find smooth ground. Unfortunately our city streets are not safe enough to cruise, and we wait for Ciclavia events in order to do so safely. The beaches are the only way to skate properly, but it'd be fantastic to finally have a local skating rink where we can thrive. There are so many Los Ángeles skaters waiting for more rinks, and only our indoor options are slowly closing. Please consider this to happen. It would benefit the community vastly.	I-779-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller-skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-780 Freda Shen

COMMENT

RESPONSE

I-780-1

NO to the Education Center. It's blatantly being proposed so that there can be an event space at the water's edge, useful for political and developer gatherings. It's only being called an education center because there are many grants out there for education purposes. Call it an Education Center and you might get the money for it. Call it by its name, an event space, and there are many fewer grants.

We need that green space for families to gather on the green, for birds to fly without fear of window crashes and death, for the eye to see an uninterrupted line of lawn and water.

We don't need another building taking up public green space.

I-780-1

The comment expresses opposition to the Education Center component of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-781 Alexandra Arellano

I-781-1 | A roller rink

COMMENT

I-781-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE

I-782 Freda Shen

COMMENT

RESPONSE

I-782-1

YES to 24-hr online trail cameras carefully set up by wildlife experts such as Miguel Ordenana , Johanna Turner or Raptor Study.

These would be fascinating educational experiences where people would be allowed to watch what happens in the Reservoir in the dark, without frightening off the wildlife or being frightened themselves by other humans.

There might be nesting cams set up by the Raptor Study experts, so we can watch the awesome growth of young hawks or owls or even our great blue herons.

All this would be possible for people to interact but not interfere. What wonders we would be privileged to see.

I-782-1

The proposed Project is described in Chapter 2 of the Draft EIR and does not include trail or nesting cameras. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. It is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-783 Freda Shen

		COMMENT	RESPONSE
I-783-1	<div>NO water activities, as the community has overwhelmingly said from Day One. Not even kayaks.</div> <div>The only water activities allowed are those by our water birds! And DWP maintenance!</div>	I-783-1	As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.

I-784 Julia Grant

COMMENT

RESPONSE

I-784-1 | Less is more!

I-784-1 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-785 Jane Cook

	COMMENT	RESPONSE
I-785-1	<p>NO KAYAKS ON THE WATER!!</p> <p>WHAT are people thinking, with "Kayak Tours? "</p> <p>Any birds in view would promptly fly away!</p> <p>There would be NOTHING to see, educational or otherwise.</p> <p>Only lots of liability, people overreaching their kayaking ability... noise, rescue vehicles....</p> <p>Not to mention the great lumbering vehicles necessary to store and launch kayaks. Please. Let's have some Common sense here.</p>	<p>I-785-1 As described in Section 2.5.1 of the Project Description, the proposed Project analyzed in the Draft EIR included a floating dock which would launch guided kayak tours. Based on comments received during the public review period, the City has made minor revisions to the proposed Project. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including through guided kayak and/or canoe tours conducted by an ecologist for educational purposes. As discussed in Chapter 3 of this Final EIR, the revisions to the proposed Project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR.</p>

I-786 Joseph Silva

COMMENT

RESPONSE

I-786-1 | Roller rink please!!!!

I-786-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-787 Jane Cook

	COMMENT	RESPONSE
I-787-1	<p>NO FENCE = NO WILDLIFE</p> <p>When dogs and outdoor cats invade the Reservoirs space, the wildlife will depart... except for coyotes. The Reservoirs land area is too small to buffer invasions of invasive domestic animals. Documented studies establish this. Billions of songbirds are lost every year to cats. The ducklings and goslings we delights in will be gone. There is a 38% reduction of bird species if dogs are even walked, unleashes, in a bird habitat area.</p> <p>KEEP THE FENCE. IMPROVE IT, BUT KEEP IT</p>	<p>I-787-1 Please see Master Response - Fence Removal.</p>

I-788 Jane Cook

	COMMENT	RESPONSE
I-788-1	<p>NO FENCE = NO WILDLIFE</p> <p>When dogs and outdoor cats invade the Reservoirs space, the wildlife will depart... except for coyotes. The Reservoirs land area is too small to buffer invasions of invasive domestic animals. Documented studies establish this. Billions of songbirds are lost every year to cats. The ducklings and goslings we delights in will be gone. There is a 38% reduction of bird species if dogs are even walked, unleashes, in a bird habitat area.</p> <p>KEEP THE FENCE. IMPROVE IT, BUT KEEP IT</p>	<p>I-788-1 Please see Master Response - Fence Removal.</p>

I-789 Freda Shen

	COMMENT	RESPONSE
I-789-1	<p>Silver Lake has a Tree Canopy Coverage Percentage that is surprisingly low - only 18.56% This DEIR has many mature trees proposed for removal, with young saplings - which may or may not ever mature, even in the estimated 20 years, depending upon maintenance and climate - to replace them. This will diminish our Tree Canopy even further.</p> <p>Under the Tree Canopy Protection Ordinance, Council File 15-0499-52, passed by City Council and awaiting implementation, this DEIR would be seriously out of line.</p> <p>We cannot destroy our urban forest like this, a forest that takes decades to reach maturity. Please reconsider this proposed Project and its inadequate DEIR in this regard. For the sake of our children who walk and play in the shade of the great trees.</p>	<p>I-789-1 The replacement of mature trees would occur over time to maintain nesting and foraging opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Furthermore, under the referenced Council File, 15-0499-S2, the City Council has instructed City departments to prepare a report on biodiversity strategies, and no ordinance has been proposed or adopted. Please see Master Response – Biological Resources.</p>

I-790 Jane Cook

COMMENT

RESPONSE

I-790-1

TREES ARE #1 CLIMATE PROTECTION KEEP THEM ALL!

It makes NO sense to destroy any mature tree.

The carbon sequestration of a mature tree is MANY times that of a group of new trees. We are in a global warming crisis; a carbon generation crisis; cutting down NY mature tree is one more shovel of earth into the grave of our atmosphere.

Other cities demand hearings and deliberation before even small street trees are cut down; this project will destroy tens of our large, mature trees.

The DEIR absolutely MUST ACCURATELY MEASURE AND DOCUMENT the effect of the elimination of each and every tree PROPOSED to be lost!

The outcome will surely show that NO TREE SHOULD BE CUT DOWN.

The Project should be PLANNED AROUND THE CONTINUED EXISTENCE OF EACH PRECIOUS TREE the Reservoir possesses.

I-790-1

As discussed in Chapter 2, Project Description, of the Draft EIR, the proposed Project would plant approximately 500 trees. The Project would include a Tree Succession Plan that would provide guidance for the gradual removal of mature trees to avoid temporary elimination of habitat value within the SLRC and replant areas primarily vegetated with non-native trees with native trees and understory. The plan would be prepared by a qualified arborist. The Tree Succession Plan would identify trees to be removed in the initial year of construction giving priority to trees that are dead, in poor health, and/or pose a safety risk to the public, including those with fungal and/or pest infestations. The plan would identify a sequence of phased removals for selected trees on a schedule throughout the 15-year period. Additionally, it would include the replacement of 80 percent of existing non-native trees over a 15-year timeline.

According to the California Emissions Estimator Model (CalEEMod) User's Guide, Appendix A, "planting trees will sequester CO₂ and is considered to result in a one-time carbon-stock change. Trees sequester CO₂ while they are actively growing." Modeling was conducted in CalEEMod to estimate sequestered CO₂ for the Project's 500 new trees, based on the Intergovernmental Panel on Climate Change (IPCC) assumed active growing period of 20 years and annual CO₂ accumulation factors for miscellaneous trees, which is the average of all broad species classes and should be used if the specific tree types are not known. The results of the modeling indicate a total sequestration of approximately 354 metric tons of CO₂ (or approximately 17.7 metric tons of CO₂ per year during the 20-year growing period). Modeling results are provided in Appendix B of the Final EIR.

Also, please see Master Response – Biological Resources.

I-791 Jane Cook

	COMMENT	RESPONSE
I-791-1	<p>TREES ARE #1 CLIMATE PROTECTION KEEP THEM ALL!</p> <p>It makes NO sense to destroy any mature tree. The carbon sequestration of a mature tree is MANY times that of a group of new trees. We are in a global warming crisis; a carbon generation crisis; cutting down NY mature tree is one more shovel of earth into the grave of our atmosphere.</p> <p>Other cities demand hearings and deliberation before even small street trees are cut down; this project will destroy tens of our large, mature trees. The DEIR absolutely MUST ACCURATELY MEASURE AND DOCUMENT the effect of the elimination of each and every tree PROPOSED to be lost! The outcome will surely show that NO TREE SHOULD BE CUT DOWN. The Project should be PLANNED AROUND THE CONTINUED EXISTENCE OF EACH PRECIOUS TREE the Reservoir possesses.</p>	<p>I-791-1 Please see response to Comment I-790-1.</p>

I-792 Deborah Hart

COMMENT

RESPONSE

I-792-1 | An outdoor roller skating rink would be an amazing addition

I-792-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller-skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-793 Jennifer Swirtz

	COMMENT	RESPONSE
I-793-1 An outdoor roller rink. Flat smooth surface. For kids and adults to enjoy.	I-793-1	The proposed Project, described in Chapter 2 of the Draft EIR, would not include a roller-skating rink. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-794 Jane Cook

COMMENT

RESPONSE

<p>I-794-1</p> <p>I-794-2</p> <p>I-794-3</p>	<p>This is no doubt LEGALLY ACTIONABLE:</p> <p>Silver Lake has a Tree Canopy Coverage Percentage that is surprisingly low - only 18.56% This DEIR has many mature trees proposed for removal. This will diminish our Tree Canopy even further.</p> <p>"Five hundred new saplings" will be diminished to a fraction of that, given the poor soil and harsh growing conditions at the Reservoirs. And, they will have to be extensively maintained to achieve any canopy at all. the climate change implications are obvious -- exacerbated by the thousands more carbon belching cars this project would accommodate. The effects within Silver Lake for air quality, heat island generation and carbon generation are truly dire.</p> <p>Under the Tree Canopy Protection Ordinance, Council File 15-0499-52, passed by City Council and awaiting implementation, this DEIR would be seriously out of line.</p> <p>A lawsuit from the Air Quality Management District, not to mention many other Environmental groups, would not be surprising, given the DESTRUCTIVE effect on our Tree Canopy this Master Plan project would wreak.</p>	<p>I-794-1 The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time.</p> <p>I-794-2 As discussed in Chapter 2, Project Description, of the Draft EIR, the proposed Project would plant approximately 500 trees. The Project would include a Tree Succession Plan that would provide guidance for the gradual removal of mature trees to avoid temporary elimination of habitat value within the SLRC and replant areas primarily vegetated with non-native trees with native trees and understory. The plan would be prepared by a qualified arborist. The Tree Succession Plan would identify trees to be removed in the initial year of construction giving priority to trees that are dead, in poor health, and/or pose a safety risk to the public, including those with fungal and/or pest infestations. The plan would identify a sequence of phased removals for selected trees on a schedule throughout the 15-year period. Additionally, it would include the replacement of 80 percent of existing non-native trees over a 15-year timeline.</p> <p>According to the California Emissions Estimator Model (CalEEMod) User's Guide, Appendix A, "planting trees will sequester CO2 and is considered to result in a one-time carbon-stock change. Trees sequester CO2 while they are actively growing." Modeling was conducted in CalEEMod to estimate sequestered CO2 for the Project's 500 new trees, based on the Intergovernmental Panel on Climate Change (IPCC) assumed active growing period of 20 years and annual CO2 accumulation factors for miscellaneous trees, which is the average of all broad species classes and should be used if the specific tree types are not known. The results of the modeling indicate a total sequestration of approximately 354 metric tons of CO2 (or approximately 17.7 metric tons of CO2 per year during the 20-year growing period). Modeling results are provided in Appendix B of the Final EIR.</p> <p>As provided in Table 3.8-6 of Section 3.8, Greenhouse Gas Emissions, of the Draft EIR, the Project would result in approximately 1,486 metric tons of carbon dioxide equivalents (MTCO2e) per year without account for sequestration. Accounting for sequestration, the Project would result in</p>
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I-794 Jane Cook

COMMENT

RESPONSE

approximately 1,468 metric tons of carbon dioxide equivalents (MTCO₂e) per year during the 20-year growing period. Project GHG emissions impacts would be less than significant as was determined in the Draft EIR.

I-794-3

As discussed in Project Description, Section 2.5.5 of the Draft EIR, the planting design for the proposed Project would be aligned with the City's New Green Deal goals of increasing tree canopy and protecting native biodiversity. Figure 2-8 of the Draft EIR includes a preliminary planting diagram. The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. The proposed Project would also comply with the City Tree Ordinance and RAP Tree Policy as discussed in the Project Description, Section 2.5.8, PDF-BIO-13 and PDF-BIO-14. Please see Master Response – Biological Resources.

I-795 Amy G

COMMENT

RESPONSE

I-795-1	I do not support the Master Plan. This draft EIR is not accurate. Anyone who lives near The Reservoir knows this. 1) Traffic around the Reservoir is already a nightmare and will only get worse with a massive development.	I-795-1	Please see Master Response - Traffic/Transportation. The comment expresses opposition to the proposed Project. This comment does not raise any specific issues with respect to the content of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-795-2	2) Your parking proposal is a joke. The side streets are already overly impacted for parking. I live on a street that is heavily used by the bars on Glendale Blvd and we have non-stop crime and vandalism because of it.	I-795-2	Please see Master Response - Traffic/Transportation.
I-795-3	3) Noise, crime, and litter will increase massively with this development. I don't think that has been accounted for in the draft EIR. 4) WE DON'T HAVE ENOUGH POLICE OFFICERS AS IT IS. THERE WILL BE NO BUDGET OR POLICE AVAILABLE TO DEAL WITH CRIME AND TRAFFIC IF THE MASTER PLAN WAS TO BE CREATED. ENOUGH! PLEASE CONSIDER THE PEOPLE THAT LIVE AROUND THE RESERVOIR AND THE MASSIVE DISRUPTION THIS WILL BE TO OUR HEALTH AND DAILY LIVES.	I-795-3	As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Also, please see Master Response - Public Safety.
I-795-4	5) THIS DEVELOPMENT WILL BECOME A HUGE HOMELESS ENCAMPMENT. WE CAN'T AND SHOULDN'T FUND ANYMORE DEVELOPMENTS UNTIL WE HAVE SOLVED OUR HOMELESS CRISIS. IT IS SHAMEFUL TO EVEN CONSIDER SPENDING ALMOST 300 MILLION ON THIS WHILE WE HAVE 50,000 HOMELESS PEOPLE LIVING ON OUR STREETS.	I-795-4	Please see Master Response - Homelessness.
I-795-5	AGAIN, THIS DRAFT EIR IS NOT EVEN CLOSE TO BEING ACCURATE. BUT IT IS A MASTERPIECE IN GASLIGHTING. ALSO, WE NEED WAAAAAAAAY MORE TRANSPARENCY REGARDING WHAT IS GOING ON BETWEEN THE CITY GOV AND LADWP. THIS ENTIRE MASTER PLAN REEKS OF CORRUPTION AND SOME UNETHICAL AGREEMENTS MADE BEHIND CLOSED DOORS. DISGUSTING.	I-795-5	Please see Master Response - Community Engagement Process. The comment expresses opposition to the proposed Project. This comment does not raise any specific issues with respect to the content of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-796 Carolyn Wessling

COMMENT

RESPONSE

I-796-1	The scale of the proposed plan is out of scope with the neighborhood. I think at a minimum only Alternative 2 should be considered. I am concerned about many aspects of the plan, including the protracted construction that would be required. When DWP was working on its building(s) on the east side of the reservoir, even though we are on the west side, we could hear all the loud activity very clearly. The backup beep of the work trucks sounded like it was right outside our window. The "bowl" effect of the Silver Lake hills amplifies noise. I cannot image the noise of 5-15 years of construction. 3.12 of the EIR states outright that the impacts of construction would be "significant and unavoidable" with "no feasible mitigation." And that doesn't even take into account the construction traffic, or the traffic disruption created by the construction. Even DWP's recent project to repair its driveway / entrance by the nursery school, a relatively small project, caused a surprising amount of disruption to traffic flows. In addition, I can't imagine the noise disturbance of amplified (or even un-amplified) special events. Ask anyone who lives in the area surrounding the reservoir: the sounds of a house party carry all over the hills-let alone the noise of a major open-air event. And all the noise and increased traffic will impact animals/wildlife as unfavorably as it will neighborhood residents. I also find the transportation portion of the EIR confusing. It seems to say that there won't be a big impact with respect to traffic because the 'revised reservoir' won't draw people from far outside the neighborhood? And yet the whole point of the over-development seems to be to make the reservoir a major city attraction? And yet we won't need many additional parking spaces? And yet the traffic impact will be negligible? Because there is a defunct bus line that runs along the west side of the reservoir? (there is not) The mixed messages in that portion are legion and seem to be designed to obscure the fact that of course a giant build-out of the reservoir will substantially and unfavorably impact the streets/parking/traffic in the area. I don't understand who exactly is driving the high level of construction and alteration of the reservoir that is contemplated by the master plan, at a huge cost, but I can only think, follow the money. Someone somewhere has to be planning on benefiting (i.e., profiting) from this project in some way. Are private interests going to be granted concessions? What about the construction firms themselves? Where is the huge amount of money needed to do all of this even going to come from? Grants? (I find that hard to believe.) I am sorry to say I also have no faith in the city's ability to manage a project and a park/facility of this size and nature now or going forward. There is a city garbage can on Glendale Blvd in front of the Bank of America, across from the Silver Lake	I-796-1	The comment expresses support for Alternative 2. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-796-2		I-796-2	This comment expresses concern regarding noise impacts. Noise impacts associated with the proposed Project are discussed in Section 3.12, Noise, of the Draft EIR and Chapter 3 of the Final EIR, which includes construction noise. Also, please see Master Response - Noise.
I-796-3		I-796-3	Please see Master Response - Noise. This comment also expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-796-4		I-796-4	Section 3.16, Transportation, of the Draft EIR discussed impacts of the proposed Project related to traffic and transportation. Also, please see Master Response - Traffic/Transportation.
I-796-5		I-796-5	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. The commenter is also referred to Master Response - Traffic/Transportation.
I-796-6		I-796-6	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic. Also, please see Master Response - Funding and Operations.
I-796-7			

I-796 Carolyn Wessling

COMMENT

RESPONSE

I-796-7 Cont. library, that I drive by every day. It is OVERFLOWING with garbage and poop bags from dog walkers; the trash spills over onto the sidewalk around it. It is an eyesore and really quite disgusting. And yet, it never gets emptied on any kind of appropriate, timely schedule. And that is just one garbage can. Here's another example: the lack of enforcement of, and frequent violation of, rules covering the use of the Silver Lake meadow, an area that is much smaller in scope than the planned reservoir complex. How is the city going to maintain and keep clean and safe an area the size of the reservoir project, especially with no perimeter fence? Can anyone even say with a straight face that they have confidence the reservoir area, unfenced, will be a clean, safe, well-maintained, constantly kept-up place for people to enjoy? Why the unicorn status for this one project? No matter the circumstances, the master plan as it stands now is vastly overreaching. I would like to think that the reservoir area could be improved and more of it opened in a reasonable fashion to people for their enjoyment. I think there are definitely improvements that can be made and I am not arguing for it to remain unchanged and unimproved for the rest of time. But the scale of the improvements set forth in the master plan as it stands is unreasonable and unwanted and unachievable without great detriment to the neighborhood.

I-796-8

I-796-9

I-796-7 As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-796-8 Please see response to Comment I-796-7. Also, please see Master Response - Fence Removal and Master Response - Public Safety.

I-796-9 The comment expresses opposition to the scale of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-797 Chip McDonald

COMMENT

RESPONSE

12/15/22

Bureau of Engineering
1149 S. Broadway, Suite 700
Los Angeles, CA 90015-2213

Dear Bureau of Engineering,

I-797-1

I am a long-time resident of Silver Lake (15 years). I chose this neighborhood over several others when I moved to the city many years ago, and have even planted roots here in an ownership capacity. This was no easy feat for myself and my family as home prices in the neighborhood skyrocketed. But for us, it was worth it. Silver Lake is one of the jewels of the city of Los Angeles. Unfortunately, this draft EIR does not treat it that way.

I must urge you to reject this draft EIR.

I-797-2

On top of the fact that the overwhelming majority of the Silver Lake community is opposed to the Reservoir Master Plan entirely, I have spoken to hundreds of people who are dismayed that not only are their voices consistently disregarded on the Master Plan matter as a whole, there seems to be an equally dismissive reception to their valid and deep concerns regarding the Draft EIR.

I-797-3

There is no plan for security once the Master Plan is finished. A problem surrounding communities have experienced to great detriment. Friends and colleagues living in these communities have expressed shock at the repeated pattern of disregard for safety once these types of projects are complete. We should learn from their experience rather than trudge forward in the same myopic and misguided way.

I-797-4

In addition to blatantly disregarding the safety of Silver Lake in any significant way, the draft EIR also claims that there will be no impact on traffic from the Master Plan. It is inconceivable how anyone who has truly and reasonably studied the situation could come to this conclusion. It smacks of a willful ignorance of the traffic patterns that already exist around the Silver Lake Reservoir now.

I-797-5

Finally, the plan to open the Silver Lake Meadow to public events is frankly a slap in the face to this neighborhood. The Meadow was proposed, and agreed to, with the understanding that it would be a place of tranquility for our community. And it has been, short of recent violations of its intent and rules (situations that foreshadow what's to come should the entire Silver Lake complex fall into the absence of security attention The Meadow has). Opening this natural park space to the absolute opposite of its intent is not only baffling, but also, as mentioned, insulting.

My perspective is not solo. The vast majority of Silver Lake is deeply concerned about the neglect this draft EIR shows the Reservoir Complex itself, as well as the repeated pleas to consider the true singularity the Silver Lake Reservoir is, as well as the perspectives of the residents who love the neighborhood so dearly.

Sincerely,

Chip McDonald

I-797-1

This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-797-2

Please see Master Response - Community Engagement Process.

I-797-3

Please see Master Response - Public Safety.

I-797-4

This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.

I-797-5

Please see Master Response – Noise and Master Response - Public Safety. This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-798 Tanya Tolmachoff

COMMENT

RESPONSE

I-798-1 | It is so disturbing that everyone is so focused on re-doing an already beautiful
park of the Silver Lake neighborhood. The reservoir doesn't need all these
changes, trees don't need to be cut down, the wildlife wants us to leave them
alone. If you want to spend money, spend it to improve the torn up roads &
I-798-2 | sidewalks in the neighborhood. Give it to those that need help. This is such a
waste!

I-798-1 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

The comment also expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-798-2 Please see Master Response - Funding and Operations.

I-799 Freda Shen

	COMMENT	RESPONSE
I-799-1	<p>NO to rain gardens in the Meadow.</p> <p>Because we don't get rain in continuous moderate rainfalls, but in heavy flooding storms, rain gardens are not a good solution for us in the Meadow. The best solution is to not build concrete structures that'll produce runoff.</p> <p>With rain gardens and runoff, we will get flooding and erosion and a soggy, very unevenly surfaced Meadow even when dry, depending on where they put these rain gardens....which uneven surface will not be good for a picnic blanket or kids lying down and rolling on blankets the way they can now in the Meadow.</p> <p>For instance, especially to prevent flooding during rains, our horseback riding arena was dug 7 feet deep, then filled with a mix of sand and gravel that allows water to soak through the top layer and quickly percolate down through the 7 feet of drainage. Even so, every year, with the first major storm of the season, the arena floods and must have a narrow sloping channel dug by the guys from the center to the side to allow a path for the water to run off to the sides of the arena. After that first storm, the arena usually doesn't flood out in a rain and can be ridden in the next day, although it remains heavily wet for a day or two.</p> <p>Any rain garden created for the Meadow will not be dug 7 feet down and receive the daily constant care and twice yearly remix of sand that our arena does. As even this promotional blurb notes, a rain garden takes a lot of care and maintenance. These rain gardens are like the floating islands - they seem like a good idea until you study them in detail, as Dan Cooper showed us.</p> <p>Leave the Meadow alone - it does fine as long as they don't build concrete paths and a concrete bulding that produce heavy runoff.</p>	<p>I-799-1 The comment expresses opposition to ornamental gardens that would function as rain collectors. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

I-800 Eric Quirk

COMMENT

RESPONSE

I-800-1 The EIR itself proves that the best option is clearly to do nothing with the space and leave the situation as it is. As a resident who lives immediately next to the reservoir, the significant amount of work that the EIR entails would seriously disrupt the peace and tranquility of the neighborhood for years, and be a huge burden to those of us who moved here precisely because the reservoir isn't an "attraction" that brings traffic, crowds, and trash.

I-800-2 If I had to pick one of the EIR's options, then I'd choose number 3. I can only support an option that includes some kind of security perimeter that limits entry and prevents people from accessing and using the site at all hours. We only have to look at the disaster of Echo Park for an example of what happens when there is no way to control access .

I-800-1 Section 3.16, Transportation, of the Draft EIR discussed impacts of the proposed Project related to traffic and transportation. Also, please see Master Response - Traffic/Transportation.

As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-800-2 The comment expresses support for Alternative 3. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-801 Jill Nakaoki

COMMENT

RESPONSE

I-801-1	I am a local resident and have significant concerns about the way the proposed changes will affect the quality of life for those of us that live near the reservoir. Significant construction will have a negative impact for a lengthy period of time. If these changes all go into effect I am also very concerned about increased crowds, parking challenges, safety/security, and worsening traffic.	I-801-1	This comment addresses various construction impacts. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.
I-801-2			
I-801-3	Any studies saying there will be no impact to traffic do not make sense as there is already significant traffic around the reservoir, particularly during peak periods. The fact that additional fundraising needs to occur for this plan makes me also believe that the proposed changes are quite ambitious. The funds would be better used to address the homeless crisis and for improved safety for our local areas. I am not in favor of the current master plan proposal and recommend only minor enhancements to the current reservoir such as improved lighting and additional safety features.		As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.
I-801-4		I-801-2	Please see Master Response - Traffic/Transportation and Master Response – Public Safety.
I-801-5		I-801-3	Please see Master Response - Traffic/Transportation.
		I-801-4	Please see Master Response – Homelessness. The commenter is also referred to Master Response – Funding and Operations. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
		I-801-5	The comment expresses opposition to the proposed Project. Please see Master Response – Public Safety. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-802 Denecia Jones

COMMENT

RESPONSE

I-802-1 | This is a great idea! It brings healthy outdoor activities to the community.
Highly recommend it!

I-802-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-803 Ethan Gold

		COMMENT	RESPONSE
I-803-1	We do not want another Echo Park. Keep Silverlake wild; keep the humans out. By all means, make the fence a lot prettier. But we know what humans do to "our" parks.	I-803-1	Please see Master Response – Fence Removal and Master Response - Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-804 Anna Molter

COMMENT

RESPONSE

I-804-1 | Would like to see an outdoor skate area, smooth concrete floor where the public can roller skate Similar to the skate plaza in Venice.

I-804-1 The proposed Project, described in Chapter 2 of the Draft EIR, would not include an outdoor skate area. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-805 Renee Nahum

COMMENT

RESPONSE

I-805-1	Please leave the reservoir complex alone ! The neighborhood cannot handle any more traffic. The wildlife cannot handle any more interruptions. We have already lost a number of the Heron rookeries due to construction .. I have not seen any reference to the most important use of the reservoir for the the fire departments' helicopters getting water from the lake to fight the fires that we all know will be more frequent, there should be NO obstruction for this purpose. We are very blessed to have a number of parks in local area and the money for this Master Plan should be used to make parks in park poor neighborhoods.	I-805-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-805-2		I-805-2	Please see Master Response - Traffic/Transportation.
I-805-3		I-805-3	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-805-4		I-805-4	As described in Public Services, Section 3.14.5 of the Draft EIR, the environmental analysis in this section was conducted in consultation with the City of Los Angeles Fire Department and City of Los Angeles Police Department. Operations would not require additional fire or hazard services such that substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities would occur. LAFD would be able to serve the proposed Project and would not result in the need for new or altered fire facilities. In addition, the proposed Project was designed in order to allow LAFD to continue to use the reservoir for water for emergency purposes as outlined in Public Services Section 3.14.1 of the Draft EIR.
I-805-5		I-805-5	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project site, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.
			As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including

I-805 Renee Nahum

COMMENT

RESPONSE

maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

This comment is conclusory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-806 Karen Lower

		COMMENT	RESPONSE
I-806-1	I am submitting the entire Silver Lake Wildlife Sanctuary recommendations because they have done what the DEIR has NOT. The Master Plan as it stands in my opinion is criminal. It calls for "necessary improvements" that will destroy the existing wildlife. The damage done during the draining of the reservoir and laying of the pipeline previously has NOT been restored. The proposed Master Plan will destroy everything existing.	I-806-1	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-806-2	The noise, disturbance, and disruption cannot be tolerated by the existing wildlife.	I-806-2	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-806-3	I'm not sure what deals are being made behind all of these proposed improvements but it is clear that had there been a truthful evaluation the recommendation would have been a completely different EIR.	I-806-3	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-806 Karen Lower

COMMENT

RESPONSE

I-806-4

The Draft EIR MUST be Revised and Recirculated**For You: the submitted expert comments on the DEIR, listed below.**

SLWS is disappointed to find **the Draft Environmental Impact Report wholly inadequate**. If the Project as proposed is to move forward, a revised DEIR must be recirculated to address the many failings in this first effort. (Read [here](#) for details on its failure.)

Further, as proposed, the Project would have significant and unavoidable negative effects. Because there are environmentally superior Alternatives within this proposal that can be used, we maintain that **the City under CEQA cannot approve the Project as proposed**.

I-806-5

Instead, if the City wants to approve a Master Plan for the Silver Lake Reservoir Complex **without a revised Draft**, it must choose one of the three less impactful alternatives contained in the DEIR.

SLWS has also advocated for another alternative, one that is a hybrid of the alternatives included in the DEIR and importantly, that is science and data driven. We are calling this: **Alternative Hybrid 3+2.***

The Inadequacy of The DEIR

The DEIR fails to comprehensively address the impacts of the proposed Project based upon specific scientific and community data.

I-806-6

Of the impacts that it does list, many are not judged by the repeatedly expressed values of the community. Instead, it ignores our values and thereby labels these impacts as **"of little significant effect"** except for the unmitigable impacts of years of construction under a vague and unsubstantiated timeline.

I-806-7

Look at the recently built North Atwater bridge whose City budget quadrupled from a 'gifted' \$4 million to over \$16 million. <https://www.latimes.com/local/lanow/la-me-ln-river-bridge-20170525-htmlstory.html>

I-806-4 Please see Master Response - EIR Recirculation Requirements.

I-806-5 Please see Master Response - Alternatives Analysis.

I-806-6 As discussed in the Project Description, Section 2.6 of the Draft EIR, construction of the proposed park zones may occur simultaneously or sequentially. Since the construction sequence is currently unknown, for purposes of this environmental analysis, it is assumed that construction of certain park zones would need to occur before other park zones to maximize usage of the proposed Project site during construction. This worst-case construction scenario would result in a 5-year construction schedule. As shown on Table 2-3, park zones may be constructed individually or sequentially as funding becomes available.

Please see Master Response - Community Engagement Process and Master Response - EIR Recirculation Requirements.

I-806-7 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-806 Karen Lower

COMMENT

RESPONSE

I-806-8

This bridge ballooned from a simple bridge requested by horseback riders for a safe river crossing to one whose inadequate attention to equestrian safety design **caused the death of a horse** within the first week https://www.theeastsiderla.com/neighborhoods/atwater_village/the-death-of-a-horse-sparks-safety-concerns-about-a-new-l-a-river-bridge/article_ee4617ac-3cd4-11ea-a59e-3779fd497a11.html

The North Atwater bridge was a relatively contained and simple project compared with the huge and complex Project proposed for our Silver Lake Reservoir. We must have a far better DEIR than this one which contains **“an inadequate level of analysis given the massive amount of changes they are proposing for the site.”** (Amy Minter, CBCM CEQA lawyer, 11/17/2022)

Silver Lake Reservoir is Unique Among LA's Green Spaces

Not another Echo Park Lake. Not another MacArthur Park. Not even another Hollywood Reservoir. Unlike the Hollywood Reservoir, this Reservoir is smack in the middle of the City, as shown in the photo above. Like the Hollywood Reservoir, our Reservoir needs perimeter fencing for the wild and the urban to exist side by side.

I-806-10

Did you know we have an invaluable ecosystem of oak/ walnut/ elderberry on the Knoll, treasured by the Gabrieleño/Tongva tribes? The DEIR didn't either.

I-806-11

It inaccurately identifies and devalues this area, proposing instead **the destruction of two of the rare CA walnut trees** currently holding the hillside in place with their matured 50' deep root systems.

Silver Lake Reservoir is a biodiversity stronghold for migratory birds, resident birds, terrestrial mammals and amphibians that is already an unmatched resource not only for Los Angeles, but for the region, as will be seen once the Regionwide Wildlife Habitat Connectivity Plan is mapped out.

I-806-12

It would take a bare minimum of \$260 million dollars and years of disturbance to turn this biodiversity stronghold into another City Park like Echo Park Lake or MacArthur Park. **To do so on the basis of a flawed DEIR, would be a loss of such magnitude**

I-806-8

The comment expresses opposition to the proposed Project. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-806-9

Please see Master Response - Fence Removal.

I-806-10

As described in Tribal Cultural Resources, Section 3.17.5 of the Draft EIR, the City submitted request to consult letters to nine Native American individuals and organizations on the City's AB 52 Notification List on December 13, 2021, as part of the AB 52 Tribal consultation effort. As determined through the City's consultation with Native American Tribes who requested consultation, no known Tribal cultural resources have been identified within the Project Site.

Consultation between the City and the Gabrielino Tongva Indians of California Tribal Council and consultation with the Gabrieleno Band of Mission Indians-Kizh Nation was completed prior to circulation of the Draft EIR. Mitigation Measure TCR-1 was revised after consultation and the consultation was concluded in good faith. No Tribal cultural resources as defined in PRC Section 21074(a)(1) that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or that are determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to PRC Section 5024.1, have been identified within the Project site.

I-806-11

Please see Master Response - Biological Resources.

I-806-12

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Please see Master Response - EIR Recirculation Requirements.

I-806 Karen Lower

COMMENT

RESPONSE

	that it can properly be called tragic.	I-806-13	This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-806-13	Don't take our word for it. Read the experts' comments just on the Bioresources and Land Use topics of the DEIR. Even they were surprised at how extraordinary the Reservoir is.	I-806-14	This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-806-14	In a time when so much of our world is threatened, we can do something! We have an unparalleled local opportunity for a better future IF we have the foresight to preserve this open space and its wildlife as a permanent part of our City and the world.	I-806-15	The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.
I-806-15	NOT A LOSS BUT A GAIN With much less money and alterations, we can meet the objectives of this Open Space's future by supporting its unique character and strengths, not by destroying that singularity. We are a "Very Low" needs community for parks and recreation as evaluated by LA County. The focus of park improvements should be directed to "Very High" and "High" needs areas, of which there are many.		As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project's fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to repurpose the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
I-806-16	Our Alternative Hybrid 3+2* is in harmony with the City's forward thinking on environment, wildlife biodiversity, and climate issues in general rather than going against it. These experts' reports show how valuable the Reservoir is and how inadequate this DEIR is.	I-806-16	The comment expresses support for the Alternative Hybrid. Please see Master Response - Alternatives Analysis.
I-806-17	-The DEIR demonstrably failed at its job. Dan Cooper RCDSMM memo 1.2 Amanda Zellmer Silver Lake DEIR Comment.pdf Silver Lake DEIRcomment Jodhan Fine.pdf CDFW Scoping Comments Silver Lake	I-806-17	Please see Master Response - EIR Recirculation Requirements.

I-806 Karen Lower

COMMENT

RESPONSE

I-806-18 Please see Master Response - Alternatives Analysis.

I-806-18

*** Alternative Hybrid 3+2 = Best solution.**
Most of Alternative 3 except for the South Valley which would instead be Alternative 2's choices but without any new lighting.
In addition, Alt. Hybrid 3+2 would feature these individual exceptions that would override anything in Alt. 3:
NO ornamental or rain gardens in the Meadow due to drought
NO wetland terraces in the Meadow without reevaluation
NO habitat fences needed in the Knoll without trails
ALL walking paths/ promenades to have an effective buffer zone from the water's edge for safety
NO habitat terraces in the Eucalyptus Grove without reevaluation
NO new lighting anywhere
Bike improvements should be provided but NO new parking

...the fence is the single most important conservation management tool at the site after the presence of water."

- LA Audubon Society: Statement on the Future Management of Silver Lake Reservoir

I-807 Gina Acuna

COMMENT

RESPONSE

I-807-1	I oppose the SLRCMP for several reasons. As a stakeholder and resident of Silver Lake my home is located directly across from the Reservoir, and our entire neighborhood has been CURRENTLY negatively impacted by illegal activity that has been occurring at the Silver Lake Meadow for months now, activity such as late night amplified music, DJ booths, raves, large group gatherings, alcohol use/ public intoxication, littering, parking issues in the entire area, etc. All of this activity is illegal and has been reported to LAPD, Councilman O'Farrell's office, SLNC, Parks & Rec, Silver Lake Forward, and is well documented. There has been zero enforcement of any of this activity to make it stop. The negative impact this has caused in our community cannot be underscored enough, specifically amongst homeowners that live across from the Reservoir. The environmental impact of this activity already has been seen, heard, felt. Noise. Trash. Distruption of the sensitive wildlife and plant habitat of the Meadow. People sleeping and defacating in the bushes along the Meadow and Silver Lake walking path.	I-807-1	Please see Master Response - Public Safety.
I-807-2	Moving forward with development of the SLMP would be a disaster for those of us in the community that have to deal with these issues that are ongoing RIGHT NOW.	I-807-2	This comment discusses current conditions at the site as it relates to existing wildlife and habitat, noise, and solid waste. For a discussion on the proposed Project's impacts, please see Chapter 3 of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-807-3	I saw no plan in the SLRMP or EIR for mitigation of parking, noise, events, late night activity, crowd control, safety protocol, or responsibility for ENFORCEMENT of any of these activities.	I-807-3	Please see Master Response – Homelessness and Master Response - Public Safety. This comment describes current conditions on site and does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-807-4	I oppose the Plan.	I-807-4	As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option. In addition, please refer to Master Response - Traffic/Transportation for a discussion on the CEQA analysis included in the Transportation section of the Draft EIR.
I-807-5		I-807-5	Please see Section 3.12, Noise and Vibration of the Draft EIR, for a discussion on the noise impacts associated with the proposed Project.
I-807-6		I-807-6	As discussed in the Project Description, Section 2.7.2 of the Draft EIR, the proposed Project could have up to 12 special events annually. As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project.
I-807-7			
I-807-8			

I-807 Gina Acuna

COMMENT		RESPONSE
I-807-7	As described in Project Description, Section 2.7.2 the proposed park hours would be from 5:00 a.m. to 10:30 p.m. Certain park areas would not include additional lighting, such as portions of the Knoll and Eucalyptus Grove (refer to Figure 2-8 in the Draft EIR) and would be closed to public access at night. Operations in the South Valley would remain consistent with current conditions. Also, please see Master Response - Public Safety for a discussion on the proposed Project's Security Plan.	
I-807-8	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.	

I-808 Joanne D'Antonio

I-808-1 | Attached

COMMENT

RESPONSE

I-808-1 The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies and to minimize impacts to habitat values. The Tree Succession Plan would include the incorporation of native plants into the understory thus providing food sources and habitat for native wildlife including native sages (*Salvia* sp.) and milkweeds (*Asclepias* sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly respectively. The native plant species planting palette would take into account the surrounding habitat quality and site appropriateness.

The preparation of a Tree Succession Plan as outlined in Chapter 2, Project Description, calls for the phased removal of trees over 15 years to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Additionally, these trees can be selectively identified for removal thus avoiding trees with active rookeries, nests, and roosts. As the new tree plantings mature, new habitat would be established over time. The successional tree removal practice would ensure that nesting and foraging habitat would not be eliminated during implementation.

Please see Master Response – Biological Resources. As stated in Section 3.4 Biological Resources, PDF-BIO-13, and the City Tree Ordinance would require replacement at a 4:1 ratio for removal of all protected trees under the ordinance. The City Tree Ordinance has established this replacement ratio as an acceptable practice to mitigate for the loss of trees valued under the ordinance. A replacement ratio is intended to compensate for the loss of mature trees taking into account the temporal loss of the trees including the time required for a replacement tree to mature and establish equal habitat values. The replacement trees would mitigate loss of mature trees taking into account their maturity (trunk diameter) and species type and would require replacement of like-to-like species within the SLRC at a 4:1 ratio. The replacement requirements in the ordinance including the 4:1 replacement ratio is established to compensate for the habitat values of the trees to be affected resulting in a less than significant impact of the Project.

Also, please see Master Response – Biological Resources.

I-808 Joanne D'Antonio

COMMENT

RESPONSE

Comment on the **Silver Lake Reservoir Complex Master Plan Project (Project)**

From Joanne D'Antonio email: trees@ncsa.la

I serve on the **Community Forest Advisory Committee (CFAC)**, a group of tree-knowledgeable representatives vetted and chosen by City Council members to keep a watchful steward eye on our urban forest. We serve under the City Board of Public Works, volunteering for the community.

I also served for the full 10 months on the **Working Group that was First Step Developing an Urban Forest Management Plan for the City of Los Angeles** (commonly known as the "Dudek Report") https://www.cityplants.org/wp-content/uploads/2018/12/10939_LA-City-Plants_FirstStep_Report_FINAL_rev12-7-18.pdf

I am also the founder and chair of the **Neighborhood Council Sustainability Alliance Trees Committee**, which has between 100-200 tree advocate stakeholders from throughout the City of Los Angeles and has existed since 2016. Our mission is: *to protect the city's urban forest and to promote its care on behalf of the community through advocacy, outreach, and education.*

NCSA Trees Committee stakeholders from the Silver Lake area brought this project to my attention, and I must say I can't imagine that the residents of Silver Lake want to lose over 100 mature trees. Many people don't know how to respond to a DEIR, but my guess is if you did outreach and talked about how many trees would be removed, you would lose most of the support. One upset resident, Hugh Kenny, wrote this article in Silver Lake Together:

<https://mail.google.com/mail/u/0/?zx=akgy40rba53i#inbox/WhctKKXpPWzZNvtQkTGzG5klhPwHzFxzKkschfGjRcFccjrzSQDdkQzswXjdbPmFnCVWg?projector=1>

Also accessible here: https://3a20fcbb-3beb-4ed8-ada9-b72c8ddddd50f.usrfiles.com/ugd/3a20fc_da365ba5fd7c407ca9c58dd2e6169169.pdf

I think many would concur with Mr. Kenny.

What can happen in initial outreach: the public is asked what amenities they want, and then they much later sadly come to find out the cost in tree removals and wildlife disruption (usually leading to death of wildlife) that comes with their wish fulfillment. I realize this happens when trying to locate spaces for the amenities, but it is at this juncture that we need to rethink how important are these "bold re-purposings" of an area at the expense of the dwindling nature in our City.

I have seen hundreds of angry postings on Nextdoor after hundreds of mature trees were removed by developers and civic projects. People are busy and not aware of CEQA procedures or Planning Dept. notifications until it is too late. Then they get frustrated and just vote in new political leaders hoping that will solve the problem -- as we can see just happened.

Why is it important to immediately retain existing trees and nature? Is it just aesthetics? Why can't we depend on mitigation? Is the mitigation really mitigation? I will provide some answers from scientific experts.

I-808-1
Cont.

I-808 Joanne D'Antonio

COMMENT

RESPONSE

I-808-2 This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

BIODIVERSITY HOTSPOT

Los Angeles is in the only designated biodiverse region in the United States. LASAN spent taxpayer money on this scientific verification of our biodiversity hotspot status, demonstrating that we are in fact losing our rich heritage of diverse flora and fauna:

https://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-si/s-lsh-es-si-bd7_afrLoop=10702232328296028_afrWindowMode=08_afrWindowid=null8_adf.ctrl-state=ac0pww9s_1f1%40%40%3F_afrWindowid%3Dnull%26_afrLoop%3D1070223232829602%26_afrWindowMde%3D0%26_adf.ctrl-state%3Dac0pww9s_5

The recommendation City Council was to direct all departments to confer with the LASAN expert biodiversity panel to follow what is necessary to preserve nature. This was Item 21 on the LA City Council Agenda of August 18, 2021 and was passed at that session:

15-0489

ENERGY, CLIMATE CHANGE, ENVIRONMENTAL JUSTICE, AND RIVER COMMITTEE REPORT relative to the progress on biodiversity initiatives and pilot projects.

Recommendations for Council action:

INSTRUCT the Bureau of Sanitation (BOS) to:

Report back regularly on progress on biodiversity initiatives.

Continue to lead and work with the Biodiversity Expert Council, the Biodiversity Interdepartmental Team, and the Biodiversity Stakeholders in order to complete the first baseline measurement of the LA City Biodiversity Index.

Continue to seek funding for biodiversity initiatives and pilot projects.

Work with the Biodiversity Teams to consult with both the Climate Emergency Mobilization Office and the Civil and Human Rights and Equity Department and report back more robustly on biodiversity equity and access to nature, as per the original biodiversity motion. Perhaps forming a Biodiversity Equity Expert Group might be in order.

INSTRUCT the BOS and the Biodiversity Interdepartmental Team departments, and the City proprietaries, Los Angeles Department of Water and Power (LADWP), Port of Los Angeles, and Los Angeles World Airports, to:

Report with the creation of department-specific biodiversity plans, including how each department intersects with native biodiversity issues, how to protect and enhance native biodiversity in City department operations and areas over which the City has oversight, and for them to include recommendations for a percentage improvement per department each year until we achieve a "no biodiversity loss" goal as soon as possible.

Study and report with Planning in the lead, on how to educate the City, builders, and the public about the problem of bird-building collisions and recommendations on how to avoid them. Include an examination of best practices around the country: the Congressional Bird-Safe Buildings Act, what they are doing to avoid them in New York City, Chicago, San Francisco, San Jose and other cities, and what the City needs to do to adopt bird-safe building standards measures.

Study and report with the Department of Recreation and Parks in the lead, on how to adopt the Audubon Cooperative Sanctuary Program for all City golf courses.

Study and report, with all the biodiversity teams, on recommendations for how to integrate biophilic (aka, nature-centered) design into City projects, development projects citywide, and city-scale planning, and to report on the health and environmental and economic benefits of biophilic design for building occupants and urban environments.

INSTRUCT the Department of Public Works to work with the Chief Legislative Analyst (CLA), and City Administrative Officer (CAO), and report on the very apparent need the City departments have for a full-time Urban Ecologist, including the time Kat Superfisky spent working with BOS, the LA River team, LADWP, the City Forest Officer, and on other important environmental Planning issues besides the wildlife corridors, and the funding and process for creating a permanent Urban Ecologist position, similar to the City's Forest Officer.

INSTRUCT the BOS to include in the next report the C40 Cities Urban Nature Declaration recently signed by the Mayor, for Council's examination and formal adoption.

DIRECT the CLA and CAO to figure out how to access the funding set aside by Governor Newsom, particularly for the ready-pilots, inclusion of a grant writer, and better resource on the overall effort.

Fiscal Impact Statement. The BOS reports that they will continue to work with the Biodiversity Expert Council, the Biodiversity Interdepartmental team, the Biodiversity Stakeholders, and students from local universities to advance biodiversity assessments and research in the field. BOS is not requesting any additional funding for biodiversity during Fiscal Year 2021-22. Neither the CAO nor the CLA has completed a financial analysis of this report.

I-808 Joanne D'Antonio

COMMENT

RESPONSE

I-808-2
Cont.

We cannot afford recreational amenities at the expense of our trees, and the wildlife they support, even for the 20 years that it will take to fully restore these. We appreciate that very few "protected" trees are slated to be removed with this project, but there are non-naturally occurring native species that are sorely needed because only 3% of our urban forest consists of native trees. This was calculated by a CFAC member utilizing the Los Angeles City Tree Inventory <https://losangelesca.treekeepersoftware.com/index.cfm?deviceWidth=1667>. In fact, all planting for this project need to be native trees and plants. The "ornamental garden" sets a bad example and should be a "native garden", not a combination with drought-tolerant planting. If an example of a beautiful native area is needed, visit the Westwood Greenway in West Los Angeles. We can have aesthetics with all new planting as native.

I-808-3

CARBON SEQUESTRATION LOSS

Utilizing the just-cited tree inventory we can find out the annual loss of carbon sequestration of each of the removed park trees, which are on the inventory. Note that these calculations are very carefully done by iTree, that produced the software used by Davey Tree that conducted our City Tree Inventory: <https://www.itreetools.org/support/resources-overview/i-tree-methods-and-files/new-carbon-equations-and-methods-2020>. Saplings at best only do half as much carbon sequestration as a mature tree: <https://onetreepanted.org/blogs/stories/how-much-co2-does-tree-absorb>. And not all saplings survive – mortality is 19% according to the study cited by the US Forest Service: <https://www.fs.usda.gov/research/treesearch/18718> (Nowak, David J.; McBride, Joe R.; Beatty, Russell A. 1990. Newly planted street tree growth and mortality. Journal of Arboriculture. 16(5): 124-130.)

I-808-4

NEW WATER USAGE DURING A DROUGHT

Saplings and young trees require watering, unlike most mature trees that require almost no watering since they routinely access ground water. And we are in a drought. Though we get occasional years of respite from the drought, it keeps coming back. Sacrificing mature trees for amenities like parking are not an environmentally sensible trade-off.

UNPROTECTED TREES

Just because a tree is not one of the 6 currently listed in the Protected Tree Ordinance does not mean it should not be protected. We should not just follow the codes, but do better. Our City takes a long time to add new ordinances but this is the recommendation from the City-sponsored "Dudek Report", a working group of City entities involved with trees: "...the City should examine the overall definition of a protected tree and examine the ordinances of other cities, such as Pasadena, which protect both select native tree species and other trees with defined significant characteristics (e.g., size, heritage value, location, etc.) This may mean that there is a sliding scale for tree value based on species and size" https://www.cityplants.org/wp-content/uploads/2018/12/10939_LA-City-Plants_FirstStep_Report_FINAL_rev12-7-18.pdf page 50

I-808-3

As discussed in Chapter 2, Project Description, of the Draft EIR, the proposed Project would plant approximately 500 trees. The Project would include a Tree Succession Plan that would provide guidance for the gradual removal of mature trees to avoid temporary elimination of habitat value within the SLRC and replant areas primarily vegetated with non-native trees with native trees and understory. The plan would be prepared by a qualified arborist. The Tree Succession Plan would identify trees to be removed in the initial year of construction giving priority to trees that are dead, in poor health, and/or pose a safety risk to the public, including those with fungal and/or pest infestations. The plan would identify a sequence of phased removals for selected trees on a schedule throughout the 15-year period. Additionally, it would include the replacement of 80 percent of existing non-native trees over a 15-year timeline.

According to the California Emissions Estimator Model (CalEEMod) User's Guide, Appendix A, "planting trees will sequester CO₂ and is considered to result in a one-time carbon-stock change. Trees sequester CO₂ while they are actively growing." Modeling was conducted in CalEEMod to estimate sequestered CO₂ for the Project's 500 new trees, based on the Intergovernmental Panel on Climate Change (IPCC) assumed active growing period of 20 years and annual CO₂ accumulation factors for miscellaneous trees, which is the average of all broad species classes and should be used if the specific tree types are not known. The results of the modeling indicate a total sequestration of approximately 354 metric tons of CO₂ (or approximately 17.7 metric tons of CO₂ per year during the 20-year growing period). Modeling results are provided in Appendix Final EIR-2 of the Final EIR.

As provided in Table 3.8-6 of Section 3.8, *Greenhouse Gas Emissions*, of the Draft EIR, the Project would result in approximately 1,486 metric tons of carbon dioxide equivalents (MTCO₂e) per year without account for sequestration. Accounting for sequestration, the Project would result in approximately 1,468 metric tons of carbon dioxide equivalents (MTCO₂e) per year during the 20-year growing period. Project GHG emissions impacts would be less than significant as was determined in the Draft EIR.

I-808-4

The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the

I-808 Joanne D'Antonio

COMMENT

RESPONSE

SHADE AND CANOPY LOSS

Though native trees are our best biodiversity choice, we need to bear in mind that the City is canopy and shade poor. And some non-native trees like the eucalyptus that this project is proposing to remove are utilized in monarch butterfly migrations, which may not have been taking place when the area was studied for this DEIR.

A City Council motion 15-0499-S2 passed in 2021 https://clkrep.lacity.org/online/docs/2015/15-0499-s2_mot_04-08-22.pdf which states **"Trees are not being effectively protected or prioritized in policy, development, or enforcement."** and it depicts our City's deficient tree canopy with this table:

The shortage of trees is illustrated by the **very low tree canopy coverage percentages in all 15 Council Districts**. As noted in the *Los Angeles Urban Forest Equity Streets Guidebook* prepared in April 2021 by CAPA Strategies, the following chart provides the tree canopy coverage distribution by each Council District, with very low percentages Citywide, as follows:

Council District	Tree Canopy Coverage Percentage
15	10.03%
9	11.71%
8	12.20%
10	15.46%
6	15.68%
14	15.80%
13	18.56%
1	20.36%
12	20.59%
2	24.99%
7	25.16%
3	25.61%
5	35.20%
11	36.43%
4	36.66%

Urban tree canopy is over 40% in Beverly Hills. Pittsburgh has a 42% canopy, and according to the US Forest Service it estimates it can support another 33% and has in fact set a goal of 60% canopy in 20 years https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/Urban%20Tree%20Canopy%20paper.pdf page 11.

Removing trees should not be approached with the idea that "we can just replant" because this approach deprives the area of canopy for many years.

CFAC and the NCSA Trees Committee scrutinize every tree removal request the comes through the Urban Forestry Division, and we challenge any that are insufficiently justified.

removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Please see Master Response – Biological Resources.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-808-4
Cont.

I-808 Joanne D'Antonio

COMMENT

RESPONSE

I-808-5

RECREATION AT WHAT EXPENSE?

I have seen children literally *CRY* at tree removals. If you were to put up photos of the beautiful trees that were removed so the kids could play on asphalt or artificial turf or even lawns, I think the sensitive ones would be upset. And we want them all to grow up to be sensitive to the environment. I personally boycott all new shopping areas that remove trees. Now I will boycott a park that removed trees to build "rec". I have always objected to "rec" coming before "parks" in RAP, and the funding is in that order. We have to change our priorities if we want to have future health in the City. Wildlife areas are not something you just "build" and the wildlife comes. It is more organic. Yes, you can plant the native plants and help the wildlife. But why remove their habitat in the first place? Wildlife does not just "live more cramped" until the new areas are built. This is what happens: "... habitat loss takes place by altering the land in a way that confuses the animals and disrupts their natural way of living. This is called habitat fragmentation and it occurs when we create roads and place attractions in the midst of woodlands and other natural areas. . . . By fragmenting habitats, areas may not be completely destroyed but it still causes [environmental chaos](https://www.conserve-energy-future.com/causes-effects-solutions-for-habitat-loss-and-destruction.php). Fragmentation can separate animals from one another and from their food sources." <https://www.conserve-energy-future.com/causes-effects-solutions-for-habitat-loss-and-destruction.php>

BIODIVERSITY NECESSARY FOR HUMAN HEALTH

From the World Health Organization:

"KEY FACTS

Biodiversity provides many goods and services essential to life on earth. The management of natural resources can determine the baseline health status of a community. Environmental stewardship can contribute to secure livelihoods and improve the resilience of communities. **The loss of these resources can create the conditions responsible for morbidity or mortality.**

Biodiversity supports human and societal needs, including food and nutrition security, energy, development of medicines and pharmaceuticals and freshwater, which together underpin good health. It also supports economic opportunities, and leisure activities that contribute to overall wellbeing.

Land use change, pollution, poor water quality, chemical and waste contamination, climate change and other causes of ecosystem degradation all contribute to biodiversity loss and, can pose considerable threats to human health.

Human health and well-being are influenced by the health of local plant and animal communities, and the integrity of the local ecosystems that they form."

I-808-6

I-808-5 This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-808-6 The SLRC would continue to function at the baseline conditions for biological diversity and wildlife connectivity. Please see Master Response - Biological Resources for a discussion of baseline conditions. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-808 Joanne D'Antonio

COMMENT

RESPONSE

<https://www.who.int/news-room/fact-sheets/detail/biodiversity-and-health#:~:text=Biodiversity%20supports%20human%20and%20societal,that%20contribute%20to%20overall%20wellbeing>

PUBLICIZE THE TREE LOSS AND RE-ADJUST YOUR PLAN

Why would we remove trees to create a park? A park needs to be a place for people to recover from the bustle of the city and experience calm. They can play basketball just fine in a gym. Surely there are treeless places to build rec centers. We do not have to destroy trees where birds can perch near water just to accommodate sports.

Please publicize and check again with the people of the neighborhood including the neighborhood councils because I am hearing they are very upset at the amount of tree loss that will take place to build this "park". Make sure you take another listen to their reaction – I don't think they initially realize this extensive tree loss.

I suggest you do what you can to put in facilities *around* the trees with minimal disturbance. Yes, scale it down. You will have a happier neighborhood. Removing 105 trees to build a park makes no sense. Kafkaesque. Outrageous!

Joanne D'Antonio

Neighborhood Council Sustainability Alliance (NCSA), Trees Committee Chair
Community Forest Advisory Committee (CFAC) Representative for CD 2, and CFAC Enforcement Subcommittee Chair

Greater Valley Glen neighborhood council (GVGC): Board Member, Sustainability Representative, PLUC member
NCSA Representative - Urban Forestry Management Plan (UFMP) Working Group

trees@ncsa.la
joanne.treedevocate@gmail.com
cd2cfac@gmail.com
(818) 387-8631

I-808-7

The proposed Project will result in direct impacts to native shrubs and trees regulated by the City Tree Ordinance, RAP Policy, and the BSS tree permit application. The proposed Project includes a Tree Succession Plan developed to manage the tree removals to ensure full compliance with the ordinances and policies and to minimize impacts to habitat values. The Tree Succession Plan would include the incorporation of native plants into the understory thus providing food sources and habitat for native wildlife including native sages (*Salvia* sp.) and milkweeds (*Asclepias* sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly respectively. The native plant species planting palette would take into account the surrounding habitat quality and site appropriateness.

The preparation of a Tree Succession Plan as outlined in Chapter 2, Project Description, calls for the phased removal of trees over 15 years to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. Additionally, these trees can be selectively identified for removal thus avoiding trees with active rookeries, nests, and roosts. As the new tree plantings mature, new habitat would be established over time. The successional tree removal practice would ensure that nesting and foraging habitat would not be eliminated during implementation. Please see Master Response – Biological Resources.

As stated in Section 3.4 Biological Resources, PDF-BIO-13, and the City Tree Ordinance would require tree replacement at a 4:1 ratio for removal of all protected trees under the ordinance. The City Tree Ordinance has established this replacement ratio as an acceptable practice to address the loss of trees valued under the ordinance. A replacement ratio is intended to compensate for the loss of mature trees taking into account the temporal loss of the trees including the time required for a replacement tree to mature and establish equal habitat values. The replacement trees would address loss of mature trees taking into account their maturity (trunk diameter) and species type and would require replacement of like-to-like species within the SLRC at a 4:1 ratio. The replacement requirements in the ordinance including the 4:1 replacement ratio is established to compensate for the habitat values of the trees to be affected resulting in a less than significant impact of the Project.

RAP Tree Policy states that whenever trees are removed, the existing trees' aggregate diameter, measured at DSH (diameter at standard height) shall be replaced at an equal or greater rate of caliper of new trees. For the proposed

I-808 Joanne D’Antonio

COMMENT

RESPONSE

Project, the City would be required to replace trees protected by the RAP Tree Policy at a 1:1 ratio for total trunk diameter. Additionally, RAP Tree Policy requires at least a 4:1 ratio for native species regardless of the caliper requirements. PDF-BIO-14 outlines the RAP Tree Policy requirement by stating that replacement trees would mitigate loss of mature trees taking into account their maturity (trunk diameter), habitat value, and species type. The 1:1 replacement requirement sufficiently compensates for the values of the trees to be affected resulting in a less than significant impact of the Project.

BSS Tree Policy, as adopted by the Board of Public Works and implemented by BSS Urban Forestry Division and the Board of Public Works, require tree replacement at a 2:1 ratio for removal of all street trees. The BSS Tree Policy was adopted by the Board of Public Works in 2015 with expert analysis concluding that it was an acceptable practice to address the loss of any removed street tree. For the proposed Project, the City would be required to replace street trees at the 2:1 replacement ratio.

The commenter is also referred to Master Response - Community Engagement Process.

I-809 Theresa Chavez

COMMENT

RESPONSE

	My husband, son and I have lived adjacent to the reservoir since 1996. Prior that I have lived nearby (Los Feliz and Silver Lake) since 1987.	I-809-1	This comment is introductory although it also questions the adequacy of the Draft EIR.
I-809-1	My position is quite simple: Anything that positively impacts the natural environment I am for. Anything that negatively impacts the human environment I am against.		Please see Master Response - EIR Recirculation Requirements.
I-809-2	This should be the priority for the Master Plan, and a revised DEIR (which is greatly needed as it does not fully address the actual impact of the Master Plan); the priority being to only implement changes or upgrades that provide a more supportive environment for the ecosystem as it currently exists in and around the reservoir. No amenities for human usage should be implemented except in the southern end (dog park, gym/community center, etc.) as needed for safe and enjoyable use of this specific area.	I-809-2	This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
I-809-3	This neighborhood and the reservoir were not built to be a human destination like the one currently proposed.	I-809-3	The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	FOR EXAMPLE: the way the reservoir area is currently used is for short periods of time — approximately up to an hour or less. But the proposal would increase that period of time to hours and hours, up to a full day of use. This would greatly impact the surrounding neighborhoods and the quality of life of those people living in the vicinity of the reservoir, along with the natural wildlife that make their homes in and around the reservoir.		This comment also expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.
I-809-4	So related to that, does anyone know how many hundreds and hundreds of cars park temporarily in our neighborhood on a daily basis? And what is the expectation for how many more cars will park on a long-term basis — for hours and hours or all day which would further clog up our human environment both physically, and in terms of air quality and noise. Despite the additional parking spaces proposed (which are inadequate and would further clog up traffic) the surrounding streets would become long-term parking for this misguided, and under evaluated Master Plan.	I-809-4	Section 3.16, Transportation, of the Draft EIR discussed impacts of the proposed Project related to traffic and transportation. Also, please see Master Response - Traffic/Transportation.
I-809-5	There already is a human impact on our neighborhood that we accept as a resident, but it is a human friendly use of the reservoir. What I oppose is a more intense human impact on our living environment and on the natural environment of the reservoir.	I-809-5	Section 3.16, Transportation, of the Draft EIR discussed impacts of the proposed Project related to traffic and transportation. Also, please see Master Response - Traffic/Transportation. The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

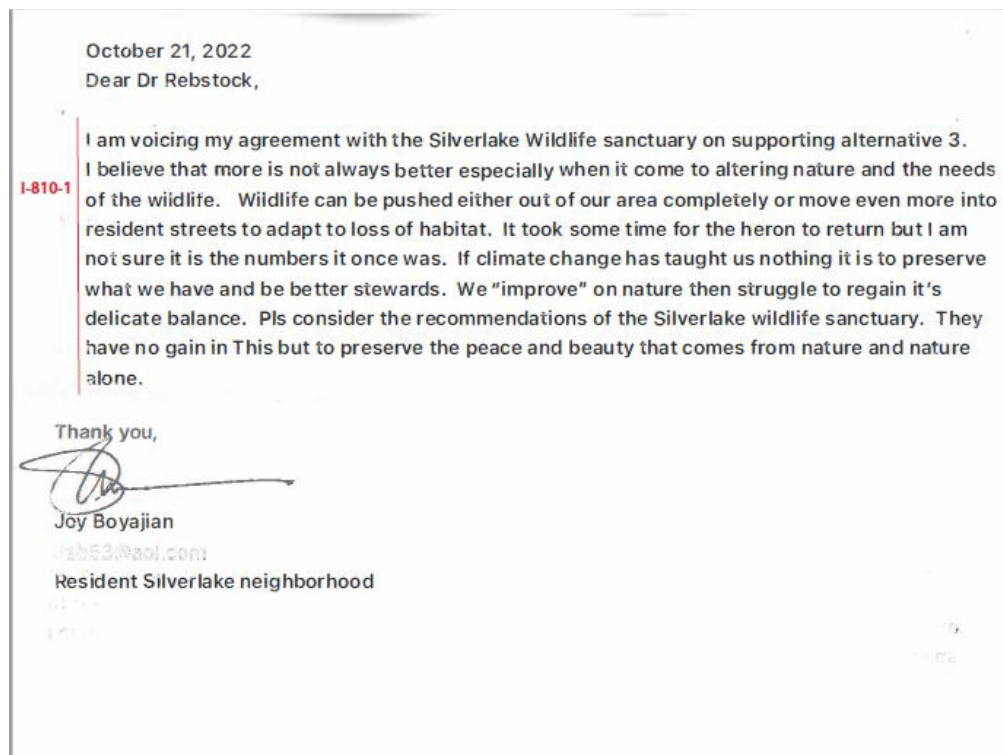
I-809 Theresa Chavez

	COMMENT	RESPONSE
I-809-6	<p>In addition I believe the funds expended to fulfill the Master Plan should be used to create or enhance green space in neighborhoods that desperately need it, not in a neighborhood that sits a mile from one of the largest urban parks in the country, that being Griffith Park. The amenities proposed for this Plan are unneeded, unnecessary, and only fulfill the sensibility that space needs to always be filled in and built upon in order to fulfill the human desire to upend and leave a human mark on the natural environment.</p>	<p>I-809-6 The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic.</p> <p>As described in Project Description, Section 2.4 of the Draft EIR, the proposed Project’s fundamental objective is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.</p> <p>The commenter is also referred to Master Response - Funding and Operations.</p>

I-810 Joy Boyajian

COMMENT

RESPONSE



I-810-1 The comment expresses support for Alternative 3. This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-811 Lynda Obst

COMMENT

RESPONSE

I-811-1 The comment expresses support for the proposed Project. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

From: [LYNDA Obst](#)
To: [SLRCMPProject](#)
Subject: Re: Silver Lake Reservoir Complex Master Plan Draft EIR
Date: Monday, October 24, 2022 4:18:40 PM

I-811-1

I love this project and what it has come up with so much I could scream it across Ivanhoe to the end of Silver Lake where do I get to do that in writing
It's gorgeous and is a point of pride for all of us that this is what we all want and accomplished
Bravo
Lynda Obst

I-812 Vasken Hagopian

COMMENT

RESPONSE

VASKEN HAGOPIAN
P.O. BOX 39582
LOS ANGELES, CA. 90039

NOVEMBER 5-2022

CITY OF L.A. BUREAU OF ENGINEERING

I-812-1

THIS LETTER ARRIVED ON NOV-4-22 AT MY HOME.
YOUR HEARING DATE WAS IN OCTOBER.

I-812-2

MY CONCERN IS THE DOG OWNERS. AS IT IS, IT STINKS WITH DOG
POOP AND PEE, AND DOG HAIR.
IF YOU ALLOW THESE DOG OWNERS IN THESE NEW AREAS !!!
YOU MIGHT AS WELL CALL IT "THE SILVER LAKE RESERVOIR DOG
OWNERS HEAVEN"

I-812-3

WE LIVE ON WAVERLY DR. FOR OVER 26 YEARS. USED TO BE ONE
DOG OWNERS, BUT NOW IT IS 2-4 DOGS FOR EACH HOME.

YES THEY WALK THEIR DOGS IN FRONT OF OUR HOME, THE DOGS
PEEP, AND POOP IN FRONT OF OUR HOME, SOME PICK UP AND SOME
JUST LEAVE IT THERE.

THERE IS NO LAW, NO RULES FOR THESE DOG OWNERS, AND WE
SUFFER WITH THE STINCH OF DOG PEE AND POOP.
WHEN WE HAVE GUESTS, ESPECIALLY AT NIGHT WE HAVE TO GO AND
ESCORT THEM IN TO OUR HOME SO THEY DON'T STEP ON THE
POOPS.

WHERE THE HELL ARE THE LAWS AGAINST THESE CARELESS DOG
OWNERS???????

THANK YOU



VASKEN HAGOPIAN

I-812-1

Please see Master Response - Community Engagement Process.

I-812-2

The comment expresses concern regarding dogs allowed at the Project site. As described in the Project Description, Section 2.3 of the Draft EIR, a Dog Park operated and maintained by RAP is currently located adjacent to the Silver Lake Recreation Center along the southeastern side of the SLRC. The existing Dog Park covers approximately 48,790 sf of space and would be expanded to approximately 56,400 sf of space and renovated to include two separate spaces for both small and large dogs. The area would be regraded and surface materials would be updated from decomposed granite to synthetic turf or other dog-friendly surfacing. Currently the Dog Park is open every day from 6:00 a.m. to 10:00 p.m., closing on Wednesdays from 6:00 a.m. to 8:30 a.m. for maintenance.

As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. This plan would include a section on Wildlife Management, Wetlands Management, Tree Succession Plan, Brush Clearance, and Security. Refer to the Project Description, Section 2.7.1 of the Draft EIR for a basic outline of each plan.

The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions, as well as the enhanced Dog Park. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-812-3

Please see response I-812-2. This comment does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-813 Barbara Ringuette

COMMENT

RESPONSE

From: Barbara Ringuette <Itrbab@att.net>
Sent: Thursday, December 1, 2022 10:22 PM
To: SLNC board; transportation@silverlakenc.org; reservoir@silverlakenc.org
Cc: SLRCMPPProject
Subject: SLNC Newsletter - Correction

Hello Silver Lake Neighborhood Council Board and Transportation & Safety Committee and SLNC Board,

I-813-1 Thank you for the December 1st Newsletter.

A correction: Metro eliminated the 201 bus line a couple of years ago. Thus, there is no bus line on Silver Lake Blvd.

Likely you have already seen that the deadline for comments on the Draft Environmental Impact Report (DEIR) for the Silver Lake Master Plan has been extended to 5 pm December 16th.

Sincerely,
Barbara Ringuette

Barbara and Lee Ringuette

I-813-1 The comment notes that the 201 bus line does not run on Silver Lake Boulevard. As described in Section 3.16.1, Transportation, the SLRC is connected to the County Metro bus system via lines #201 that runs West Silver Lake Drive with multiple stops adjacent to the Complex and #92 which runs on Glendale Boulevard with multiple stops which are a short walking distance from the SLRC (Figure 3.16-1 of the Draft EIR). Line #92 connects to Burbank, Glendale and downtown LA. According to LA Metro’s NextGen Bus Plan, Line # 201 will be discontinued. Portions of Line #182 and #603 will stop in the project vicinity and connect to Hollywood and Echo Park. The Vermont/Sunset Metro Station is approximately 1.45 mile west of the Project Site and the Vermont/Santa Monica Metro Station is approximately 1.42 miles southwest of the Project Site.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

I-814-1 This comment is introductory and does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-814-1

Phyl van Ammers
 Ronald van Ammers
 2300 Moreno Drive
 Los Angeles, CA. 90039
phylvanammers@gmail.com
 October 16, 2022

Re: Written comment on Silver Lake Draft EIR

Andrew Salas
 Gabrielino Band of Mission Indians – Kizh Nation
admin@gabrielinoindians.org

Anthony Morales
 Gabrielino/Tongva San Gabriel Band of Mission Indians
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Dr. Jan Green Rebstock
 City of Los Angeles
 Public Works, Bureau of Engineering
Jan.green.rebstock@lacity.org

Silver Lake Reservoir Complex Master Plan Project
 "Submit a Comment"
https://comment-tracker.esassoc.com/silverlake_master/index.html#/27/welcome

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

I-814-1
Cont.

Silver Lake Neighborhood Council (SLNC).
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We appreciate the opportunity to comment on the Silver Lake DEIR.

The proposed Project would redevelop approximately 116 acres of the 127-acre Silver Lake Reservoir Complex with a contemporary design that would create seven park zones blending vegetated areas with public spaces. ("The Project")

Chapter 2 of the Project Description states the Silver Lake Reservoir Complex (SLRC) is a designated Historic Cultural Monument, designated as a Historic-Cultural Monument primarily for its association with the development of the Silver Lake neighborhood, its significant association with William Mulholland, and as an early and important example of a hydraulically sluiced reservoir.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

I-814-1 The California Environmental Quality Act establishes a policy of sustainability. Historical resources (buildings, structures, or archeological resources) are considered part of the environment and are subject to review under CEQA. It is well-established that a sense of place motivates stewardship.

I-814-2 In 1770, when the Gaspar de Portolá expedition passed through the area now occupied by the Silver Lake Reservoir complex, it was the site of an Indian village, probably Kizh (or Tongva) people.

The village was on the road that led from the village most usually called Yang-Na, and the road led from the village in the long valley to today's Griffith Park, through a predecessor road of Crystal Springs Drive to a road in the San Fernando Valley. The road, which Griffith J. Griffith called "the river road," on the San Fernando Valley side of Griffith Park led to a fording place in the river. The river on that side – before it turned south and flowed through the Glendale Narrows – was more like a creek, much of its flow there was subterranean. The river could be easily forded on that side.

The road before it entered what became known as the Rancho Los Feliz –land granted to *ranchera* Maria Ygancia Verdugo in 1843 – is gone. Her 1845 irrigation ditch was possibly the beginning of later irrigation projects, including eventually Silver Lake and then Ivanhoe reservoirs.

The road through the long valley the Spanish, Mexican, and then American settlers traveled is under the Silver Lake Reservoir Complex's concrete basins. The road where it left the long valley is about Rowena Avenue. An approximation of the route to the San Fernando Valley may be followed today, and the river may be easily crossed on that side today on the short bridge called Riverside Drive Bridge, which leads from Zoo Drive into Burbank. The road becomes Riverside Drive, but branches to three streets: Sonora Avenue, Riverside Drive and Victory Boulevard.

I-814-3 The area the SLRC occupies may have been the site of the house that José Vicente Feliz or his daughter and her husband constructed in 1780 – meaning the beginning of Los Angeles's non-Indian built environment was possibly where Los Angeles began.

The area around the reservoirs was not well developed until the 1920s, but the "paper town" called Ivanhoe was subdivided in the late 1880s. The bulldozer was invented in 1923, making it easier to build in the hilly tract.

In 1903, L. C. Brand's workers dynamited open the long hill called Hard Luck that separated land near the river from land around today's reservoir complex to create a trackbed for the inurban electric train that ran through a tunnel from downtown to Glendale. In the 1920s, a metal structure replaced part of the wooden viaduct and the hill or a hill was excavated to create Fletcher Drive on the west side of the river. (There was a short Fletcher Drive in Glassell Park before then.)

When private automobile ownership was rare, Los Angeles electric interurban trains provided public transportation first, to open areas to real estate speculation, and then to allow commuters to live in Glendale, Atwater, Silver Lake, and Echo Park when the downtown area was the center of commerce.

The municipal stairways in the Silver Lake and Echo Park neighborhoods were critical to the sprawling open development of Los Angeles and tracts on the east side of the river.

The Silver Lake Reservoir Complex land is an area of historic importance.

Introduction

I-814-2 This comment is introductory and does not raise any specific issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-814-3 This comment includes general background and history of development in the City of Los Angeles and vicinity of Silver Lake. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

I-814-4 This comment includes general background and history of development in the City of Los Angeles and vicinity of Silver Lake. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Understanding the geology of the area once called the Rancho Los Féliz is the beginning of seeing the history of the land occupied by the Silver Lake Reservoir Complex.¹

Today's Silver Lake, Echo Park and Los Feliz neighborhoods were and are in a hilly area with one long valley called at one time *El Portezuelo*. The Silver Lake Reservoir Complex occupies a large part of El Portezuelo. As may be seen from the Carlson map, the valley was fairly large on the north -- where the reservoirs are located -- narrowed, and extended south of the Silver Lake reservoir dam to where Echo Park Lake is today.

If you stand on the Silver Lake dam and look straight ahead looking to the south, you can see a bank building on Sunset. Echo Park Lake is a little to the east of there, corresponding to the blue painted areas of the long valley in which the reservoirs are located. Looking from Echo Park Lake by the statue called the Lady of the Lake and looking straight ahead, you see the skyscrapers on Bunker Hill.

Bunker Hill used to be higher than it is now.

Late 1960s, early 1970s redevelopment of the old district -- which John Fante and Jack Kerouac wrote was the center of Los Angeles during the years tenements, boarding houses, "pensioners" living in the skeletons of once elite Victorian houses, bars, milk stores, newspaper stands, drugstores stood on the hill -- lowered Bunker Hill.

There was another valley between the hill occupied partly by what realtors the Moreno Highlands and the Franklin hills. There was -- at the time the below map was created -- a large gulch, which could be called a valley, and a canyon that also could be called a valley, in the area of today's Elysian Park. Elysian Park and Elysian Heights were once part of the tract called "Stone Quarry hills."

City government sold or gave away 80 percent of its pueblo land, beginning in 1853.

Some of the Stone Quarry Hills could not be given away. Elysian Park, dedicated in 1886, was land that could not be given away.²



1945 Carlson map³

An ancient Indian road once went from the Indian village sometimes called Yang-Na to the portezuelo. During the time real estate speculators attempted to subdivide and sell land during the "Boom of the Eighties" (1880s), the portezuelo was renamed Ivanhoe Canyon.

The road continued through today's Griffith Park into the San Fernando Valley and from there to the Central Valley, turning west to reach what was the Oakland estuary, now Lake

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

I-814-4
Cont.

Merritt. A branch of the road went further north, into Mendocino County, occupied by the Pomo people. The road also went east, into the Mojave.

The first European land expedition in Alta California that traveled from San Diego north to search for Monterey. The expedition members crossed the Los Angeles River on August 3, 1769.

A steep hill descended into the river in the Glendale Narrows, seen on a survey of “the Stone Quarry Hills” (largely occupied today by Solano Canyon, Dodger Stadium, Elysian Heights, and Elysian Park) in 1868.⁴ That hill still descends almost into the edge of the river, even though the river now flows – when it flows -- in a concrete sepulchre.

According to H. E. Bolton’s 1927 translation of Father Crespi’s diary, Crespi wrote the members of the Portolá expedition followed the plain they had been in. The plain they were in is considered part of the Los Angeles plain although the river separates the two areas. The Portolá expedition had been in the San Gabriel Valley.

On August 2, 1769, from the western edge of the Los Angeles plain before it reaches the river, they “entered a very spacious valley, well-grown with cottonwoods and alders, among which ran a beautiful river from the north northwest, and then doubling the point of a steep hill, it went on afterwards to the south. To the north northeast there is another river bed which forms a spacious water-course but we found it dry. This bed unites with the river....”⁵

Bolton wrote, in an asterisked note explaining the location of the campsite on the eastern side of the river, “Los Angeles River, where Los Angeles now stands. The dry river bed to the north was Arroyo Seco. Camp was probably near Downey Avenue.” Downey Avenue is now North Broadway. North Broadway after it crosses the river to the east side intersects with North Spring Street. The Broadway Bridge is at the end of the Glendale Narrows, and the water in the Glendale Narrows was deep, thrust upwards by bedrock.

One of the other members of the Portolá expedition, Catalan engineer Miguel Costansó, wrote about crossing the river from the eastern bank to the western bank:

*“B(V)adeamos el Río de la Porciúcula que baja con mucha rapidéz de la cañada por donde desemboca de la sierra para entrar el llano...”*⁶

Cañada may be interpreted as ravine, canyon, gorge, strait, arroyo. A “narrow” is a restricted land or water passage.

That the expedition members waded through the river suggests they did not ford the river in the Narrows, where water descended rapidly. The expedition forded the river below the Narrows, where it spread out. This was in August, in the rainless season.

The likeliest place for the expedition to have crossed the river was about where the Spring Street Bridge crosses it today. The river changed its course in 1825, but that change occurred further to the south. The expedition crossed the river again in January 1770, Portolá’s return to San Diego.

On August 3, 1769, the expedition traveled about half a league – about 1.3 miles – from the crossing place through the area commonly called Dogtown after the Ann Street animal shelter, which was to become the city’s first industrial area after the arrival of the Southern Pacific Railway in 1876. This area included what is today’s Los Angeles State Historic Park, commonly called “the cornfield,” once the SPPR railyard. In 1849, E.O.C. Ord and William Rich Hutton depicted a cornfield at about that location in their *Plan de la Ciudad de Los Angeles*.

One day, it may be possible to reconstruct the route from the river to what is today’s Olvera Street and the plaza. From a description by landscape painter William Henry Jackson it was “a very winding street.”

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

On January 29, 1867, Jackson camped at the settlement of El Monte. The plain extended many miles from where he was camped, and thousands of wild horses lived on the plain.

On January 31, 1867, he wrote:

"Up pretty early & baked grub and afterwards we all posted off to town. Passed a few low flat-roofed whitewashed & solitary looking Mexican houses on the right & left. Passed over the Los Angeles river on a narrow foot bridge & followed a very winding street up into the central part of the town....⁷ Blake Gumprecht, in *The Los Angeles River Its Life, Death and Possible Rebirth*, page 147, wrote about a foot bridge washed away by debris from the dam in 1868. The dam was above today's Broadway Bridge, so Jackson's description was probably about the area at the Broadway Bridge.

If the road was very winding in 1867, it had probably been winding in 1769.

At 1.3 miles, Portolá encountered Indians coming from their village, the village usually called Yang-Na. On today's streets, it is 1.3 miles from the Spring Street bridge to today's plaza area. Although it's just about never acknowledged, Yang-Na was on the apron of Fort Moore Hill, where the church, the plaza, Olvera Street, the firehouse, the Chinese history museum are. Indians, possibly not descendants of the people that lived there in 1769, had that area taken from them in the 1830s, and they were given *Ranchería de los Poblanos*, and then that was taken from them and they were moved across the river to *El Pueblito*, and then that was taken from them.

Portolá then took a branch of what was called by the end of the Hispanic eras *El Camino Viejo* and went in a westerly direction, passing the La Brea tar pits. The expedition climbed over the mountains, purportedly over what in the American era became the Sepulveda Pass, into the San Fernando Valley. There was no pass there in 1769, and Crespi described a difficult ascent.

On January 16, 1770, the Portolá expedition returned from its journey north. Portolá went through a gap in the Santa Monica Mountains at the location of today's William Mulholland Memorial Fountain. The expedition then went over "small knolls" to reach the valley, where they encountered Indians living in a village.

The road went through the valley, and emerged at about the bottom of today's Echo Park Lake, entering the Los Angeles plain. *Plan de la Ciudad de Los Angeles* showed a branch of El Camino Viejo went through the hills at that point.

On their second trip north, Father Juan Crespi named the gap in the mountains and the hills "portezuelo."

On February 21, 1776, the Juan Bautista de Anza expedition crossed the river, probably at about the same place as had the Portolá expedition, traveled up El Camino Viejo, took the branch through the hills, and camped in the valley, by then called by the Spanish El Portezuelo. This expedition traveled the next day through today's Griffith Park to Toluca Lake and then went west.

The portezuelo was a large meadow, and the Indians living in the village in the valley may have gathered plants and dug for tubers and seeds in it. The road through the valley was a portion of the primary road to the Central Valley in the Hispanic era, *El Camino Viejo a Los Angeles*. Vaqueros drove cattle along the route to reach hungry Argonauts during the California Gold Rush, going through the route that went through the valley. The other route into the valley was over a hill, about where Lake Hollywood is today. Below the river was a ravine or gorge, with a creek running through it.

This area was part of the cattle rancho of *ranchera* Maria Ygnacia Verdugo, a rancho granted on March 22, 1843. Her rancho, until the American era, when it was reduced as a result of the Land Act hearings because it conflicted with the claim of the city of Los Angeles for land

I-814-4
Cont.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

within what had been pueblo limits, included Echo Park, Angelino Heights, Victor Heights, and East Hollywood.

There is no photograph or painting of Maria Ygnacia Verdugo. Below is a photo of one of her daughters – Raymunda, who was married to Juan Domingo, the German immigrant who arranged with Pio Pico to have the Indians removed from *Rancharia de los Poblanos* so that Domingo could expand his vineyard.



Photo of Raymunda and her son Torio Domingo.⁸

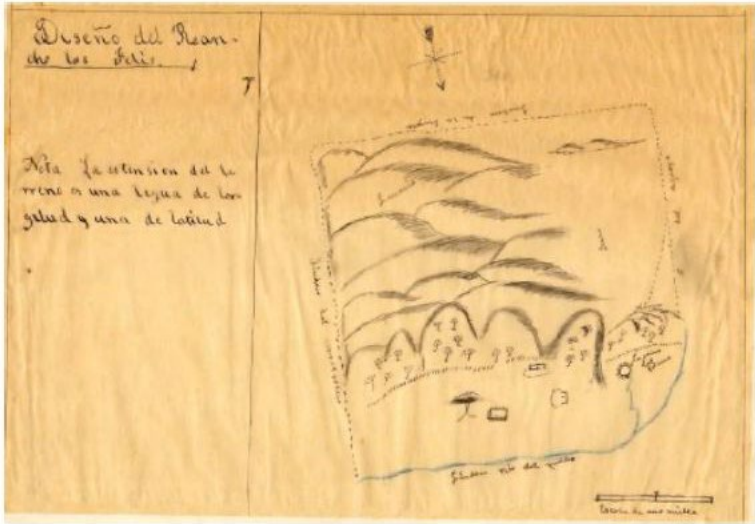
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I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

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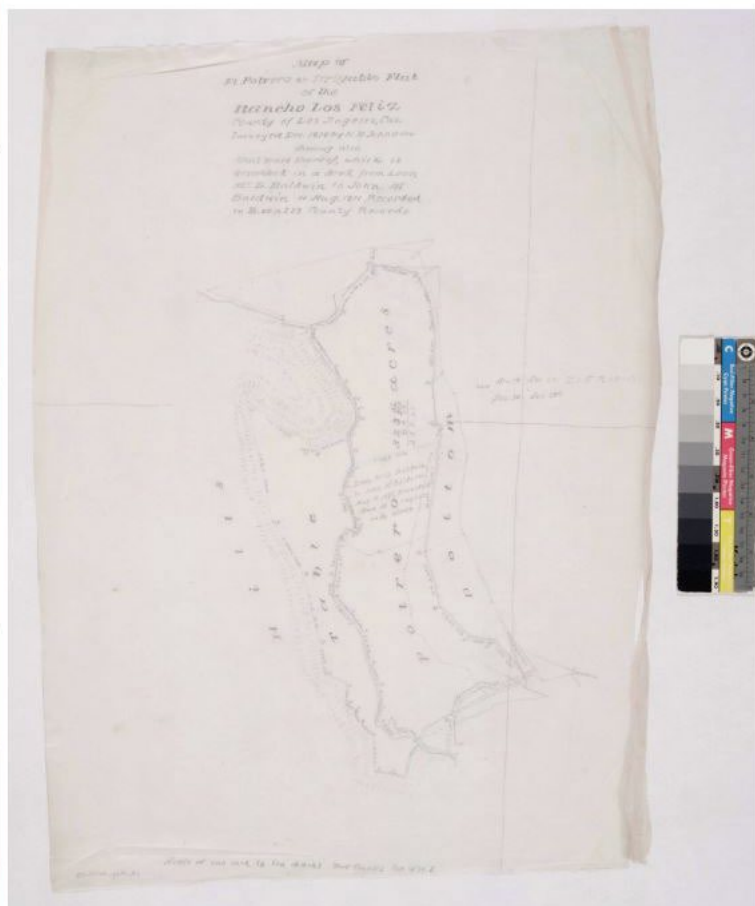
Maria Ygnacia Verdugo's 1843 diseño.⁹

Title records indicate her ditch was in the San Juan enclosure or her pasture, but there is no map showing her San Juan enclosure and nothing extant shows where her pasture was. The pasture or San Juan enclosure could have been the portezuelo; on the other hand, her ditch probably did not reach it. To reach the portezuelo from the river, her ditch would have gone uphill. It is unlikely Maria Ygnacia used a pump to lead the water in her ditch uphill in 1845. A ditch for water existed in 1870 in the portezuelo. In the map below, the portezuelo was called the potrero.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

I-814-4
Cont.

H. M. Johnston, "El Potoso or Irrigable Flat of the Rancho Los Feliz." Huntington digital library, Huntington Library, San Marino.
<https://hdl.huntington.org/digital/collection/p15150coll4/id/11397/rec/2>.

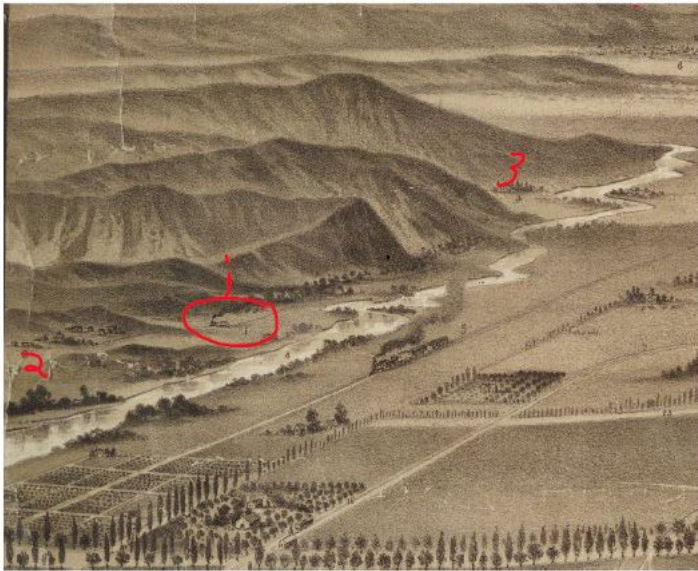
I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

A ditch through the portezuelo fed Reservoir No. 4 and the Elysian Reservoir. Reservoir No. 4 and the Elysian Reservoir – constructed before Silver Lake – served the domestic and agricultural uses of the growing city, supplementing the zanja system of irrigation first constructed in about 1781, and which served the pueblo and later the city of Los Angeles until 1903.

Real estate speculators arranged for carriages came up the route through the portezuelo to view proposed subdivisions. Carriages – perhaps the same carriages – took residents of downtown Los Angeles to see ostriches kept in the Charles Sketchley and Griffith J. Griffith ostrich farm.



Detail from "Boulevard Tract."¹⁰

In 1887, a few structures existed in what real estate speculators named the town of Ivanhoe, when the Ostrich Farm Railway traveled from Sisters' Hospital to the ostrich farm in what is today Griffith Park.

The artist for "Boulevard Tract" stood on a hill that is in today's Forest Lawn Memorial Park. The detail of the drawing shown below showed a tiny train on the west side of the river. The tiny train represented the Ostrich Farm Railway, which went from Griffith's ostrich farm in what is today Griffith Park through the portal in the hills.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

Number 3 on the drawing indicated the ostrich farm. Number 1 indicated the train to the ostrich farm. No. 2 was Ivanhoe in 1887.

In 1887, Griffith J. Griffith named a street Rowena after the love interest in Sir Walter Scott's novel *Ivanhoe*.¹¹ A predecessor road to Rowena was a stretch of the old road, called the Camino Público or Camino Real for a time after 1851.¹²



Ivanhoe subdivision map.¹³

The route of the Ostrich Farm Railway depicted on the subdivision map existed in reality. Looking at the subdivision map, the train ran along today's Griffith Park Boulevard. The reservoir did not exist. The streets were named, but did not exist, and – if the plots were sold no

I-814-4
Cont.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

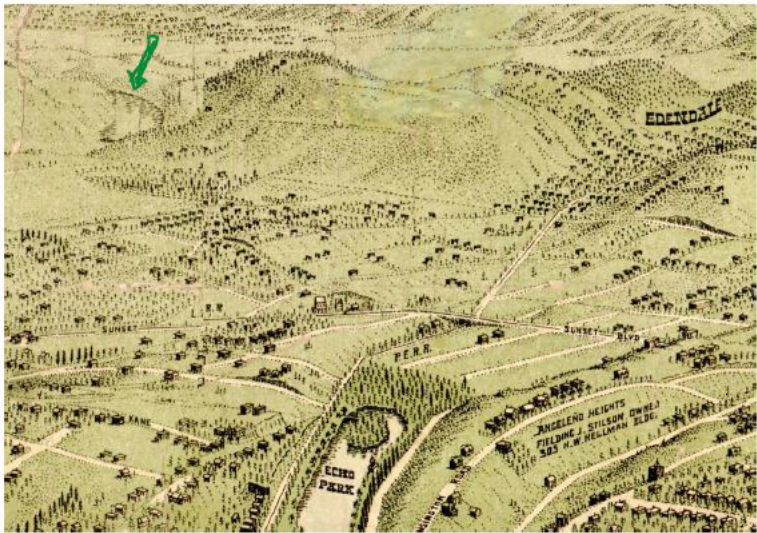
RESPONSE

record remains showing they did, building permits were not issued until later. Ivanhoe Elementary School began in a two-story farmhouse in 1886. Presumably, the farmhouse existed before 1886.

On December 8, 1887, the embryo city Ivanhoe was established. It did not manage to survive in the form its promoters intended. "Ivanhoe was situated on the Los Feliz Rancho, comprising the eastern portion of the Lick Tract; it was recorded June 2, 1887, and consisted of 700 acres divided into 1,300 lots....A free carriage went to the tract daily."¹⁴

There were three ways to get to the former Rancho Los Feliz for a time. One was on the road by then through the Cahuenga Pass and then along the river road, on the valley side, then along the road through the park. The second route was the Portezuelo route – shown on state engineer William Hammond Hall's 1880 map which, was where carriages also went – possibly the same carriages at the same time – to the Ivanhoe subdivision. The third route was the railway to the ostrich farm. The Ostrich Farm Railway opened a portion of what is today Sunset Boulevard. Sunset Boulevard burrowed through Fort Moore Hill – excavated first for dirt for Union Station and then for the 101 Freeway – in 1904.

The 1909 "Birdseye" view of Los Angeles showed one lake, undivided. It looks like three houses stood on the flank of the hill facing the reservoir.



Detail from 1909 Birdseye View.¹⁵

Before Mulholland flooded what he – according to his granddaughter Catherine Mulholland in her biography *William Mulholland and the Rise of Los Angeles* (University of California Press, 2002)– called Ivanhoe Canyon.

I-814-4
Cont.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

The name Ivanhoe Canyon may have begun with the “paper town” of Ivanhoe created during the Boom of the Eighties. Until the popular success of Helen Hunt Jackson’s *Ramona*, Anglo real estate promoters erased the Spanish and Mexican era history. After 1888, “boomers” created a syncretic romanticized Hispanic past.¹⁶ The street named Allesandro is a misspelling of the name of the character Romana’s Indian husband.

William Mulholland, in an interview by the *Los Angeles Times* on May 8, 1927, said:

“Forty years ago, I lived within a half-mile of what is now Silver Lake and used to picnic along the stream that flowed through the meadows. In 1903, I built the dam that made Silver Lake. We used to walk to the top of the surrounding hills, which were considered the finest viewpoints in Los Angeles.”¹⁷ Mulholland probably lived a mile and a half from what became Silver Lake, rather than “within a half-mile.”

It is possible Mulholland lived in another house, but Catherine Mulholland wrote in *William Mulholland* that her grandfather lived in what he called “an old shack” during the years beginning in 1886 that he worked on the Crystal Springs project.

Ernest Garcia – one of Rafaela Feliz’s children – recalled that William Mulholland roomed with his family at their ranch house. Rafaela Feliz was one of Maria Ygnacia Verdugo’s grandchildren.¹⁸

His mother had lived next door to where Ernest was living at the time of his interview – she died in 1939 – at 2854 Rowena Avenue.¹⁹ An apartment building is today at 2854 Rowena Avenue. It is a peculiar structure. The front structure looks like a modified house. The roof is unusual, typical of houses in Los Angeles built around the turn of the twentieth century.



Los Feliz Ranch House.²⁰

I-814-4
Cont.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

In the 1880s, the “old ranch house” was where the William Mulholland Memorial Fountain, dedicated in 1940, stands. A little shack was attached to the house at the time of the undated photograph.

Another ranch house, always referred to as “the new ranch house,” was built possibly in the 1850s, possibly by either Antonio Félix or Anastacio Félix. Archivists from different libraries state different men built the “new ranch house,” at different times. That house – “the new ranch house” -- became the ranger station in Griffith Park.

Because Ernest Garcia lived in the “old ranch house” when he was a child does not necessarily mean either that house or the attached house was a house built in the early years María Ygnacia lived on the rancho. The houses in the photograph show steeped roofs. The main house had a chimney. Spanish era houses had flat roofs. It is, for the same reason, unlikely the houses in the photograph had been a house belonging to Vicente Félix or to either of his sons that had *sitios* on the rancho.

In 1852, William Rich Hutton sketched a house in or near “El Portezuelo.” This house also had a steeped roof.



“Near Los Angeles September 18, 1852.”²¹

No other place near Los Angeles looked like the scene in Hutton’s sketch other than the area in front of the low hills between the valley and the river. The San Gabriel Mountains showed behind the hills, which were then unexcavated. The house stood on flat land. No intermediate hills were shown. The house was probably, therefore, at about what would be at or near today’s Fletcher Drive and Glendale Boulevard.

I-814-4
Cont.

I-814 Phyl van Ammers/Ronald van Ammers

COMMENT

RESPONSE

I-814-4
Cont.

After secularization of the missions in 1834, emancipated Indians often went to the ranchos to get work. Any number of structures could have been on the rancho that were intended to house Indian vaqueros.

There is no record of a deed or grant to anyone else before 1843. Maria Ygnacia's husband Juan José Anastacio Félix was a relative of Vicente Félix -- comisionado of the pueblo from 1787 to 1800. Juan José Anastacio's father Anastacio Maria Félix had lived on the rancho from the early 1790s until his death in 1810. Juan José Anastacio and Maria Ygnacia Verdugo and their family moved to the rancho in 1828. Although it is generally believed a governor granted the rancho to Vicente, only two bits of evidence imply someone granted him a rancho.²²

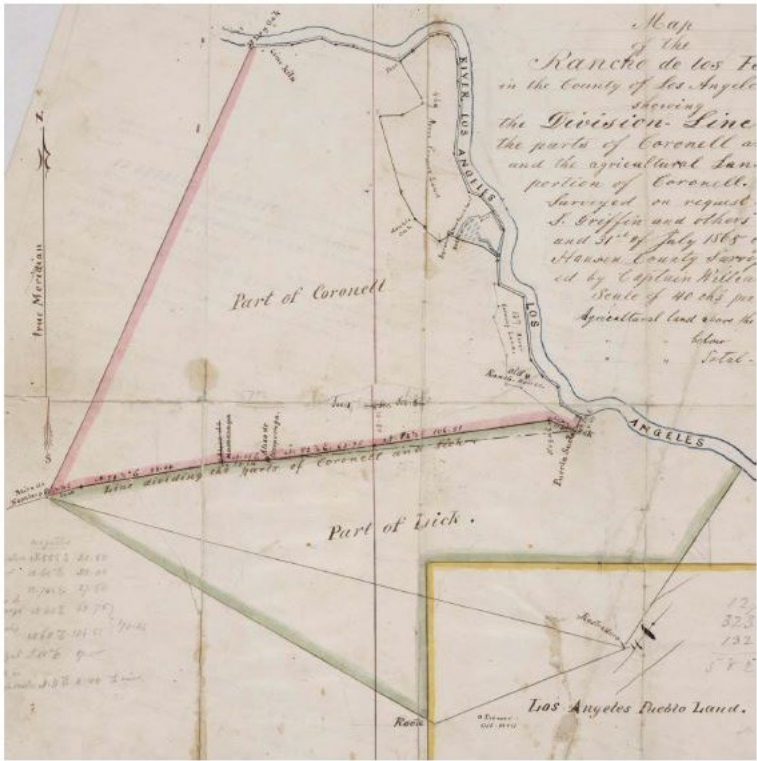
Vicente had been a soldier with the Anza expedition. He may have built a home on what became the Rancho Los Félix as early as 1780. One of his grandchildren was born in Los Angeles in 1780. There is no indication his daughter and her family lived anywhere in Los Angeles other than on the rancho.

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Cont.



“Map of the Rancho de los Felis showing the Division-Line between the parts of Coronell [Coronel] and Lick”²³ Crystal Springs was depicted with blue dashes. The “Puerta Suela” was near a bump in the river on the right side of the sketch that is still there. The bump went around Elysian Valley (Frogtown). It still does.

The name “Puerta Suela” was meaningless, because it means “door sole-of-shoe”. The map shows the entrance to the Portezuelo, Portezuelo means little door. It was a gap in the Santa Monica Mountains.

The area where the river formed a hoop at the top of the survey went around a hill in what is today Griffith Park.

I-814 Phyl van Ammers/Ronald van Ammers

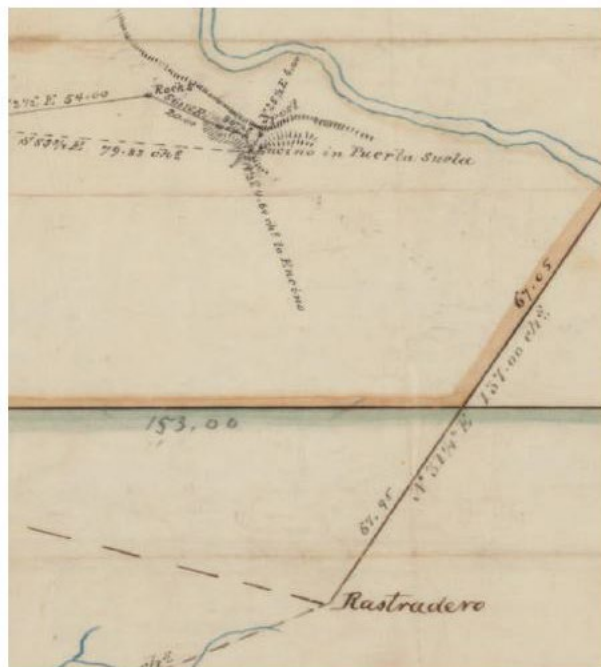
COMMENT

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Vicente Féliz's (probable) cousin Anastacio Maria Féliz and his wife Gertrudis Valenzuela lived on the rancho until his death in 1810 and her death in 1816. Their son Juan José Anastacio, his wife María Ygnacia Verdugo, and their children lived on the rancho from 1828. Two of Vicente's sons lived on the rancho, both listed in Guillermo Cota's 1816 as having been granted a sitio by the rancho. Francisco continued to live on the rancho until his death. His son was murdered in 1836. Francisco's wife died in 1836. Their daughters and their families lived near Francisco. On the 1844 census, Francisco was living on the rancho with a daughter.

Antonio probably lived on the rancho, and Anstacio Mauricio and his family lived on the rancho with their children. Anastacio, Jr., lived on the rancho.

The old ranch house, the new ranch house, and the "Puerta Suela" may be seen on the "Map of the Rancho de Felis" above.

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Cont.

I-814 Phyl van Ammers/Ronald van Ammers

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Detail from "Plat of Rancho Los Feliz, line from Nopalero to Portezuelo."²⁴ "Rastradero" meant the *Arastradero*, probably the location where bulls were slaughtered and their hides roughly tanned, which was a little below today's Echo Park Lake. The "Puerta Suela" is in this map at a somewhat different location from where it was in "Map of the Rancho de los Feliz."

The Arastradero may be seen in the detail from "Los Feliz and Providencia."



Detail from "Los Feliz and Providencia."²⁵

An irrigation ditch, possibly an extension of what was called the "Feliz ditch," went through the valley, and may have fed Reservoir No. 4, now Echo Park Lake. Maria Ygnacia Verdugo requested permission from the ayuntamiento to use water from the Los Angeles River in 1841. She requested permission in 1841, which was two years before Governor Manuel Micheltorena granted her the rancho for the benefit of herself and her family.²⁶ In 1845, Vicente

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Cont.

I-814 Phyl van Ammers/Ronald van Ammers

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de la Osa granted a right of way for a zanja, to use water from the river, to Maria Ygnacia Verdugo, across the "pasture land of Feliz or the enclosure of San Jose."²⁷ We have not come across any map showing the "enclosure of San Jose." Some maps refer to the portezuelo as the "potrero." A potrero is a paddock. A paddock is a small field or enclosure where horses are kept or exercised. It is similar in meaning to a field, a meadow, or pasture.

Twenty years later, the Feliz (sometimes called Felix) Ditch reached the Elysian Reservoir.²⁸ Along the way to the reservoir, the ditch joined the Chavez ditch.

In the 1860s, a ditch ran through the valley today occupied by the Silver Lake Reservoir Complex.

In 1873, the city filed a lawsuit against Mc.L. Baldwin, then owner of the valley through which an irrigation ditch ran, to quiet its title to two heads of water on the river and ended up buying the two heads for \$50,000.²⁹ The Silver Lake Reservoir Complex occupies part of the valley: the Portezuelo.

There was a second portezuelo – or *portillo*. That little door opened to a plateau of land occupied by the Indian village called Cahuenga, possibly until 1810, when the San Fernando Mission absorbed Rancho Portezuelo, owned by Maria Ygnacia's uncle Mariano de la Luz Verdugo. Universal Studios occupies that platform of land. A road went over the hill behind the village and descended to the Los Angeles plain. The road over the hill was the Cahuenga Pass until sometime in the 1870s, when a road was established in the ravine below the hill. The ravine went from the San Fernando Valley to the Los Angeles plain. In about 1860, telegraph poles were erected in the ravine.

An ancient road that was called *El Camino Viejo* by the end of the Hispanic eras went both over the hill in the Cahuenga Pass and through the portezuelo on the Rancho Los Feliz. It was part of *El Camino Viejo a Los Angeles*, the oldest route from the Central Valley to Los Angeles. Los Angeles County designated it as a *camino público* in 1851.³⁰

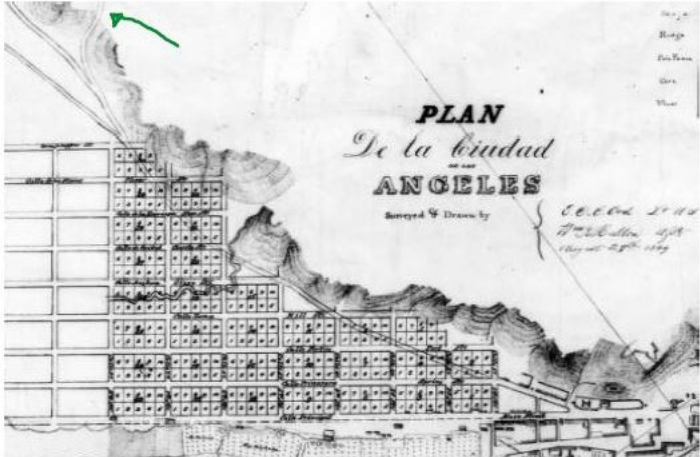
E.O.C. Ord and William Rich Hutton drew part of El Camino Viejo as it was in 1849 in their *Plan de la Ciudad de Los Angeles*. One branch turned to the west, ending in Boca de Santa Monica. The Gaspar de Portolá expedition – the first European land expedition in California – took this branch on August 3, 1769. One branch went to the Cahuenga Pass. The third went through the hills at what was called the Arastradero into the Rancho Los Feliz.

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Cont.

I-814 Phyl van Ammers/Ronald van Ammers

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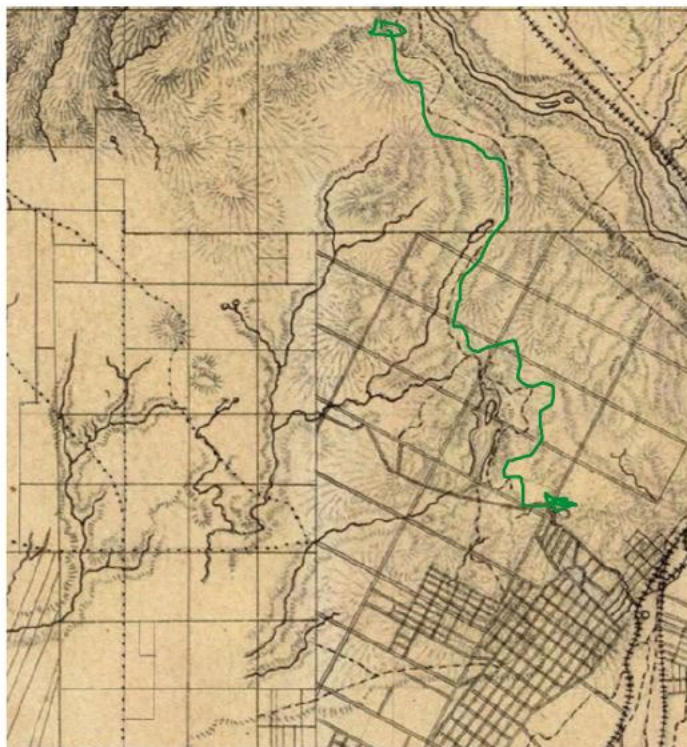
Detail of Plan de la Ciudad de Los Angeles³¹

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Cont.

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Cont.Detail from William Hammond Hall topographic map³²

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Cont.

In 1880, State Engineer William Hammond Hall’s topographic map showed El Camino Viejo then began at the edge of downtown Los Angeles, at about 8th Street. The road had shrunk as the city grew.

The road, which was a length of El Camino Viejo á Los Angeles, Camino Público in 1851, and part of which was later Los Feliz Road, went through the Portezuelo on the Rancho Los Feliz. Hall depicted the route with dashes. The road went from the subdivided portion of downtown Los Angeles. A small circle adjacent to a railroad tract near the bottom right of the image represented the plaza.

The old road went to Reservoir No. 4, around Angelino Heights, bumped up to about where Sunset Boulevard would be, and slid through the portezuelo to where the Mulholland memorial fountain is today. The Silver Lake Reservoir Complex was built over a portion of the old road. The road turned towards what is today Griffith Park at about the intersection of Fletcher Drive and Riverside Drive. The other line composed of dashes – about today’s Riverside Drive – did not connect with the old road. This was because of the hills between the two roads. Today’s Rowena Avenue, somewhat modified, is a portion of the old road. The Los Angeles River ran through the Glendale Narrows. The Southern Pacific Railroad tracks were on the east side of the river.

A pond or small lake was in the land in the portezuelo – a few years later called Ivanhoe Canyon, now occupied in part by the Silver Lake Reservoir Complex. A creek ran from the bottom of the pond.

Hall’s topographic map showed the old road – not seen in the detail -- continued to the predecessor road to Crystal Springs Drive, which leads into the San Fernando Valley.

The pond may be seen in Herman Herzog’s “A valley near Los Angeles,” painted about 1873. It is the faint blue area.

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Cont.

Herman Herzog painting of "A valley near Los Angeles."³³

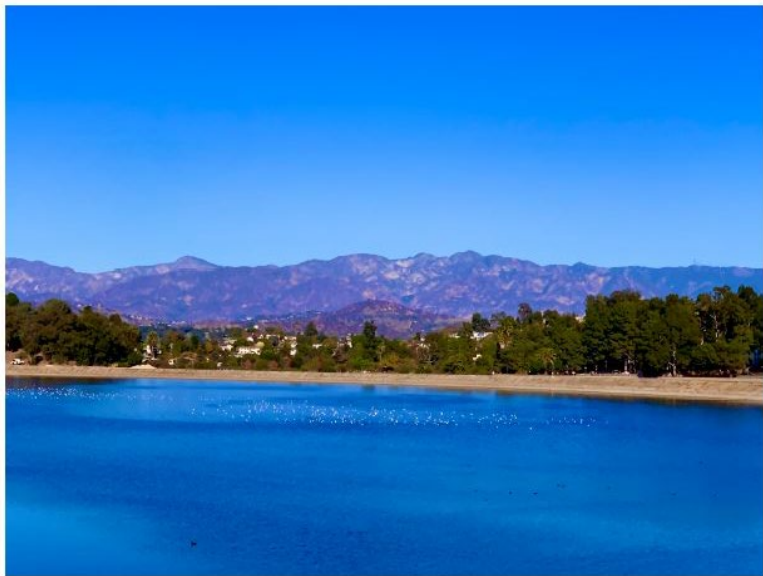
In the middle ground of Herzog's painting is a hill shaped something like a triangle. That hill may be seen today from the Silver Lake dam. That steep sided hill is part of the Verdugo mountains.

I-814 Phyl van Ammers/Ronald van Ammers

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Cont.



Feride Diri photograph³⁴

In 1903, L.C. Brand’s workers dynamited open “Hard Luck Hill” to create an easement over which they constructed tracks for the interurban railway from downtown to Glendale. Part of the easement still exists as a dirt road.

In a beginning sequence of the 1914 film *Tillie’s Punctured Romance*, Charlie Chaplin stood on stunt rider Winna Brown’s ranch. Brown’s ranch became Tom Mix’s film site called “Mixville” in 1919. Mixville became an auto camp, and it is now the Silver Ridge shopping center.

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Cont.Mixville³⁵

Marc Wanamaker generously provided this photograph from Bison Archives. Someone found the photograph in an attic and gave it to him. The photo is not dated but, because the trolley viaduct can't be seen, it was shot before the low hill was excavated to create Fletcher Drive. A windmill may be seen in this photo, partly obscured by a telephone pole. Previous occupants may have dug a well.

The hill in the background of the Chaplin's first full length film had a road leading over it. The "Red Car" viaduct could not be seen. The wood viaduct went over a flat area. Its concrete pediments still stand on the hill above what is today, Fletcher Drive. The viaduct cannot be seen in the film, meaning it is likely, although not certain, that a portion of the hill remained between what is today Riverside Drive and Winna Brown's ranch.

The image below is from *Tillie's Punctured Romance* on YouTube.
<https://www.youtube.com/watch?v=TdFEq2AlkrY>.

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Cont.



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Red Car on wooden trestle.³⁶

In the 1920s, the center part of the viaduct was replaced with metal beams, and Fletcher Drive was probably excavated at that time.

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Cont.



Detail from 1920 official transportation and city map of Los Angeles and suburbs.³⁷ Although this map showed an area indicating the Ivanhoe reservoir, the 1921 Bridwell map showed one undivided lake.

The red and yellow lines indicate trolley routes. On this map what is today Sunset Boulevard is marked Hollywood Boulevard. In 1920, Riverside Drive was Los Feliz Boulevard. "Ivanhoe Avenue" went to Waverly. There was no Fletcher Drive on the west side of the river, only a short street called Fletcher Drive in Glassell Park. There is still an Electric Avenue, but it does not connect to where the trolley went. The route before Fletcher Drive was excavated appears to be the same as after it was excavated.

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Cont.Red Car on partly metal trestle.³⁸

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COMMENT

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Cont.



Silver Lake from the east.³⁹
In the 1921 silent film *Hard Luck*, Buster Keaton fished in a lake. Although Keaton also filmed a scene in MacArthur Park, it appears from the background hills that Keaton was fishing in Silver Lake.

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The view is from the east side of Silver Lake in 1907. Water and Power Associates.
https://waterandpower.org/museum/Early_LA_Water_Reservoirs.html

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Cont.

I-814 Phyl van Ammers/Ronald van Ammers

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Cont.



Buster Keaton fishing in *Hard Luck*. <https://www.youtube.com/watch?v=L4wZja2uu1M>. It looks like there is a road in about the middle of this still. On the 1922 unrecorded Bridwell map, the street called "Fanning" was on the east side of the lake. The street called "Redesdale" was on the west side of the lake. Redesdale Avenue exists on the west side of the lake today, but it threads through a higher elevation than appears on the photograph. The hills have no houses, yet, in the 1921 still from the film, which means the hills in the photograph are the hills on the west side. The Verdugo Mountains may be seen behind the hills. Buster must have been sitting on a flank of Mulholland's reinforced earthen dam.

Developers deeded rights to the city for stairways that ascended the hills that surround the reservoirs in what had been El Portezuelo. From photographs of the construction of the dam it appears there were no stairways in 1903. These may have been wood stairs in the early years after 1903. The concrete stairs are stamped "1926" with contractor's stamps on the Moreno Highlands hill. The Westerly stairs were probably constructed so that travelers could reach the

I-814 Phyl van Ammers/Ronald van Ammers

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I-814-4 Cont.	<p>trolley that went along Sunset Boulevard. Sunset Boulevard's predecessor was the Ostrich Farm Railway that went from Sister's Hospital to the ostrich farm in what is today, Griffith Park.</p> <p>The City of Los Angeles, Bureau of Engineering illegally closed the Fargo Stairs. The Bureau of Engineering, in Revocable Permit No. CEB-94-05-04-A, closed the stairs. They have been closed for about forty years, without approval from the City Council. The City Council illegally closed the Westerly stairs. These are still locked to the public, although the people living on the stairs have keys.</p> <p>There are no educational plaques that reflect the Indian village once in the portezuelo. No information is provided about the Portolá expedition's January 16, 1770, journey through the portezuelo. No information is provided about the February 21, 1776, Anza expedition campsite in the portezuelo. No noticeable information is provided about Maria Ygnacia Verdugo or Vicente Félix.</p> <p>Nothing yet indicates the old route, part of the ancient Indian route that went through the land now occupied by the Silver Lake Reservoir Complex.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> o Further and deeper research should be done into history of the area. Father Crespi's description of the area indicates there was an Indian village in the long valley that the Silver Lake Reservoir Complex occupies. There should be at least signage indicating an Indian village was in the valley o Acknowledgment that the branch of El Camino Viejo that went through the Félix rancho was a primary route during the Hispanic eras and in the early years of American occupation. o Acknowledgment that the road through the rancho was an Indian road, not a road built by Spanish speaking people. o Acknowledgment that the resource is a Tribal Cultural Resource and thus significant under CEQA. It is NOT "Less than significant." o Signage should inform the public of, about Vicente Félix, a soldier with the Anza expedition, that lived on the rancho, about the 1770 Portolá expedition's campsite in the valley, about the Anza expedition's campsite in the valley on February 21, 1776, and about Maria Ygnacia Verdugo, granted the Rancho Los Félix in 1843. o The Project is NOT "less than significant" as a historical resource or as a cultural resource. o The City Council should open the Fargo stairway and the Westerly stairway to the public. It should open the streets it illegally closed to allow the gated Hathaway development. These stairways and streets are not only historically significant but allow greater public pedestrian access to the Silver Lake Reservoir Complex. Global warming will mean walking will increase by necessity. Sustainability of the environment requires more walking places, not fewer. The illegal closures were not then and are not now in the public interest. <p>Los Angeles from about 13,000 years ago until the arrival of the Portolá expedition</p>
I-814-5	<ul style="list-style-type: none"> o Further and deeper research should be done into history of the area. Father Crespi's description of the area indicates there was an Indian village in the long valley that the Silver Lake Reservoir Complex occupies. There should be at least signage indicating an Indian village was in the valley
I-814-6	<ul style="list-style-type: none"> o Acknowledgment that the branch of El Camino Viejo that went through the Félix rancho was a primary route during the Hispanic eras and in the early years of American occupation.
I-814-7	<ul style="list-style-type: none"> o Acknowledgment that the road through the rancho was an Indian road, not a road built by Spanish speaking people.
I-814-8	<ul style="list-style-type: none"> o Acknowledgment that the resource is a Tribal Cultural Resource and thus significant under CEQA. It is NOT "Less than significant."
I-814-9	<ul style="list-style-type: none"> o Signage should inform the public of, about Vicente Félix, a soldier with the Anza expedition, that lived on the rancho, about the 1770 Portolá expedition's campsite in the valley, about the Anza expedition's campsite in the valley on February 21, 1776, and about Maria Ygnacia Verdugo, granted the Rancho Los Félix in 1843.
I-814-10	<ul style="list-style-type: none"> o The Project is NOT "less than significant" as a historical resource or as a cultural resource.
I-814-11	<ul style="list-style-type: none"> o The City Council should open the Fargo stairway and the Westerly stairway to the public. It should open the streets it illegally closed to allow the gated Hathaway development. These stairways and streets are not only historically significant but allow greater public pedestrian access to the Silver Lake Reservoir Complex. Global warming will mean walking will increase by necessity. Sustainability of the environment requires more walking places, not fewer. The illegal closures were not then and are not now in the public interest.
I-814-12	<p>Los Angeles from about 13,000 years ago until the arrival of the Portolá expedition</p>

I-814-5	A general history of the City of Los Angeles was included in the confidential archaeological report included as Appendix E of the Draft EIR, as well as substantive research on the precontact history of the area, the history of the Reservoir complex, and a substantive land use history was compiled for the portions of the complex that could be impacted by the project.
I-814-6	The possible location of the Félix Ranch House is outside of the Project Site. Evidence of the El Camino Viejo is not known to extant within the project site or related to potential impacts of the project.
I-814-7	As described in Tribal Cultural Resources, Section 3.17.1 of the Draft EIR, in compliance with the requirements of AB 52, the City of Los Angeles Bureau of Engineering provided formal notification of the Project via certified mail to Native American groups that are listed on the City's AB 52 contact list which included a detailed project description. Two of the Gabrielino tribes requested to consult on this project. During consultation the tribes did not indicate that the acknowledgement of indigenous trails or roads were of concern to them for this particular project and therefore they had no comment on this issue.
I-814-8	As described in Tribal Cultural Resources, Section 3.17.5 of the Draft EIR no Tribal cultural resources as defined in PRC Section 21074(a)(1) that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or that are determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to PRC Section 5024.1, have been identified within the Project site.
I-814-9	The comment is noted for the record and will be forwarded to the decision-makers for review.
I-814-10	Impacts to archaeological and tribal resources were evaluated in Cultural Resources, Section 3.5.5 and Tribal Cultural Resources, Section 3.17.5 of the Draft EIR and were concluded to be less than significant after mitigation.
I-814-11	Impacts or changes to the Fargo Stairway and the Westerly Stairway are not part of the proposed Project and beyond the scope and recommendations of the Draft EIR.

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Cont.

Remains of ancient camels found in the La Brea tar pits measured 7 feet from the shoulder. Mammoths, giant sloths, bison antiquus, dire wolves and saber tooth cats once roamed Los Angeles. It is possible the Indians followed the megafauna on the animals' migratory trails for thousands of years before the large animals became extinct. Indian roads through Los Angeles may have been created by megafauna.

Archeological evidence points to human habitation of Southern California as early as 13,000 years ago.⁴⁰

Tongva people – also called Kizh and Gabrieliño – superseded or absorbed an earlier people living in Los Angeles.⁴¹ Tataviam villages were mostly in the San Fernando Valley.⁴²

The native people of California are often referred to as "proto-agricultural."⁴³ This description is somewhat misleading when applied to California Indians because it presumes that Indian pruning, burning, irrigation and seed harvesting would have inevitably led to agriculture.

Lowell John Bean and Harry W. Lawton's "Some Explanations for the Rise of Cultural Complexity in Native California, with Comments on Proto-Agriculture and Agriculture," reprinted in *Before the Wilderness: Environmental Management by Native California*, listed two clearly proto-agricultural people: the Paiute people that inhabited the Sierra Nevada Mountain Range in east central California and the Cahuilla in the Palm Springs area.⁴⁴

Bean and Lawton did not describe Southern Californian native people as "proto-agricultural." They felt "quasi-agriculture" better described Southern Californian land management.

Bean and Lawton found one explanation for Southern California Indians remaining as hunter-gatherers in the fact of the abundance of California's food resources and highly developed techniques of energy extraction that made it unnecessary to adapt agriculture, "except in some of the marginally productive desert areas."

That is, a Bean and Lawton proposition is that in Southern California the Indians had no need to develop agriculture. This is not a sufficient explanation.

Bean and Lowell, however, provided an additional explanation:

"... (I)n southern California, where there were few barriers to intercultural communications, trade alliances associated with military commitments extended from the west coast across the state into Arizona. Several such alliances provided routinized trade routes allowing a considerable exchange of goods across several ecological zones and directed that flow along ecological lines rather than cultural or linguistic ones. Agricultural products also must have occasionally passed along these trade routes in addition to shell beads, obsidian, and other goods, and undoubtedly knowledge of agricultural practices along the Colorado River."

Extensive contained burning in southern California promoted the growth of desired grasses and herbs in the following season.⁴⁵ Bean and Lawton documented quasi-agricultural patterns of acorn gathering and plant manipulation, wild tobacco planting, methods of harvesting mesquite, pine-nut and agave, the transplantation of plants to better environments, weeding, and seed gathering of wild grasses in fields near their villages.

Florence Shippek, in her article "Kumeyaay Plant Husbandry: Fire, Water, and Erosion Control Systems," described effective systems adapted to the climate by water management to maintain ground waters close to valley surfaces, and to keep the main springs and surface streams at usable levels.⁴⁶

Yang-Na was located on the Native American road that led from (if the sea routes can be considered a road) from the Channel Islands on the west to the Mohave and from there as far as St. Louis, Missouri on the east.

I-814-12 This comment provides general background City of Los Angeles around downtown and in the vicinity of the Project Site and pre-contact through to the modern era history. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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The Indian roads also stemmed from Baja California and went as far north as Pomo villages in Mendocino County, although the primary road north was the road later called El Camino Viejo a Los Angeles that crested the Tehachapi Mountains, descended into the Central Valley and then turned west to the Oakland estuary (today's Lake Merritt).⁴⁷

If there had been no Indian roads to follow, there could have been no Spanish land expeditions in the eighteenth century.

Father Juan Crespi's name for the opening in the Santa Monica Mountains was the portezuelo. This was "the gap" between today's Griffith Park and the long line of hills -- topped in part by Waverly Drive -- that extended to and the steeper hills in Elysian Park.

J. M. Guinn stated the Portolá expedition returned to Los Angeles from the San Fernando Valley by way of the Cahuenga Pass, writing, "Portola discovered the Pass on his return trip and the main traveled road up the coast afterwards went through the Pass."⁴⁸

Guinn wrote, "In compiling the history of the Spanish and Mexican eras, I have taken Bancroft's History of California as the most reliable authority. I have obtained much original historical material from the Proceedings of the Ayuntamiento or Municipal Council of Los Angeles (1828 to 1850)."⁴⁹

Ayuntamiento records are in the municipal archives in the Piper Tech building -- the building behind Union Station and across from a Denny's. Nothing in these records discusses the Portolá expedition's journey through Los Angeles.

Bancroft did not offer an opinion about where it was that Portolá was when the expedition came from the San Fernando Valley, writing in a footnote, "January 16th to 18th, their [Portolá's] route through the Los Angeles region was also different [from their August 5, 1769, route] but not very clear."⁵⁰ Bancroft's primary assistant Thomas Savage was born and raised in Cuba. Savage also traveled from San Francisco to Los Angeles to interview older residents. He probably translated the Costansó, Crespi and Portolá journals as predicate for Bancroft's conclusion; yet the route the expedition took was not clear to Bancroft.

J. M. Guinn had no evidence or any authority to support his claim that Portolá discovered the Cahuenga Pass and went through it in January 1770. H. E. Bolton adopted the Guinn conclusion and the Teggart translation.⁵¹ Herbert Eugene Bolton annotated his translation of Fr. Juan Crespi's diary entry for January 16, 1770, writing that Portolá returned to the Los Angeles plain by way of the Cahuenga Pass.⁵²

Frederick J. Teggart added to Guinn's error with a dubious interpretation of one word in engineer Miguel Costansó's journal. According to Adolph van Hebert-Engert and Fredrick J. Teggart, the expedition found a "gorge" that permitted passage to the "plain of the *Ojo de Agua de los Alisos*."

The previous summer, the Portolá expedition had stopped at the Ojo de Agua, the spring of water of the alders. The campsite was on the Los Angeles plain; that is, the plain of Ojo de Agua was the same thing as the Los Angeles plain.⁵³

The Spanish version provided with Teggart's translation, however, did not say "gorge" in Castilian. The Spanish read, "...*haciendonos hallar un abra que sin dificultad nos franqueó paso al llano del Ojo de Agua de los Alisos*..."⁵⁴ "Abra" in both Castilian and Catalan means "open" and "opening."⁵⁵ "Abra" on the island of Cuba, however, meant gorge. The explorers' writings were in Castilian. None of them came from Cuba.⁵⁶

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It is possible Teggart's translation was initially drawn from Thomas Savage's translation for Bancroft, although he did not attribute it to Savage. Teggart had positions at UC Berkeley, becoming an associate professor in 1911. H. H. Bancroft sold his library of materials to UC Berkeley in 1905. H.E. Bolton was also a professor at UC Berkeley.

There was a ravine or gorge (a narrow valley between hills or mountains) that went from the San Fernando Valley to the Los Angeles plain. It was possible for people on horseback or on foot to go through what has become "the Cahuenga Pass," although there was a creek in the bottom as late as 1880, when William Hammond Hall drew his topographic map of Los Angeles and San Bernardino Counties. Governor Micheltorena's campsite in 1843 was in the ravine. The old road, however, did not go through the ravine: it went up a hill from the location of what had been the Indian village of Cahuenga (The village probably disappeared by 1810.).

Describing the ascent up the hills from the valley and descent into the Los Angeles plain on January 14, 1846, William Bryant wrote: "It commenced raining heavily this morning. *Crossing a ridge of hills*, we entered the magnificent undulating plain surrounding the city of Angeles, now verdant with a carpet of fresh vegetation."⁵⁷ (Italics added for emphasis.)

The authors of an 1854 report of explorations and surveys by the United States War Department described the ascent into the hills. The expedition left the San Fernando Mission buildings and headed towards Los Angeles: "When we reached the base of the hills, we crossed a running stream, bordered by grass, which we afterwards found to be the Los Angeles river (sic, Los Angeles River), and then the ascent of the hills immediately commenced."⁵⁸ (Italics added for emphasis.)

Portolá did not find a gorge to go through the Santa Monica Mountains. They found an open place that allowed them to pass without difficulty to the Los Angeles plain.

On January 16, 1770, according to Alan K. Brown's translation, Crespi wrote:

"We set out in the morning from the pool here, keeping on eastward through this large valley... to come directly upon the Porciuncula River. On going about three leagues through the valley here, the mountains make an opening on the southwest of this plain [the San Fernando Valley plain] and in a depression at the foot of it we saw a stream, or ponded up water, at which there were two villages belonging to the very good heathens of this place, who came out unarmed as soon as they saw us in order to greet us, and we were very happy to see us once again. They brought us some gruel, and the chief of one village guided us through the aforesaid opening in the southwestern range [Crespi wrote "*sueste*" -- southeast -- not southwestern range], and we came into a small hollow in which upon two sides we came across a good deal of water, with a good deal of wood and better grass for the mounts. We made camp at this spot, and I called it the two small watering places of the small hollow of *Los Santos Mártires San Cleto y San Marcelino*, the Holy Martyrs Saint Cletus and Saint Marcellinus. Four leagues' march from the pool we set out from. Course eastward and southeastward."⁵⁹

A cañada is a glen, a narrow valley. A *cañadita* may be translated as a hollow. A hollow is a small, sheltered valley. The diminutive "*ita*" indicates either smallness or affection, as does the ending "*uelo*." The Spanish text did not use a word that could be translated as "aforesaid."

On today's roads it is 17.5 miles from Encino -- where the Portolá expedition had emerged on August 5, 1769, after going over the Santa Monica Mountains -- to the William Mulholland Memorial Fountain. A natural spring in Encino State Historic Park provided a year-round source of water for the ancient native village called Siutcanga.

It appears from Crespi's description that on January 16, 1770, the Portolá expedition went through the San Fernando Valley for about seven leagues (about 18.55 miles) from a *poza*

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(small lake or swamp) where they had spent the previous night. Indian people the Spanish had previously met – meaning met the first time the expedition came into the valley at or near Encino – gave them acorn mush. At this point, the expedition members were eating their mules, so the Indians may have saved the lives of the expedition, possibly explaining Crespi's exuberant writing.

The "captain" of one of the villages guided them through the opening in the mountains on the southeast, and that opening was and still is the area around the William Mulholland Memorial Fountain. Because the Golden State Freeway bit off chunks of land, it is difficult now to see that across from the fountain, the lawn dips. That land declined to the river until the freeway route was excavated in about 1960.

People that grew up before the freeway was built may remember emerging from the arctic chlorinated water of the Griffith Park swimming pool in summer and running downhill past the rusted life-endangering children's playground (that no longer exists) and into the river, where they caught pollywogs in glass jelly jars filled with river water.

Two of the other openings in the hills – through Fletcher Drive and through Hyperion Avenue – did not exist until the 1920s.

In figuring out where the expedition was, it is important to note what Crespi did not say. He did not say the expedition went over a hill. He did not write Spanish travelers went through a ravine or gorge.

On April 26, 1770, the Portolá expedition again camped at what Crespi had named The Holy Martyrs Saints Cletus and Marcellinus.

To reach the martyrs' valley, the expedition went up "some knolls," to a place that had two little watering places at the foot of the small pass (In the Spanish text, "small pass" was "portezuelo") belonging to what Crespi called the *Santa Catalina de Bononia* valley, later, the San Fernando Valley. A knoll is a small hill or mound. Assuming the expedition entered through the opening at or near the William Mulholland Memorial Fountain, the expedition went up a road approximating today's Los Feliz Boulevard, which may in 1770 have been a small knoll or several small knolls. Alternatively, it is possible the knolls referred to the line of hills that began at the present fountain and continued to Elysian Park, in which case they may have ascended a hill at what is today, Fletcher Drive, which was later excavated. The 1880 William Hammond Hall topographic map, however, did not show that route.

An Indian village stood on one of the creeks. Ten or twelve "very fine heathens" came over to the Spanish with bowls full of pinole, which Alan K. Brown translated as gruel. Pinole is acorn, seeds, and wild grains.⁶⁰

The Silver Lake Reservoir Complex occupies the Holy Martyrs Saints Cletus and Marcellinus valley. There was an Indian village in it, and its people had acorns, seeds and wild grains, suggesting the meadow had been an extensive gathering field, and that there had been oak trees growing either in it or on the hillsides.

The 1775-1776 Juan Bautista de Anza expedition spent the night of February 21, 1776, on land that would be called the Rancho Los Feliz. They camped in El Portezuelo.

Herbert Eugene Bolton, commenting about the February 21, 1776, Anza journey from the San Gabriel Mission, wrote:

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"The march was west to the Porciúncula River (the Los Angeles River), then northwest up the river through the gap to the turn of the mountains west of Glendale, where camp was made."⁶¹

Bolton's interpretation was partly correct. There was a gap between the hills in (technically, most of) Griffith Park and the hills partly topped by Waverly Drive that extended to Elysian Park where the William Mulholland Memorial Fountain is, and where "the old ranch house" had been. This site was a short distance from the river. Another gap was the Arastradero on the Feliz rancho. It was not on the river.

The many people, including children, and many horses and mules in the Anza expedition could not have gone up the river from the crossing place. A steep hill descended to the river's edge, and further along – in the Glendale Narrows – the land was marshy. The diaries of Font and Portolá did not reflect a journey upriver.

Indigenous people used reed boats and plank boats to reach the offshore islands. They may have used boats in the Narrows, but nothing shows the Spanish did. It was probably rare for Spanish era travelers to swim horses upriver on the west side of the river to reach the Rancho Los Feliz or for people living on the rancho to ride horses downriver to reach the town.

An athletic hiker could have clambered up the tall hill that descended into the river on the west bank of the river in the Glendale Narrows to reach the town part of Los Angeles from the rancho, but it would have been hard going for someone on a horse.⁶²

The location of the Anza campsite was the valley of martyrs where Portolá had camped on January 16, 1770, but the name "portezuelo" had come to mean the valley, rather than Crespi's portal to the little valley or the dear valley.

Father Pedro Font accompanied the 1775-1776 Anza expedition. He and Anza came up with different figures for the number of people that accompanied the expedition in 1775-1776.⁶³ On February 20, 1776, Font wrote, "... (I)t was decided to resume the journey tomorrow, leaving at the mission of San Gabriel ten soldiers and two settlers, with their families.... they being selected today in order to continue the journey in the morning with the rest..."⁶⁴

Anza wrote in his diary, "I have decided to set forth with most of the expedition for the presidio of Monte Rey..."⁶⁵ He described a journey of three leagues after crossing the river to reach El Portezuelo. His measurement was usually the same as 3 miles to one league — 9 miles from the crossing place.

Father Pedro Font wrote that the expedition traveled four leagues — 10.4 miles — on a road with many mires after fording the river.⁶⁶

The Anza expedition had to go around the hills. Duplicating that route today is hard. To today's plaza from the Spring Street Bridge is 1.3 miles. Olvera Street to Pershing Square is 1.2 miles. Pershing Square to the bottom of Echo Park Lake is 1.9 miles. The expedition went around Angelino Heights. The bottom of Echo Park Lake to Bob's Market is .6 miles. To Woodcat Coffee Bar, another .8 miles. To Silver Lake Dog Park is 1.6 miles. Total: 10 miles. If Font was correct, they camped somewhere in what is today the Silver Lake Reservoir Complex. If Anza was correct, they camped between Echo Park Lake and Silver Lake.

On February 21, 1776, at 11:30 in the morning, most of the Anza expedition left the second site of the San Gabriel Mission. Today's street address of the mission structure, built about 1805, is 428 S. Mission Drive.

Both Font and Anza wrote they traveled two leagues — either 5.2 miles or 6 miles — to the river. The shortest distance to any place on the river from 428 S. Mission Drive is 8 miles. The expedition probably crossed below the Narrows. The crossing place may have been where

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Portolá had crossed or downriver from where Portolá crossed.⁶⁷ If they crossed where Portolá crossed, Anza was at the Spring Street Bridge.

The expedition arrived at the campsite that both Fr. Pedro Font and Juan Bautista de Anza referred to as “El Portezuelo” at four-thirty in the afternoon.

Anza wrote:

“At half past eleven, when everything was ready for the march, I set forth with seventeen of the soldiers and the same number of the families destined to remain in this California, besides six of my company. Four of these last are remaining here to await Lieutenant Moraga, as has been said, and also to escort the cattle belonging to the colonists. I set out on the regular road to Monte Rey, which we followed for a little more than a league to the southwest.⁶⁸ Continuing for another league to the west-southwest, we crossed the Porciúncula River. After this we made three more leagues, traveling until five o’clock in the afternoon, having marched five and a half hours, when we halted at El Portezuelo, where the night was passed. Notwithstanding that for a number of days past it has not rained very hard, the road has been so heavy that many of the mules which carried the loads fell down.”⁶⁹

In H. E. Bolton’s translation, Font wrote:

“I pronounced the blessing with ashes and said Mass...

“We set out from the mission of San Gabriel at half past eleven in the morning, and at half past four in the afternoon we halted at the Puertezuelo [sic, Portezuelo] having traveled six leagues [Anza wrote it was five leagues] two to the west with some turns to one side and the other, and the rest to the west-northwest. At two leagues we crossed the Porciúncula River, which carries a great deal of water and, running toward the Bay of San Pedro, spreads out and is lost in the plains a little before reaching the sea. The land was very green, and flower strewn. The road has some hills and many mires caused by the rains, and for this reason the pack train fell very far behind. At the camp site there is permanent water, though little, and plenty of firewood. On the left at a distance runs the chain of hills which form the Bay of San Pedro in the sea, and on the right the Sierra Nevada and another rough and long one which is in front of it.”⁷⁰

Brown’s translation of part of the diary was, “At the stopping place there is year-round water, although little of it, and sufficient firewood. As one goes along, far off on the left hand, upon the sea, lies the hill range forming the San Pedro bight, and on the right rises the snowy range, with another steep, steep range lying in front of it.”

The “rough and long” range was the Verdugo Mountain range. The snowy range was the San Gabriel Mountains. A watercolor painting by William Rich Hutton in about 1847 depicted the San Gabriel Mountains covered top to bottom with snow.⁷¹

Both the snow-covered mountains and the Palos Verdes Peninsula could be seen from -- what is today -- downtown Los Angeles. The Verdugo range could not have been seen from today’s plaza area although it was possible to see the some of the Verdugo range from the crossing place at the bottom of the Narrows.

The Verdugo range may be seen from the dam walkway at the back of the Silver Lake Reservoir Complex. It may be seen today from Fletcher Drive before it crosses the river. It could not have been seen from Fletcher Drive in 1776, because there was then a hill in the way.

Nothing about Font’s description suggests a trip through the river or along the river or up a steep hill on the west side of the river. The description does not suggest travel through what must have been a watery ravine – the ravine through which today passes the 101 Freeway. There were no hills, although probably once some rises in the land, on the Los Angeles plain.

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Only a view seen on the Los Angeles plain could be, "As one goes along, far off on the left hand, upon the sea ..." That is, in this sentence Font described the journey from the Los Angeles River to the place where El Camino Viejo turned. Once the expedition traveled in a northwesterly direction, the sea could no longer be seen on the left.

The sentence about seeing the sea should have preceded the sentence about the campsite. There were "some hills." The campsite had little water. The pond and two creeks in the portezuelo would have provided barely enough water for over two hundred people, horses, and mules. A campsite at the place Bolton concluded was at about today's John C. Ferraro soccer field would have been adjacent to the river, which would have had a great deal of water. A campsite in the ravine, through which a stream ran, or where Studio City – not far from the river -- would have had a lot of water.

Font did not describe an Indian village. The village of Yang-Na had not disappeared in the seven years since the Portolá expedition passed through. Mission and church records reflect baptisms of people from Yang-Na.⁷² The village in the portezuelo may have disappeared.

The next day, the expedition left El Portezuelo at eight in the morning and halted at *El Agua Escondida* (sic), an unspecified distance before *El Triunfo*. Triunfo Canyon is a little to the east of Westlake Lake, and a little over 12 miles from today's 405 and 101 interchange. On today's road, it is 41 miles from the William Mulholland Memorial Fountain to Triunfo Canyon.

The expedition traveled nine leagues on a westward course "with some veering." Font measured about 3 miles to the league, so 27 miles. Encino is 18 miles from the William Mulholland Memorial Fountain. Agua Escondida was at about 9 miles west of Encino at today's Calabasas. The City of Calabasas website places the Anza camp just west of the city, which makes the campsite around Juan Bautista de Anza Park.

"Shortly after setting out from the stopping place," the expedition came into a "very spacious valley." At a little over three leagues from El Portezuelo was the place they called *Los Nogales*. There was "a small spring of water like a little lake, issuing in the midst of the plain, near which there were small walnut trees."⁷³ It is 7.5 miles from the William Mulholland Memorial Fountain to Toluca Lake, going through the park from the fountain.

On hundred and seventy-six years later, Ronald Reagan and Nancy Reagan celebrated their marriage at reception in actor William Holden's house in Toluca Lake.

The historic natural lake that is today's Toluca Lake was fed by springs of upwelling ground water from the Los Angeles River and San Fernando Valley subterranean aquifers. One district was previously a walnut grove, and the residential lots were cut into the grove, preserving the original Southern California black walnut trees. Nogales means walnut trees. The Southern California Black Walnut is a small tree.

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¹ For an explanation of the geology, see, Harry W. Carlson, "Geology of the Elysian Park-Silver Lake District, Los Angeles County, California," (Pasadena: Cal Tech, 1945), 8. Typescript Caltech thesis. https://thesis.library.caltech.edu/5657/1/Carlson_hw_1945.pdf

² Phyl Diri, "Where the Brake Fern and the Willow Find a Home," *California History* (Fall 1983), 162-169.

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- ³ Harry W. Carlson, "Geologic map of the Elysian Park-Silver Lake District." Unpublished thesis in support of master's degree in geology, Cal Tech (1945). https://thesis.library.caltech.edu/5657/2/Carlson_hw_1945_plate.PDF.
- ⁴ Map of the 35 Acre Tracts of the Los Angeles City Lands, Hancock's Survey, situate on the Southern Slope of the Stone Quarry Hills," August 1863, Call Number SR_Map_0377. <https://hdl.huntington.org/digital/collection/p15150coll4/id/11777/rec/138>.
- ⁵ Juan Crespi, Robert Weldon Brower, and Herbert Eugene Bolton, *Fray Juan Crespi, Missionary Explorer on the Pacific Coast, 1769-1774* (Berkeley: University of California Press, 1927), 146-147.
- ⁶ Adolph van Hebert-Engert and Frederick J. Teggart, *The Narrative of the Portola Expedition of 1769* (Berkeley: University of California, 1910), 120. <https://babel.hathitrust.org/cgi/pt?id=uc1.31822043016872&view=1up&seq=98&q1=August%2003>.
- ⁷ "Plat of Rancho Los Feliz, line from Nopalero to Portezuelo," created by Lothar Seebold, date 1871, Huntington Digital Library, San Marino, SR_Box_21(09)01. <https://hdl.huntington.org/digital/collection/p15150coll4/id/12370/rec/1>. (Retrieved 8/20/2020).
- ⁸ "Los Felis and Providencia," SR-Map_0114, undated but probably the same date as the "Plat of Rancho Los Feliz line from Nopalero to Portezuelo. Huntington Library, San Marino. Solano-Reeve collection. <https://hdl.huntington.org/digital/collection/p15150coll4/id/11453/rec/16>. This map detail shows the route through El Portezuelo that the "Plat of Rancho Los Feliz" designated as "Puerta Suela."
- ⁹ William Henry Jackson, *Frontier Photographer to California and return, 1866-1867*. (The Arthur H. Clark Company, Glendale, CA: 1959), 125. The editors – LeRoy R. Hafen, Professor of History, Brigham Young University, and Ann Hafen -- put the word "Aliso" in parenthesis after Jackson's abbreviation "st." I deleted it because Aliso Street was not a "very winding street." It was a straight street.
- ¹⁰ "Portrait of Senora Reyormunda [sic] Feliz de Domingo and her son, Torio Domingo, [s.d.]" California Historical Society, California Historical Society Collection 1860-1960, Title Insurance and Trust, and C.C. Pierce Photography Collection, 1860-1960), University of Southern California Libraries. <https://digitallibrary.usc.edu/asset-management/2A3BF14FJ1Q?FR=1&W=1920&H=995>.
- ¹¹ The California State Archives "Spanish Archives Expediente 350 Los Feliz Diseño" was submitted with the Land Commission case filed after 1850. *Diseño del Rancho Los Felis*, is dated 1865 by the Huntington archivist but it is a traced copy of a map certified by Lauren Upson dated 1843. The Huntington Library, San Marino. <https://hdl.huntington.org/digital/collection/p15150coll4/id/11388>.
- ¹² Detail from "Boulevard Tract: being a part of the San Rafael Rancho and surrounding country midway between Los Angeles and Pasadena" (1887?). Huntington Library, San Marino. <https://hdl.huntington.org/digital/collection/p15150coll4/id/3825/rec/3>.
- ¹³ See, R. Renshaw, "Map of Ivanhoe" (1887). Huntington Library, San Marino. <https://hdl.huntington.org/digital/collection/p15150coll4/id/5031/rec/5>.
- ¹⁴ In 1905, J. M. Guinn researched the municipal archives with the objective of locating the commercial roads that existed as of 1850. Benjamin D. Wilson and Wilson Jones signed the decree of a Court of Sessions made on May 19, 1851, establishing *Caminos Públicos* in the County of Los Angeles – which then embraced San Bernardino and Orange Counties and parts of Kern and Riverside County. Guinn identified the Santa Barbara Road among the listed roads.

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This road went from Los Angeles to Cahuenga, to Encino to Triunfo. Neither he nor the Board of Sessions members described the road, but there was no other road from the plaza area but the road through the Feliz rancho in 1851 that could have carried cattle. J. M. Guinn, "The Old Highways of Los Angeles," *Annual Publication of the Historical Society of Southern California*, vol. 6, no. 3 (1905), 253-257.

https://www.jstor.org/stable/41168597?seq=3#metadata_info_tab_contents.

¹³ R. Renshaw, "Map of Ivanhoe. Los Angeles County, Cal."

¹⁴ Glenn S. Dumke, *The Boom of the Eighties in Southern California* (San Marino, California: Huntington Library, 1944), 187, 188.

¹⁵ "Los Angeles, 1909" (Los Angeles: Birdseye View Pub. Co., 1909). Library of Congress. <https://www.loc.gov/resource/g4364l.pm011040/>.

¹⁶ Carey McWilliams wrote, "With the great Anglo invasion of Southern California after 1880, the Spanish background of the region was, for a time, almost wholly forgotten...." *Southern California Country: An Island on the Land* (1946), included in *Writing Los Angeles: A Literary Anthology*, ed. David L. Ulin (New York: The Library of America, 2002), 313. In the subsequent pages, McWilliams describes the resurrection of the Spanish past under the leadership of Charles Lummis.

¹⁷ Silver Lake reservoir was flooded in November 1907, with water from the ground under Crystal Springs. [https://planning.lacity.org/odocument/f4dd1f42-ae5e-4951-8342-a317e30f50d8/Silver_Lake_Master_Plan_Final_\(8-20\).pdf](https://planning.lacity.org/odocument/f4dd1f42-ae5e-4951-8342-a317e30f50d8/Silver_Lake_Master_Plan_Final_(8-20).pdf)

¹⁸ "When he was 16, Ernest F. Garcia got his first job as a water boy for the famed engineer known as the father of this city's water system. Today Garcia will retire at 65 as an electric power plant operator for the ... Department of Water and Power, after a 49-year career that has seen the growth of a great metropolis... Garcia remembers the days when Mulholland roomed with his family in their ranch house near the corner of Riverside Drive and Los Feliz Blvd. That intersection is now graced by a memorial fountain dedicated to the engineer... The Garcia home was on the Los Angeles rancho, originally a Spanish land grant to the maternal side of the family.... Today Ernest Garcia lives with his wife Mary at 2860 Rowena Avenue...." "City Power Employee to Retire after 49 Years," *Los Angeles Times*, May 31, 1954.

¹⁹ "Last of Feliz Family Will Be Paid Final Honors Today" -- One of Los Angeles' last links with her colorful Spanish tradition will be severed today when requiem mass is celebrated at 9:30 a.m. at the Plaza Church for Mrs. Rafaela De Garcia, 73, whose father, Anastacio Feliz, was the owner of a Spanish grant which covered what is now the Griffith Park area. -- Mrs. De Garcia, who died Wednesday at her home, 2854 Rowena Ave., was the last of the pioneer Feliz family after whom Los Feliz Blvd. and Los Feliz School were named. She was born in Los Angeles, as was her mother. Her father came to California from Spain during the gold rush days and was given a grant of some 3015 acres. -- here. ... "Obituary, *Los Angeles Times*, August 4, 1939.

Mrs. Garcia's father was Anastacio Maria Mauricio Feliz, one of the children of Juan José Anastacio Feliz and Maria Ygnacia Verdugo. He didn't come from Spain, nor did his parents, nor his grandparents. Neither of her parents arrived in the Gold Rush. The American government did not make land grants. Her mother was Juana Maria Valenzuela, born in Los Angeles in 1827. Juana Maria's father was Jose "Miguel" Segundo Valenzuela, born in the San Diego Presidio in 1783, a soldier at the San Diego Mission in 1820.

²⁰ "Los Feliz Ranch House." (Ca. 1900). Courtesy of Marc Wanamaker, Bison Archives.

²¹ William Rich Hutton. "Near Los Angeles" (1852). Huntington Library, San Marino. <https://hdl.huntington.org/digital/collection/p15150coll7/id/869/rec/1>

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²² On the 1816 list of “*los pobladores, Inválidos y Vecinos*” signed by Comisionado Guillermo Cota, the Feliz Rancho was “within pueblo bounds.” Francisco Feliz was living on the rancho, according to this list, on land given to him by his father Vicente Feliz, on land given to Vicente. In 1802, Santa Barbara Presidio Commander Goycochea assumed Borica or some other governor granted Vicente the rancho., according to H. H. Bancroft, *California*, vol. 2, 111. Francisco was living on the rancho when Micheltorena granted the rancho to Maria Ygnacia.

²³ George Hansen, “Map of the Rancho de los Felis showing the Division-Line between the parts of Coronell [Coronel] and Lick.” (1868). Huntington Library, San Marino. <https://hdl.huntington.org/digital/collection/p15150coll4/id/11392/rec/88>.

²⁴ Lothar Seebold, surveyor, “Plat of Rancho Los Feliz, line from Nopalero to Portezuelo.” (January 24, 1871). Huntington Library, San Marino. <https://hdl.huntington.org/digital/collection/p15150coll4/id/12370/rec/1>.

²⁵ “Plat of Rancho Los Feliz, line from Nopalero to Portezuelo,” created by Lothar Seebold, date 1871. Huntington Digital Library. San Marino, SR_Box_21(09)01. <https://hdl.huntington.org/digital/collection/p15150coll4/id/12370/rec/1>. (Retrieved 8/20/2020).

²⁶ C.P. Dorland, “The Los Angeles River – Its History and Ownership,” *Southern California Historical Society Quarterly* (Los Angeles: Read 1890), 33. In 1855, the “Feliz ditch” drew water from the river on the San Fernando Valley side of the river. See, *City of Los Angeles v. Pomeroy* (1899) 124 Cal. 597, 649 [57 P. 585]. The ditch in 1880 snaked around hills and went through the portezuelo. See, Joseph A. Bernal, “Rancho Los Felis: showing Lyons, Wilson, and Felis properties and the Canal & Reservoir Co. ditch.” (December 23, 1880), Huntington Library, San Marino. <https://hdl.huntington.org/digital/collection/p15150coll4/id/11399/rec/1>.

Antonio Coronel created a “*toma*” or diversion on the San Fernando Valley side that carried water in the Felis ditch along the bottom Griffith Park hills. The ditch stopped short of the valley now occupied by the Silver Lake Reservoir Complex. George Hansen, “Ranchos Providencia y Cahuenga: southern portion of Ranchos Providencia y Cahuenga along Los Angeles River.” (1864) Huntington Library, San Marino. <https://hdl.huntington.org/digital/collection/p15150coll4/id/13117/rec/6>.

²⁷ Dorland, “The Los Angeles River,” 33.

²⁸ See, “DWP board votes to cover Elysian Park Reservoir,” *The Eastsider*. (April 17, 2012). https://www.theeastsiderla.com/archives/dwp-board-votes-to-cover-up-elysian-park-reservoir/article_7d3447f7-8227-5d4c-9869-e45738e38d54.html

²⁹ Dorland, “Los Angeles River,” 34.

³⁰ In 1905, J. M. Guinn researched the municipal archives with the objective of locating the commercial roads that existed as of 1850. Benjamin D. Wilson and Wilson Jones signed the decree of a Court of Sessions made on May 19, 1851, establishing *Caminos Publicos* in the County of Los Angeles – which then embraced San Bernardino and Orange Counties and parts of Kern and Riverside County. Guinn identified the Santa Barbara Road among the listed roads. This road went from Los Angeles to Cahuenga, to Encino to Triunfo. J. M. Guinn, “The Old Highways of Los Angeles,” *Annual Publication of the Historical Society of Southern California*, vol. 6, no. 3 (1905), 253-257.

³¹ The original Ord’s survey map disappeared from the Mayor’s Office in 1870. A copy presumably made by L. Seebold was hung on one of the walls of the City Engineer’s Drafting Room. *Annual Report of the Engineering Department of Los Angeles* (1918), 72. Google Books. https://www.google.com/books/edition/Annual_Report_of_the_Engineering_Departm/l_Y4AQA

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[AMAAJ?hl=en&gbpv=1&dq=Why+did+the+city+of+los+angeles+have+pueblo+land&pg=PA72&printsec=frontcover](#). The Huntington Library has two copies – but not of the original -- and so does the USC Library, all four available on-line. The copy showing the clearest route of El Camino Viejo is on the Los Angeles Public Library site. E.O.C. Ord, *Plan de la Ciudad de Los Angeles*. Map 00039. <https://tessa.lapl.org/cdm/singleitem/collection/maps/id/42/rec/1>.

³² William Hammond Hall, State Engineer, "Los Angeles & San Bernardino Topography," David Ramsey Map Collection. <https://www.davidramsey.com/maps3795.html>.

³³ Herman Herzog, "A Valley Near Los Angeles," (1870s). UC Berkeley, Bancroft Library, Robert B. Honeyman, Jr. Collection. BANC PIC 1963.002:1373—FR.

³⁴ Feride Diri photograph of Silver Lake. (June 2020).

³⁵ "Tom Mix's Mixville." Photo courtesy of Marc Wanamaker, Director, Bison Archives.

³⁶ Ralph Morris, "Two street cars in Silver Lake," Los Angeles Public Library, Ralph Morris Collection. <https://tessa.lapl.org/cdm/ref/collection/photos/id/105586>.

³⁷ Detail from "Official transportation and city map of Los Angeles, California and suburbs," 1920, Cunningham, Curtiss & Welcho, Co. publisher.

<https://hdl.huntington.org/digital/collection/p15150coll4/id/3673/rec/4>.

³⁸ "Pacific Electric Railway car on Fletcher trestle." (Undated) Huntington Library, San Marino). <https://hdl.huntington.org/digital/collection/p15150coll2/id/18804/rec/1>.

³⁹ "Silver Lake Dam," 1907 UC Riverside, Library, Water Resources Collections and Archives Collection. Joseph B. Lippincott papers. Permalink:

<https://calisphere.org/item/ark:/13030/hb9g50097h/>.

⁴⁰ Paleo West Archeology, Technical Report, "Cultural Resource Investigation in Support of the Inglewood Transit Connector Project, Los Angeles County, California." (December 12, 2018), 6-8. <https://files.ceqanet.opr.ca.gov/189318-4/attachment/bKLsXwBujzGW5Y7r0Ocurw38GsfFZA7I2z8pix6TslAymZN7y-9mUEtmA-tgJvBILx7IcwLC1cSl0P0>.

https://web.archive.org/web/20120402101741/http://davidchambers.us/?page_id=10

⁴¹ Mark Q. Sutton, "People and Language: Defining the Takic Expansion into Southern California," *Pacific Coast Archaeological Society Quarterly*, vol. 41, nos. 2 & 3 (2005, printed 2009). <http://www.pcas.org/assets/documents/Takic.pdf>

⁴² John R. Johnson and David D. Earle, "Tataviam Geography and Ethnohistory," *Journal of California and Great Basin Anthropology*, 12(2).

<https://escholarship.org/uc/item/9b23j0pt;jsessionid=5373CA81CBB49D13C36B81CE5A82810E>.

"Fernandeño Tataviam Band of Mission Indians Historical Tribal Territory," Tribal Consultation Pursuant to CEQA, Appendix, McCadden Project EIR,

https://planning.lacity.org/eir/McCadden/FEIR/files/FEIR_A.pdf.

⁴³ Proto agriculture occurs when hunter-gatherers engage in practices that assist the growth of wild plants. The development of proto-agriculture reflects hunter-gatherers increasing knowledge of how to make plants grow, which was eventually to lead to the knowledge required for full -scale agriculture. See, Rochelle Forrester, "Agriculture and Pastoralism," typescript, 2006. <https://www.rochelleforrester.ac.nz/agriculture-and-pastoralism.html>.

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⁴⁴ Thomas C. Blackburn and Kat Anderson, *Before the Wilderness: Environmental Management by Native Californians*, (Ballena Press Publication, Menlo Park, California: 1993). Henry T. Lewis, Lowell John Bean and Harry W. Lawton, eds. "Some Explanations for the Rise of Cultural Complexity in Native California, with Comments on Proto-Agriculture and Agriculture," *Patterns of Indian burning in California: ecology and ethnohistory*. The Owens Valley Paiute were also an Uto-Aztecan speaking people, see., Herbert W. Luthin, *Surviving Through the Days: A California Indian Reader* (Berkeley: University of California Press, 2002), 586, note 11.

⁴⁵ Henry T. Lewis, "Patterns of Indian Burning in California: Ecology and Ethnohistory," *Before the Wilderness*, op cit., pages 55 to 116, Han Timbrook, John R. Johnson, and David D. Earle "Vegetation Burning by the Chumash," *Before the Wilderness*, op. cit., pages 117-149.

⁴⁶ Florence Shippek, "Kumeyaay Plant Husbandry: Fire, Water, and Erosion Control Systems," *Before the Wilderness*, op cit., page 379-380.

⁴⁷ John W. Robinson, "Winged Feet in the Dust: Long-Distance Trade Routes in Aboriginal California," *The California Territorial Quarterly*, Number 52, Winter 2002, pages 4 to 17. Also see James T. Davis, "Trade Routes and Economic Exchange Among the Indians of California," *Aboriginal California Three Studies in Cultural History*, edited by Robert Fleming Heizer (The University of California Archaeological Research Facility, 1963), and Richard I. Ford's paper "Inter-Indian Exchange in the Southwest," published in the *Handbook of North American Indians: Southwest*, edited by Alfonso Ortiz and William C. Sturtevant (Smithsonian Institution, 1983) Volume 10, pages 711-722. Frank Latta, Jr. presented the story of El Camino Viejo á Los Angeles to the Kern County Historical Society in 1936. This is the story as told by American pioneers. The organization published Latta's manuscript in 1936. It is available through Bear State Books, Exeter, California. His focus in this manuscript was on the pioneers' experience but Latta's *Saga of Rancho El Tejón* documents its use by the Spanish as early as 1780. This is edited by Monna Olson and based primarily on the narrative of José Jesús López, Majordomo of El Tejon. It is also available through Bear State Books.

⁴⁸ J. M. Guinn, "History of Cahuenga Valley and Rancho La Brea," *Annual Publication of the Historical Society of Southern California*, Vol. 8, No. ½ (1909-1910), 87.

⁴⁹ J. M. Guinn, *A History of California and An Extended History of Los Angeles*, vi.

⁵⁰ H. H. Bancroft, *History of California*, vol. 1, 163, fn. 23.

⁵¹ J. M. Guinn was born in Ohio in 1834. He mustered out of the army in 1864 and settled in Alameda County. Soon after he reached Alameda County, he walked to the Boise Basin to mine gold. After three years, he returned to California and settled in Anaheim – so he probably passed through Los Angeles in about 1867. He moved to Los Angeles to be superintendent of schools in 1883. "Guinn was Secretary of the Historical Society of Southern California," Social Networks and Archival Context. <https://snaccooperative.org/ark:/99166/w6rv2j4f#biography>.

⁵² "On January 16, Portolá left San Fernando Valley by Cahuenga Pass, and camped near its mouth north of Hollywood." H. E. Bolton, et al., *Juan Crespi: Missionary Explorer of the Pacific Coast* (Berkeley: University of California Press, 1927), 271. His translation is as follows: "From this place, without leaving the valley, we went on to the southeast, and instead of crossing the mountains which encircle it to the east by the same road as the other time, we cut across them by the southeast without losing ground. We were aided by our good fortune in discovering a pass which opened the way for us to the plain of Los Alisos. In this march we

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made three and a half leagues and camped among some hills at the outlet from the range, somewhat distant from a small arroyo which sinks into the sand near its source." Id., 269.

⁵³ Portolá called the Los Angeles plain *La Puente*, presumably because in 1769, expedition members had built a bridge – a Puente – across an arroyo so their horses could pass over it. This place was to become Rancho La Puente in 1840. The place is now the city of Puente. The city of Puente is on the plain on the east side of the river. Portolá may considered the Los Angeles plain and the plain on the east side of the river to be the same. Portolá was correct "The Los Angeles plain is a broad, level expanse of land comprising more than 800 square miles.... The Los Angeles plain is traversed by several large watercourses, most notably the Los Angeles, Rio Hondo, San Gabriel and Santa Ana Rivers..." Google books. "Los Angeles Union Station Run-True Tracks Project" (2004), 18.

https://www.google.com/books/edition/Los_Angeles_Union_Station_Run_through_Tr/M7E2AQAAAJ?hl=en&gbpv=1&dq=Los+Angeles+plain&pg=RA1-PA18&printsec=frontcover.

⁵⁴ Miguel Constansó, *The Narrative of the Portolá Expedition of 1769*, eds. Adolph van Hemert-Engert and Frederick J. Teggart, (Berkeley: University of California Press, 1910), 157 and 158. <https://babel.hathitrust.org/cgi/pt?id=uc1.31822043016872&view=1up&seq=7&skin=2021>. The Reveley translation is in *An Historical Journal of the Expeditions by Sea and Land... from a Spanish Ms.*, translated by William Reveley, Esq. (A. Dalrymple, 1790). Recent hardcover copy is Gale, ECCO, print editions, April 19, 2018. It is a Google book and can be read free on line. https://www.google.com/books/edition/An_Historical_Journal_of_the_Expeditions/GbRfAAAAcAAJ?hl=en&gbpv=1.

⁵⁵ In recent Spanish geographic terms, an "abra" is a bay. In Cuba, "abra" – in 1960 meant "gorge." In Chile – 1967 – it meant "pass, cove, bay, fjord." In Peru in 1955, abra meant "pass." United Nations, Third Session of the Ad Hoc Group of Experts on Geographical Names (1971), "A Glossary of Spanish and Portuguese Geographical Terms with English Equivalents." https://unstats.un.org/unsd/geoinfo/ungegn/docs/3rd-gegn-docs/3rd_gegn_inf10.pdf.

⁵⁶ Teggart stated Nelson Croxford Smith made the first draft of the translation and that he and Manuel Carpio prepared the final version. Teggart's background does not show fluency in Spanish Colonial writing. Croxford Smith's 1910 thesis at the University of California, Berkeley, was the introduction to translation of the diary, but he included in his bibliography a translation by A. Dalrymple, and the Charles Lummis translation in *Land of Sunshine*, vol. 14, pp. 485-496, and vol. 15, 38-47. (1901). Nelson Croxford Smith, *An Introduction to the Translation of the Constansó Diary of the California Expedition of 1769-1770*, Master's Thesis, 1910. <https://babel.hathitrust.org/cgi/pt?id=uc1.c2927411&view=1up&seq=60>.

⁵⁷ Bryant, *What I saw in California*, 393.

⁵⁸ United States War Department, *Reports of Explorations and Surveys to Ascertain the Most Practicable and Economical Route for a Railroad from the Mississippi River to the Pacific Ocean, Made Under the Direction of the Secretary of War*, in 1853-4, Volume V (Washington, D.C.: Beverly Tucker, Printer, 1856), 75. <https://babel.hathitrust.org/cgi/pt?id=uiug.30112060801310&view=1up&seq=195&size=125&q1=Los%20Angeles>.

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⁵⁹Juan Crespi, *A Description of Distant Roads: Original Journals of the First Expedition into California, 1769-1770* edited and Translated by Alan K. Brown (San Diego: San Diego State University Press, 2001), 663.

⁶⁰Juan Crespi, *A Description of Distant Roads*, 690 and 691.

⁶¹H. E. Bolton, *Anza's California Expeditions*, vol. 4 (Berkeley: University of California Press, 1930), 245, footnote 1.

⁶²Seligman stated Domingo Feliz was Juan Félix's nephew. He wasn't. Seligman, *Los Feliz*, 27.

⁶³Pedro Font counted Juan Bautista de Anza (1), Fray Pedro Font (1), the commissary of the expedition (1), Don Mariano Vidal (1), Lieutenant Don Joseph Joachin Moraga (1), ten veteran soldiers, as an escort for the expedition (10). Twenty soldiers, recruits for Monterey (20), the wives of the twenty soldiers, children, and other persons belonging to these twenty families (106), Muleteers (20), four families of settlers and others attached (17). H. E. Bolton, *Anza's California Expeditions*, vol. 4 (Berkeley: University of California Press: 1930), 3.

Anza counted himself (1), Fray Pedro Font (1), Fathers Fray Francisco Garcés and Fray Thomás Eciarc (Garcés and Eciarc did not go with Anza through Los Angeles on February 21, 1776), Alférez Joseph Joachin Moraga (He did not accompany Anza on February 21, 1776), ten soldiers of the presidio to escort the expedition and return with Anza (10), twenty-eight soldiers (28) 29 women, wives of the soldiers (29). 136 persons of both sexes and all ages, belonging to the same soldiers and to four other volunteer families, who are going to live in California (136), 15 muleteers (15), 3 cowboys (3), 3 servants of the fathers (3), four of his servants (4), five interpreters (5), 1 commissary (1). He included 25 pack mules, 220 saddle animals belonging to the expedition, one hundred and twenty saddle animals belonging to members of the troop, 302 beef cattle. H. E. Bolton, *Anza's California Expedition*, Vol. 3 (Berkeley: University of California Press, 1930), 1 – 3.

⁶⁴“(I)t was decided to resume the journey tomorrow, leaving at the mission of San Gabriel ten soldiers and two settlers, with their families, as was ordered by Commander Ribera in San Diego, they being selected today in order to continue in the morning with the rest.” H. E. Bolton, *Anza's California Expeditions*, vol. 4, 243.

⁶⁵H. E. Bolton, *Anza's California Expeditions*, vol. 3, 105.

⁶⁶H. E. Bolton, translator and editor, *Anza's California Expeditions*, vol. 4, 245. “Bolton (1930) states that the league reported in his diaries was...2.6 miles. Anza's leagues were a bit longer, 3.0.” J. N. Bowman & R.F. Heizer, *Anza and the Northwest Frontier of New Spain* (Highland Park: Southwest Museum, 1967), note 11, 175.

⁶⁷The shortest distance from the San Gabriel Mission to Portolá's crossing place today is 8 miles. Anza's campsite near the mission may have been at a distance to the west from today's mission building or today's building may have been built at a location different from where the mission structures – probably primitive – had been built.

⁶⁸The *legua* or league was 2.597 miles. See, *California Missions Foundation*, Kenneth Pauley, “Weights and Measurements in California's Mission Period, Part 1 — Linear Measurements.” <http://californiamissionsfoundation.org/articles/weightsandmeasuresmissionperiod/>.

⁶⁹“The route was evidently along the line of the Southern Pacific Railroad through Alhambra to Los Angeles River, thence northwest up the river through the Portezuelo. Camp was at the turn of the mountains west of Glendale.” Herbert Eugene Bolton, *Anza's California Expeditions*, Volume 3, 105, fn. 2.

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⁷⁰ The San Gabriel Mountains were once called the Sierra Madre. Both names existed side-by-side until 1927, when the U.S. Board on Geographic Names decided in favor of “San Gabriel Mountains.” “Sierra Madre” passed out of common usage. The Sierra Nevada Mountains are a range between the Central Valley of California and the Great Basin. Fr. Font may have meant the snowy mountains. “Sierra” means mountain range. “Nevado” means “snowy,” feminine is “Nevada.” Font had a “short” diary as well as a complete one. In both, Font counted six leagues from the San Gabriel Mission to El Portezuelo. Anza counted five leagues. H. E. Bolton, *Anza’s California Expeditions*, vol 4, 245. Alan K. Brown’s translation of what Father Font wrote:
“[February] 21, Wednesday, I did the blessing of ashes; I said Mass, and during it ... words to the people who were remaining and to the rest of them who were going (who wept a bit since they regretted this separation) by using the gospel of the day to reaffirm what I had been saying to them in the talks I gave them. That is, that they had come in order to suffer and give an example of Christianity to the gentiles, etc., the whole of it amounting to exhorting both groups to repent for their faults and patience in hardship, etc., etc. We went out from Mission San Gabriel at a half past eleven in the morning and halted at a half past four in the afternoon at the spot called El Portezuelo having traveled for five leagues following a west-northwestward course with some veering to one side and the other. At two leagues we crossed the Porciuncula River, which carries a good amount of water and runs toward the San Pedro bight and spreads out and loses itself upon the plains shortly before reaching the sea. The land was very green and flowery, and the route had a few hills and a great deal of miry grounds created by the rains. This is why the pack train fell far in the rear. At the stopping place there is year-round water, although little of it, and sufficient firewood. As one goes along, far off on the left hand, upon the sea, lies the hill range forming the San Pedro bight, and on the right rises the snowy range, with another steep, steep range lying in front of it.” Alan K. Brown, ed., Tr., *With Anza to California, 1775-1776: The Journal of Pedro Font O.F.M.* (Norman, Oklahoma: The Arthur H. Clark Company, 2011), 215.
⁷¹William Rich Hutton, “Los Angeles, April 1848,” “Drawings of William Rich Hutton, 1847-1852,” The Huntington Library, San Marino.
<https://hdl.huntington.org/digital/collection/p15150coll7/id/870/rec/1>.
⁷²One Mission San Gabriel baptismal record showed the baptism of “Bernardo de la rancheria Yabit” on August 20, 1784. “Yabit” was the padres’ name for Yang-Na. Historian Susan Morris provided the baptismal information in an e-mail dated April 21, 2020.
⁷³The summary of Font’s diary for February 22, 1776, is drawn from Pedro Font, *With Anza to California, 1775-1776: The Journal of Pedro Font, O.F.M.*, Translated and edited by Alan K. Brown (Norman, Oklahoma: The Arthur H. Clark Company, 2011), 215-216.

2.5 Responses to Public Comments

Public Meeting

COMMENT

RESPONSE

	00:56:46.950 --> 00:56:48.609 Nicolle Steiner: to raise their hand.		
	355 00:57:09.800 --> 00:57:11.370 Nicolle Steiner: All right.		
	356 00:57:17.540 --> 00:57:19.949 Nicolle Steiner: We will start with Andrew.		
	357 00:57:26.210 --> 00:57:43.580 Thomas, Andrew: Hello! Can you hear me?		
P-1-1	358 00:57:43.590 --> 00:58:03.529 Thomas, Andrew: My comment is that the draft eir accurately and comprehensively describes the impacts of and potential mitigation strategies for the proposed project, and I support the City Council approving the draft Eir, or the Eir at that point of the types of impacts considered the most significant and unavoidable impact, as you mentioned, is a noise	P-1-1	The comment notes that the Draft EIR accurately and comprehensively describes the impacts of and potential mitigation strategies of the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
P-1-2	359 00:58:03.540 --> 00:58:21.079 Thomas, Andrew: associated with construction and operation of the complex. I think the mitigation measures of the Ei are good, but I do urge you to prohibit amplified music in the complex at all times, and I also urge the construction, noise, mitigation, measures are here too strictly and expanded upon wherever possible.	P-1-2	The comment requests that construction noise mitigation is expanded where possible. Section 3.12, Noise and Vibration, of the Draft EIR, discusses mitigation that would be implemented to reduce noise impacts during construction of the proposed Project. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	360 00:58:21.180 --> 00:58:33.559 Thomas, Andrew: Years of experience in the community have convinced me that the community members support the goals of the master plan, which are an enhanced walking experience, a serene, natural retreat, and a place to interact with the neighbors		The comment also requests that amplified music be prohibited during operations. As discussed in Chapter 3 of this Final EIR, based on comments received during the Draft EIR comment period, the City has decided to remove the use of amplified speakers for special events during operations of the proposed Project. As shown in Table 3.12-21 of the Draft EIR, on-site noise levels during special events without amplified speakers would be less than significant. Please see Master Response – Noise.
P-1-3	361 00:58:33.580 --> 00:58:50.869 Thomas, Andrew: as a participant in the development of the master plan. I believe the elements of the plan are all there for the reason for this reason, and they'll all uh help achieve these goals. Without these elements the goals will not be met, and the benefits will not be realized. And i'm aware of the proposals to maintain the status quo,	P-1-3	The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	362 00:58:50.910 --> 00:59:08.730 Thomas, Andrew: which would mean the reservoirs property, would remain mainly used as a dwp, storage, and staging facility, and also, as a quote you, Lake Unquote, and I think it's unfair to restrict the use of the complex to these exclusive and exclusionary uses. When one la needs parks,		

Public Meeting

COMMENT

RESPONSE

363
00:59:08.740 --> 00:59:22.370
Thomas, Andrew: two birds need areas to nest and feed three. The planet needs carbon, sequestration and cooling from things like water and more trees, and for the city needs stormwater capture. So we have all these needs, and we have this opportunity.

P-1-3 cont. 364
00:59:22.380 --> 00:59:36.830
Thomas, Andrew: I think it's unwise not to seize this opportunity to realize these benefits. Of course, construction will be necessary, which will result, as we said, an unavoidable noise. But we can accept this if the noise, mitigation measures are it here too,

365
00:59:36.840 --> 00:59:53.759
Thomas, Andrew: and I want to also mention that I support the off-site improvements that mitigate the transportation impacts, including the parking and bicycle lanes that are included in the draft. The ir um I think the the the plan pro poses a parking lane along Silver Lake Drive and a reconfigured parking area on west over Lake Drive,

P-1-4 366
00:59:53.770 --> 00:59:57.269
Thomas, Andrew: and I support these measures because I think they should believe

367
00:59:57.390 --> 01:00:14.580
Thomas, Andrew: the parking pressures on the neighborhood residents, and because the proposed protected bike lanes will increase safety for pedestrians and bicyclists. So proposed improvements to the Dock Park and rec center, too, as well as the regrading and restoration of the pedestrian paths, will address safety concerns two hundred and fifty

368
01:00:14.590 --> 01:00:21.070
Thomas, Andrew: in the area and serve the recreational needs of the community. So to them up quickly, I accept the findings of the Eir

P-1-5 369
01:00:21.300 --> 01:00:28.580
Thomas, Andrew: with the additional noise, mitigation measures, and I will ultimately urge the city council to approve the eir. Thank you.

370
01:00:30.450 --> 01:00:35.700
Nicolle Steiner: Thank you for your comment. You got a few extra seconds there. Forgot the clock.

371
01:00:40.180 --> 01:00:42.410
Nicolle Steiner: Um, Scott Sternberg!

P-1-4

The comment expresses support for the recreational and off-site improvements proposed by the Project. Based on comments received during the public comment period, parking will not be added along Silver Lake Boulevard, the City has determined to implement Option 2, Bike Only. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-1-5

This comment is conclusory and does not raise any additional issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

P-2-1	<p>372 01:00:45.850 --> 01:00:48.889 Scott Sternberg: Hi! Can you hear me? Yes,</p> <p>373 01:00:49.060 --> 01:00:57.459 Scott Sternberg: uh, okay. I'll start. I think you know. I guess the first thing I want to start with i'm a I've looked for thirteen years of a homeowner.</p> <p>374 01:00:57.510 --> 01:01:09.330 Scott Sternberg: I'm not a stakeholder uh it seems like the stakeholders you're referring to, or the people on this call, and the people who who have done a great job of putting this plan together, and I realized you spent a lot of time doing that. But</p> <p>375 01:01:10.190 --> 01:01:16.969 Scott Sternberg: the first thing I want to say is this community does not have recreational needs. We might have recreational once we</p> <p>376 01:01:17.050 --> 01:01:36.660 Scott Sternberg: right. We might want to have a nice place to walk around, but we don't have recreational needs. Our needs are to mitigate the homeless problem. These are people who are part of our community, and our tax dollars should be going towards them, not making a nice place for us to walk and walk our dogs. I have a dog I love walking around the reservoir.</p>	P-2-1	<p>The comment states that the community does not have recreational needs and expresses opposition to the proposed Project. As described in the Project Description, Section 2.2 of the Draft EIR, the Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic. The underlying purpose of the Project is to repurpose the SLRC as a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.</p> <p>Please see Master Response - Homelessness This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
P-2-2	<p>377 01:01:36.670 --> 01:01:54.989 Scott Sternberg: Um! Our needs are around an imminent drought. The drought that we're in the drought that's getting worse. We don't have recreational needs. We have Recreational W. So let's be clear about that. And as a community member, I don't want this. I think maybe alternative to really alternative. Three sound</p>	P-2-2	<p>Please see Master Response – Drought Conditions.</p> <p>This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
P-2-3	<p>378 01:01:55.010 --> 01:02:11.649 Scott Sternberg: same to me when we're living living at a time that we're living in right now. When I look around every day and nobody is talking about homelessness, we're talking about this. I feel like I'm in a in the twilight zone. Uh in terms of your study. I appreciate all the work you've been into it</p>	P-2-3	<p>Please see Master Response – Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
P-2-4	<p>379 01:02:11.660 --> 01:02:30.860 Scott Sternberg: that went into it. But honestly, the fact that transportation uh showed up as low impact makes me question the efficacy of that impact analysis. I've lived here again. For thirteen years I've</p>	P-2-4	<p>Please see Master Response – Parking/Bike Option and Master Response – Traffic/Transportation.</p>

Public Meeting

COMMENT

RESPONSE

P-2-5

This comment expresses opposition to the proposed Project. The comment does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-2-4
Cont.

been on all these streets. I've walked around all these streets. The parking solutions that you've suggested are completely insufficient.

380

01:02:30.870 --> 01:02:39.880

Scott Sternberg: We should not be trying to make this special event arena for people to be driving through this place, parking It's going to ruin

381

01:02:39.980 --> 01:02:44.420

Scott Sternberg: our neighborhood. It's going to kill local businesses.

382

01:02:44.430 --> 01:03:00.139

Scott Sternberg: Uh nobody wants this. I appreciate. All of you have done this hard work. You stakeholders. You want this, You've done this work. I get it, but nobody wants this. Take the fence down, Plan some trees. Let's do stuff for wildlife, but let's really focus on our needs. Not at once. Thank you for your time.

P-2-5

383

01:03:01.380 --> 01:03:03.119

Nicolle Steiner: Thank you for your comment,

384

01:03:10.010 --> 01:03:11.229

Nicolle Steiner: Cindy.

385

01:03:11.770 --> 01:03:15.059

Nicolle Steiner: I'll back back. I'm sorry i'm gonna

386

01:03:16.450 --> 01:03:18.320

Nicolle Steiner: mess up some of these names.

387

01:03:18.620 --> 01:03:25.330

Cyndi Hubach: Hi, Thank you. That was perfect. Well, hubach um I'm Cindy, you back I love on the way. Can you hear us?

388

01:03:25.640 --> 01:03:28.750

Nicolle Steiner: Uh, yes, you are unmuted.

389

01:03:29.930 --> 01:03:32.550

Cyndi Hubach: Yes, I hear you.

390

01:03:33.340 --> 01:03:37.580

Tamseel Mir: I can hear you, Cindy, I can hear you.

391

Public Meeting

COMMENT

RESPONSE

P-3-1

01:03:38.570 --> 01:03:39.819

Cyndi Hubach: Um

392

01:03:40.330 --> 01:04:00.280

Cyndi Hubach: so. Yes, Hi, I'm Cindy Hubbach. I live on the west side of the Reservoir, and I'm. A member of the Silver Lake Reservoirs Conservancy Um actually joined the Conservancy because of my concerns about wildlife Um! Every spring I would see ducklings walking down the road to their doom or getting picked off in the reservoir

393

01:04:00.290 --> 01:04:07.970

Cyndi Hubach: uh migratory birds were stopping in, but finding no real place for food or shelter. Uh! There was water, and there were trees, but it wasn't working

394

01:04:08.080 --> 01:04:10.319

Cyndi Hubach: for any of them. And um!

395

01:04:10.480 --> 01:04:18.049

Cyndi Hubach: And I actually thought at the time what we need are some floating islands. That's why I got involved actually um in the conservancy and

396

01:04:18.500 --> 01:04:22.030

Cyndi Hubach: the reservoir improvements in general,

397

01:04:22.160 --> 01:04:30.200

Cyndi Hubach: the reservoir is, there are not habitat When they were built at the turn of the century the banks were earthen and gently sloped in the fiftys. They were

398

01:04:30.320 --> 01:04:44.419

Cyndi Hubach: um steepened and short up with asphalt and cement. We see today to increase capacity. So what we have been left with are the remnants of an industrial water facility, those steep banks, the ugly striped asphalt that one hundred and fifty

399

01:04:44.490 --> 01:04:50.689

Cyndi Hubach: people have complained about as long as I've lived here, and the large, sterile, inhospitable pools.

400

01:04:50.970 --> 01:05:00.300

Cyndi Hubach: Um! It's true that we've been through a lot of construction in this neighborhood, and none of us really wants to go through it again. But the fact is that we didn't benefit from most of that construction.

P-3-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

401
01:05:00.540 --> 01:05:05.640
Cyndi Hubach: These improvements will benefit all of us. The plans, the animals, the people

402
01:05:05.790 --> 01:05:12.899
Cyndi Hubach: um, and there will be some pain. But there will be something of your lasting value and beauty at the end of it

P-3-1 cont 403
01:05:12.910 --> 01:05:36.499
Cyndi Hubach: this project meets the objectives of the community plan to increase some um. It is carefully to consider the desires and preferences of the process of selecting something we can. Maybe we could give her instructions to if you could go down. I would also like to say that while we may disagree on aspects of the plan, or on the value of having any plan at all

404
01:05:36.510 --> 01:05:45.249
Deborah Weintraub: as neighbors and stakeholders, I know we all want um what is best for our community to work through this and remain friends.

P-3-1 cont 405
01:05:45.260 --> 01:06:01.020
Cyndi Hubach: Um! As with anything in a democracy. If we do this right um, none of us will be completely happy when it's over. But I hope we can create something that we all come up with, and that makes our neighborhood a better place. Maybe we should go to another person and come back to Cindy.

406
01:06:01.490 --> 01:06:03.550
Nicolle Steiner: Okay, Yup, we can do that.

407
01:06:03.910 --> 01:06:08.639
Nicolle Steiner: So, Cindy, you have to click the interpretation button, as it says on this screen.

408
01:06:09.470 --> 01:06:16.639
Nicolle Steiner: And if everyone could take a time to just look at the screen more time and click that interpretation button so that we can all hear you.

409
01:06:16.720 --> 01:06:17.870
Nicolle Steiner: Um!

410
01:06:17.980 --> 01:06:27.760

Public Meeting

COMMENT

RESPONSE

Nicolle Steiner: We'd appreciate that. So you have to click the button twice one to pick the language, and the second time to the original audio. That's an important step.

411
01:06:29.410 --> 01:06:31.660
Nicolle Steiner: All right, Frida. Sham

412
01:06:42.020 --> 01:06:44.460
Nicolle Steiner: Steven, Can you on me? There we go.

413
01:06:47.980 --> 01:06:49.689
Freda Shen: Okay, You got it.

P-4-1 414
01:06:49.760 --> 01:06:59.309
Freda Shen: Yes, we can hear you. Thank you. Hi! I'm Frida Shan, originator and co-founder of Silver Lake wildlife sanctuary and twenty-four year. Silver Lake resident

415
01:06:59.320 --> 01:07:14.929
Freda Shen: I would like to request a second meeting a few weeks from now to give people time to review the complex draft eir. It is very complex, especially Chapter five, which has just recently become available on the Project website

P-4-2 416
01:07:14.940 --> 01:07:31.530
Freda Shen: Chapter Five. The analysis of alternatives is critical to understanding our options. Going forward. It has found two alternatives which are acknowledged to be environmentally superior to the proposed project. Why should we care?

417
01:07:31.540 --> 01:07:44.339
Freda Shen: Because we are in a time of severe decline in bird numbers and a time of increasing danger of multiple species going extinct. This earth needs our care.

418
01:07:44.350 --> 01:08:00.440
Freda Shen: These species need space. Our values may be global, but we must act locally. The reservoir complex is one of the best open habitat spaces left in crowded Los Angeles. It is in our care

419
01:08:00.450 --> 01:08:17.809
Freda Shen: we had mitigations for her, and nesting during earlier construction. They did not work, and the herons left their eucalyptus grove nests only coming back years later in a different location. Pictures are pretty, but reality may have different outcomes.

P-4-1

The comment requests a second meeting to be held at a later date in order to allow more time for public review of the Draft EIR. The comment period was open for more than the required 45-day comment period and comments were accepted via the project website or by mail as shown on Section 1.6.1, Public Review of Draft EIR, of the Draft EIR.

P-4-2

This comment expresses concern regarding impacts to wildlife. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures.

Public Meeting

COMMENT

RESPONSE

P-4-3	<p>420 01:08:17.990 --> 01:08:46.159 Freda Shen: At this point in our review we urge the city to choose alternative three with elements from alternative to please email us at Silver Lake Wildlife sanctuary at Gmail Dot Com. For information about alternatives three and two with questions. Details will go in our written comments. These two alternatives are environmentally superior alternatives to the proposed project, and together are the best choice</p>	P-4-3	The comment expresses support for implementation of Alternative 3 with elements of Alternative 2. Please see Master Response - Alternatives Analysis. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
	<p>421 01:08:46.170 --> 01:08:52.049 Freda Shen: for the future of our reservoir complex and the lives that depend on it. Thank you.</p>	P-5-1	The comment expresses opposition to the proposed Project at this location. As described in the Project Description, Section 2.2 of the Draft EIR, the Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City’s potable water needs, they are considered an important neighborhood-defining characteristic. The underlying purpose of the Project is to repurpose the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.
	<p>422 01:08:53.790 --> 01:08:55.850 Nicolle Steiner: Thank you for your comment today,</p>		This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.
P-5-1	<p>423 01:08:59.990 --> 01:09:01.759 Debbie Slater.</p> <p>424 01:09:07.450 --> 01:09:26.160 Debbie Slater: Hello! Can you hear me? All right? Thank you so much for uh allowing us to speak tonight. I'm going to start off by saying, just because you can build something doesn't mean that you should build something, and I so appreciate the gentleman who spoke second,</p>		As discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option. Also, please see Master Response – Parking/Bike Option and Master Response – Traffic/Transportation.
	<p>425 01:09:26.220 --> 01:09:36.460 Debbie Slater: and bringing up this idea of recreational needs. Uh, the idea of turning the silver, like reservoir into a public park,</p>		
	<p>426 01:09:36.470 --> 01:09:48.110 Debbie Slater: is not really what the city as a whole needs, with the amount of density, building and Tsc. Projects that are going around Los Angeles.</p>		
	<p>427 01:09:48.120 --> 01:10:03.369 Debbie Slater: There are areas that are desperately in need of green space, of park Space Silver Lake is very green space rich, and this is not something that the city should be spending their money on</p>		
P-5-2	<p>428 01:10:03.420 --> 01:10:14.739 Debbie Slater: um for me. I agree also that the idea of them saying that the traffic increase is not an environmental impact</p>		
	<p>429 01:10:14.910 --> 01:10:29.020</p>		

Public Meeting

COMMENT

RESPONSE

P-5-3

The comment expresses support for Alternative 1, the No Project Alternative or Alternative 3. Please see Master Response - Alternatives Analysis. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-5-2 cont.

Debbie Slater: is really naive and and quite insulting to those of us who live here, and operate here on a daily basis, to think that adding an additional one hundred and thirty-five parking spaces is not going to bring congestion

430

01:10:29.210 --> 01:10:34.080

Debbie Slater: a hundred times the worse than it already is. Uh, it is fairly

431

01:10:34.210 --> 01:10:38.030

Debbie Slater: angry. Um! On top of which

432

01:10:38.510 --> 01:10:40.700

Debbie Slater: I really wish that

433

01:10:40.840 --> 01:10:47.510

Debbie Slater: the reservoir had not been taken offline to begin with, because this never would have even become a vision.

434

01:10:47.560 --> 01:10:55.180

Debbie Slater: So, along with the previous speaker, I really would encourage this environmental report to

P-5-3

435

01:10:55.260 --> 01:11:09.530

Debbie Slater: be presented to the city, emphasizing the alternatives, Uh personally, I in favor of alternative one. But as a sort of compromise I would say alternative Three is some place that we can start

436

01:11:09.720 --> 01:11:17.620

Debbie Slater: um not to mention the expense again back to Speaker to our city, has so many more important issues at hand.

437

01:11:18.180 --> 01:11:19.320

Debbie Slater: Thank you.

438

01:11:21.350 --> 01:11:22.970

Nicolle Steiner: Thank you for your comment,

439

01:11:26.940 --> 01:11:28.150

Nicolle Steiner: Sandy.

440

01:11:29.600 --> 01:11:37.689

Public Meeting

COMMENT

RESPONSE

	<p>Deborah Weintraub: Um, Nicole. I think that um Steven wanted you to call on Adam. See? Next to the accident and lower.</p> <p>441 01:11:37.710 --> 01:11:43.709 Nicolle Steiner: Oh, okay, sorry, Sandy, when you'll be next Adam safe.</p> <p>442 01:11:44.100 --> 01:11:45.579 Nicolle Steiner: Can I mute yourself?</p> <p>443 01:11:47.140 --> 01:11:49.780 Adam Sieff: Hi! Can you hear me? Yes,</p> <p>444 01:11:50.530 --> 01:12:01.539 Adam Sieff: thank you. Thanks, for let me, despite inadvertently lowering my hand. Um. My name is Adam Steve. My wife and I own a home on kennel worth one block from the project.</p> <p>445 01:12:01.590 --> 01:12:09.949 Adam Sieff: I have the privilege of serving as chair of silver like forward, a community nonprofit, representing hundreds of community stakeholders</p> <p>446 01:12:10.470 --> 01:12:24.760 Adam Sieff: with the understanding that today's meeting is focused only on the adequacy of the draft environmental impact report, and not to relitigate the content of the master plan, or whether it should move forward. I just wanted to make three points.</p> <p>447 01:12:25.000 --> 01:12:37.020 Adam Sieff: First, we broadly agree with the draft Eir's findings that the master Plan alternative best achieves the designated project goals with only de minimis impacts.</p> <p>448 01:12:37.030 --> 01:12:50.769 Adam Sieff: In particular, we agree with the Dei I's findings that the master Plan alternative would have no significant impacts other than noise impacts from construction and potential noise impacts from amplified sound, from special events,</p> <p>449 01:12:50.910 --> 01:13:04.060 Adam Sieff: especially because the possibility of amplified events sound is a discretionary aspect of the plan that the community could control or prohibit, and we would be open to, uh removing that from the plan.</p> <p>450</p>		
P-6-1		P-6-1	This comment is introductory. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
P-6-2		P-6-2	The comment expresses support for the proposed Project. Please see Master Response -Noise.

Public Meeting

COMMENT

RESPONSE

P-6-2
cont. 01:13:04.350 --> 01:13:14.479
Adam Sieff: Uh, we agree with the drafts conclusion that the benefits of the master Plan alternative far outweigh these limited, sporadic and temporary noise impacts.

451
01:13:14.820 --> 01:13:24.069
Adam Sieff: Second, we also agree with the drafts findings that each of the other project alternatives fail to achieve the designated project goals.

P-6-3 452
01:13:24.220 --> 01:13:33.179
Adam Sieff: These alternatives only marginally reduce adverse impacts and yet drastically undercut the project benefits the master plan is intended to achieve.

P-6-4 453
01:13:33.900 --> 01:13:45.889
Adam Sieff: Third and finally, I just want to highlight the master plan alternatives, positive environmental benefits, not just as adverse impacts, and these include creating new habitat wetlands and increased biodiversity.

454
01:13:45.960 --> 01:13:58.610
Adam Sieff: I want to thank you all for your consideration and time. We encourage the city to approve the master Plan alternative, and we look forward to submitting a formal comment before the deadline. Thank you,

455
01:14:00.190 --> 01:14:01.790
Nicolle Steiner: Thank you so much,

456
01:14:04.380 --> 01:14:05.639
Nicolle Steiner: Sandy.

457
01:14:09.200 --> 01:14:21.270
Sandy: Hi! Can you hear me?

P-7-1 458
01:14:21.360 --> 01:14:26.899
Sandy: The Silver Lake Reservoir formally reservoir? So I've been here a while,

459
01:14:26.950 --> 01:14:33.220
Sandy: and i'm a pretty cool person. I'm pretty chill, and I like people, and I like parks, but you people are

460
01:14:33.420 --> 01:14:37.519

P-6-3 The comment expresses support for the analysis included in Chapter 5, Analysis of Alternatives. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-6-4 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-7-1 This comment is introductory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

P-7-2

Sandy: almost really fraudulent on this traffic data.

461

01:14:37.910 --> 01:14:53.730

Sandy: Wow! I'm not surprised. I'm not surprised, especially with what's going on with Mitchell, Farrell and Nurse Guy and uh the City Council Right now. Good job, man, Good job! Letting this project go forward with all that. Okay. So

462

01:14:53.750 --> 01:15:00.590

Sandy: I surmise that the criteria that the outlaw to determine that the uh

463

01:15:00.650 --> 01:15:15.199

Sandy: there's no significant traffic impact from turning Lake into a party zone. Uh, they probably use the criteria uses that the traffic is already capacity. So cramming more cars and trucks and school buses into our faces wouldn't be noticeable

464

01:15:15.350 --> 01:15:17.329

Sandy: because we're already dying.

465

01:15:17.370 --> 01:15:35.239

Sandy: But I would like it noted for the record that street services, at least city street services already doesn't and cannot maintain Dwayne Street for the amount of traffic that it bears as witnessed by this facts, my house in yard being run into a run through

466

01:15:35.250 --> 01:15:42.640

Sandy: at least ten times by falling trucks and cars on the hill street that is called Duane Street.

467

01:15:43.400 --> 01:15:46.440

Sandy: Nobody is contacting me for this information,

468

01:15:46.510 --> 01:15:54.360

Sandy: So this dot data sounds a little bit fraudulent, and um not least so. No,

469

01:15:54.570 --> 01:15:56.240

Sandy: don't do this

470

01:15:57.750 --> 01:15:59.050

Sandy: this

P-7-2

This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

P-7-2
Cont.

471
01:15:59.560 --> 01:16:08.869
Sandy: unless you address this. We can't get away with this. You cannot get away with this. It's obviously ~~gonna~~ have a traffic impact.

472
01:16:10.830 --> 01:16:20.230
Sandy: Oh, so sad! I'm so sad and depressed. I can't even take it. You guys had a chance to do something cool. And you're lying to us. That's how I feel, and ~~i'm~~ sad.

473
01:16:20.520 --> 01:16:29.220
Sandy: So it looks like I got thirty-eight more seconds to complain. I don't want to complain. I'm just bummed out, and ~~i'm~~ so exhausted

474
01:16:29.310 --> 01:16:40.699
Sandy: from being lied to. Why don't you do something about the freeway cut through? Why don't you do something about the horrible condition of Silver Lake Boulevard.

475
01:16:49.110 --> 01:16:51.459
Sandy: Why don't you do something about the terrible bike lanes. I can't ride my bike to CVS from here. It's so dangerous, are you kidding? Why don't you do something real?

476
01:16:51.690 --> 01:16:59.110
Sandy: and be honest with us. This has been me. Sorry about it, but Yeah, ~~i'm~~ against it.

477
01:16:59.300 --> 01:17:00.309
Sandy: Bye,

478
01:17:01.880 --> 01:17:04.130
Nicolle Steiner: Thank you for your comments. Sandy

479
01:17:05.760 --> 01:17:07.599
Nicolle Steiner: Andres K.

480
01:17:07.770 --> 01:17:09.250
Nicolle Steiner: Here, next.

P-8-1

481
01:17:12.810 --> 01:17:29.070
Andras K: Can you hear me? Hi! So my name is Andrea ~~Kenixen~~ and I'm a twenty one year resident of Silver Lake, and I live within five hundred feet of the Reservoir Complex. I've been to every master plan meeting, and to several of the related neighborhood council meetings.

P-8-1

This comment expresses opposition to the proposed Project and concern regarding public input being incorporated into the Master Plan. Please see Master Response – Community Engagement Process.

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

482
 01:17:29.080 --> 01:17:47.329
 P-8-1 cont. Andras K: erez agmoni. For years I've thought that the master plan was unrealistically grandiose and overwhelming for our little hillside neighborhood, and I've heard the majority of neighbors who spoke at the meetings likewise voiced serious concerns. But these concerns never seem to be reflected in the plan, as it was developed, and repeatedly presented one hundred and fifty.

483
 01:17:47.990 --> 01:17:57.540
 Andras K: Given the alternative between the master plan and doing nothing, I would enthusiastically choose doing nothing, because I see the reservoir as beautiful as it is,

484
 01:17:57.560 --> 01:18:10.660
 Andras K: but for the first time, because the Eir mandates providing reasonable alternatives, i'm seeing a compromise option that begins to respond to the concerns we've been stating for years. It's called alternative three one

P-8-2 485
 01:18:10.860 --> 01:18:25.689
 Andras K: without getting too much into the weeds. The single most important new feature, I see is a new eight foot non-scalable, continuous perimeter fence with gates that would limit public access from dust to Don.

486
 01:18:25.930 --> 01:18:44.969
 Andras K: This would be a key step toward preserving neighborhood peace and security. Other compromises include keeping the Noel, the eucalyptus grove and the waters edge dedicated for wildlife, not adding new building structures anywhere but the South valley, and naturalizing some banks for wildlife, habitat,

487
 01:18:44.980 --> 01:18:47.999
 Andras K: habitat, but keeping the water open, as it is now,

488
 01:18:48.600 --> 01:19:02.320
 Andras K: all other master plan options would radically change the reservoir complex into a twenty, four over seven open venue, with weekly events and new and unnecessary buildings. Alternative. Three or similar,

489
 01:19:02.330 --> 01:19:09.899
 Andras K: would be best for preserving the most natural space, and have it in the least negative impact, mainly because of the non-scalable fence

490

P-8-2

The comment expresses support for Alternative 3, and requests that the security fence proposed under Alternative 3 be implemented and other Project components be implemented or removed. Please see Master Response - Alternatives Analysis and Master Response – Fence Removal. This comment does not raise any issues with respect to the adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

P-8-2 cont. 01:19:09.910 --> 01:19:32.890
 Andras K: the dawn to dust public access and the Reduced and consolidated
 Uh Consolidated Development and built structures. To be clear Alternative
 three is a compromise. By no means is it complete and perfect, but it
 addresses important concerns. Personally, I could not accept any plan
 that didn't have the security fence and the daily access limitation
 Alternative three can be found on page five, ten.

491
 01:19:32.900 --> 01:19:34.850
 Andras K: Check it out. Thank you.

492
 01:19:36.060 --> 01:19:37.290
 Nicolle Steiner: Thank you.

493
 01:19:39.410 --> 01:19:41.350
 Nicolle Steiner: London widow.

494
 01:19:43.570 --> 01:19:45.080
 Nicolle Steiner: Unmute yourself,

495
 01:19:53.560 --> 01:19:57.509
 Nicolle Steiner: London, when prompted. You'll have to accept to unmute
 yourself.

496
 01:20:04.380 --> 01:20:06.559
 Nicolle Steiner: It looks like you are still muted.

497
 01:20:18.990 --> 01:20:24.309
 Nicolle Steiner: Um, I think we'll go down to the next person. We'll come
 back to you. Okay, Linden.

498
 01:20:24.410 --> 01:20:25.900
 Nicolle Steiner: Uh Rachel.

499
 01:20:26.100 --> 01:20:28.720
 Nicolle Steiner: You'll be prompted to unmute yourself.

500
 01:20:35.040 --> 01:20:37.820
 Rachel: Hi! My name is Rachel.

P-9-1 501
 01:20:37.900 --> 01:20:44.680
 Rachel: Hi, um! I'm fortunate to be a resident of Silver Lake, and I
 currently serve on the Board of Silver Lake forward.

P-9-1

The comment expresses support for the proposed Project and does not raise
 any issues with respect to the content and adequacy of the Draft EIR.
 Therefore, it is noted for the record and will be forwarded to the decision-
 makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

P-9-1
cont.

502
01:20:44.770 --> 01:21:00.710
Rachel: Our organization is excited to see this community-driven project continue to move forward and based on the findings outlined in the draft EIR. We are pleased. The Silver Lake ~~master plan~~ project poses no significant adverse environmental impacts.

503
01:21:00.850 --> 01:21:16.879
Rachel: It's clear that the long-term project benefits to the community the environment and all Angelino's outweigh any temporary inconveniences like noise during the construction things. The mitigations the EIR carefully considers, are adequate in addressing the short term impacts.

504
01:21:17.120 --> 01:21:30.969
Rachel: Furthermore, alternatives that reduce the scope of the project undermines the needs and desires of the community which ~~were consistently expressed~~ throughout the community engagement process. In the development of the plan

505
01:21:30.980 --> 01:21:38.129
Rachel: we look forward to working together to make the ~~master plan~~ a reality for all Angelinos present and future to enjoy.

506
01:21:38.170 --> 01:21:42.760
Rachel: We appreciate everyone participating in the public process. Thank you.

507
01:21:46.400 --> 01:21:48.419
Nicolle Steiner: Thank you for your comments,

508
01:21:49.540 --> 01:21:54.120
Nicolle Steiner: London. You'll be prompted again to unmute yourself. Nope,

509
01:21:57.690 --> 01:21:59.110
Nicolle Steiner: Um!

510
01:22:00.150 --> 01:22:07.170
Nicolle Steiner: Linden's hand is down, so we will move on to mark ~~Ernestus~~.

511
01:22:17.990 --> 01:22:32.529
Marc ~~Ernestus~~: Hello! Can you hear me?

Public Meeting

COMMENT

RESPONSE

P-10-1

512
01:22:32.540 --> 01:22:42.450
Marc Ernestus: We talk about security, and they talk about environmental impact. Um, which all of which has been addressed in the Master Plan, and it's supported by all the empirical data that we have on the subject. Um,

513
01:22:42.610 --> 01:22:58.119
Marc Ernestus: if you're complaining about traffic. Um, I see I would. I would argue that you have a much larger issue on your hands. Um! And I would suggest that you start convincing people to start riding bikes. Um, because we live in Los Angeles. This is a car centered city. Um! You

514
01:22:58.130 --> 01:23:14.130
Marc Ernestus: uh! You have a much larger issue. If you're complaining about noise again, you live in a city of millions of people. Uh, this is unequivocally a good thing, a little bit of noise, for at the end of the day what's going to be a long term benefits to this community. Again i'll argue You get over yourself.

515
01:23:14.150 --> 01:23:39.310
Marc Ernestus: Um. I just want to say to the City Council members that you are elected officials. It is on you to understand these issues at a fundamental level at a better level than the average citizen. The people who come on here and complain. They're usually the loudest voices. But um! I think that this is unequivocally a good project it should. One hundred percent go forward. I'm glad to hear that all the environmental concerns have been addressed.

516
01:23:39.320 --> 01:23:52.190
Marc Ernestus: And um yeah, I just think that it is on the City Council to be brave and to stand up to these people, and to explain to them either wrong to understand the issues and to continue to move forward. This. So thank you.

517
01:23:53.940 --> 01:23:55.219
Nicolle Steiner: Thank you,

518
01:23:56.600 --> 01:24:00.440
Nicolle Steiner: Steven. I see that Lyndon Tams back up. Can we try

519
01:24:00.830 --> 01:24:04.060
Nicolle Steiner: um again to unmute London?

520
01:24:12.010 --> 01:24:24.779
Linden Waddell: Hi! Can you hear me? Hello, Yes, i'm sorry we have a couple of people using different computers for this zoom meeting in my

P-10-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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	COMMENT	RESPONSE
	<p>house, and I think our profiles were messed up. I apologize. No problem. Okay,</p> <p>521 01:24:25.410 --> 01:24:42.179 Linden Waddell: All right. What I wanted to say is, I've been a resident in Silver Lake for forty years. I love it here, and we are a fantastic neighborhood, but we are not built to support a recreational commercial destination.</p> <p>522 01:24:42.190 --> 01:25:00.369 Linden Waddell: You know I cherish it as it is, this is one of the last remaining serene, passive places in a very busy city. The reservoir for us is already a huge win, you know. I looked up. Um</p> <p>523 01:25:00.380 --> 01:25:05.340 Linden Waddell: parks in nine zero, zero, three, nine and nine zero, zero, two, six,</p> <p>524 01:25:05.350 --> 01:25:34.140 Linden Waddell: and we already have the Silver Lake Walking Path Wreck Center, two Dog Parks basketball playground, Meadow, Tesla Park apart, Pocket Park, Sunny Nook River Park, Glennhurst Park, North Atwater Park, Bomb Park, Red Car River Park, Marsh Street, Nature Park, Chevy Chase Park, Rattlesnake Park, Elysion Valley Gateway Park, and in nine and ah! Two, six. There's Echo Park, Bellevue, Laurel and Hardy, Part Park, Rockview Community Park, a Lesion Park, six Section six,</p> <p>525 01:25:34.150 --> 01:25:42.399 Linden Waddell: I mean. We have. We are a gold mine here, and I just can't see how</p> <p>526 01:25:42.470 --> 01:26:00.599 Linden Waddell: you know bringing this to our lovely, serene neighbourhood is going to be good for the community, You know we can't fix a sidewalk outside the basketball court, and we think something like this can be made and maintained.</p> <p>527 01:26:00.610 --> 01:26:02.769 Linden Waddell: I mean, you know,</p> <p>528 01:26:02.780 --> 01:26:23.220 Linden Waddell: forget the noise, Forget all those things. I'm not a big naysayer. I'm not a nimbyist, but I am an imbeist. I am proud of Silver Lake as it is, and I don't think we need to be a Disneyland. We've got Griffith Park right next door. We've got the La River. I think we have an overflow of things already,</p>	<p>P-11-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

Public Meeting

COMMENT

RESPONSE

529
01:26:23.230 --> 01:26:29.219
P-11-1 cont. Linden Waddell: and it's just not necessary. I would vote for no alternative. Thank you.

530
01:26:30.940 --> 01:26:32.610
Nicolle Steiner: Thank you for your comment.

531
01:26:32.900 --> 01:26:38.360
Deborah Weintraub: Um, Nicole. I wondered about getting back to Cindy. Did she raise her hand again.

532
01:26:41.020 --> 01:26:47.809
Mary Nemick: No, I don't. She's not going to make a comment again, because she knows it was recorded.

533
01:26:47.980 --> 01:26:51.300
Deborah Weintraub: Okay, no problem, thank you.

534
01:26:54.960 --> 01:26:57.000
Leslie Edmonds.

535
01:27:06.600 --> 01:27:16.150
Leslie Edmonds: Yes, Um, yes, I am a twenty one year member of this community, and I can recall when the metal was being proposed

P-12-1 536
01:27:16.160 --> 01:27:35.629
Leslie Edmonds: uh about seventeen years ago, and many of the same concerns that we hear now. I heard then where people did not want to have two acres of dead rotten trees opened up to the community. And now I see that it is now the serene place that people want to protect.

537
01:27:35.640 --> 01:27:49.379
Leslie Edmonds: So I am definitely for the Eir as it stands. I believe it. It deals with all the issues um in terms of adding wildlife uh protection and habitat.

P-12-2 538
01:27:49.390 --> 01:28:18.069
Leslie Edmonds: Uh in terms of capturing a rain water that now just flows down the street is the vehicle for us to uh reclaim that water. It is a way for us to enhance the tree canopy because trees are dying. Those eucalyptus trees are at the end of their life cycle, and they're dying, and we need to be able to replace replenish the tree canopy to to create that cooling center that now is so required for human life.

P-12-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-12-2 The comment notes existing drainage and the state of current trees on the Project site. The replacement of mature trees would occur over time to maintain nesting opportunities, while increasing the number of native trees on site. As described in Project Description Section 2.7.1 of the Draft EIR, the proposed Project includes the preparation of a Tree Succession Plan to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

539
01:28:18.150 --> 01:28:28.830
P-12-3 Leslie Edmonds: Um! I believe that any short term problems and I know that noise from construction is going to be a short term issue, and I know that um

540
01:28:28.860 --> 01:28:57.300
P-12-4 Leslie Edmonds: that those things can be handled, and it looks like the Eir has realized that I think traffic is going to be something that needs to be looked at, so that people have confidence in it. But I think There is certainly short term problems that have long term benefits, and those long term benefits will last us into decades of benefits. And so I want to support the eir, the draft eir as it stands, and I

541
01:28:57.310 --> 01:29:01.660
Leslie Edmonds: hope that we can accomplish all that it is set out to accomplish.

542
01:29:05.090 --> 01:29:07.079
Nicolle Steiner: Thank you for your comment today,

543
01:29:12.200 --> 01:29:14.050
Nicolle Steiner: Chip McDonald.

544
01:29:14.430 --> 01:29:16.739
Nicolle Steiner: It'll be prompted to unmute yourself.

545
01:29:19.190 --> 01:29:38.800
P-13-1 Chip McDonald: Uh hello! Can you hear me? Yes, Great um! I wanted to thank everyone uh that was involved in presenting this to us it was presented very thoroughly, and it's good to have uh an opportunity to voice uh opinions. It's very important that we have civil discourse around this. Um,

546
01:29:39.880 --> 01:29:53.289
Chip McDonald: yeah, I've I am a silver like resident. I have been for seventeen years. Um, I rented for many of those years, and uh have recently uh decide made the conscious decision as difficult as it was

547
01:29:53.300 --> 01:30:13.189
Chip McDonald: for me and my family to uh stay in silver like um. It is. Some is a neighborhood that I love, and I feel like it is uh my home. And uh, I I just had to say, and and this has been said before by a couple of people. Um! But I also wanted to add my voice to that. That

P-12-3 The comment notes impacts associated with construction noise would be short term. Construction noise impact are analyzed in Section 3.12 of the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-12-4 The comment notes traffic impacts and expresses general support for the proposed Project. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-13-1 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

	<p>548 01:30:13.800 --> 01:30:17.940 Chip McDonald: um I have yet to speak to anyone</p>	P-13-2	<p>The comment expresses concern for security during operation of the proposed Project and traffic impacts. Please see Master Response – Fence Removal and Master Response - Public Safety. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
P-13-1 cont	<p>549 01:30:17.970 --> 01:30:34.750 Chip McDonald: uh that actually wants this. I'm sure that there are people that do. I've heard someone calling people nimb's. And you know, calling the people that are opposed to this these people. Um, which is a remarkably rude</p>		
	<p>550 01:30:34.790 --> 01:30:52.310 Chip McDonald: Um, But there are a lot of people who do not want this to happen for a lot of the reasons that people have talked about. Uh, and it does seem like that's just overlooked. Uh, by every time I come to one of these things It is as if there is no push back. But there is,</p>	P-14-1	<p>This comment expresses concern for wildlife impacts and questions the need for the proposed Project. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Also, please see Master Response – Biological Resources.</p> <p>The 2004 Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) establishes policy and land use guidelines for the Silver Lake region of the City. The Community Plan identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset.</p> <p>This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>
P-13-2	<p>551 01:30:52.350 --> 01:31:02.880 Chip McDonald: I think, the main reason for me is that, uh, I have no faith that there will be a security plan implemented other than the speaker who pointed out this perimeter fence.</p>		
	<p>552 01:31:02.890 --> 01:31:29.850 Chip McDonald: It could be tempted to go with alternative three. But uh! In the end. Having no faith in that uh security issue being taken care of due to experience in Silver Lake, I would have to uh firmly be against and go with alternative one, and risking my two minutes here, I will say that the idea that there will be no traffic impact is preposterous, and it is if that person has never been to silver lake. Thank you.</p>		
	<p>553 01:31:31.450 --> 01:31:32.639 Nicolle Steiner: Thank you,</p> <p>554 01:31:34.920 --> 01:31:36.719 Nicolle Steiner: Nina Woodson.</p>		
P-14-1	<p>555 01:31:44.460 --> 01:31:49.540 Nina Woodson (she/her): Hello, um! I just I couldn't um,</p> <p>556 01:31:50.580 --> 01:32:02.169 Nina Woodson (she/her): you know. Echo, what Chip McDonald just said more and twenty year long, Resident and Silver Lake, and my main concern is that</p>		
	<p>557 01:32:02.490 --> 01:32:11.279</p>		

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COMMENT

RESPONSE

P-14-1 cont.

Nina Woodson (she/her): this the civil, like reservoir right now, is a habitat for migrating birds. And

558
01:32:11.330 --> 01:32:17.360
Nina Woodson (she/her): how much of that do we have left in the world in our dying earth?

559
01:32:17.730 --> 01:32:19.679
Nina Woodson (she/her): I I

560
01:32:19.990 --> 01:32:22.870
Nina Woodson (she/her): We really need to protect

561
01:32:23.090 --> 01:32:35.340
Nina Woodson (she/her): um it as a natural habitat. Um. And if that means fencing, if that me,

562
01:32:35.550 --> 01:32:45.989
Nina Woodson (she/her): we don't need more recreational opportunities in Los Angeles, I. You can go to the beach. You can go to the mountains there.

563
01:32:46.070 --> 01:32:55.619
Nina Woodson (she/her): You don't need a recreational opportunity. Um in the center of Los Angeles, and I just

564
01:32:56.310 --> 01:33:02.240
Nina Woodson (she/her): I appreciate all the effort that's been put into this um

565
01:33:03.740 --> 01:33:07.759
Nina Woodson (she/her): draft proposal. But um,

566
01:33:08.890 --> 01:33:11.590
Nina Woodson (she/her): we don't have to rethink the wheel.

567
01:33:11.630 --> 01:33:23.119
Nina Woodson (she/her): Let's just leave it as it is um simple things. I recently was at the Silver Lake reservoir at the Dog Park this last weekend, and

568
01:33:23.290 --> 01:33:24.360
Nina Woodson (she/her): a

Public Meeting

COMMENT

RESPONSE

P-14-1 cont.

569
01:33:24.540 --> 01:33:32.179
Nina Woodson (she/her): you know people use it, but there's ways to use it without it being super intrusive. And

570
01:33:32.740 --> 01:33:35.850
Nina Woodson (she/her): I just really hope that um

571
01:33:36.330 --> 01:33:42.409
Nina Woodson (she/her): some thought and consideration will be put into that. We don't have to overthink this.

572
01:33:43.670 --> 01:33:44.790
Nina Woodson (she/her): Thank you.

573
01:33:47.490 --> 01:33:48.689
Nicolle Steiner: Thank you,

574
01:33:52.270 --> 01:33:53.940
Nicolle Steiner: David Whitley

575
01:33:54.230 --> 01:33:55.429
Nicolle Steiner: Weekly.

576
01:34:00.370 --> 01:34:01.890
David Wheatley: Hi! Can you hear me?

577
01:34:04.290 --> 01:34:06.250
Nicolle Steiner: I can't hear, David.

578
01:34:09.050 --> 01:34:10.519
David Wheatley: How about now,

579
01:34:10.930 --> 01:34:17.210
Nicolle Steiner: David? I still can't hear you, and it looks like you're unmuted. Maybe you were on the wrong channel.

580
01:34:19.350 --> 01:34:23.050
Nicolle Steiner: Can you hear me now?

581
01:34:24.060 --> 01:34:28.850

Public Meeting

COMMENT

RESPONSE

Nicolle Steiner: Pick English and then click it again and put pick, mute, original audio.

582

01:34:37.210 --> 01:34:39.480

David Wheatley: Can you. Can you hear me now?

583

01:34:39.910 --> 01:34:40.940

David Wheatley: Hello,

584

01:34:43.950 --> 01:34:54.920

Tamseel Mir: David! So I I think only a few of us can hear you, so i'm not sure if you can um in in the option below where it's interpretation if you want to click English.

585

01:35:01.330 --> 01:35:09.379

David Wheatley: Okay. My name is David Wheatley i'm the co-chair of the Urban design and Preservation Advisory Committee to the Silver. Like Neighborhood Council,

586

01:35:09.520 --> 01:35:17.709

David Wheatley: we have not had a chance to uh discuss this matter in our group, so i'm here, speaking on my own.

587

01:35:17.900 --> 01:35:28.370

David Wheatley: I've been involved in appeals of a burdensome, overbearing projects that come to Silver Lake and other committees, other communities,

588

01:35:28.620 --> 01:35:39.930

David Wheatley: and I'm. Uh I've noticed the city planning commission for it. Yes, on every application brought by usually a developer enthusiastically supported by the Government,

589

01:35:40.390 --> 01:35:42.530

David Wheatley: and they deny every appeal,

590

01:35:42.930 --> 01:35:45.879

David Wheatley: however angry the neighbors are.

591

01:35:46.080 --> 01:35:50.090

David Wheatley: Turn them down, and then it goes to planning land, use management,

592

P-15-1

The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-15-1

Public Meeting

COMMENT

RESPONSE

01:35:50.240 --> 01:35:53.549
David Wheatley: and we've had some corruption over there. So

593
01:35:53.940 --> 01:35:56.840
David Wheatley: um, I do not trust at all

594
01:35:57.720 --> 01:36:04.649
David Wheatley: anything in this particular presentation, because it reminds me so immediately

P-15-1 cont 595
01:36:05.170 --> 01:36:08.550
David Wheatley: of what our city government has said to us

596
01:36:08.750 --> 01:36:15.269
David Wheatley: these projects, that they so unfairly, and, I believe, cruelly supported the

597
01:36:15.290 --> 01:36:21.850
David Wheatley: and however these many appeals that have been denied, So when I hear things like

598
01:36:22.430 --> 01:36:33.230
David Wheatley: uh the security, if they're going to be six hundred people out there twelve times a year, and let's say there's no amplified sound. We really think those six hundred people are going to sit there and be quiet.

P-15-2 599
01:36:33.550 --> 01:36:52.140
David Wheatley: What about them? What sort of noise impact are they going to be making? Are we going to end up with our own version of the Hollywood Bowl, where they have noise problems for the neighbors all the time. I agree with everyone who opposes this project. The best alternative is the one that says, don't do it. Number four

600
01:36:52.150 --> 01:36:58.579
David Wheatley: that needs to be on there as well. It's perfectly fine the way it is. It's a nature enclave

P-15-3 601
01:36:58.910 --> 01:37:15.370
David Wheatley: uh people get to meditate, relax, chill after a hard day. We don't need to turn this into six flags over whatever Nots very far Disneyland or anything else. Let's keep it nice, quiet, calm, and relaxed,

602

P-15-2 The comment expresses general concern for security during operation of the proposed Project. Please see Master Response –Fence Removal and Master Response - Public Safety.

Please see Master Response – Noise.

P-15-3 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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COMMENT

RESPONSE

P-15-3
Cont. 01:37:15.380 --> 01:37:22.529
David Wheatley: and all the Government speak, and this thing needs to be
challenged every single word of the way. Thank you for letting me speak.

603
01:37:23.390 --> 01:37:24.539
Nicolle Steiner: Thank you.

604
01:37:25.320 --> 01:37:33.530
Deborah Weintraub: I'm Nicole. This is Deborah again. I couldn't hear,
David. It seems like some of you could hear him

605
01:37:34.090 --> 01:37:35.070
Deborah Weintraub: right.

606
01:37:35.150 --> 01:37:38.320
Nicolle Steiner: Yes, I heard him once he fixed the audio,

607
01:37:38.440 --> 01:37:47.980
Deborah Weintraub: so I i'm not sure why. I couldn't hear, but I don't
know whether the other members of the public are hearing when some of us
can't hear them.

608
01:37:48.830 --> 01:37:57.310
Deborah Weintraub: So maybe you could go through one more time what's
needed for each speaker again and choosing their language.

609
01:37:59.210 --> 01:38:01.170
Nicolle Steiner: Okay, no problem.

610
01:38:01.560 --> 01:38:17.650
Nicolle Steiner: So if everyone could that wants to speak today could
take the time to click on this interpretation, Icon, at the bottom of
your screen and select English or Spanish um, whatever language you want
to listen in.

611
01:38:17.810 --> 01:38:31.519
Nicolle Steiner: And then, once you've done that click the interpretation
button a second time and click, mute original audio, so that will put you
in the main audio um room, where we can all hear you.

612
01:38:35.980 --> 01:38:40.299
Nicolle Steiner: All right. Let's get the next

613

Public Meeting

COMMENT

RESPONSE

P-16-1

01:38:42.150 --> 01:38:47.880
 Nicolle Steiner: next commenter, David Jones. You'll be prompted to unmute yourself.

614
 01:38:52.200 --> 01:38:57.500
 David Jones: Yeah. Hello, uh, My name is David. Can you hear me?

615
 01:38:57.510 --> 01:39:17.040
 David Jones: All right? Thank you. Uh, yeah. I've lived in Silver Lake for more than twenty years um both across from the Dog Park on Silver Lake Boulevard, and now in West Silver Lake Drive along the path. I support the comments from the folks with, uh several lake forward. I'm. In favor of enhancing public enjoyment while taking measures for serve wildlife.

616
 01:39:17.050 --> 01:39:24.790
 David Jones: I realize you can't have your cake and eat it too, and noise levels are, and of oil and out of oil unavoidable. Excuse me,

617
 01:39:24.800 --> 01:39:43.750
 David Jones: but for me the long term benefits outweigh the nuisance from temporary development. I'm. In favor of no fencing natural landscapes that replace this met, and bankments improve dog parks and increase walking past. Um, and of Of course, the measures outlined to support wildlife

618
 01:39:43.760 --> 01:39:49.899
 David Jones: want the community and wildlife to thrive and believe. This plan serves all. Um, thank you.

619
 01:39:51.430 --> 01:39:55.539
 Nicolle Steiner: I can give you time back

620
 01:39:57.570 --> 01:40:00.290
 Nicolle Steiner: I see that Cindy has her hand up.

621
 01:40:00.310 --> 01:40:04.519
 Nicolle Steiner: Um, so maybe, even if we can go to her,

622
 01:40:05.770 --> 01:40:08.849
 Nicolle Steiner: since we didn't all hear a comment for the last time.

623
 01:40:12.360 --> 01:40:26.730

P-16-1

The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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RESPONSE

P-17-1

This comment expresses support for the proposed project and wildlife habitat improvements. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Cyndi Hubach: Hi! Can you hear me? Yes, we can. Hello, Hi! Great! Sorry about that. I miss the instructions. I apologize. Um, I'm Cindy Hubak. I live on the west side of the reservoir, and I'm. A member of the Silver Lake Reservoirs

624

01:40:26.870 --> 01:40:32.490

Cyndi Hubach: Conservancy. I I actually joined the Conservancy because of my concern about wildlife.

625

01:40:32.530 --> 01:40:38.860

Cyndi Hubach: Every spring I would see ducklings walking down the road to their doom, or getting picked off in the reservoir.

626

01:40:38.970 --> 01:40:55.130

Cyndi Hubach: Um! Migratory birds were stopping in, but finding no real place for food or shelter. Um! There was water, and there were trees, but it wasn't working for the birds and the animals. Um! I really observed Wildlife, so I could see that they were struggling. Um!

627

01:40:56.180 --> 01:41:05.819

Cyndi Hubach: So I thought we could do something better, and I actually thought of floating islands uh before they were a glimmer in the eye of the uh Silver Lake. Master Plan um, and that's why I got involved.

628

01:41:05.930 --> 01:41:15.149

Cyndi Hubach: Um, the reservoirs, as they are, are not habitat. When they were built at the turn of the century, the twentieth century, the banks were earthen and gently sloped,

629

01:41:15.160 --> 01:41:28.319

Cyndi Hubach: but in the early nineteen fifties to increase capacity. The banks were made steeper and short up with the as fault and the cement that we see today, and what we have been left with are the remnants of an industrial water facility. The steep

630

01:41:28.450 --> 01:41:33.539

Cyndi Hubach: thanks, the ugly striped asphalt, the large, sterile, inhospitable

631

01:41:33.710 --> 01:41:43.440

Cyndi Hubach: pools. Um! It's true that we've been through a lot of construction in this neighborhood, and none of us wants to go through it again. I I I hear that i'm with you,

632

01:41:43.500 --> 01:41:51.430

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COMMENT

RESPONSE

Cyndi Hubach: but The fact is that we didn't benefit from most of that construction; and as I see it, this will benefit all of us. The plants, the animals, the people.

633

01:41:51.520 --> 01:41:57.399

Cyndi Hubach: Um! There will be some pain, but there can be something of real lasting value and beauty at the end of it.

634

01:41:57.690 --> 01:42:04.770

Cyndi Hubach: This project meets the objectives of the community plan to increase our parkspace, our natural habitats, and improve our climate. Resilience!

635

01:42:05.000 --> 01:42:17.629

Cyndi Hubach: Um! I don't think it's perfect. I don't think anyone thinks it's, perfect, but it is a carefully thought out plan. It has attempted to consider the desires and preferences of the community, and I think it's something we can work with

P-17-1 cont.

636

01:42:17.790 --> 01:42:27.350

Cyndi Hubach: um. And finally, I would also like to say that while we may disagree on aspects of the plan, or on the value of having any plan at all, as we have heard um

637

01:42:27.840 --> 01:42:33.170

Cyndi Hubach: as neighbors and stakeholders. I know we all want the best for our community and for each other,

638

01:42:33.210 --> 01:42:46.759

Cyndi Hubach: and I hope we can work through this and remain friends. Um! As with anything in a democracy. If we do this right. Um, none of us will be completely happy when it's over. That's what compromise is all about.

639

01:42:47.020 --> 01:42:47.980

Thank you.

640

01:42:48.910 --> 01:42:50.230

Nicolle Steiner: Thank you.

641

01:42:52.080 --> 01:42:54.910

Nicolle Steiner: Keep pressing this button. I apologize,

642

01:42:55.890 --> 01:43:03.969

Public Meeting

COMMENT

RESPONSE

Nicolle Steiner: Lyndon. I see you have your hand raised, if you could. Please wait till we had a chance for everyone to make a comment. Um,

643
01:43:04.200 --> 01:43:06.919
Nicolle Steiner: then we can get back to you if we have time at the end.

644
01:43:07.980 --> 01:43:10.339
Nicolle Steiner: Ainslie Cohen! Cohen!

645
01:43:15.070 --> 01:43:34.120
Ainsley Cohen: Hi! Can you hear me? Hi! Um! I've also been a member of this community for a long time now, and i'd like to agree with Uh, Scott, Sternberg and Chip, and so many others who have just voiced all their concerns about what kind of an impact this type of a project would have on our community. I

646
01:43:34.130 --> 01:43:38.989
Ainsley Cohen: I think it's very short-sighted of the team to assume that there would be no

P-18-1

647
01:43:39.000 --> 01:43:56.419
Ainsley Cohen: mit ctl and impact with traffic. Traffic is already a huge issue. Um! And while everybody in our neighborhood loves to jump on a bike or walk, people coming from outside of the neighborhood would definitely be driving in. And I think that's what everybody is talking about when they refer to the traffic concerns one hundred and fifty

648
01:43:56.430 --> 01:44:03.310
Ainsley Cohen: originally. But in speaking with all my neighbors and and people in the community and people that I see out around the reservoir.

649
01:44:03.320 --> 01:44:29.759
Ainsley Cohen: When this plan was originally presented to us. Uh, I don't think that people were actually given a choice to just say no change. Um! It always seemed like you could choose option one or two, but many people seemed confused, and it didn't seem like there was an option to just choose. We don't want to do anything, and so I urge us to have a vote um within our community for people who live in our neighborhood who live within the

P-18-2

650
01:44:29.770 --> 01:44:51.630
Ainsley Cohen: zip codes, that we all agree with that we should actually have a vote to see who really really wants to do this, because I haven't spoken to anybody that wants to do this. Um, I think we're all really concerned when we see what happened with Echo Park, and I think the money

P-18-1 This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation.

P-18-2 The comment expresses opposition to the proposed Project and states that improvements to recreation are not needed by the City. As described in the Project Description, Section 2.2 of the Draft EIR, the Silver Lake–Echo Park–Elysian Valley Community Plan (Community Plan) identifies several opportunities related to the proposed Project, including the promotion and facilitation of implementing the Project as a valuable community and recreational asset. Although the Silver Lake and Ivanhoe Reservoirs are no longer in service for the City's potable water needs, they are considered an important neighborhood-defining characteristic.

The comment expresses concern regarding the community engagement process and homelessness. Please See Master Response - Community Engagement Process and Master Response – Homelessness. This comment does not raise any issues with respect to the content of adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

P-18-2
cont.

needs to be put into underserved communities that need green space. Those there are plenty of those communities

651
01:44:51.640 --> 01:45:06.700
Ainsley Cohen: uh within Los Angeles that need the money for their own version of green space. Um, the caller who listed all the parks we have plenty, and also um the homeless crisis that we're facing, and no one seems to be talking about it. But it's

652
01:45:06.710 --> 01:45:13.099
Ainsley Cohen: we need to put the money there. That's who needs it. Those people need help. We do not need um

653
01:45:13.200 --> 01:45:19.000
Ainsley Cohen: concerts or fanfare. This neighborhood is already beautiful. Thank you.

654
01:45:22.900 --> 01:45:24.150
Thank you,

655
01:45:26.960 --> 01:45:29.030
Nicolle Steiner: Mike Gross.

656
01:45:35.970 --> 01:45:36.860
mike kroze: Bye.

657
01:45:37.150 --> 01:45:43.530
mike kroze: Um, my name is uh Micro, and i'm a on the board of Silver Lake Wildlife Sanctuary.

658
01:45:43.560 --> 01:45:46.420
mike kroze: Can you hear me? Oh, Yeah, there you go. Okay?

P-19-1

659
01:45:46.490 --> 01:45:53.109
mike kroze: Um, I wanted to speak uh about transportation. Uh, specifically the

660
01:45:53.140 --> 01:45:58.109
mike kroze: twenty-five uh ninety degree parking spaces by the Rec. Center.

661
01:45:58.170 --> 01:46:17.559

P-19-1

The comment expresses concern for impacts to traffic and pedestrian safety related to the proposed offsite improvements. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. As shown on revised Figure 2-17 in Chapter 3 of the Final EIR, the proposed Project would add two pedestrian high visibility crosswalks, one on the east and one on the west side of the SLRC. Also, please see Master Response – Traffic/Transportation.

Also, as discussed in the Project Description, Section 2.5.2 of the Draft EIR, the proposed Project would add 15 new parking spaces along the South Valley on West Silver Lake Drive. Based on comments received during the Draft EIR, the City has decided not to add parking along Silver Lake Boulevard. Please see Master Response - Parking/Bike Option.

Public Meeting

COMMENT

RESPONSE

P-19-1
cont.

mike kroese: Um, I wanted to reference first from Section three point sixteen dash, eight uh transportation from the D eir uh where it talks about the Silver Lake Echo Park, or Asian Valley Community plan that cited uh from two thousand and four

662
01:46:17.570 --> 01:46:19.359
mike kroese: uh, which I think is

663
01:46:19.850 --> 01:46:32.170
mike kroese: reasonable, since things haven't actually gotten better since then. Uh, and some of the issues stated uh residential neighborhood streets are being used to avoid traffic on congested major thoroughfares,

664
01:46:32.270 --> 01:46:44.059
mike kroese: disturbing the quality of life and making neighborhood streets unsafe for children at pedestrians and traffic injection uh congestion and circulation issues um

665
01:46:44.070 --> 01:46:58.570
mike kroese: that reflect regional transportation problems and the narrow and substandard residential streets in the hillsides that hinder circulation and create problems for parking and access by safety vehicle

666
01:46:59.230 --> 01:47:08.969
mike kroese: and in Section Es Five and areas of known controversy. Although I don't know Why, it's a controversy. Um!

667
01:47:09.240 --> 01:47:17.370
mike kroese: Some of the issues are increased parking and trapping circulation on local streets. And uh pedestrian safety.

668
01:47:17.570 --> 01:47:27.609
mike kroese: So I wanted to reference. Oh, my goodness, only twenty-five seconds uh that street that's being talked about is only fifty feet wide, and some of the cars and trucks are up to twenty-five feet,

669
01:47:27.620 --> 01:47:41.490
mike kroese: and they would be sticking out into the street themselves, and we know that parking at ninety degrees requires dangerous backing out and and stopping of traffic. And i'm sorry I ran out of time. I

670
01:47:41.590 --> 01:47:42.940
mike kroese: talk to you slow,

671

Public Meeting

COMMENT

RESPONSE

P-19-2

01:47:43.160 --> 01:47:47.789
 mike kroze: but I would hope that this part of the Uh.

672
 01:47:47.970 --> 01:47:53.919
 mike kroze: The project is not done, because I think it would be terrible
 for the community. Thank you.

673
 01:47:55.090 --> 01:48:02.729
 Nicolle Steiner: Thank you for your comment. You always have the
 opportunity to submit a written comment. Um, anytime during the comment
 period.

674
 01:48:05.780 --> 01:48:07.340
 Nicolle Steiner: Hugh Kenny,

675
 01:48:14.990 --> 01:48:18.119
 Nicolle Steiner: you should be prompted to unmute yourself

676
 01:48:20.800 --> 01:48:22.349
 There you can

677
 01:48:22.690 --> 01:48:23.750
 um

678
 01:48:26.880 --> 01:48:31.120
 Nicolle Steiner: queue. I can't hear you

679
 01:48:32.330 --> 01:48:33.219
 any good.

680
 01:48:33.910 --> 01:48:39.820
 Nicolle Steiner: I kind of can hear you, which sounds really really far
 away, very faint.

681
 01:48:41.150 --> 01:48:47.240
 Nicolle Steiner: I'm not sure if you have gone through the process of
 selecting a language

682
 01:48:50.890 --> 01:48:54.230
 Nicolle Steiner: we can't hear you. I'm sorry.

683
 01:49:02.980 --> 01:49:03.830

P-19-2

The comment requests that the proposed 90-degree parking spaces be
 eliminated from consideration. Please see Master Response – Parking/Bike
 Options. This comment does not raise any issues with respect to the adequacy
 of the Draft EIR. Therefore, it is noted for the record and will be forwarded to
 the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

Nicolle Steiner: Nope,

684
01:49:03.940 --> 01:49:06.440
Nicolle Steiner: Still can't hear you, Hugh.

685
01:49:08.890 --> 01:49:14.530
Nicolle Steiner: We're going to go down to the next person. We'll try you again. Um in a in two minutes,

686
01:49:15.630 --> 01:49:17.820
Nicolle Steiner: Stephanie Barton.

687
01:49:23.870 --> 01:49:33.109
Stephanie Bartron: Hi, everyone! Thank you for being here. Um, i'm a thirty. One year resident of Silver Lake. I've lived in different parts of the neighborhood, but I've lived

P-20-1 688
01:49:33.120 --> 01:50:00.649
Stephanie Bartron: around the reservoir for a while. Um, and i'm also on the board of this over like reservancy. So i'm gonna say first of all that I've talked to lots of people who do support this, and are really excited about all of the improvements that we will be getting to our neighborhood, especially all of the wildlife and habitat improvements. Um! The migrating birds will be so much better served by the wetland habitats and the floating islands. The biodiversity um

689
01:50:00.660 --> 01:50:07.449
Stephanie Bartron: for the plants. Specifically we'll support the birds. Um, and be really great.

690
01:50:07.900 --> 01:50:25.370
Stephanie Bartron: Let's see what else on my list. Um, also um I There's been a lot of comments. We i'm sorry I'm trying to stay positive here, but we've had a lot of people who don't seem to think that they want bike lanes, but then they're afraid of uh sorry, not afraid.

P-20-2 691
01:50:25.520 --> 01:50:53.169
Stephanie Bartron: They want bike lanes. They want to increase the walkability. We want public safety. We want public health. Um, and we do have a lot of people in our neighborhood that don't have backyards, and Don't have front yards. Some people live in houses with really steep hillsides, and they don't have places to walk. I know there's no sidewalks in my part of Silver Lake, so we do need the sort of part where we can. We can all get, not just get together, but but we can exercise and walk and walk with our neighbors.

P-20-1 This comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-20-2 The comment expresses support for walkability in the neighborhood. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

P-20-3

692
 01:50:53.180 --> 01:51:17.919
 Stephanie Bartron: So um! I just want to say I really am excited about the master plan. I think the er does a great job. Um, I've read both of them cover to cover, and I think that it does a really great job of talking about the concerns and the mitigations needed for that. Um! It was really effective, and I look forward to seeing this all gradually happen over the next five or ten years. Okay, Thank you very much.

693
 01:51:19.690 --> 01:51:21.809
 Nicolle Steiner: Thank you for your comment today,

694
 01:51:23.360 --> 01:51:24.780
 Nicolle Steiner: Hugh Kenny,

695
 01:51:25.390 --> 01:51:26.859
 Nicolle Steiner: try it again.

696
 01:51:32.970 --> 01:51:33.860
 My name,

697
 01:51:38.070 --> 01:51:39.120
 that one

698
 01:51:40.490 --> 01:51:46.720
 Nicolle Steiner: I'm: sorry. I look here, very faint something, but we can't make out any sound.

699
 01:51:46.890 --> 01:51:51.180
 Wendy Delgado: Yeah, here, you sure we hear you very faintly. Maybe try

700
 01:51:51.340 --> 01:51:53.309
 Wendy Delgado: uh raising your volume.

701
 01:51:55.060 --> 01:51:56.160
 Um,

702
 01:52:00.220 --> 01:52:02.199
 okay, If I yell,

703
 01:52:03.390 --> 01:52:05.320
 that's that. That's not enough

P-20-3

This comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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	COMMENT	RESPONSE
	<p>704 01:52:05.830 --> 01:52:13.490 Nicolle Steiner: kind of I heard you say if you yell, but it's still very far away. It's it's we can't really make out all the words.</p> <p>705 01:52:16.090 --> 01:52:24.909 Nicolle Steiner: Okay, cute. What you can do is you can try to dial in</p> <p>706 01:52:25.160 --> 01:52:26.260 Nicolle Steiner: um</p> <p>707 01:52:27.050 --> 01:52:28.399 Nicolle Steiner: on a phone.</p> <p>708 01:52:28.470 --> 01:52:31.280 Nicolle Steiner: Um, and we can try you again.</p> <p>709 01:52:33.350 --> 01:52:35.070 Nicolle Steiner: Sorry about that.</p> <p>710 01:52:35.550 --> 01:52:39.160 Nicolle Steiner: Let's move on to James Ellsworth.</p> <p>711 01:52:39.240 --> 01:52:42.109 Nicolle Steiner: You can You'll be prompted to unmute yourself.</p> <p>712 01:52:51.750 --> 01:52:56.000 Nicolle Steiner: Hi! Hello! Can you hear me? Yes,</p> <p>713 01:52:56.010 --> 01:53:14.629 James Ellsworth: Great sorry. The jobs um started barking right as I unmute it. Um, hey? So I just wanted to say that I have been living in silver life for fifteen years. And right when we moved here was when the introduction of the meadow happened, and</p> <p>P-21-1 714 01:53:14.640 --> 01:53:19.880 James Ellsworth: we went to a lot of meetings, and there were a lot of people that said,</p> <p>715 01:53:19.970 --> 01:53:39.199 James Ellsworth: You know what no one's gonna go to the beach. There's gonna be so much traffic. There's gonna be so many people that are parking um. There were so many people that were against, you know, the</p>	<p>P-21-1 This comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.</p>

Public Meeting

COMMENT

RESPONSE

the meadow, and I think it's really such an example of like, how successful

P-21-1
cont. 716
01:53:39.310 --> 01:53:49.099
James Ellsworth: this kind of project can be. Um, I also just you know I feel like It's sad that we are so used to seeing

P-21-2 717
01:53:49.110 --> 01:54:01.080
James Ellsworth: a chain link fence with barbed wire around the park that we want to keep it that way. Um, I don't know any place that you know, has chain link fences with barbed wire, and wants to keep it.

P-21-3 718
01:54:01.210 --> 01:54:14.100
James Ellsworth: So I I really want to thank you all for all the work. I know there's been a ton of resistance, and it's been really beautiful to see the evolution. It's been nice to, you know, When I first moved here

719
01:54:14.150 --> 01:54:30.949
James Ellsworth: everyone was walking on the street on Silver Lake Boulevard, because there wasn't a path, and there were so many people that were against the path, and so I guess. Um, I just wanted to say thank you, and that I really believe in the future. And the proposals that you're putting together. Thanks.

720
01:54:33.760 --> 01:54:35.099
Nicolle Steiner: Okay.

721
01:54:42.010 --> 01:54:47.020
Nicolle Steiner: Okay. Sorry, Bob, that are strong, so to Strong

722
01:54:47.520 --> 01:54:49.759
Nicolle Steiner: do we prompt it to unmute yourself.

723
01:54:51.070 --> 01:55:08.579
Bob Soderstrom: Hey, Nicole, How are you? Can you hear me? Hello! Yes, welcome, hey? Very good thanks for having us tonight. My name is Bob. So to i'm a co-founder of silver, like Forward, i've lived in the neighborhood for eleven years. My wife and I live in a house. Um, just just a few steps up from the locking path on Armstrong.

P-22-1 724
01:55:08.590 --> 01:55:25.659
Bob Soderstrom: Um, i'd like to thank everyone involved for the hard work. I know a lot goes into this. Um! What an amazing opportunity! One hundred and twenty acres uh that has come available because of an

P-21-2 The comment expresses support for removal of the perimeter fence. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-21-3 This comment is conclusory and does not raise any issues with respect to the content and adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-22-1 The comment expresses support for the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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P-22-1
cont.

abandoned public utility in the middle of this huge city, at such a unique opportunity

725

01:55:25.670 --> 01:55:35.440

Bob Soderstrom: that we have, we can either embrace a creative vision for the future, or we can hold that into the rusty fences and the big concrete bathtub of the past.

726

01:55:35.470 --> 01:55:49.580

Bob Soderstrom: What if we wrap the reservoir and the spirit of the meadow. Wouldn't that be really beautiful? And that's part of the questions that came up in this extensive master Plan Survey process that happened in two thousand and nineteen and two thousand and twenty, that we all voted on many times.

727

01:55:49.910 --> 01:56:08.200

Bob Soderstrom: I'd like to say that I support the proposed plan in the Cir and encourage the city council to adopt it. I will next spring, and i'll remind you that the master Plan process had many large public meetings and five or six public surveys, and the proposed plan reflects what the neighborhood voted for.

728

01:56:08.210 --> 01:56:22.470

Bob Soderstrom: There were many features that were voted down. I'll remind people like swimming and boats, and there were features that were voted for and approved, that have now been incorporated into this plan uh, like more access, and the environmental ed center and the and the floating islands.

729

01:56:22.590 --> 01:56:33.039

Bob Soderstrom: I spend a lot of time at the reservoir with my children and a lot of their friends. I've got a ten year old and a four year old, all their school friends who congregate there every day. I appreciate

730

01:56:33.050 --> 01:57:01.880

Bob Soderstrom: the person who mentioned that some people don't have yards at their own homes, and they go out walking in the neighborhood looking for spaces to to be uh our group. Silver, like forward, also worked with King Middle School over the hill, which has one of La Usd's environmental, very few environmental magnets. There are five hundred students there in an environmental magnet, and they're surrounded by a sea of asphalt. They're planting plants and learning about the environment by pushing seeds into soil in Folgers cans.

731

01:57:01.890 --> 01:57:15.930

Bob Soderstrom: So when we talk about underserved communities needing green space. It's right here where we live, and what an opportunity for

Public Meeting

COMMENT

RESPONSE

those students to have access to this reservoir uh to learn about environmental stewardship in our own city.

732
01:57:15.940 --> 01:57:32.120
Bob Soderstrom: Um! I just like to mention that a lot of these meetings are held when parents are putting their kids to bed or bathing their kids or giving their kids dinners, and so often the meetings are sometimes skewed towards different voices in the community. But I just like to remind people that There are a lot of parents,

P-22-1 cont.

733
01:57:32.130 --> 01:57:43.199
Bob Soderstrom: uh, with families and children in this neighborhood that voted for these features, and are very, very excited about the proposed plan, and i'm one of them. Thank you very much for the time to speak.

734
01:57:45.020 --> 01:57:47.359
Nicolle Steiner: Thank you for your comment.

735
01:57:49.680 --> 01:57:53.690
Nicolle Steiner: Next up is Nicole Anton.

736
01:57:57.790 --> 01:58:17.029
Nicole Antoine: Hi! Can you hear me. Yes, great Hi! Thank you. Um. So my name is Nicole. I've lived in Silver Lake for ten years, and I actually live in a region that is very park deprived. It's region two. It goes up against the one on one. There is no green space in that area. Um, basically just a freeway

P-23-1

737
01:58:17.440 --> 01:58:23.470
Nicole Antoine: and a hill, and you have to walk to the lake, of course, to see any green space, or to this little triangle park

738
01:58:23.520 --> 01:58:33.500
Nicole Antoine: that we called the little triangle, dog, park, laurel, and hardy park over there. So anyways um I work with the silver lip, wild wildlife sanctuary to um

739
01:58:33.720 --> 01:58:45.129
Nicole Antoine: analyze this uh, and I think that the best option is definitely alternative. Three um, with some elements of alternative to, I do think that we should

740
01:58:45.140 --> 01:58:54.809

P-23-1 The comment expresses support for implementation of Alternative 3 with some elements of Alternative 2, and nothing built on the Knoll or Meadow. Please see Master Response - Alternatives Analysis. This comment does not raise any issues with respect to the adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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RESPONSE

P-23-1
Cont. Nicole Antoine: have nothing built on the knoll or meadow. Um, just to mention also I'm. I am a landscape designer, and although I love the 3D renderings of

741
01:58:54.920 --> 01:59:11.579
Nicole Antoine: everything that's in the plan. I also looked at their other renderings, and it seems like those other parks that they have developed are very...very busy compared to what we have at the meadow now, so I encourage everybody to go to their website.

P-23-2
742
01:59:11.600 --> 01:59:15.329
Nicole Antoine: Um, I believe it's pronounced

743
01:59:15.460 --> 01:59:31.110
Nicole Antoine: Hargreaves and Jones, and you could see all of their other designs, and although they're really beautiful, I don't think it's really what the neighborhood is looking for. We're looking to maintain um the wildlife protections that we have now, and

744
01:59:31.120 --> 01:59:38.830
Nicole Antoine: at least replace the fence with something that's wildlife friendly, featuring gates that have

745
01:59:39.290 --> 01:59:54.340
Nicole Antoine: you know, time limits so that we don't have something that gets out of control like Echo Park, which, after they spent all the money in Echo Park Lake, they had to replace all of it. So in. Last comment is about the budget. So in looking at the budget for the project,

P-23-3
746
01:59:54.350 --> 02:00:10.369
Nicole Antoine: I see that even the meadow alone is about sixty million dollars. Um, we're asking for seventy thousand dollars to rehab a concrete asphalt circle in region to silver, like. So everyone please think about this project.

747
02:00:11.280 --> 02:00:12.150
Nicole Antoine: Thank you.

748
02:00:13.080 --> 02:00:14.200
Nicolle Steiner: Thank you.

749
02:00:19.350 --> 02:00:21.089
Nicolle Steiner: Next is Pam

P-23-2 The comment suggests review of Hargreaves Jones' design work and requests that the existing perimeter fence be replaced with a wildlife-friendly design and features gates with time limits. Please see Master Response – Fence Removal, which describes the proposed Security Plan and Project Design Features (PDFs) that would be implemented in conjunction with fencing to protect biological resources.

P-23-3 Please see Master Response – Funding and Operations. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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COMMENT

RESPONSE

P-24-1 Please see Master Response – Drought Conditions.

750
02:00:31.380 --> 02:00:34.909
Nicolle Steiner: Pam. You'll be prompted to unmute yourself, and you have to accept that,

751
02:00:47.020 --> 02:00:52.459
Nicolle Steiner: Pam. You'll have to unmute yourself on your end when you are prompted to do so,

752
02:01:01.630 --> 02:01:06.379
Nicolle Steiner: we'll come back to you. Um! Let's go to Glen David Gold.

753
02:01:13.160 --> 02:01:16.930
Glen David Gold: I don't know if you can hear me now

754
02:01:17.140 --> 02:01:22.319
Glen David Gold: tremendous. Uh, I uh am a silver like resident, and I feel

755
02:01:22.790 --> 02:01:30.280
Glen David Gold: well, I guess I feel inadequate because I've only been here about four and a half years. Um! But before that I was living in Oakland,

756
02:01:30.700 --> 02:01:34.759
Glen David Gold: and I lived on the shores of Lake Merritt, and i'm sure

P-24-1 757
02:01:34.980 --> 02:01:38.630
Glen David Gold: a lot of you know this already. But Lake Murray was the first

758
02:01:38.680 --> 02:01:45.509
Glen David Gold: wildlife sanctuary in America, started one thousand eight hundred and seventy. Something like that kind of

759
02:01:46.340 --> 02:01:52.180
Glen David Gold: it started before almost any of the other wildlife sanctuaries in the country, and one of the things that

760
02:01:52.340 --> 02:01:55.420
Glen David Gold: what's interesting about it is that it wasn't planned at all.

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COMMENT

RESPONSE

P-24-1
cont.

761
02:01:55.540 --> 02:02:00.110
Glen David Gold: And excuse me. I need to turn this off here right My uh my dinner is telling me it's ready.

762
02:02:00.300 --> 02:02:04.730
Glen David Gold: I'll keep this quick. I always wondered what would happen if it had been planned.

763
02:02:04.880 --> 02:02:11.740
Glen David Gold: What if there had been community environment? What if there had been sort of the idea that we could have influenced this in some way,

764
02:02:11.990 --> 02:02:24.940
Glen David Gold: and I've been excited all the way along attending the meetings and uh, all the way up to this one, just hearing people's, opinions, and hearing people's input into it, because there's so much thoughtfulness in the community that I feel that

765
02:02:25.500 --> 02:02:32.040
Glen David Gold: when you walked around the shores of Lake Merritt and you saw that there was birds that were interacting in the worlds of people,

766
02:02:32.080 --> 02:02:35.190
Glen David Gold: that everything was okay. And it worked out.

767
02:02:35.390 --> 02:02:39.119
Glen David Gold: I'm just a i'm really thrilled to know what the future will bring to us.

768
02:02:39.260 --> 02:02:43.960
Glen David Gold: And what I would just say is that as we live in a community

769
02:02:44.280 --> 02:02:46.350
Glen David Gold: and an environment in which

770
02:02:47.010 --> 02:02:52.089
Glen David Gold: we don't know what the future is going to be, except it's going to be drier. It could be more dire.

771
02:02:52.580 --> 02:02:55.639

Public Meeting

COMMENT

RESPONSE

P-24-1
cont.

Glen David Gold: Any attempt we make to face that head on

772
02:02:55.690 --> 02:02:59.470
Glen David Gold: rather than not plan, for it can only be a good thing.
Thank you.

773
02:03:02.190 --> 02:03:03.849
Nicolle Steiner: Thank you for your comment,

774
02:03:04.480 --> 02:03:05.590
Nicolle Steiner: Pam.

775
02:03:05.890 --> 02:03:08.760
Nicolle Steiner: Let's try that again. Um!

776
02:03:09.350 --> 02:03:13.180
You should be prompted to unmute yourselves by our moderator.

777
02:03:25.270 --> 02:03:29.269
Nicolle Steiner: All right. It It doesn't look like you are unmuted,

778
02:03:29.520 --> 02:03:33.719
Nicolle Steiner: so we'll we'll jump to the next comment Turn and we'll
come back to you,

779
02:03:34.280 --> 02:03:36.160
Nicolle Steiner: Amory Johnson.

780
02:03:44.700 --> 02:03:47.309
Anne-Marie Johnson: Good evening, everyone. I hope you can hear me.

781
02:03:49.330 --> 02:03:51.109
Anne-Marie Johnson: I'm assuming you can hear me.

782
02:03:51.300 --> 02:04:03.920
Nicolle Steiner: I'm, Marie, we can't hear you. It looks like your mic is
going, and you might be speaking. Um, not sure if you have followed. I
did click on interp the interpretation button,

783
02:04:03.930 --> 02:04:12.210
Nicolle Steiner: select English, and then click on it one more time and
mute the original audio, so we can hear you here in the main channel.

Public Meeting

COMMENT

RESPONSE

784
02:04:16.630 --> 02:04:19.620
Nicolle Steiner: Hello! I'm not able to hear you.

785
02:04:22.000 --> 02:04:23.290
Anne-Marie Johnson: Hello!

786
02:04:26.520 --> 02:04:42.279
Anne-Marie Johnson: Hello! You're still not in the main channel. Um! Hello! There you go! Hello! My name is Anne-Marie Johnson. I'm the co-founder of Silver Lake Together Advocacy Team. I've lived in silver like my whole life.

P-25-1 787
02:04:42.290 --> 02:05:04.700
Anne-Marie Johnson: Uh, thank you for holding this meeting. I believe the BoE, Hargreaves, and the special interest groups have ignored the concerns of the majority of the public who oppose this proposed global tourist destination. I am a firm supporter of alternative one, and please consider the following suggestions: that may or may not be included in alternative 3|

788
02:05:05.410 --> 02:05:33.459
Anne-Marie Johnson: top and thin, all trees, and replace dead or dying trees with native trees. Um maintain and improve all landscaping, minimal remodeling of the Rec center. Replace all perimeter fences with a tasteful rod-iron, similar to the La River fences. Fences must be designed for unencumbered movements of wildlife. Replace the meadow grass with hybrid uh drought, tolerant grasses.

P-25-2 789
02:05:33.470 --> 02:06:03.449
Anne-Marie Johnson: hire a permanent park ranger to service silver Lake rec center. Hire additional full-time staff for the rec center. Improve the dog park with heat resistant artificial turf. Plant, shade trees. Build pergolas and benches. Hire a full time Biologist and urban wildlife officer. Provide dash buses to transport people from the Rec. Center to the La River, Griffith Park facilities and activities, the Pool soccer Field tennis courts and play area.

790
02:06:03.460 --> 02:06:33.360
Anne-Marie Johnson: on Riverside Drive. Enforce all lam, seek um with assistance of the LAPD if necessary. There are other areas in the city who are Park deprived. Silver Lake Rec Center is already a park. It is already a park, and it didn't take long for someone to throw the Nimby bomb, which is just another term for racist old white person uh the stay off of my long. We better stay away from that type of dialogue.

791

- P-25-1 This comment expresses support for Alternative 1, the No Project Alternative. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
- P-25-2 The commenter supports Alternative 1 and provides various recommendations to be incorporated into Alternative 3. Please see Master Response - Alternatives Analysis. As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Master Response – Fence Removal and Master Response – Public Safety.

Public Meeting

COMMENT

RESPONSE

P-25-2
cont. 02:06:33.370 --> 02:06:42.130
Anne-Marie Johnson: We don't need this other areas. Do I support a
alternative one with a few adjustments and thank you for the opportunity.

792
02:06:44.070 --> 02:06:45.949
Nicolle Steiner: Thank you for your comment,

793
02:06:48.610 --> 02:06:50.729
Nicolle Steiner: Pam. Let's try one more time.

794
02:06:51.360 --> 02:06:55.499
Nicolle Steiner: We are going to prompt you to unmute yourself.

795
02:07:03.060 --> 02:07:05.749
Nicolle Steiner: I still see that you're muted.

796
02:07:10.470 --> 02:07:17.400
Nicolle Steiner: We'll keep moving and get back to you. Um! If we are not
able to unmute yourself, you can provide a

797
02:07:17.680 --> 02:07:24.610
Nicolle Steiner: written comment. Um! And we can put that screen up um at
the end of the commentary,

798
02:07:26.240 --> 02:07:28.510
Nicolle Steiner: Alex. Magman.

799
02:07:37.880 --> 02:07:49.390
Alex Magnin: Hi, there! Can you hear me

800
02:07:52.370 --> 02:07:57.870
Nicolle Steiner: today? We are really only taking comments. We are not
responding to questions.

801
02:07:57.970 --> 02:08:12.180
Alex Magnin: Oh, okay, um, yeah. So I I scan the report as best I could,
and I didn't see those stats which which seem pretty pretty crucial to
being able to assess the project. Um,

P-26-1 802
02:08:12.260 --> 02:08:40.669
Alex Magnin: you know I don't know if i'm for and against it, but I just
read a seven hundred page report about like bats and whatnot. It was
missing some pretty key facts, you know, like how many people are going

P-26-1 The comment requests that the Draft EIR disclose the number of visitors that
would attend the proposed Project. Tables 2-7 and 2-8 of the Draft EIR show a
total increase in park attendance by proposed park space during the weekend
and weekday. These numbers were calculated in accordance with the added
resources and park spaces and as discussed on Page 76 of the Transportation
Impact Assessment included as Appendix K to the Draft EIR. This comment
does not raise any issues with respect to the content and adequacy of the
Draft EIR, therefore, it is noted for the record.

Public Meeting

COMMENT

RESPONSE

P-26-1
cont.

to come, and that's knowable stuff, right like you can. You know there's there's been undoubtedly tons of like urban studies research about that sort of thing. So, anyway, look, I know that there's like a movement against nimbies, and that's probably a good thing for society in general,

803

02:08:40.680 --> 02:09:00.520

Alex Magnin: but it doesn't mean, like, you know, that there's a specific rightness to like building this park, you know, who wouldn't want to Park. I get it. Um. Unfortunately, when we read reports where you know, if they don't have basic facts like how many people might visit this park, it creates a little bit of a crisis of faith, right?

804

02:09:00.530 --> 02:09:13.969

Alex Magnin: And so, anyway, I would sort of i'm neutral on on the park. Um, but i'm not impressed by the process, I suppose, is what I'm saying, and I have no doubt that everyone here is like a a smart person. But

805

02:09:13.980 --> 02:09:21.509

Alex Magnin: you know, when you don't have skin in the game for getting outcomes right. It's really hard for good decisions to happen. Um.

806

02:09:21.590 --> 02:09:24.499

Alex Magnin: So. Yeah, I don't know. I guess uh

807

02:09:24.720 --> 02:09:36.010

Alex Magnin: this stuff is hard, and then i'm sorry. But um, we'd like to know how many people are going to come every day. You can definitely get that right within, you know, twenty or something. So yeah, please do.

808

02:09:37.820 --> 02:09:41.850

Nicolle Steiner: Thank you for your comment. The presentation did mention

809

02:09:41.960 --> 02:09:43.160

Nicolle Steiner: um The

810

02:09:43.860 --> 02:09:53.900

Nicolle Steiner: I believe the table or page number in the Eir, where that information can be found. Um! So I read you to look at the project description,

811

02:09:53.910 --> 02:10:10.270

Nicolle Steiner: and your comment today will be responded to um in the final eir, and i'll point you in the right direction as well. I believe Jan mentioned tables two, seven, two, eight, and two nine um of the draft, Ir: with that information.

Public Meeting

COMMENT

RESPONSE

P-27-1 The comment discusses reallocation of funds and expresses concern for impacts to noise during special events. Please see Master Response – Funding and Operations. Please see Master Response – Noise. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

812
02:10:15.330 --> 02:10:16.570
Nicolle Steiner: Jan.

813
02:10:22.840 --> 02:10:25.529
Gian: Hello! Hello! Welcome!

814
02:10:25.800 --> 02:10:29.409
Gian: Hi! I'm just wondering if I have My!

815
02:10:31.000 --> 02:10:33.640
Nicolle Steiner: I'm sorry. Can you repeat that I didn't catch it.

816
02:10:34.160 --> 02:10:38.819
Gian: Oh, how well can you guys hear me? Yes, okay.

817
02:10:39.630 --> 02:10:48.090
Gian: Hi, um. My name is Jion. I have lived here. I am in just outside of Serbia since I was five years old. I'm now thirty, three.

818
02:10:48.190 --> 02:10:51.309
Gian: Um. So I've seen this neighborhood change um.

819
02:10:52.690 --> 02:10:55.989
Gian: I basically wanted to speak about um

820
02:10:56.260 --> 02:10:57.260
Gian: just

821
02:10:57.610 --> 02:11:02.340
Gian: creating another alternative to the use of the money for this and the finances of it.

822
02:11:02.510 --> 02:11:15.980
Gian: Now i'm all for improving the neighborhood, and looking towards the future, and and having this as a foundational basis for it. Um! But at the same time I also don't want to disturb what we already have that's going well for us.

823
02:11:17.850 --> 02:11:27.229

P-27-1

Public Meeting

COMMENT

RESPONSE

P-27-2

The comment expresses concern for parking and opposition to construction and improvement of buildings as part of the proposed Project. Please see Master Response – Parking/Bike Options and Master Response Transportation/Traffic. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-27-1
Cont.

Gian: I'm: I'm thinking about Griffith Park, and using their existing infrastructure over there, such as the Greek Theater for the six hundred people.

824
02:11:27.500 --> 02:11:37.980
Gian: You guys want to put at the meadow? And I say that because I have experience in entertainment venues and

825
02:11:38.580 --> 02:11:41.760
Gian: the amount of noise, the amount of traffic. The amount of

826
02:11:41.950 --> 02:11:52.319
Gian: everything that comes along with that kind of set up that happens hours and sometimes days before an event or an event that happens is pretty disturbing. Um,

827
02:11:52.620 --> 02:11:58.320
Gian: and especially for a neighborhood that, like hours of tranquility, and this for any other people come here for, is going to be

828
02:11:58.640 --> 02:12:02.810
Gian: disturbed for the least of anybody's worries.

829
02:12:02.840 --> 02:12:03.889
Gian: So

830
02:12:04.450 --> 02:12:08.179
Gian: you know, for my own personal experience, having that

831
02:12:09.110 --> 02:12:19.060
Gian: having that applicator over there in the meadow is not a good thing. now concerning the two of the buildings that are going to be built too, I'm not for that either

P-27-2

832
02:12:19.150 --> 02:12:21.450
Gian: I would like to have just

833
02:12:21.600 --> 02:12:30.610
Gian: an improvement of the current buildings that we do have, and also probably some parking abatement rather than increasing the parking.

834
02:12:30.670 --> 02:12:41.989

Public Meeting

COMMENT

RESPONSE

P-27-2
cont.

Gian: I don't know how many people here have actually been up and been around the reservoir lately, but even when you try to go for a walk, and you're trying to park around there. You're gonna have to park a few blocks away. Just so you can get around,

835

02:12:43.490 --> 02:12:46.370

Gian: and there's like two minutes. Sorry. Thank you.

836

02:12:47.680 --> 02:12:49.770

Nicolle Steiner: Thank you for your comment today,

837

02:12:52.430 --> 02:12:53.830

Betsy.

838

02:13:00.820 --> 02:13:02.109

Betsy Isroelit: Can you hear me?

839

02:13:03.810 --> 02:13:08.349

Nicolle Steiner: Hello, Betsy! I am not able to hear you.

840

02:13:08.610 --> 02:13:13.580

Nicolle Steiner: I um. If you could follow the instructions on this slide,

841

02:13:13.640 --> 02:13:17.180

Nicolle Steiner: click on the interpretation button and select English

842

02:13:17.280 --> 02:13:22.659

Nicolle Steiner: and click that interpretation button one more time and select mute, original audio,

843

02:13:23.610 --> 02:13:25.190

Nicolle Steiner: and that she fix it.

844

02:13:26.420 --> 02:13:27.370

Betsy Isroelit: I

845

02:13:27.510 --> 02:13:29.689

Betsy Isroelit: did both of those

846

02:13:41.320 --> 02:13:51.870

Public Meeting

COMMENT

RESPONSE

Nicolle Steiner: you can. You need to select the that? But interpretation button twice, first to select the language and then again to mute the original audio.

847
02:14:05.350 --> 02:14:12.040
Nicolle Steiner: We'll give you a minute to two minutes to figure that out. We'll go to the next

848
02:14:12.400 --> 02:14:14.919
Nicolle Steiner: um, Martin Gray.

849
02:14:21.810 --> 02:14:24.910
Martin Grey: Hey, can you hear me?

850
02:14:25.340 --> 02:14:33.599
Martin Grey: So? I have so many thoughts and so little time? Uh, I've lived in Silver Lake for thirty, six years,

851
02:14:33.920 --> 02:14:37.889
Martin Grey: and uh, as much as I love the reservoir,

852
02:14:38.230 --> 02:14:40.050
Martin Grey: I love it as it is

853
02:14:40.590 --> 02:14:41.889
Martin Grey: the

854
02:14:42.610 --> 02:14:46.330
Martin Grey: scary things about this project,

855
02:14:46.720 --> 02:14:53.690
Martin Grey: aside from the obvious which is traffic having lived through the repiping. The sewer lines.

856
02:14:53.860 --> 02:14:55.110
Martin Grey: Um!

857
02:14:55.400 --> 02:14:59.440
Martin Grey: And everybody complained. You know we all We all needed that

858
02:14:59.690 --> 02:15:03.589
Martin Grey: without a doubt we needed to upgrade our our infrastructure.

P-28-1

This comment expresses opposition to the proposed Project and concern regarding traffic impacts, fence removal, and expresses support to reallocate funds. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response - Traffic/Transportation, Master Response – Fence Removal, and Master Response – Funding & Operation.

This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-28-1

Public Meeting

COMMENT

RESPONSE

P-28-1
cont.

859
02:15:04.260 --> 02:15:08.449
Martin Grey: Um! This is not a need so much as a desire for what,

860
02:15:08.690 --> 02:15:12.720
Martin Grey: and I hate to say it. But for what really seems like

861
02:15:13.690 --> 02:15:16.149
Martin Grey: a community that has become

862
02:15:16.520 --> 02:15:24.639
Martin Grey: filled with with just people that seem so entitled that we should. We should have this. It's just

863
02:15:25.050 --> 02:15:33.169
Martin Grey: so. We're like, was always a community of diversity uh working class as well as well to do. Um.

864
02:15:33.190 --> 02:15:34.449
Martin Grey: I've seen it

865
02:15:34.580 --> 02:15:36.430
Martin Grey: just uh

866
02:15:36.740 --> 02:15:40.219
unfortunately deteriorate. In my opinion. I know

867
02:15:40.340 --> 02:15:41.859
Martin Grey: I may be alone.

868
02:15:41.890 --> 02:15:48.810
Martin Grey: I understand it. I grew up in Brooklyn. Um saw that community change. I've been out here for

869
02:15:49.170 --> 02:15:51.259
Martin Grey: almost forty years now,

870
02:15:51.330 --> 02:15:53.110
Martin Grey: and um

871
02:15:53.150 --> 02:15:56.050

Public Meeting

COMMENT

RESPONSE

P-29-1

The comment expresses opposition to the proposed Project because of traffic, cost, and fence removal. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The commenter is also referred to Master Response – Traffic/Transportation, Master Response – Funding & Operation, and Master Response - Fence Removal.

P-28-1
cont.

Martin Grey: I am so against this project, for,
872
02:15:56.380 --> 02:15:58.810
Martin Grey: uh, not only the traffic, but
873
02:15:59.010 --> 02:16:02.669
Martin Grey: people have talked about the cost. I think that could be
874
02:16:02.830 --> 02:16:10.970
Martin Grey: better served to help the underserved communities. We live
so close to Griffith Park we live so close to E Echo Park,
875
02:16:11.190 --> 02:16:12.889
Martin Grey: which, by the way,
876
02:16:13.100 --> 02:16:16.889
Martin Grey: didn't get cleaned up until Mitchell Farrell put a fence
around it.
877
02:16:17.200 --> 02:16:22.169
Martin Grey: Um! I can't imagine this reservoir with no fence. Um!
878
02:16:22.200 --> 02:16:31.140
Martin Grey: I I kind of feel like i'm freely associating, so pardon me.
I see the time is up. Those are my comments. I'm: against this. Thank you
for the opportunity to speak.
879
02:16:32.790 --> 02:16:35.539
Nicolle Steiner: Thank you for your comments today,
880
02:16:41.629 --> 02:16:42.860
Nicolle Steiner: Mary.
881
02:16:48.370 --> 02:16:55.419
Mary: Hi, Can you hear me? Hello, Yes, Great. Okay, Thank you.
882
02:16:55.520 --> 02:17:11.400
Mary: I'll be brief. Okay, This project is not tethered to any reality.
We'll be facing in the next fifteen, twenty years. Many of the ideas and
renderings are fantastical, and wouldn't be out of place on a vision
board for saudi arabia is the line
883

P-29-1

Public Meeting

COMMENT

RESPONSE

02:17:11.490 --> 02:17:30.270
 Mary: uh i'm not hearing any strategies for long-term climate change, adoption, seeing many strategies that are not relevant in the upcoming decades um seeing unshaded concrete more lights, more cars more missions more disruption to biodiversity.

P-29-2 884
 02:17:30.280 --> 02:17:39.530
 Mary: Twenty-four access, with no fences, will ensure this area will become completely trashed, like so the supportive Basin and the Bologna wetlands

885
 02:17:40.180 --> 02:17:54.979
 Mary: uh the images of children waiting in the water and the draft Eri are completely ridiculous. We've had summers since two thousand and ten that I've hit one hundred and eight, a hundred, eleven and one hundred and thirteen degrees. The reservoir has no water.

886
 02:17:55.049 --> 02:17:56.729
 Mary: You can see the bottom

P-29-3 887
 02:17:56.799 --> 02:18:13.339
 Mary: uh this project on the surface is being spoken about like. It's an infrastructural initiative, but it's very obviously an economic initiative for what i'm assuming are a few very lucky contractors and developers who are going to be gone in fifteen years. When this project is pushed through,

888
 02:18:13.480 --> 02:18:30.999
 Mary: we, the people who actually live in the neighborhood and people my age, who are in our thirties. We will be the ones facing the long term consequences of this project. It's completely ridiculous. It's completely untenable. I urge you not to push this through. Thank you.

889
 02:18:34.799 --> 02:18:36.969
 Nicolle Steiner: Thank you for your comment,

890
 02:18:39.150 --> 02:18:40.420
 Nicolle Steiner: Betsy,

891
 02:18:41.059 --> 02:18:43.459
 Nicolle Steiner: and try again.

892
 02:18:46.730 --> 02:18:48.010
 Betsy Isroelit: Can you hear me?

P-29-2 This comment expresses concern for security. As described in the Project Description Section 2.7 of the Draft EIR, an Operations and Maintenance plan would be prepared for the proposed Project prior to construction. The routine operations and maintenance of the proposed Project would include the routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, graffiti removal, and cleaning of park facilities. RAP would continue to operate and manage the Silver Lake Recreation Center including the proposed Multi-Purpose Facility similar to existing conditions. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Also, please see Master Response – Fence Removal.

P-29-3 The comment expresses opposition to the proposed Project. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

As described in the Project Description, Section 2.7.3 of the Draft EIR, the proposed Project, through LADWP, would continue to replenish reservoir water as needed through the existing Pollock Well No. 3, similar to existing conditions.

Public Meeting

COMMENT

RESPONSE

893
02:18:49.250 --> 02:18:52.560
Nicolle Steiner: I'm still not able to hear you, Betsy.

894
02:18:52.610 --> 02:18:59.729
Betsy Isroelit: Unfortunately I do bring up that slide one more time

895
02:18:59.770 --> 02:19:01.330
Nicolle Steiner: you'll need to click

896
02:19:01.900 --> 02:19:03.549
Nicolle Steiner: interpretation

897
02:19:03.830 --> 02:19:09.970
Nicolle Steiner: English, and then once again interpretation and mute The original audio.

898
02:19:12.809 --> 02:19:14.150
Betsy Isroelit: Is it working?

899
02:19:17.959 --> 02:19:24.029
Nicolle Steiner: I think the mute original audio might be what you're missing from that step.

900
02:19:25.160 --> 02:19:26.359
Nicolle Steiner: Try that

901
02:19:26.520 --> 02:19:29.539
Nicolle Steiner: interpretation and meet the original audio.

902
02:19:29.889 --> 02:19:33.220
Betsy Isroelit: I did it for about the tenth time, so never mind.

903
02:19:39.559 --> 02:19:43.909
Nicolle Steiner: Sorry we're still not able to hear you.

904
02:19:46.049 --> 02:19:50.980
Nicolle Steiner: We'll try again at the end. Here, let's get to Hugh Kenny.

905
02:19:56.530 --> 02:19:57.769
I do anything

Public Meeting

COMMENT

RESPONSE

906
02:19:58.950 --> 02:20:00.130
Nicolle Steiner: so

907
02:20:04.930 --> 02:20:11.260
Nicolle Steiner: could you maybe talk like right next to your computer or
audio device. Or maybe

908
02:20:11.800 --> 02:20:13.469
yeah, I guess.

909
02:20:13.500 --> 02:20:15.070
Does that do anything? I

910
02:20:15.720 --> 02:20:17.369
I got to over it again.

911
02:20:18.820 --> 02:20:19.780
Okay,

912
02:20:19.940 --> 02:20:22.910
Nicolle Steiner: it's really not

913
02:20:23.210 --> 02:20:24.420
Nicolle Steiner: audible.

914
02:20:30.590 --> 02:20:31.480
Thank you.

915
02:20:32.450 --> 02:20:34.580
Nicolle Steiner: We really can't hear you

916
02:20:41.010 --> 02:20:42.949
Nicolle Steiner: try one more time.

917
02:20:46.220 --> 02:20:50.280
Nicolle Steiner: Sorry. Unfortunately, we really can't hear

918
02:20:50.810 --> 02:20:54.150
Nicolle Steiner: or decipher your words.

Public Meeting

COMMENT

RESPONSE

P-30-1

919
02:20:54.510 --> 02:20:56.150
Nicolle Steiner: We will

920
02:20:56.710 --> 02:21:13.739
Nicolle Steiner: jump back to jump down to Paul Hugh. If if you would like to provide a comment, we will put up on the screen the um ways. You can provide a written comment during the comment period.

921
02:21:14.110 --> 02:21:23.010
Nicolle Steiner: Or again, you can try to dial in to this call. Um,

922
02:21:32.700 --> 02:21:33.810
Nicolle Steiner: Paul.

923
02:21:39.410 --> 02:21:40.690
Paul Tzanetopoulos: Hello, everyone!

924
02:21:41.960 --> 02:21:57.679
Paul Tzanetopoulos: Hello, thanks. Everybody Um. Let's see. I'm a forty-five. Well, at least forty-five years residents of of Silver Lake and uh the community is obviously very precious to me. I own a a number of homes. Here.

925
02:21:57.710 --> 02:21:58.880
Paul Tzanetopoulos: Um!

926
02:21:59.280 --> 02:22:09.559
Paul Tzanetopoulos: First of all that I just think it's a little offensive when people say this is a community-driven project I that's just completely false.

927
02:22:09.790 --> 02:22:21.020
Paul Tzanetopoulos: I I hate hearing things like that when it doesn't include the community. Uh, and it's just i'm pulling this regard for reality. I just this is really

928
02:22:21.130 --> 02:22:31.790
Paul Tzanetopoulos: hard to uh understand, but the the a lot of the practical things like people that have mentioned the meadow. Uh, I clearly, you know I certainly

929
02:22:31.890 --> 02:22:37.420

P-30-1

The comment expresses concern regarding community input being incorporated into the proposed Project and the current impacts of the previous implementation of the Meadow. Please see Master Response – Community Engagement Process. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Public Meeting

COMMENT

RESPONSE

P-30-2

This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation, of the Draft EIR. All impacts were concluded to be less than significant. Also, please see Master Response – Traffic/Transportation. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-30-1
cont.

Paul Tzanetopoulos: uh would accept the fact that some there's been some benefits from the meadow. But, um!

930
02:22:37.550 --> 02:22:57.460
Paul Tzanetopoulos: The quality of life, since the meadow has really decreased for myself and my neighbors and parts of the neighborhood. Watch. It's very. It's almost unbearable. Here, Post Post meadow. It's a traffic uh getting out. You just can't get out of your house. You can't get it, anyway. It's just awful

931
02:22:57.470 --> 02:23:13.200
Paul Tzanetopoulos: uh. So I don't know uh how close people live. That's say the matter has been a plus thing. Um, it's. It's been very tough on us, uh, and in terms of transportation. Um! Those of you on the committee that uh look at the d ot uh

P-30-2

932
02:23:13.210 --> 02:23:29.380
Paul Tzanetopoulos: information. Please look at it carefully. The chances that they they looked at the traffic. Um, during the pandemic. Are we relevant? And you know this the driving in this community. We're in gridlock even today.

933
02:23:29.500 --> 02:23:34.249
Paul Tzanetopoulos: Uh, twice a day. Great actual gridlock today

934
02:23:34.260 --> 02:23:56.469
Paul Tzanetopoulos: uh day to day is what is my point? So the idea that there's no effect is just just preposterous. So please check the dates on the dots data, cause they uh they simply can't be true. The quality of life. Uh is, uh, adversely effective. We can't leave our homes or come home or invite somebody over to visit. Uh, thank you very much.

935
02:23:58.780 --> 02:24:00.870
Nicolle Steiner: Thank you for your comment.

936
02:24:02.230 --> 02:24:12.509
Nicolle Steiner: If you have joined by phone. Um, please press Star nine in order to raise your virtual hand and and be in the virtual line.

937
02:24:15.510 --> 02:24:17.530
Nicolle Steiner: Paul Newman,

938
02:24:17.640 --> 02:24:20.589
Nicolle Steiner: Here's what I found.

Public Meeting

	COMMENT	RESPONSE
939 02:24:20.760 --> 02:24:21.690 Okay,	P-31-1	This comment is an introductory comment. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.
940 02:24:22.750 --> 02:24:25.909 Nicolle Steiner: My watch is trying to find all in it.		
941 02:24:26.130 --> 02:24:27.619 Paul Neuman: Hi! Can you hear me?		
942 02:24:27.960 --> 02:24:29.640 Paul Neuman: Hello!		
943 02:24:29.940 --> 02:24:31.350 Paul Neuman: Hello!		
944 02:24:32.630 --> 02:24:35.850 Paul Neuman: Hello! We can't hear you.		
945 02:24:35.960 --> 02:24:39.100 Nicolle Steiner: You		
946 02:24:39.790 --> 02:24:45.470 Nicolle Steiner: could please click on the interpretation button at the bottom of your screen and play, pick English,		
947 02:24:45.800 --> 02:24:53.629 Nicolle Steiner: and then again click the interpretation button a second time and click mute, original audio.		
948 02:24:54.290 --> 02:25:08.660 Paul Neuman: Can you hear me? I uh, I join this midway through so because of work stuff. But uh, so I didn't know all the instructions. So that was my fault. I want mostly want to point out, though, that		
P-31-1 949 02:25:08.670 --> 02:25:26.689 Paul Neuman: at least with two of the callers and Marie and Betsy, I was repeatedly. We were here. We're more than one here. Hearing them say, Hello, Hello! Hello! Hello! And the call. You were instructing them that they were not to that they had not done things, and that the problem in effect was theirs. We were hearing them. So I suggest,		
950 02:25:26.700 --> 02:25:42.760		

Public Meeting

COMMENT

RESPONSE

P-31-2

This comment does not raise any issues with respect to the content and adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

P-31-1
cont.

Paul Neuman: maybe as a parable, that rather than assuming that the problem is elsewhere, that sometimes innocently and and you know no, no, no offense, but uh, not in any way immoral or amoral, but that the problem sometimes is

951

02:25:42.770 --> 02:26:04.119

Paul Neuman: the expectations of people who are managing a process who project onto them What they think is the case, and they don't necessarily. Uh I mean somebody I heard was talking about other stats. I know I heard somebody else say that they are in the uh the I guess Rfp. Or the proposal expectations. But a lot of Times expectations can be wildly uh out of uh,

952

02:26:04.130 --> 02:26:14.459

Paul Neuman: out of actual reality, in terms of what to what might occur, or what is actually occurring at that moment. Um, i'm! Probably being obscure and rambling. But i'm saying, first of all, that yes, we could hear those people

953

02:26:14.590 --> 02:26:25.909

Paul Neuman: that which is important to know. We could hear them here. If you can't hear them. Maybe that's an issue you guys are having, and you should look at your at your communications there, but i'll make a quick point about um

954

02:26:25.920 --> 02:26:39.269

Paul Neuman: expectations. Having lived in Silver Lake a long time, The bike path. It's great to have bypass. I'm all for bypass. But uh, for all the years it's been in place, i'm surprised if I see more than one person a month.

955

02:26:39.380 --> 02:27:08.100

Paul Neuman: I I saw one group of naked bicyclists, which is a thing, I guess, and I saw more people in that one group for twenty seconds going by. Then I've seen in twenty years, or however long the bike path has been there uh ten years. I don't know uh, so it it's. Obviously it's invalid. It's just to say that that aspiration does not always meet reality, and sometimes the problems that approve are far more severe than than have ever been allowed to be a possible possible outcome.

956

02:27:08.110 --> 02:27:08.960

Paul Neuman: Thank you.

957

02:27:10.700 --> 02:27:12.750

Nicolle Steiner: Thank you for your comment,

958

Public Meeting

COMMENT

RESPONSE

02:27:12.850 --> 02:27:28.469
Nicolle Steiner: and to just address the issue with the audio. I I just want to make sure that the comments are part of the recording, and if you're not in the right audio um, then it won't. Be recorded as part of the the record.

959
02:27:34.820 --> 02:27:41.959
Nicolle Steiner: Um, I see. Hold on Number one zero eight.

960
02:27:42.570 --> 02:27:50.179
Nicolle Steiner: But in order to raise your virtual hand, you'll have, I mean, in order to accept. You have to press Star Six.

961
02:27:52.190 --> 02:27:55.200
1213****108: Hello! It's Betsy. It's really right.

962
02:27:56.210 --> 02:27:57.570
1213****108: Can you hear me?

963
02:27:58.310 --> 02:28:00.610
Nicolle Steiner: I can't hear the audio. But

964
02:28:03.030 --> 02:28:04.500
1213****108: who is speaking?

965
02:28:07.460 --> 02:28:08.530
1213****108: I

966
02:28:10.800 --> 02:28:13.039
1213****108: find Paul's parable,

967
02:28:13.390 --> 02:28:18.600
1213****108: brilliant, and the best slides I've had in a week, so i'm just going to hang up,

968
02:28:18.980 --> 02:28:20.330
1213****108: not working.

969
02:28:26.570 --> 02:28:31.550
Nicolle Steiner: I couldn't hear the audio. I'm not sure is that still on seems to have hung up.

970

Public Meeting

COMMENT

RESPONSE

02:28:38.770 --> 02:28:42.040
Nicolle Steiner: All right. Let's try, Hugh Kenny.

971
02:28:53.030 --> 02:28:58.229
Nicolle Steiner: Here you still have the same problem.

972
02:28:58.820 --> 02:29:04.110
Nicolle Steiner: Sorry we cannot decipher what you are saying,

973
02:29:04.570 --> 02:29:06.920
i'm gonna to control my life so, General,

974
02:29:12.990 --> 02:29:19.569
Nicolle Steiner: and we'll put up the slide again on how to provide written comments here after we try. Betsy.

975
02:29:27.880 --> 02:29:29.380
Betsy Isroelit: Hello, Hello,

976
02:29:33.700 --> 02:29:36.979
Nicolle Steiner: Betsy! I can't hear you on the

977
02:29:37.370 --> 02:29:39.740
regular channel.

978
02:29:40.190 --> 02:29:58.880
Nicolle Steiner: I've I've done what i'm supposed to do at least six times um my screen says Maybe if someone can note her comment down that can hear her, Wendy, I think you can hear her Um, if you could write down her comments so we can have it for the public record. Um,

979
02:29:58.890 --> 02:30:00.329
Nicolle Steiner: that might be helpful.

980
02:30:00.480 --> 02:30:16.730
Betsy Isroelit: Thank you. I'll start the clock. Go ahead. Thank you. I appreciate that. Um. I just just for the record. I at least six times I did as the instruction said. It didn't work, so I find Paul's comment about parables

981
02:30:16.870 --> 02:30:29.380

P-32-1

The comment expresses concern for wildlife, traffic, and noise. Impacts to biological resources are analyzed in Section 3.4, Biological Resources, of the Draft EIR. All impacts were concluded to be less than significant with implementation of mitigation measures. Section 3.12, Noise and Vibration, of the Draft EIR, discusses mitigation that would be implemented to reduce noise impacts during construction of the proposed Project. Please see Master Response – Noise.

Tables 2-7 and 2-8 of the Draft EIR show a total increase in park attendance by proposed park space during the weekend and weekday. These numbers were calculated in accordance with the added resources and park spaces and as discussed on Page 76 of the Transportation Impact Assessment included as Appendix K to the Draft EIR. This comment does not raise any issues with respect to the content and adequacy of the Draft EIR, therefore, it is noted for the record.

P32-1

Public Meeting

COMMENT

RESPONSE

P-32-1
cont.

Betsy Isroelit: growing in, and the best laugh I've had in about a week. So thank you, Paul. Um, I think Frida and Chip expressed out very eloquently, concerns about wildlife and

982

02:30:29.420 --> 02:30:46.200

Betsy Isroelit: um the impact on the neighborhood as far as traffic noise. Um, But I would like to just reference. What ships said uh wants versus needs, and I think there's some very basic questions that all the people I talk to are asking,

983

02:30:46.570 --> 02:30:51.859

Betsy Isroelit: which is how many people are going to come. A day which has been asked

984

02:30:51.920 --> 02:31:05.939

Betsy Isroelit: How much money like, really, how much money is this gonna cost? And really, truly, how long is this gonna last? Is it going to last five years, ten years, twenty years, two years, three days, I mean, that's

985

02:31:05.950 --> 02:31:24.940

Betsy Isroelit: It's impossible for the average person to determine that. Based on what's been presented. Um, I'd also like to comment on being less selfish and thinking about people who actually don't have parks in their communities, and it's easy to find that information.

P-32-2

986

02:31:25.430 --> 02:31:32.250

Betsy Isroelit: Um, Griffith Park Swimming Pool. One example. There's kids who need to learn to swim,

987

02:31:32.370 --> 02:31:47.490

Betsy Isroelit: and the pool has been closed because there's not a little bit of money to fix it. There's no way for people to get to Griffith Park. Don't have cars or bicycles, but yet it's right around the corner,

988

02:31:47.510 --> 02:32:00.269

Betsy Isroelit: so I think we should just open our hearts and think of people who aren't as wealthy as the people who live in this community, and who actually need

989

02:32:00.750 --> 02:32:07.620

Betsy Isroelit: who really truly need a place to play a place to swim a place to hike.

990

02:32:07.790 --> 02:32:08.740

P-32-2

The comment requests concern about project cost and need within the neighborhood Project. Please see Master Response – Funding and Operations. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

Public Meeting

COMMENT

RESPONSE

P-33-1

Betsy Isroelit: Thank you.

991
02:32:14.110 --> 02:32:15.589
Wendy Delgado: Thank you, Betsy.

992
02:32:18.280 --> 02:32:20.989
Nicolle Steiner: The cool. It's ready. Thank you.

993
02:32:21.420 --> 02:32:22.920
Nicolle Steiner: P. Feldman.

994
02:32:29.650 --> 02:32:31.920
Nicolle Steiner: Hello, hello!

995
02:32:33.290 --> 02:32:45.170
pfeldman: Can you hear me? Our last caller?

996
02:32:45.180 --> 02:32:59.479
pfeldman: And I just want to make clear that the plan at this point is just still filled with negative environmental impacts, several of which can be remedied only if the plan is just completely scuttled. And so i'd say i'll turn it to another. One

997
02:32:59.550 --> 02:33:10.069
pfeldman: is the best solution. I think the plan is selfish, and it's near-sighted. The report talks about approximately thirty one

998
02:33:10.080 --> 02:33:29.320
pfeldman: uh green spaces parks uh within a couple of miles of of Silver Lake. I don't think that even includes Griffith Park. It also doesn't include the Reservoir area itself, which we now have. The meadow. We have the Rec center area, including the basketball courts and uh, the

999
02:33:29.330 --> 02:33:37.409
pfeldman: uh children's facilities and um soccer field, Whatever the dog park we have,

1000
02:33:37.580 --> 02:33:47.629
pfeldman: the green space Here we're looking at it, and we also have the water here which is protected uh the wildlife, and so forth, are protected, as is one hundred and fifty.

1001
02:33:47.640 --> 02:34:17.090

P-33-1

The comment expresses opposition to the proposed Project. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Public Meeting

COMMENT

RESPONSE

P33-2 pfeldman: U I think it's just selfish and near-sighted for people to say, we need this. We may want it. But there's other bigger needs in this city, where there's so much homelessness where there's just not enough resources for other things. But basically the other thing I want to address is traffic. It's ludicrous to say that there's no significant uh impact, and that needs to be mitigated with traffic, because that also includes parking

1002
02:34:17.100 --> 02:34:24.209
pfeldman: uh in in other factors, right now on the streets to the west of uh the reservoir. It's

P-33-3 1003
02:34:24.220 --> 02:34:42.540
pfeldman: very hard for one car to even get through, because there's so many cars parked for people using the reservoir for people whose homes are there, and so forth. Fire trucks can't get through at times if they had to. Uh garbage trucks can't get through, ambulance can't get through

1004
02:34:42.550 --> 02:34:55.380
pfeldman: uh to put in this kind of so-called world-class amenity, and expect all these people here, and have at most one hundred and fifty more parking spaces is absolutely bogus.

1005
02:34:55.580 --> 02:35:03.049
pfeldman: Uh, I could go on and on, but I guess i'm out of time, so I i'll just continue making uh written comments.

1006
02:35:04.200 --> 02:35:07.279
Nicolle Steiner: Thank you very much for your comment,

1007
02:35:07.300 --> 02:35:16.819
Nicolle Steiner: and with that let me show one more time here on the screen, where and how you can provide written comments on the draft. Tir

1008
02:35:17.000 --> 02:35:25.450
Nicolle Steiner: um. The comment period is extended through December second two thousand and twenty-five, and we'll take in comments until five Pm. On that day

1009
02:35:25.480 --> 02:35:32.850
Nicolle Steiner: you could send written comments to the address on your screen as well as going to the project website.

1010
02:35:35.450 --> 02:35:45.009

P-33-2 The comment expresses concern over existing homelessness in the community. Please see Master Response - Homelessness.

P-33-3 Response – Traffic/Transportation. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

CHAPTER 3

Revisions, Clarifications, and Corrections to the Draft Environmental Impact Report

In accordance with CEQA Guidelines Section 15132(a), this chapter of the Final Environmental Impact Report (EIR) provides revisions, clarifications, and corrections to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document. These revisions, clarifications, and corrections are the result of the responses to public and agency comments received on the Draft EIR, new information that has become available since publication of the Draft EIR, or recognition of inadvertent errors or omissions.

3.1 Revisions and Corrections

The revisions herein include, but are not limited to, the following minor modifications to the proposed Project.

Modification of Crossing Signal – Offsite Improvement. In addition, the two pedestrian-activated flashing beacon crossings along West Silver Lake Drive and near the corner of Silver Lake Boulevard and Armstrong Avenue would be converted to high visibility crosswalks.

Removal of Parking Component along Silver Lake Boulevard - Offsite Improvement. As described in Chapter 2.0, Section 2.5.2 – Offsite improvements, two options were proposed in the Draft EIR for improvements along Silver Lake Boulevard, between Armstrong Avenue and Duane Street. However, the City has decided to include Option 2, the Bike-only improvement. Option 1, which included the addition of street parking would no longer being considered for the proposed Project. All mentions of Option 1 have been removed throughout the Draft EIR. Where applicable, the Bike-only Option is no longer referred to as “Option 2” throughout the Draft EIR since it is the only offsite improvement option that is proposed as part of the Project.

Removal of Floating Dock and Kayaking Opportunities. The proposed Project would no longer include the floating dock component or opportunities for guided kayak tours. No public access to water activities would be allowed, including guided kayak and/or canoe tours conducted by an ecologist for educational purposes. The only water access associated with the proposed Project would include small footpaths through the proposed wetland terraces to observational platforms that would be used for ongoing monitoring and maintenance of the wetlands, as well as for educational purposes. All mentions of the floating dock component and kayak tours have been removed throughout the Draft EIR.

Removal of Amplified Speaker Use during Special Events. Based on comments received during the Draft EIR comment period, the City has decided to remove the option to have amplified speakers during special events as part of the proposed Project. Special events would still be allowed up to 12 times per year as detailed in the Draft EIR. Due to the removal of amplified speaker use from the proposed Project, the significance determinations related to operational noise in Section 3.12, *Noise and Vibration* and operational impacts to recreation in Section 3.15, *Parks and Recreation* of the Draft EIR have been reduced to less than significant.

The revisions, clarifications, and corrections provided in this chapter do not add significant new information or support a conclusion that the Project would result in new or substantially more severe significant environmental impacts as compared to those disclosed in the circulated Draft EIR.

More specifically, CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to PRC Section 21092.1 and CEQA Guidelines Section 15088.5) but before the EIR is certified. CEQA Guidelines Section 15088.5 specifically states the following:

New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:

- *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
- *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.*
- *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

CEQA Guidelines Section 15088.5 also provides that “[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR ... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

As demonstrated in this Final EIR, including any changes to the environmental analysis in Chapter 3 of the Draft EIR, the changes presented in this chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section

15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA. Sections 3.1 through 3.10 below reference these revisions to the Draft EIR and are incorporated herein as part of the Final EIR. Revised language or new language is underlined. Deleted language is indicated by ~~striketrough~~ text.

Draft EIR Executive Summary

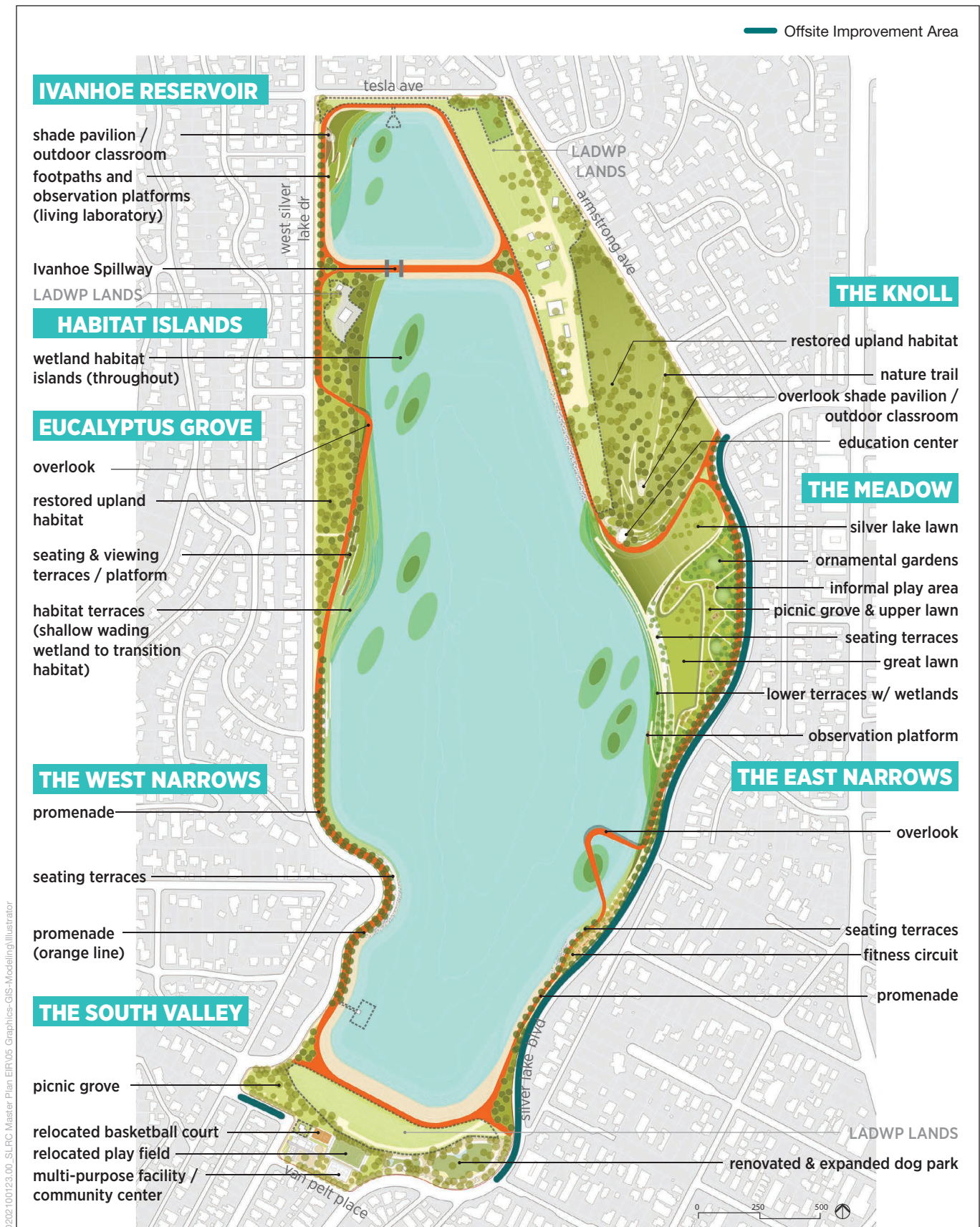
Page ES-4 Figure ES-1 has been modified to remove the floating dock from the Project. This figure would replace Figure ES-1 included in the Draft EIR.

See updated Figure ES-1 on the following page.

Page ES-6 The text under Section ES.6, *Summary of Environmental Impacts, Significant and Unavoidable Impacts*, is revised as follows:

As discussed in Section 3.12, *Noise*, while implementation of mitigation measures would reduce noise level and associated impacts at noise-sensitive receptors, noise levels could still exceed local jurisdiction significance thresholds when taking into account the potential worst-case overlap of the various construction phases. Noise impacts during construction and project vibration impacts from construction activities with respect to human annoyance would be considered significant and unavoidable even with implementation of mitigation measures. ~~Operational noise impacts associated with amplified music from special events would also be considered potentially significant and unavoidable with implementation of mitigation measures.~~

Offsite Improvement Area



SOURCE: Hargreaves Jones Landscape Architects, 2023

Silver Lake Reservoir Complex Master Plan Project

Figure ES-1
Proposed Project

Page ES-23 The text under heading Section ES.6, *Summary of Environmental Impacts, Cumulative Impacts*, is revised as follows:

With implementation of mitigation measures, the proposed Project's contribution to cumulative impacts would be less than significant except for noise impact during construction ~~and operational noise related to amplified speaker systems during special events~~, which would remain significant and unavoidable despite implementation of feasible mitigation measures.

Draft EIR Chapter 2, Project Description

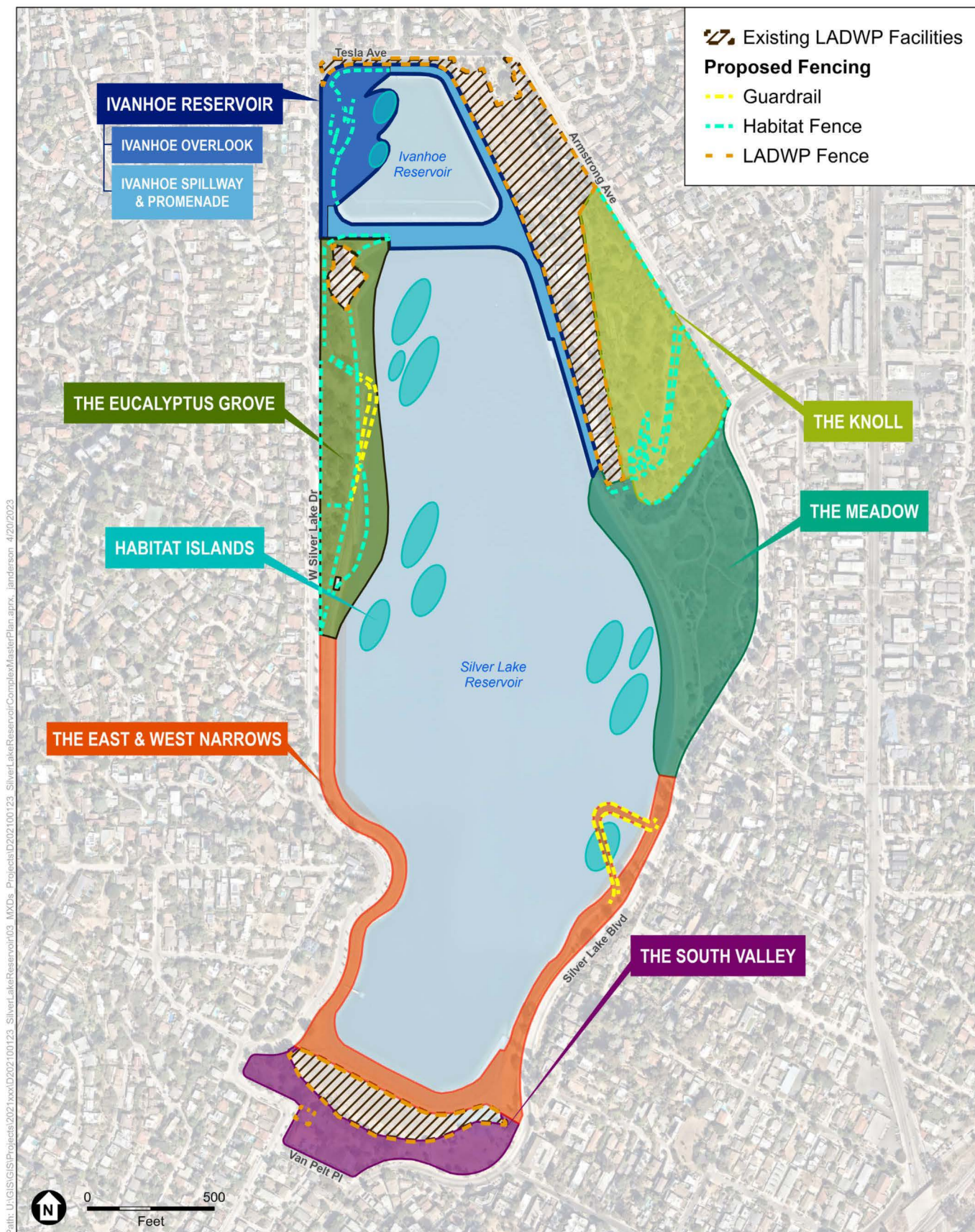
Page 2-8 Figure 2-4 has been modified to remove the floating docks. This figure would replace Figure 2-4 included in the Draft EIR.

See updated Figure 2-4 on the following page.

Page 2-9 This row on Table 2-1 has been revised as follows:

**TABLE 2-1
PROPOSED PARK SPACES, USES, AND ACTIVITIES PER PARK ZONE [REVISED]**

Proposed Park Zone	Existing Uses	Proposed Park Space, Use, or Activity
The Meadow	Lawn	Reconfigure and expand lawn Add: Education Center, seating terraces, ornamental gardens, picnic grove, informal play area, floating dock , wetland terraces, lighting



SOURCE: Nearmap, 2021; Hargreaves Jones Landscape Architects, 2020; ESA, 2022

Silver Lake Reservoir Complex Master Plan Project

Figure 2-4
Proposed Park Zones

Page 2-10 Figure 2-5 has been modified to remove the floating docks. This figure would replace Figure 2-5 included in the Draft EIR.

See updated Figure 2-5 on the following page.

Page 2-11 The text under Section 2.5.1, *Proposed Park Zones, The Meadow*, is revised to state as follows:

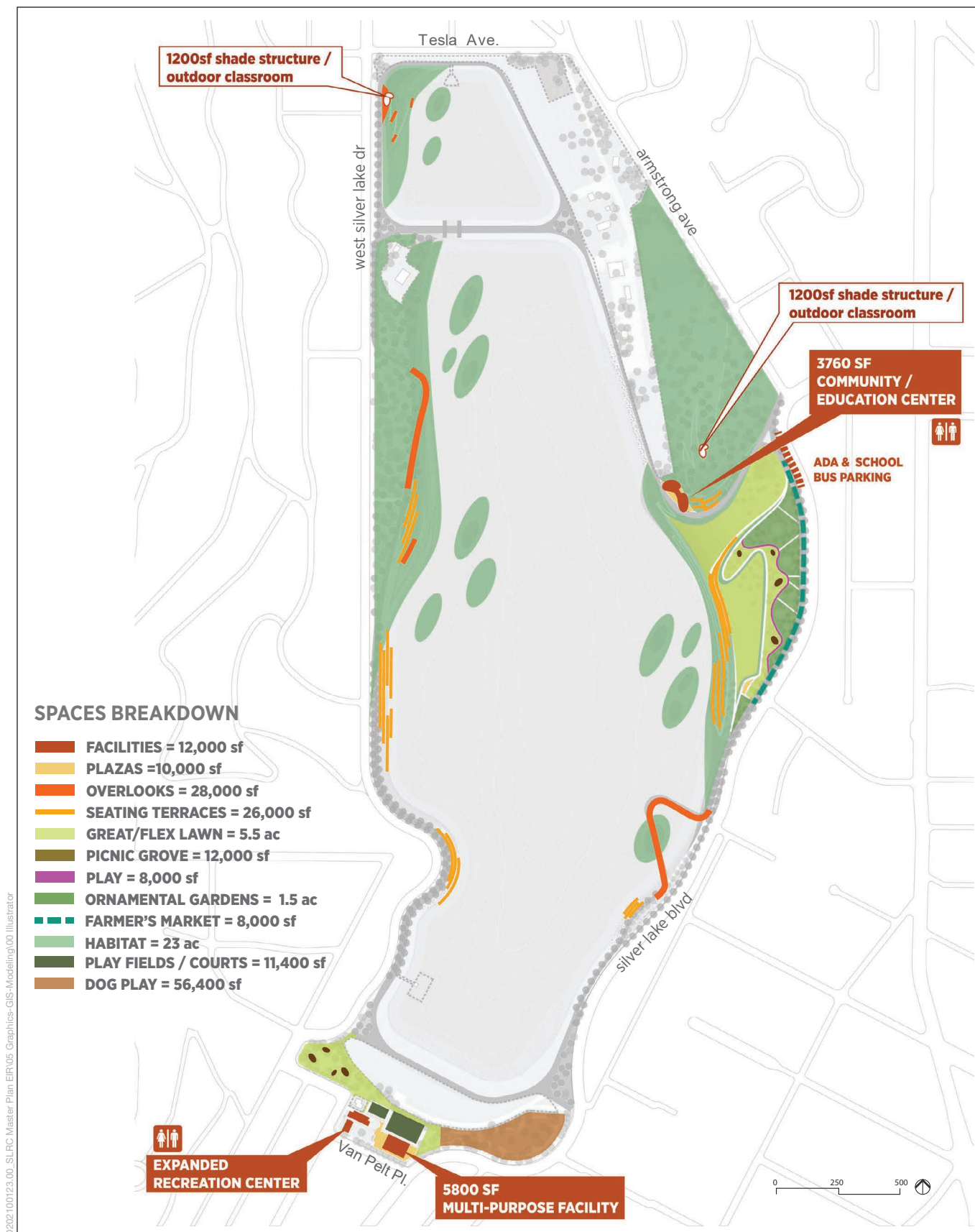
The proposed Education Center would be connected directly to the Silver Lake Reservoir via an accessible pathway ~~leading down to a floating dock~~. This area would provide educational opportunities ~~for visitors, and/or guided kayak or canoe tours by ecologists~~. The roof of the Education Center would be both a landing point along the path leading to the top of the Knoll, with a roof terrace overlooking the reservoirs and an extension of the landscape with a green roof connected to the Knoll's western slope. The proposed promenade would connect the Meadow to the proposed, approximately 3,760-square-foot, Education Center along its western edge.

Page 2-14 Figure 2-8 has been modified to remove the floating docks. This figure would replace Figure 2-8 included in the Draft EIR.

See updated Figure 2-8 on page 3-3-10.

Page 2-18 Figure 2-10 has been modified to remove the floating docks. This figure would replace Figure 2-10 included in the Draft EIR.

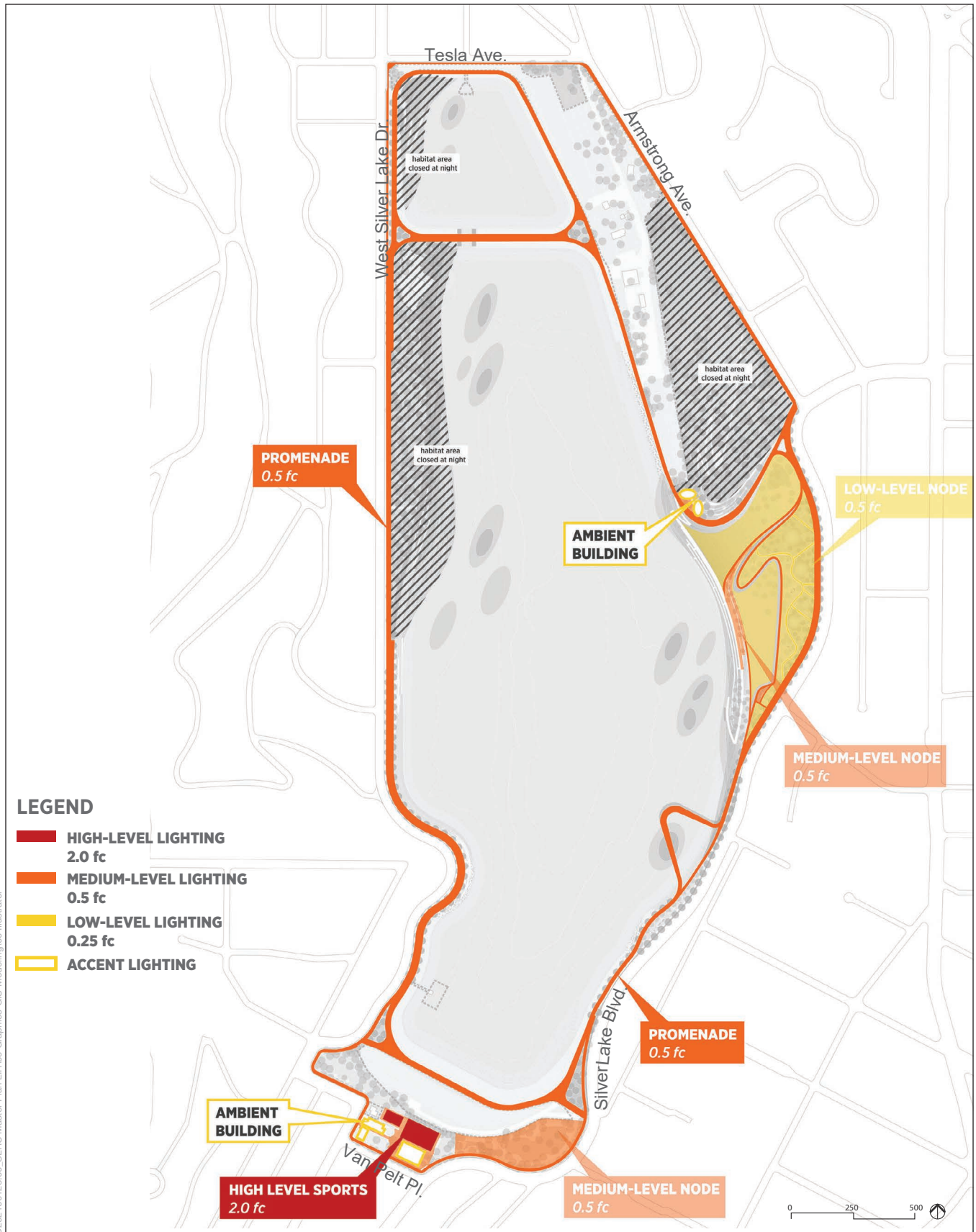
See updated Figure 2-10 on page 3-3-11.



SOURCE: Silver Lake Reservoir Complex Master Plan, 2023

Silver Lake Reservoir Complex Master Plan Project

Figure 2-5
Proposed Spaces, Uses and Activities Diagram

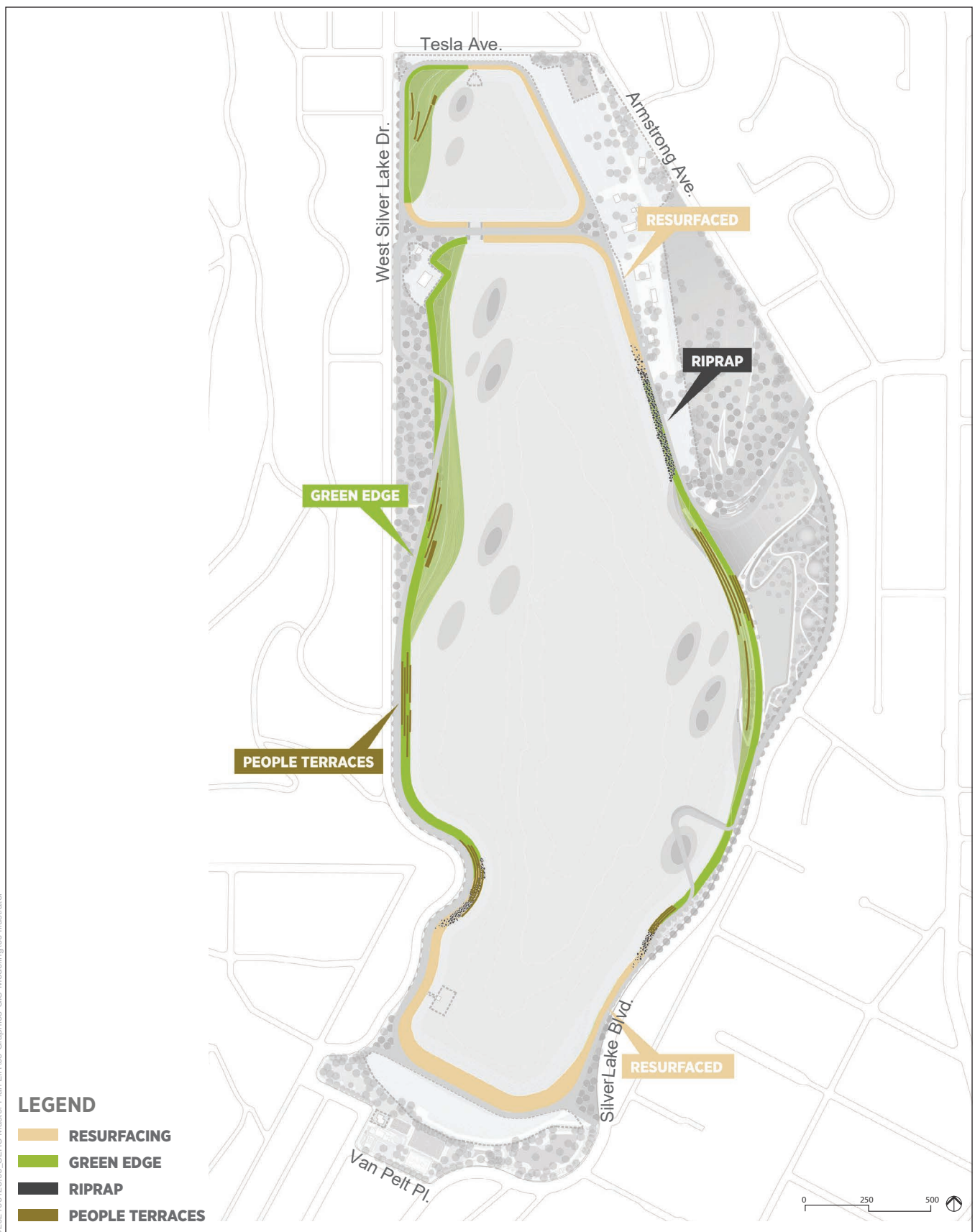


SOURCE: Silver Lake Reservoir Complex Master Plan, 2023

Silver Lake Reservoir Complex Master Plan Project

Figure 2-8
Proposed Lighting Diagram

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SOURCE: Silver Lake Reservoir Complex Master Plan, 2020

Silver Lake Reservoir Complex Master Plan Project

Figure 2-10
Proposed Embankment Edge Diagram

Page 2-25: The text under Section 2.5.2, *Offsite Improvements*, is revised to state as follows:

Additionally, offsite improvements would occur along Silver Lake Boulevard, between Armstrong Avenue and Duane Street for a length of approximately 3,000 feet. ~~Two options for improvement are proposed along this portion of the proposed Project. Option 1 would include an improved southbound bike lane on the west side of the road, closest to the SLRC, and relocate an existing northbound bike lane to the west side of the road. The bike lanes would be buffered by a 5-foot wide sidewalk running the length of this segment, followed by the addition of parallel parking on the west side of the road. Currently, there is only parallel parking along the eastern side of Silver Lake Boulevard and the proposed design in Option 1 would add approximately 135 new parking spaces to the western side of the road. Please refer to **Figure 2-16** for a cross section of the potential configuration of this option.~~ Option 2 ~~The proposed Project would include restriping along Silver Lake Boulevard with improvements to the bike lanes, and relocating the existing northbound bike lane to the western side of the road and adding a 4-foot buffer along the length of this segment. Alternatively, bike lanes could remain on either side of the road. The City would create a design committee during the development of final design drawings which would include other City entities, such as City Planning, LADOT, and the local Council Districts, to determine the final configuration of the bike lane. The committee would provide input into final design decisions based on the needs of the local area, safety requirements (including lane and buffer widths), buffer design features, drainage features, local connectivity, and consistency with existing City plans. No additional parking is included in this option would be implemented along this portion of the proposed Project. Please refer to **Figure 2-16** for a cross section of the potential configuration for Option 2 the proposed bike lane improvements.~~

Page 2-25 The text under Section 2.5.2, *Offsite Improvements*, has been revised as follows:

Additional offsite improvements would include two new ~~pedestrian-activated flashing beacon crossings~~ high visibility crosswalks added along West added along West Silver Lake Drive and near the corner of Silver Lake Boulevard and Armstrong Avenue as shown on **Figure 2-17**. These crosswalks would require ramps compatible with the Americans with Disabilities Act (ADA) on either end of the intersection, and all changes would be subject to final approval by LADOT.

Page 2-26 Figure 2-15 has been modified to remove “on-street parking” from Silver Lake Boulevard and the floating dock. This figure would replace Figure 2-15 included in the Draft EIR.

See updated Figure 2-15 on the following page.



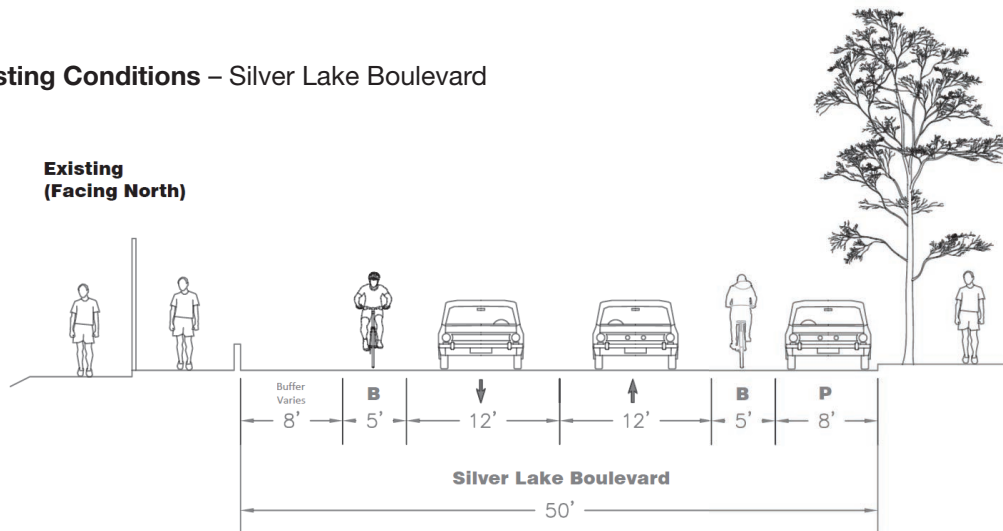
SOURCE: Silver Lake Reservoir Complex Master Plan 2023

Silver Lake Reservoir Complex Master Plan Project

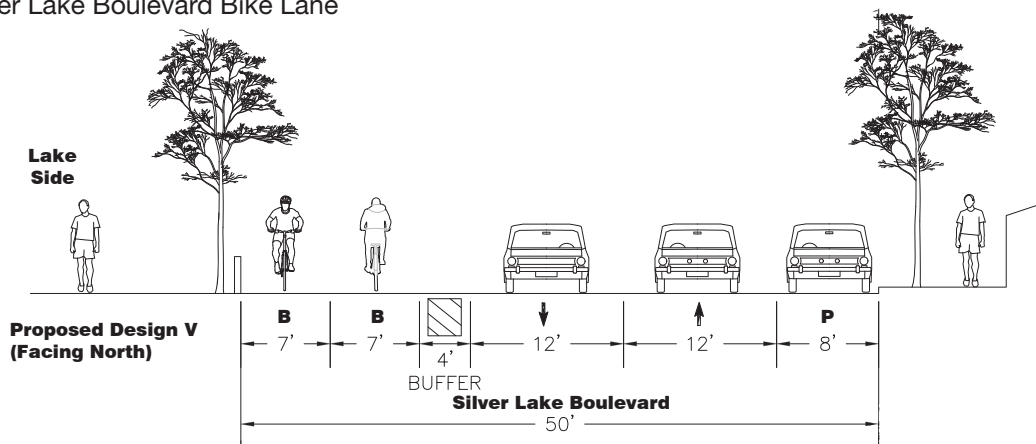
Figure 2-15
Proposed Offsite Improvement Location

- Page 2-27 Figure 2-16 has been revised to remove the cross section for Option 1. This figure would replace Figure 2-16 included in the Draft EIR.
- See updated Figure 2-16 on the following page.*
- Page 2-28 Figure 2-17 has been updated to show high visibility crosswalks instead of pedestrian activated flashing beacons and to remove the floating dock. This figure would replace Figure 2-17 included in the Draft EIR.
- See updated Figure 2-17 on page 3-3-16.*
- Page 2-29 The text under Section 2.5.2, *Offsite Improvements*, has been revised as follows:
- Portions of the low concrete wall that surrounds the SLRC would need to be removed to provide pedestrian access points into the site that align with street connections. On the eastern side of the reservoir, openings could be created ~~every 100 feet~~ along a 3,000-foot area located between Armstrong Avenue and Duane Street, to allow more strategic entry points into the park based on the park entry points shown in Figure 2-17 if Option 1 is selected. Wall openings would be approximately 5 feet in length at each location.
- Page 2-29 The text under Section 2.5.4, *Exposed Reservoir Edge Treatment*, has been revised as follows:
- For safety purposes, the reservoir embankments would be improved to remove the steep, slippery surface of the existing reservoir to the maximum extent possible and replace it with a combination of soft vegetation, riprap, and seating terraces to minimize risk of people getting in the water. No public access to water activities would be allowed, ~~except through guided kayak and/or canoe tours conducted by an ecologist for educational purposes~~. Signage would state these public access restrictions, including no swimming. The proposed Project design would maintain a consistent 6- to 12-inch curb around the edge of the reservoir to provide a barrier between the walking path and edge of slope. Consideration in the new reservoir edge treatment would be given for emergency egress elements to provide ways to exit the water. Wherever possible, an approximate 5-foot planted buffer with integrated seating would be maintained between the path and the edge of slope.
- Page 2-31 Figure 2-18 has been modified to remove the floating docks. This figure would replace Figure 2-18 included in the Draft EIR.
- See updated Figure 2-18 on page 3-3-17.*

Existing Conditions – Silver Lake Boulevard



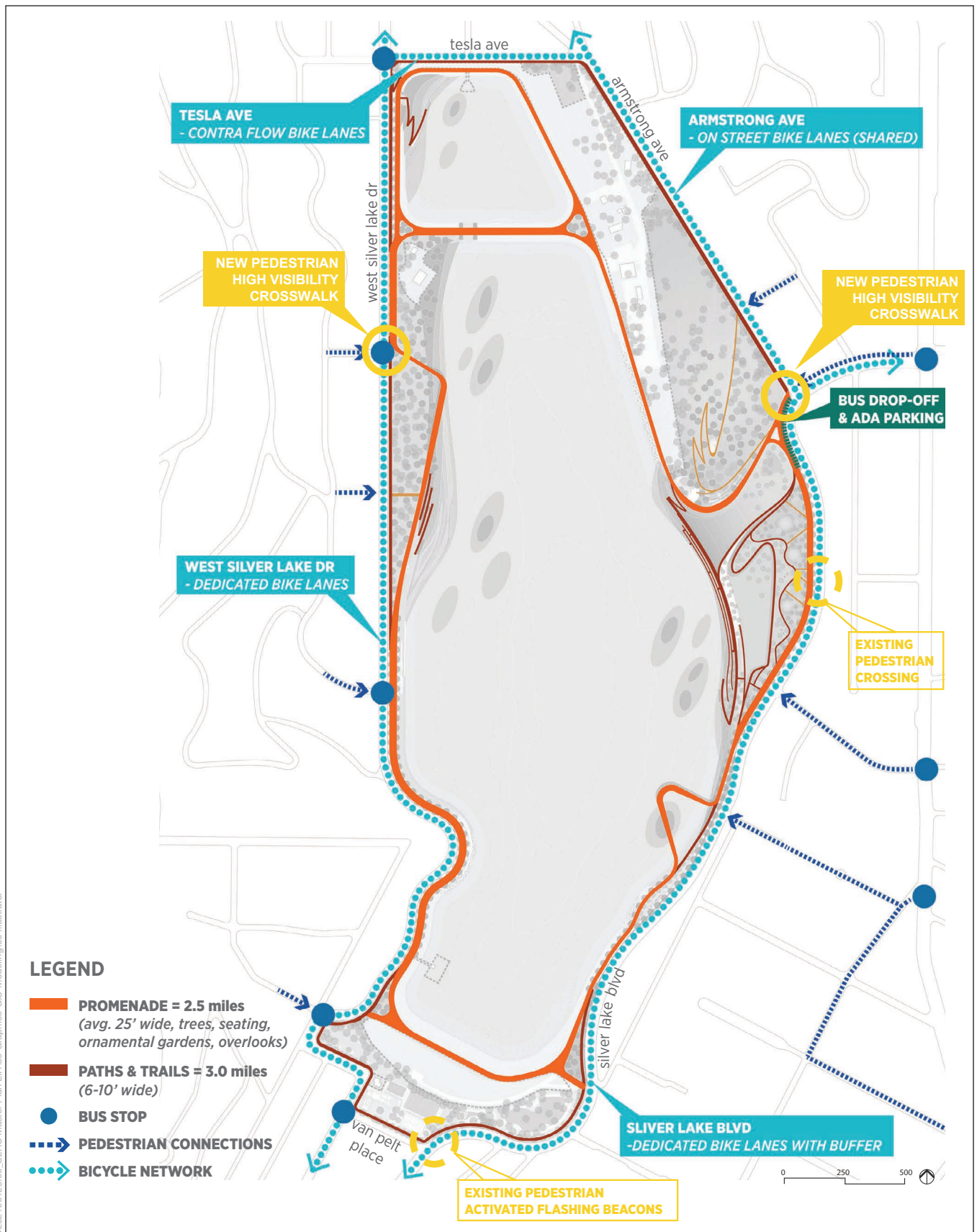
Silver Lake Boulevard Bike Lane



SOURCE: Jano Baghdanian & Associates (JBA), 2022

Silver Lake Reservoir Complex Master Plan Project

Figure 2-16
Potential Configuration for Offsite Improvements



SOURCE: Hargreaves Jones Landscape Architects, 2023

Silver Lake Reservoir Complex Master Plan Project

Figure 2-17
Proposed Circulation Diagram

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SOURCE: Silver Lake Reservoir Complex Master Plan, 2023

Silver Lake Reservoir Complex Master Plan Project

Figure 2-18
Proposed Planting Diagram

Page 2-47 The text under Section 2.6.2, *Construction Activities, Waterside Construction (Piles)*, has been revised as follows:

Various proposed park zones include structures and other facilities to be located within the reservoirs, such as overlooks, and terraces, ~~and a proposed floating dock~~. To support these proposed structures within the water, piling must occur. The primary purpose of pile foundations would be to strengthen the soil layers within the reservoir beds to make them stable enough for the foundation of a structure and to support the weight of pedestrians. Piles would be installed using drilling and/or vibratory pile drivers using construction equipment listed in **Table 2-6** as shown on Section 2.6.4 *Truck and Worker Commute Trips*.

Page 2-47 The text under Section 2.6.2, *Construction Activities, Offsite Improvements*, is revised to state as follows:

The addition of ~~parking and/or~~ bike lanes along Silver Lake Boulevard would require at a minimum restriping along the area between Armstrong Avenue and Duane Street. ~~If the parking option with the sidewalk is chosen (Option1), then additional demolition would be required.~~ Construction would require the following: removal of asphalt along Silver Lake Boulevard, approximately one foot of excavation, placement and compaction of base material, then forming and pouring of concrete. This work would require partial road closures along Silver Lake Boulevard for a total of approximately 2.5 weeks.

Page 2-52 This portion of Table 2-7 has been revised as follows:

TABLE 2-7
ESTIMATED POTENTIAL WEEKEND VEHICLE TRIPS GENERATED BY EACH PARK USE [REVISED]

Park Use	Existing Area/Size	Proposed Area/Size	Increase in Park Attendance	Peak Use Vehicle Trips		
				Arrive	Depart	Total
The Knoll						
Floating Deck	N/A		All internal capture	0	0	0
Overlook Shade Pavilion/Outdoor Classroom	N/A	1,200 sq. ft.	10 People	2	2	4
Education Center*	N/A	3,760 sq. ft.	15 People	0	0	0

Page 2-53 This portion of Table 2-8 has been revised as follows:

TABLE 2-8
ESTIMATED POTENTIAL WEEKDAY VEHICLE TRIPS GENERATED BY EACH PARK USE [REVISED]

Park Use	Existing Area/Size	Proposed Area/Size	Increase in Park Attendance	Peak Use Vehicle Trips		
				Arrive	Depart	Total
The Knoll						
Floating Deck	N/A		All internal capture	0	0	0
Overlook Shade Pavilion/Outdoor Classroom	N/A	1,200 sq. ft.	15 People	2	2	4
Education Center*	N/A	3,760 sq. ft.	85 Students	(4 buses) 12	(4 buses) 12	(8 buses) 24

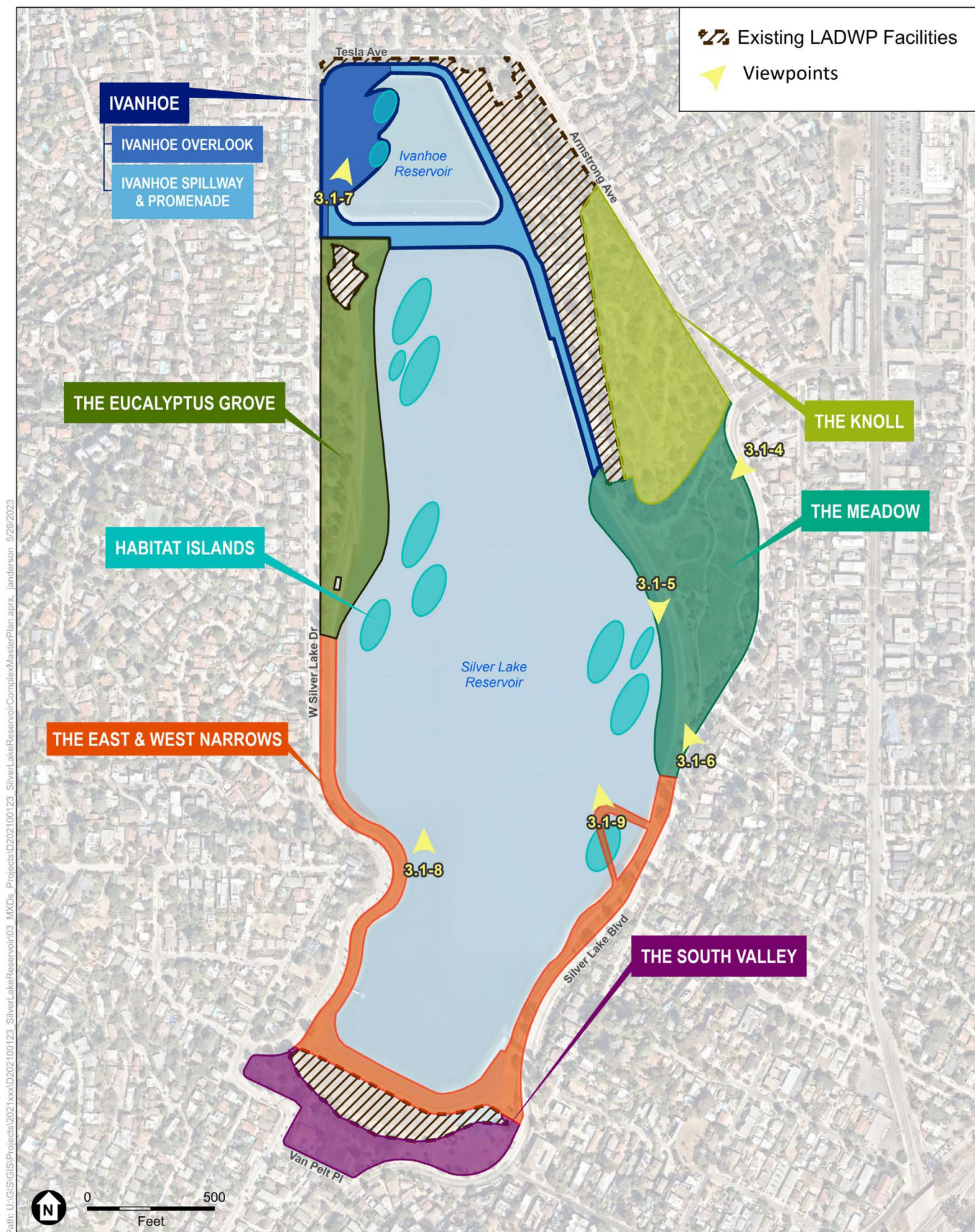
Page 2-54: The text under Section 2.7.2, *Routine Operations and Maintenance*, is revised as follows:

The proposed Project would also allow for large, scheduled public events; ~~including outdoor concerts, movie nights, or luncheons, and requiring amplified sound.~~ The proposed Project would not include the use of amplified speakers for special events. It is anticipated that up to approximately 600 visitors would attend such events, with a mixture of approximately 70 percent of attendees coming from the immediate neighborhood by walking or other non-vehicle means, and 30 percent driving in to attend the event. The proposed Project is anticipated to be a local serving recreational Project. However, the proposed Project could have a regional draw during special events. For purposes of this analysis, a special event would be assumed to occur weekly during the three months of summer vacation (presumably June, July, and August), for a total of 12 events annually. These events would require a permit from the City and would be staffed appropriately. Allowable event hours would be from noon to 10:00 p.m. ~~The L.A. City Municipal Code prohibits the use of amplified sound within 500 feet of any residential zone from 10:00 p.m. to 7:00 a.m. (City of LA 2021b).~~ The estimated increase in attendance and the peak use vehicle trips are shown on Table 2-9.

Draft EIR Section 3.1, Aesthetics

Page 3.1-10 Figure 3.1-3 has been modified to update arrow directions associated with the viewpoints. This figure would replace Figure 3.1-3 included in the Draft EIR.

See updated Figure 3.1-3 on the following page.



SOURCE: Nearmap, 2021; Hargreaves Jones Landscape Architects, 2020; ESA, 2022

Silver Lake Reservoir Complex Master Plan Project

Figure 3.1-3
Viewpoint Key Map

Draft EIR Section 3.4, Biological Resources

The following text has been added to the Final EIR to include bat survey results conducted by the City.

Page 3.4-3 As additional clarification supporting the Draft EIR analysis, ESA biologists conducted a daytime bat habitat assessment, emergence surveys, and nighttime acoustic monitoring bat surveys were completed throughout suitable roosting and foraging habitat within the proposed approximately 116-acre project footprint plus a 100-foot buffer (survey area). The survey area included structures (i.e., buildings and reservoir infrastructure) and any trees and shrubs that may support roosting bats. A description of each survey type's methodology is provided below.

A daytime roost habitat assessment was conducted on May 24, 2022. The survey consisted of a visual inspection of all suitable roost locations within the existing infrastructure, and any vegetation, such as palm trees and snags, that may support roosting bats. Visual inspection included searching for sign of roosting activity such as identification of any bats, guano, and/or staining within buildings that could be used by bats for ingress/egress or roosting. A high-powered spotlight (>300 lumens) and binoculars were used to aid in the visual inspection. All trees or existing infrastructure within the proposed Project area were also inspected for bat roosting during the assessment.

Two emergence surveys were conducted by ESA biologists, one in May 2022 and the other in July 2022. The biologists conducted the surveys on the east side of the Reservoir to the south of the Knoll. This location was chosen to allow for visual coverage of individuals emerging from the Knoll vegetation and two fan palm trees present on the south side of the Knoll. While the emergence surveys were intended to visually capture emergence from potential roost locations, a mobile bat detector (Wildlife Acoustics Echo Meter Touch 2 Pro for IOS® [Echo Meter]) was also used to capture echolocation calls (vocalizations) of bats foraging within the immediate vicinity. The Echo Meter was used during both emergence surveys; however, the Anabat Walkabout Active Detector (Anabat) was used in conjunction with the Echo Meter during the summer emergence survey. A high-powered spotlight (>300 lumens) and binoculars were used to aid in the survey.

The spring and summer nighttime acoustic monitoring was conducted immediately following completion of the visual emergence surveys, and was intended to record bats foraging within and/or traveling through the survey area after dark. The acoustic meter was used at seven locations throughout the survey area which were established based on the results of the habitat assessment, for a total of 10 minutes each. Similar to the emergence survey, the Echo Meter was used during both nights of acoustic monitoring; however, the Anabat was used in conjunction with the Echo Meter during the summer nighttime acoustic

monitoring. The Echo Meter and Anabat automatically processed and identified each pass (defined as a single bat detection) recorded at each point, which was later post-processed to verify/reject any questionable or incomplete data. The number of passes recorded does not represent the number of individual bats, rather, the number of times an individual flew past the acoustic meter.

The recorded bat calls were processed using Sonobat Version 4.4.5, using the region and subregion classifiers for southwest California. Manual vetting of automatically identified calls consisted of manually reviewing subsets of calls for each species, as well as reviewing individual calls and comparing them to a reference library of bat calls. Where initial manual review indicated automated misclassifications of call groups (e.g., groupings by minimum frequency, species, season, or time of night), these groups were manually reviewed and identified to most likely species. Many bat species have overlapping call repertoires; therefore, not all bat calls can be conclusively identified to a species. Identifications for inconclusive calls were deferred to the most likely species based on a combination of automatic species identification, survey-specific trends noted during manual call review, and species expected to occur based on known seasonal and geographic distribution.

Page 3.4-8 Mammal species observed include Mexican free-tailed bat (*Tadarida brasiliensis*), canyon bat (*Parastrellus hesperus*), coyote (*Canis latrans*), and desert cottontail (*Sylvagus audobonii*).

Page 3.4-11 Table 3.4-3 has been revised to add two bat species under the Mammals subheading as follows:

**TABLE 3.4-3
SPECIAL-STATUS WILDLIFE SPECIES [REVISED]**

Common Name Scientific Name	Sensitivity Status	Preferred Habitat/Known Elevational Range	Presence/Potential to Occur within the BSA
Mammals			
Silver-haired bat <i>Lasiorycteris noctivagans</i>	--/--WBWG Medium	Associated with coniferous, mixed coniferous, and deciduous forests, most closely associated with old-growth forests. They form maternity colonies almost exclusively in tree cavities/hollows. They prefer to feed in disturbed areas, often in clearings and waterways.	Present. This species was recorded during the summer acoustic monitoring survey. It is commonly found throughout the arid southwest, in areas that support open water and an abundant prey base (i.e., insects).
Yuma myotis <i>Myotis yumanensis</i>	--/--WBWG Low	Occurs in lower montane coniferous forest, riparian forest, riparian woodland, and upper montane coniferous forest. Roosts in buildings, mines, caves, or crevices, but has also been seen roosting in abandoned swallow nests and under bridges.	Present. This species was recorded during the spring acoustic monitoring survey. It is commonly found throughout the arid southwest, in areas that support open water and an abundant prey base (i.e., insects).

Page 3.4-12 **Silver-haired Bat**

Silver-haired bat is a WBWG species ranked as Medium, which indicates a level of concern that should warrant closer evaluation and research. This species prefers mature-growth woodland with densities of mature and dying trees for roosting, but prefer feeding in disturbed or open areas with clearings and/or water sources. There is a high likelihood this species uses the area for feeding.

Yuma Myotis

Yuma myotis is a WBWG species ranked as Low, which indicates most of the existing data support stable populations of the species, and that the potential for major changes in status in the near future is considered unlikely. This species is adapted to a variety of habitat types, including mature forest and riparian forests, as well as built structures like buildings and bridges. There is a high likelihood this species uses the area for feeding.

Page 3.4-28 **Special-Status Wildlife**

A total of two special-status species are known to occur within the bat survey area, including silver-haired bat and Yuma myotis. A total of five special-status wildlife species, Crotch's bumble bee, monarch butterfly, hoary bat, western mastiff bat, and western yellow bat, were identified as having a low potential to occur within the BSA. Habitat for these species occurs primarily within the semi-natural woodlands located in the Knoll and Meadow areas. No other special-status wildlife species were determined to have a potential to occur within the BSA.

Direct impacts to the ~~five-seven~~ special-status species that are present or may be present may occur from direct mortality (loss of individuals) due to construction activity or the removal of habitat. While the Project site would be located outside of documented overwintering site for monarch butterfly, habitat for the species does occur at the Knoll and Eucalyptus Grove park zones. Therefore, potential impacts to monarch butterfly could result from the removal of large eucalyptus and pine tree species. To minimize impacts to suitable habitat resulting from the removal of trees, the proposed Project would include the preparation of a Tree Succession Plan as outlined in Chapter 2, *Project Description*, to phase the removal of trees in a scheduled manner to allow for new tree and shrub plantings to mature and provide interim habitat value as the new vegetation is planted over time. The Tree Succession Plan would incorporate native plants into the understory thus providing food sources and habitat for native wildlife including native sages (*Salvia* sp.) and milkweeds (*Asclepias* sp.) which are necessary nectar sources for special-status species like Crotch's bumble bee and monarch butterfly respectively. This successional tree removal practice would ensure that nesting and foraging habitat would not be eliminated during implementation of the Tree Succession Plan.

To minimize impacts to biological resources including special-status invertebrates **Mitigation Measure BIO-1** would be implemented to require a preconstruction training for all contractors to note sensitive biological resources on-site. To minimize impacts to special-status invertebrates, **Mitigation Measure BIO-2** would require pre-construction surveys be conducted for Crotch's bumble bee and monarch butterfly. If these species are found on site during the surveys the mitigation measure would also require construction area delineation, construction vehicle speed reductions, and avoidance of host vegetation, to avoid impacts. With implementation of these mitigation measures, impacts to these special-status invertebrates would be reduced to a less than significant level.

Special-status bats that occur within the BSA, including silver-haired bat and Yuma myotis as well as those that have a low potential such as the hoary bat, western mastiff bat, and western yellow bat, may occur within large trees and skirted palm trees within the Project site. Bat colonies utilizing the site are adapted to living in an urbanized setting with the existing lighting on-site, including the adjacent residential areas and traffic along roads. However, removal of large trees or skirted palm trees, if required, may result in direct bat mortality or disturbance of maternity roosts, and would be considered a significant impact. Mature trees would be removed subject to the Tree Succession Plan which would be implemented over a 15-year period, allowing time for new tree plantings to become established. Additionally, trees can be selectively identified for removal thus avoiding trees with active roosts. As the new tree plantings mature new roosting habitat would be established over time.

Page 3.4-30 The text for Impact 3.4-1, *Candidate, Sensitive, or Special Status Species*, is revised to state as follows:

A proposed Education Center would be constructed within the Meadow along the base of the Knoll overlooking the Silver Lake Reservoir. The proposed Education Center would include small indoor and outdoor teaching and assembly spaces, including two interior classrooms. Accent lighting would be added to the proposed Education Center (Figure 2-8). It is expected that the education center would be used during the daytime. The proposed Education Center would be connected directly to the Silver Lake Reservoir via an accessible pathway ~~leading down to a floating dock~~. No public access to water activities would be allowed, ~~except through guided kayak tours conducted by an ecologist for educational purposes~~. The impact of the proposed Education Center would be greatly outweighed by the creation of native upland and wetland habitat and would be considered less than significant. New native habitat would enhance habitat values for numerous wildlife species within the Knoll landscaped areas. ~~Additionally, the kayak tour guided by trained ecologists would be temporary, infrequent and would not result in degraded habitat values and would be considered less than significant.~~

Draft EIR Section 3.9, Hazards and Hazardous Materials

Page 3.9-22 The text for Impact 3.9-5, *Emergency Preparedness*, has been modified to state as follows:

Construction activities would be confined primarily to within the perimeter of the SLRC and would not impact surrounding roadways or restrict access for emergency vehicles. However, during construction of offsite improvements, such as trenching of drainage and underground utilities, and restriping along Silver Lake Boulevard for the addition of ~~parking spaces and/or~~ bike lanes, partial road closures would be required that would temporarily affect emergency response times. These closures would be temporary, lasting approximately 2.5 weeks. The proposed Project would include implementation of PDF-TRA-1 and PDF-TRA-2, requiring the implementation of a traffic management plan and construction staging plan which would include detour routes and BMPs, as well as coordination with and advance notice to local emergency providers. In addition, PDF-TRA-3 would require construction trips to be scheduled during off-peak hours, and PDF-TRA-4 would ensure that temporary access shall be provided to any parcels that may be impacted by construction (Refer to Section 3.16, *Transportation*). Impacts would be considered less than significant.

Draft EIR Section 3.10, Hydrology and Water Quality

Page 3.10-25 The text for Impact 3.10-1, *Water Quality*, is revised to state as follows:

As shown in Table 3.10-3, the proposed Project may change the water function of all or a portion of the SLRC (Refer to Section 3.10.2, *Regulatory Framework, Water Quality Control Plan for the Los Angeles Region*). The proposed Project would construct wetland habitats and may introduce fish species to the reservoirs, and therefore may result eventually to a change in the designated beneficial uses within the Basin Plan as outlined in Table 3.10-3. Public access to the water is not being considered as part of the proposed Project ~~except through guided kayak tours conducted by an ecologist~~. The reservoir would remain in compliance with designated water quality standards if future water quality conditions do not exceed the designated water quality goals established in the Basin Plan, which are listed Table 3.10-2 (Refer to Section 3.10.2, *Regulatory Framework, CWA Section 303: Water Quality Standards and Implementation Plans*).

Page 3.10-29 The Water Quality Report included several modeled scenarios. The proposed Project would require 227 AFY from Pollock Well #3 if a stormwater capture project, as analyzed in the report under one of the modeling conditions, would be implemented. The proposed Project would not include the implementation of a stormwater capture project and therefore would operate similar to existing conditions as modeled in the Water Quality Report. The edits below reflect that change. The text for Impact 3.10-2, *Groundwater Supplies*, is revised to state as follows:

The proposed Project includes a suggested water level elevation range between elevations 445 and 447 feet for optimal wetland habitats growth and sustainability. It is anticipated that continuous flows of Basin 4-12 groundwater would be needed when the reservoir elevation is low, and sporadic pumping of groundwater would be required every three to six hours when reservoir elevations are high. Although it is anticipated that the proposed Project would require more frequent pumping to maintain water levels to sustain the proposed wetland habitats, the results of the Water Quality Report indicate that the proposed Project would maintain the same ~~reduce the~~ average volumes of groundwater required to refill the SLRC each year. The proposed Project would maintain similar pumping requirements ~~require pumping 227 AFY of groundwater from Pollock Well #3, whereas requiring approximately 241 AFY are currently needed~~ to maintain water levels within the reservoirs, similar to ~~under~~ existing operations (CWE 2020).

Page 3.10-32 The text for Impact 3.10-4, *Flood Hazard, Tsunami, or Seiche*, is revised to state as follows:

The proposed Project would construct structures and other facilities within the reservoirs, such as overlooks, and terraces, ~~and a floating dock~~. Pile foundations would be installed in waterside construction areas to strengthen the soil layers within the reservoir bed, which would make them stable enough for the foundation of a structure for supporting the weight of pedestrians. In addition, the proposed Project would construct new walkways or improvements along the dams to allow connection across the reservoirs. As described in Section 3.10.2, *Regulatory Framework, Department of Water Resources Division of Safety of Dams*, SB 92 requires EAPs be updated (at minimum) every 10 years or when there are significant changes at a dam, its critical appurtenant structures, or downstream hazard classification (DSOD 2019). Construction of the Project facilities would not result in changes to the dam or critical appurtenant structures. Therefore, updates to the EAP would not be required.

Draft EIR Section 3.11, Land Use

Page 3.11-14
to 3.11-19 Portions of Table 3.11-1 requiring revisions are included below and have been revised as follows (other portions of the table remain the same):

TABLE 3.11-1
CONSISTENCY WITH APPLICABLE PLANS AND GOALS, OBJECTIVES AND POLICIES [REVISED]

Goal or Objective	Consistency
Mobility Plan 2035	
<p><i>Safety</i></p> <p>Policy 1.1: Roadway User Vulnerability: Design, plan, and operate streets to prioritize safety of the most vulnerable roadway user.</p>	<p>Consistent. Both The proposed off-site improvements options would include the installation of two-way protected bike lanes along the western side of the Silver Lake Boulevard, closest to the SLRC for ease of access to the site. Option 1, which includes additional parking on the western side of Silver Lake Boulevard, would include a new 5-foot sidewalk between the bike lanes and parking, improving bicycle safety on Silver Lake Boulevard.</p>
<p><i>Access</i></p> <p>Policy 3.1: Recognize all mode of travel, including pedestrian, bicycle, transit, and vehicular modes as integral components of the City's transportation system.</p> <p>Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p>Consistent. Connections to the proposed Project area from the surrounding neighborhood were informed by the existing bus stop locations along West Silver Lake Drive and Glendale Boulevard as well as the existing pedestrian pathways in the neighborhood. To allow for public access to park amenities, an accessible vehicle and bus parking area would be located at the corner of Silver Lake Boulevard and Armstrong Avenue. To create safe points of entry into the proposed Project area, new pedestrian-activated flashing beacon high visibility crossings would be added along Silver Lake Boulevard and West Silver Lake Drive. The proposed pathways would be implemented as pedestrian only with bike circulation around the perimeter. Bicycle parking and/or bike-share stations would be located at all key pedestrian connection points. These proposed Project circulation design elements recognize all modes of travel and would aid in the reduction of vehicle trips by providing opportunities for public access of the area via public transportation and walking/biking. The Project also includes the addition of parking along West Silver Lake Drive, and the addition of either Parking with an improved bike lane (Option 1) or an improved bike lane (Option 2) along Silver Lake Boulevard between Armstrong and Van Pelt. Both options would include protected bike lanes. Option 1 would include a sidewalk between the lanes of traffic and a two-way bike lane placed closest to the SLRC for ease of access to the site, improving bicycle circulation on Silver Lake Boulevard. Refer to Section 3.16, Transportation for further discussion on the Project's consistency with the Mobility Plan.</p>
2020-2045 RTP/SCS	
<p>Goal 6: Support healthy and equitable communities</p> <p>Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network</p> <p>Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats</p>	<p>Consistent. SCAG's 2020–2045 RTP/SCS includes Goals 6, 7, and 10 that are applicable to the proposed Project which would avoid or reduce the proposed Project's environmental impacts. The proposed Project would not conflict with applicable strategies of the 2020-2045 RTP/SCS. The goals of the 2020-2045 RTP/SCS are focused on priorities, such as promoting land use and growth patterns that facilitate transit use and active transportation (e.g., bicycling and walking), thus, reducing VMT and increasing energy efficiency. The proposed Project would not conflict with the strategy of the 2020-2045 RTP/SCS to encourage pedestrian and bicycle access through the provision of new recreational opportunities within the proposed Project area that would serve the immediate neighborhood and vicinity. Thus, the proposed Project would not conflict with 2020-2045 RTP/SCS strategies to promote sustainable transportation solutions and support healthy and equitable communities. The proposed Project would</p>

Goal or Objective	Consistency
	<p>implement native groundcover and implement replanting strategies over time to increase species diversity and improve overall habitat value of SLRC areas such as the Knoll and Eucalyptus Grove. The ornamental garden areas would be a combination of native and drought-tolerant species appropriate to the Los Angeles region to provide a plant palette adapted to climate change. Additionally, the proposed Project would add new floating habitat islands to both the Ivanhoe and Silver Lake Reservoir, and wetland habitat along the perimeter of the reservoirs which would create new habitat and <u>potentially</u> increase species diversity within the proposed Project area, and aid in the overall health/water quality of the reservoirs. Therefore, the proposed Project would protect and restore habitat, consistent with the 2020-2045 RTP/SCS.</p>
Complete Streets	
<p>Goal: The Complete Streets Design Guide provides a compilation of design concepts and best practices that promote safety, accessibility and convenience for all transportation users as described in California's Complete Streets Act of 2008 (AB 1358); including pedestrians, bicyclists, transit riders, and motorists. By prioritizing people over cars, the streets of Los Angeles can provide lively gathering places that foster community building and neighborhood identity, encourage healthy recreational activities such as walking, running, and bicycling.</p>	<p>Consistent. As described in Section 2.0, <i>Project Description</i>, the proposed Project includes two Options associated with parking and/or bike improvements surrounding the SLRC. Option 1 would include a two-way improved bike lane on the west side of the road, closest to the SLRC, buffered by a 2-foot sidewalk running the length of this segment, followed by the addition of parallel parking on the west side of the road. <u>Option 2</u> The proposed Project would include restriping along Silver Lake Boulevard with improvements to the bike lane only and no addition of parking. Under Option 2 the two-way improved bike lane would be on the west side of the road, followed by a marked buffer, and then traffic lanes in both directions. Figure 2-16 shows a cross section of both options the potential bike lane improvements. Both options would include protected bike lanes on the side closest to the SLRC allowing for easier access to the proposed Project site. <u>Final bike lane design would be determined by a final design committee composed of City agencies.</u> The proposed Project would promote safety, accessibility, and convenience for all visitors, and encourage physical activities with the inclusion of various recreational amenities.</p>
L.A's Green New Deal	
<p>Protect and restore sensitive habitats.</p>	<p>Consistent. The proposed Project would plant native groundcover and implement replanting strategies over time to increase species diversity and improve overall habitat value of SLRC areas such as the Knoll and Eucalyptus Grove. Additionally, the proposed Project would add new floating habitat islands to both the Ivanhoe and Silver Lake Reservoir, and wetland habitat along the perimeter of the reservoirs which would create new habitat and <u>potentially</u> increase species diversity within the proposed Project area, and aid in the overall health/water quality of the reservoirs. All biologically sensitive areas would contain wildlife fencing. Therefore, the proposed Project would protect and restore habitat.</p>

Draft EIR Section 3.12, Noise and Vibration

Page 3.12-1 The text in Section 3.12, *Noise and Vibration*, is revised to state as follows:

Impacts to noise are significant and unavoidable, even with standard regulatory requirements and the implementation of Project Design Features (PDFs) **PDF-NOISE-1: Haul Route** and **PDF-NOISE-2: Construction Noticing and Community Liaison** and mitigation measures **NOISE-1: Equipment Controls**, **NOISE-2: Mobile Noise Barriers**, **NOISE-3: Construction Equipment Noise Shielding and Muffling Devices**, ~~**Noise-4: Special Event Permit—Amplified Speaker System**~~, and **NOISE-54: Equipment Setbacks**. Project vibration impacts from construction activities with respect to human annoyance would also be significant and unavoidable. No feasible mitigation is available. Vibration impacts associated with structural damage from on-site construction activities would be less than significant. Finally, cumulative noise impacts related to construction ~~and operations~~ would be significant and unavoidable.

Page 3.12-26

to 3.12-27

The text in Section 3.12.3, *Significance Thresholds and Criteria*, Subsection, *Methodology – On-Site Stationary Point-Source Noise (Operation)*, is revised to state as follows:

Operational noise sources for the proposed Project include active and passive recreational activities and informal gatherings, outdoor education classroom activities, ~~special events with amplified sound~~, fixed mechanical equipment, refuse collection and grounds/landscaping maintenance activities, and on-site parking. Stationary noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as open spaces, outdoor activities, rooftop mechanical equipment, and loading area activity, calculating the hourly L_{eq} noise level from each noise source at sensitive receptor property lines, and comparing such noise levels to existing ambient noise levels.

On-site operational noise was modeled using CadnaA noise propagation Project. CadnaA is a Windows-based software Project that predicts and assesses noise levels in the vicinity of noise sources based on International Organization for Standardization 9613-2 algorithms for noise propagation calculations. CadnaA considers environmental factors, such as topography, intervening structures, and distance (both horizontally and vertically) from a noise source. This is particularly relevant for projects containing outdoor meeting, performance, and gathering areas at varying elevations that ~~would have amplified sound and~~ could potentially affect surrounding land uses and receptors. Since the Project has various open-air areas that create a relatively complex soundscape, the CadnaA model was used to estimate the various noise sources and their effects on the ambient noise environment. The CadnaA modeling accounted for 14 receptor points surrounding the Project site and are labeled modeling points A through N

in the analysis below. Operational noise from the Project was evaluated at each modeling point and compared to the closest ambient noise levels measured at R1 through R8 for each respective modeling point.

Stationary noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as open spaces, outdoor activities, rooftop mechanical equipment, parking facilities, and loading area activity, calculating the hourly L_{eq} noise level from each noise source at sensitive receptor property lines, and comparing such noise levels to existing ambient noise levels. Open spaces and outdoor activities may generate noise from people conversing/talking while engaging in activities such as picnicking, exercising, recreational sports (e.g., catch, frisbee, etc.) or other similar recreational activities. ~~In addition, within the Meadow park zone, park users may apply for special events permits, such as for outdoor concerts, movie nights, or luncheons, that could potentially be held within the Meadow outdoor open spaces and could utilize amplified speakers.~~ The combined noise levels from each operational noise source were estimated to evaluate composite noise level impacts at the nearest sensitive receptor.

Page 3.12-28 The text in Section 3.12.3, *Significance Thresholds and Criteria*, Subsection, *Methodology – On-Site Stationary Point-Source Noise (Operation)*, is revised to state as follows:

~~The Meadow, once completed, would feature two lawn areas that could host local events such as concerts and outdoor movie screenings; ornamental gardens; a picnic grove; wetland habitat terraces with walkways; floating wetland islands; and an observational platform. As such, The Meadow may include the use of an amplified sound system for purposes of this noise assessment, an amplified sound system is included as a noise source in The Meadow generating a sound level of up to 91 dBA L_{eq} at 25 feet from the sound system (University of Michigan Department of Environmental Health Science 2016).~~

Page 3.12-38 Text was added in Section 3.12.5, *Impacts and Mitigation Measures*, Subsection, *Construction – Significance Determination*, after the final paragraph before Table 3.12-14 as follows:

Short-term noise levels constituting the thresholds of pain and hearing damage are 120 dB and 140 dB, respectively (Kinsler, 1982).¹ Table 3.12-14 and Table 3.12-15 show average daytime mitigated construction noise levels at each of the studied receptors; the predicted levels are substantially below the thresholds of pain and hearing damage. The Occupational Safety and Health Administration require hearing conservation plans when noise levels continuously exceed 85

¹ Kinsler et al. *Fundamentals of Acoustics*, 1982.

dba over an 8-hour period.² The predicted noise levels at the nearest receptors would not exceed 85 dBA, with the exception of occasional use of concrete saws and operation of individual pieces of construction equipment. Consequently, the significant and unavoidable noise impact is not generated by virtue of noise levels that would be considered harmful but, rather, as a result of the magnitude of the increase over existing ambient noise levels without construction at certain receptor locations. Therefore, Project construction noise would not result in adverse health effects related to pain, the onset of hearing loss, or other significant health effects.

Page 3.12-43 The text in Section 3.12.5, *Impacts and Mitigation Measures*, Subsection, *Increased Occupancy in Outdoor Spaces*, is revised to state as follows:

As discussed in Chapter II, *Project Description*, of the Draft EIR, the Project would incorporate publicly accessible open space and amenities, available to the general public. ~~Special events, including outdoor concerts, movie nights, or luncheons could potentially be held at the outdoor open spaces and could require amplified sound.~~³

The Meadow, which is a publicly accessible open space with lawn and shade trees. It is anticipated that most use of this area will be during the hours of 5:00 A.M. to 10:00 P.M. It is not anticipated that any people would congregate in the area during nighttime hours. The Meadow would be closest to sensitive receptor location R3. The area is approximately 7.5 acres, and completion of the Project would accommodate an increase of an estimated 130 people. ~~Amplified noise would be permitted only during special events and is discussed in further detail below. No amplified noise would be permitted in this area.~~

Page 3.12-46 The text in Section 3.12.5, *Impacts and Mitigation Measures*, Subsection, *Special Events*, is revised to remove the following text:

Special Events

~~Special events such as outdoor concerts, movie nights, or luncheons could potentially be held at the outdoor open spaces and could require amplified sound. Under the proposed Project, special events would occur within The Meadow analyzed above based on provided maximum occupancy levels of 600 people. Noise levels from special events under the proposed Project have been encompassed in the analyses of the individual open space areas and are shown in Table 3.12-20. Figure 3.12-6 shows the modeled speaker locations.~~

² OSHA, Occupational Safety and Health Standards Part 1910.95, Occupational Noise Exposure. Available at: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.95>

³ ~~Under the Project, special events would occur within the outdoor spaces analyzed based on occupancy herein. Therefore, noise levels from special events under the Project have been encompassed in the analysis of individual open space areas.~~

Page 3.12-46 The text in Section 3.12.5, *Impacts and Mitigation Measures*, Subsection, *Composite Noise Levels from Project Operations*, is revised to state:

As shown in **Table 3.12-21**~~20~~, the combined noise levels from mechanical equipment, loading activities and refuse, and open spaces ~~without amplified music~~ would not exceed the significance threshold of 5 dBA over ambient noise levels at any of the receptor locations. ~~As shown in Table 3.12-22, the combined noise levels from mechanical equipment, loading activities and refuse, and open spaces with amplified music from special events would exceed the significance threshold of 5 dBA over ambient noise levels at receptor locations R3 and R4. Therefore, impacts from on-site operational noise would be less than significant without amplified music and would be potentially significant with amplified music from special events.~~

Page 3.12-47 Table 3.12-20, *Special Event Noise Levels*, is removed from the Draft EIR:

TABLE 3.12-20
-SPECIAL EVENT NOISE LEVELS [DELETED]

Modeled Receptor	Corresponding Sensitive Receptor	Ambient Noise Level (dBA L _{eq})	Combined Noise Level (dBA L _{eq})							
			Amplified Speaker, on bluff facing east	Amplified Speaker, on bluff facing west	Amplified Speaker, on bluff facing south	Amplified Speaker, on bluff facing north	Amplified Speaker in east Meadows facing west	Amplified Speaker in west Meadows facing east	Amplified Speaker in south Meadows facing north	Amplified Speaker in north Meadows facing south
A	R1	55.9	56.4	57.0	56.0	58.9	56.4	55.9	56.3	55.9
B	R2	59.3	59.3	59.3	59.3	59.8	59.3	59.3	59.6	59.3
C	R3	56.2	58.0	56.9	57.4	65.6	58.4	56.3	63.4	58.3
D	R3	56.2	59.5	57.2	57.7	66.6	58.2	57.3	59.5	64.2
E	R3	56.2	58.8	56.9	56.6	63.4	58.5	60.8	60.3	67.4
F	R3	56.2	72.5	60.4	62.8	59.2	64.8	63.0	64.4	68.7
G	R4	65.4	66.6	65.4	70.6	65.4	65.6	65.3	68.9	68.3
H	R4	65.4	65.2	65.3	67.6	65.2	65.3	65.2	65.4	66.3
I	R5	54.3	54.3	54.3	52.4	54.3	54.4	54.4	54.3	52.2
J	R6	61.0	61.0	61.0	61.4	61.0	61.0	61.0	61.0	61.1
K	R8	61.4	61.6	63.0	62.8	61.5	62.7	61.6	61.6	62.4
L	R8	61.4	61.6	64.8	61.9	61.7	63.7	61.6	61.6	61.5
M	R7	56.5	56.7	60.0	56.9	56.8	59.1	56.7	56.7	56.6
N	R8	61.4	61.5	65.3	61.6	61.9	64.1	61.6	61.7	61.4

NOTE: **Bold** values and shaded cells indicate an increase of 5 dBA or greater over ambient noise levels.

SOURCE: ESA, 2022.

Page 3.12-48 Figure 3.12-6, *Special Event Speaker Locations*, is removed.

Page 3.12-49 Table 3.12-21 title is revised as follows:

TABLE 3.12-~~21~~20
OPERATIONAL ON-SITE NOISE LEVELS ~~WITHOUT AMPLIFIED SPEAKERS~~

Page 3.12-50 Table 3.12-22, *Operational On-Site Noise Levels with Amplified Speakers*, is removed from the Draft EIR:

TABLE 3.12-22
OPERATIONAL ON-SITE NOISE LEVELS WITH AMPLIFIED SPEAKERS [DELETED]

Modeled Receptor	Corresponding Sensitive Receptor	Daytime Ambient Noise Levels (dBA Leq)	Noise Source (dBA Leq)									Total Composite Noise (dBA Leq)	Total Sound Level Increase (Composite + Ambient - Ambient)	Significant Impact?
			Park Zone Occupancy Increase											
			HVAC	Amplified Speakers ^a	The Knoll	The Meadow	East Narrows	West Narrows	The South Valley	The Eucalyptus Grove	Silver Lake Perimeter			
A	R1	55.9	3.2	55.9	11.8	14	9.6	12.5	1.9	18.6	21.5	58.9	3.0	No
B	R2	59.3	3.4	49.8	11.4	12.4	6.2	17.1	3.3	20	22.4	59.8	0.5	No
C	R3	56.2	0.8	65.1	29	30.6	15.2	12.2	3	-0.8	16.4	65.6	9.4	Yes
D	R3	56.2	6.2	66.2	29.7	31.4	15.5	13.3	5.8	-0.8	17.1	66.6	10.4	Yes
E	R3	56.2	7.3	67.1	25.9	36.6	12.9	15.7	7.3	1.2	17.6	67.4	11.2	Yes
F	R3	56.2	9.0	72.4	12.9	39.9	18.8	20.8	9.2	14.6	22.4	72.5	16.3	Yes
G	R4	65.1	10.8	69.2	10.6	39	29.9	24.7	11.1	16.9	28	70.6	5.5	Yes
H	R4	65.1	15.4	63.9	7.4	27.2	39.9	28.9	14.8	16.1	37.7	67.6	2.5	No
I	R5	51.3	21.5	45.9	-2.9	10.7	19.6	24	25.8	9.6	20.5	52.4	1.1	No
J	R6	61.0	33.0	44.5	-3.2	6.6	18	19.5	40.2	0.5	16.8	61.1	0.1	No
K	R8	61.4	18.9	58	7.1	26.5	24.1	43.1	16	15	34.9	63.1	1.7	No
L	R8	61.4	-0.3	62.1	10	25.9	19.8	40.8	6.1	20	34.4	64.8	3.4	No
M	R7	56.5	-0.5	57.4	6.7	21.3	14.7	26.8	1	15	23.2	60.0	3.5	No
N	R8	61.4	2.8	63.1	11	26.2	18.5	38.9	7.7	30.3	34	65.4	4.0	No

NOTE: Bold values and shaded cells indicate an increase of 5 dBA or greater over ambient noise levels. On-site operational noise modeling worksheets are provided in Appendix J.

^a—Amplified speaker noise levels presented are the maximum noise level from each scenario at each receptor location

SOURCE: ESA, 2022.

Page 3.12-51 Text is revised for Section 3.12.5, *Impacts and Mitigation Measures*, Subsections, *Mitigation Measures* and *Significance Determination*, as follows:

Mitigation Measures:

~~**NOISE 4: Special Event Permit—Amplified Speaker System.** The use of an amplified speaker system in the Meadow shall avoid facing north or south to limit noise impacts at the nearby sensitive receptors, as feasible. Special event permits shall be issued prior to any special event with provisions related to speaker directionality, hours of operations, and noise level restrictions. Further, temporary noise barriers, blankets, or baffles may be required on either side of and behind speakers to limit the amount of excess noise reaching nearby sensitive receptors. None required.~~

Significance Determination:

~~Significant and Unavoidable~~ Less than significant.

~~While Mitigation Measure NOISE 4, Special Event Permit—Amplified Sound would require a special event permit and establish guidelines for speaker placement and directionality, operating hours, and the use of temporary noise barriers, blankets, or baffles may be required on either side of and behind speakers to limit the amount of excess noise reaching nearby sensitive receptors, noise from the amplified speaker system for special events may still temporarily exceed the significance threshold at sensitive receptors near to the amplified speaker system at location R3. Because special events may include outdoor concerts, movie nights, luncheons, or other similar types of events that draw members of the community, it may not be feasible to reduce the volume of the amplified speaker system to a level below the significance threshold while still retaining a sufficient volume level for people in the Meadow park zone to adequately hear and enjoy the special event. Therefore, while Mitigation Measure NOISE 4 would minimize sound from the amplified speaker systems for special events to the extent feasible, noise impacts would be significant and unavoidable even after mitigation is applied.~~

Page 3.12-51

to 3.12-52 Text and Table 3.12-23 heading in Section 3.12.5, *Impacts and Mitigation Measures*, Subsection, *Structural Damage – On-Site Equipment*, are revised as follows:

Project construction would generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The PPV vibration velocities for several types of construction equipment measured at increasing distances are identified in **Table 3.12-~~21~~23**. Table 3.12-~~21~~23 provides the estimated vibration velocity levels at the nearest off-site structures to the Project site, which include V1 (Single-family residential uses to the north, west, and northwest of the Project site near the corner of West Silver Lake Drive and Tesla Avenue), V2 (Single-family residential uses to the north, east, and northeast of the Project site at the corner of Armstrong Avenue and

Tesla Avenue), V3 (Neighborhood Nursery School at the corner of Armstrong Avenue and Tesla Avenue), V4 (Single-family residential uses to the east of the Project site along Silver Lake Boulevard, including the Neutra House), V5 (Single-family residential uses to the southeast of the Project site along Silver Lake Boulevard), V6 (Single-family residential uses to the south of the Project site along Silver Lake Boulevard), V7 (Single-family residential uses to the west of the Project site along West Silver Lake Drive), and V8 (South Outlet Chlorination Station and Meter House north of the existing Recreation Center). Note that receptors V1, V2, V5, V7, and V8 are conservatively assumed to be historic resources and use a significance threshold of 0.12 in/sec PPV. These receptors are assumed to be located within the Neutra Residential Historic District (V5), the Silver Lake Residential Historic District (V1, V2, and V7), or are historic resources located within the Project site's South Valley (V8) (FTA 2018). All other buildings in the area would be located at greater distances to the Project site and would experience lower vibration velocities from on-site construction activity.

TABLE 3.12-21~~23~~
CONSTRUCTION VIBRATION IMPACTS – BUILDING DAMAGE

As indicated in Table 3.12-~~2123~~, the estimated vibration velocity levels from construction equipment would not exceed the significance thresholds of 0.12 in/sec PPV and 0.2 in/sec PPV at any of the sensitive receptors.

Page 3.12-53
 to 3.12-54

Revise text and Table 3.12-24 heading in Section 3.12.5, *Impacts and Mitigation Measures*, Subsection, *Human Annoyance – On-Site Equipment*, as follows:

With respect to human annoyance, the FTA's *Transit Noise and Vibration Impact Assessment* identifies residential buildings as sensitive receptors. As discussed above, per FTA guidance, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential uses, assuming a minimum of 70 vibration events occurring during a typical construction day. **Table 3.12-~~2224~~** provides the estimated vibration levels at the off-site sensitive uses due to construction equipment operation and compares the estimated vibration levels to the specified significance criteria for human annoyance. As indicated in Table 3.12-~~2224~~, the estimated groundborne vibration levels from off-road construction equipment would exceed the significance criteria for human annoyance at the adjacent sensitive receptor locations V1, V2, and V4 through V7. **Therefore, potential vibration impacts with respect to human annoyance that would result from temporary vibration from off-road construction equipment would be significant prior to the implementation of mitigation measures at sensitive receptor location V1, V2, and V4 through V7.**

TABLE 3.12-~~2224~~
CONSTRUCTION VIBRATION IMPACTS – HUMAN ANNOYANCE

Page 3.12-54 Mitigation Measure NOISE-5 been renumbered as follows:

NOISE-45: Equipment Setbacks. The operation of construction equipment that generates high levels of vibration during any phase of construction occurring in the South Valley will be limited to setback distances from receptor V8. Receptor V8 includes the South Outlet Chlorination Station and Meter House. Setback distances apply in all directions surrounding the two buildings identified as V8. The following equipment shall be prohibited from operating within their respective setback distances:

- Large bulldozers shall be prohibited within 21 feet of receptor V8
- Loaded Trucks shall be prohibited within 19 feet of receptor V8
- Jackhammers shall be prohibited within 12 feet of receptor V8
- Small bulldozer shall be prohibited within 3 feet of receptor V8

The contractor(s) shall require and document compliance with the minimum allowable setbacks in a construction vibration management plan, which shall be provided to the City prior to issuance of a demolition permit. The construction vibration management plan shall detail the types of equipment to be used during demolition, grading, and building construction, estimated vibration velocities, and distance to vibration receptor V8. Equipment and or alternative construction techniques to be used within the required setbacks for large bulldozers, loaded trucks, jackhammers, and small bulldozers shall be identified to ensure that vibration velocities will not exceed thresholds for potential structural damage.

Page 3.12-55 Text and Table 3.12-25 heading in Section 3.12.5, *Impacts and Mitigation Measures*, Subsection, *Significance Determination (groundborne vibration-structural damage)*, are revised as follows:

With implementation of Mitigation Measure NOISE-45, potential structural vibration impacts on receptor V8 would be mitigated to less than significant.

Table 3.12-~~2325~~ shows the estimated vibration levels at V8 with implementation of NOISE-45.

TABLE 3.12-~~2325~~
MITIGATED CONSTRUCTION VIBRATION IMPACTS – STRUCTURAL DAMAGE

Page 3.12-59 Text in Section 3.12.5, *Impacts and Mitigation Measures*, Subsection, *Cumulative Impact*, is revised as follows:

Due to provisions set forth in the LAMC that limit stationary source noise from items, such as rooftop mechanical equipment ~~and amplified sound~~, noise levels would be less than significant at the property line for each related project. As analyzed above, noise impacts associated with the Project on-site operations

would be less than significant, ~~with the exception of amplified speaker systems during special events, which would be significant and unavoidable~~ for the Project. The nearest related project with an operational component⁴ is Related Project No. 4, which would consist of 6 condominium units across 3 lots and is located approximately 800 feet to the east of the Project site. Noise from the Related Project's on-site sources would be limited to areas in the immediate vicinity of each related project. Although each related project could potentially impact an adjacent sensitive use, that potential impact would be localized to that specific area and would not contribute to cumulative noise conditions at or adjacent to the Project site. ~~Nonetheless, because the Project would have a significant and unavoidable impact from the use of amplified speaker systems during special events, operational on-site noise from the Related Project could combine with the operational on-site noise from the Project (i.e., amplified speaker systems during special events).~~ Therefore, the Project's contribution to operational noise would not be cumulatively considerable, and cumulative impacts from on-site noise associated with operation of the Project and related projects would be ~~significant and unavoidable~~ less than significant.

Page 3.12-60 Text in Section 3.12.5, *Impacts and Mitigation Measures*, Subsections, *Cumulative Impact- Construction/Operation Noise* and *Cumulative Impact – Construction/Operation – Groundborne Vibration*, and Section 3.12.6, *Summary of Impacts*, is revised as follows:

Mitigation Measures:

Implementation of **Mitigation Measure NOISE-1** through **NOISE-34** would reduce temporary on-site construction noise ~~and operational noise~~ at the Project site. However, the noise levels would remain significant and unavoidable and, therefore, could contribute to a significant cumulative construction ~~and operational (amplified speaker systems during special events)~~ noise impact.

Significance Determination:

Significant and Unavoidable Impact during construction ~~and operations (amplified speaker systems during special events)~~

Construction/Operation - Groundborne Vibration

Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. However, there are no structures adjacent to both the Project and any related project that could be impacted by potential cumulative vibration from overlapping construction. Vibration attenuates at high rates with distance. Therefore, construction vibration would only affect sensitive uses located directly adjacent to the Proposed Project and another related project. **Therefore, due to the rapid attenuation of vibration, should construction of a related project overlap with Project construction, it**

⁴ Related Projects No. 12 and No. 13 are also within 1,000 feet of the Project site; however, these related projects are City infrastructure projects that upon completion would not generate any operational noise or vibration.

would not contribute to the Project's construction vibration impacts and no cumulative impacts associated with related projects would occur.

Due to the rapid attenuation characteristics of groundborne vibration and distance from each of the related projects to the Project site, there is no potential for cumulative operational impacts with respect to groundborne vibration.

Therefore, operation of the Project, considered together with related projects, would not result in a significant cumulative impact.

Mitigation Measures:

Implementation of **Mitigation Measure NOISE-45**.

3.12.6 Summary of Impacts

Table 3.12-2426 summarizes the impact significance determinations and lists mitigation measures related to noise.

Page 3.12-61 Table 3.12-26 has been revised as follows:

TABLE 3.12-2426
SUMMARY OF PROPOSED PROJECT IMPACTS TO NOISE [REVISED]

Impact	Mitigation Measure	Significance
3.12-1: Noise Standards		
Construction	Mitigation Measures NOISE-1 through NOISE-3	SU
Operations	Mitigation Measure NOISE-4 <u>None Required</u>	SU <u>LTS</u>
3.12-2: Groundborne Vibration		
Construction Structural Damage	Mitigation Measure NOISE-45	LTSM
Construction Human Annoyance	None Feasible	SU
Operations	None Required	LTS
3.12-3: Airport Noise	None Required	NI
3.12-4: Cumulative	Mitigation Measures NOISE-1 through NOISE-5	SU
<u>Construction Noise</u>	<u>Mitigation Measures NOISE-1 through NOISE-35</u>	<u>SU</u>
<u>Construction Vibration</u>	<u>Mitigation Measure NOISE-4</u>	<u>LTSM</u>
<u>Operational Noise</u>	<u>None Required</u>	<u>LTS</u>
<u>Operational Vibration</u>	<u>None Required</u>	<u>NI</u>

NOTES:

NI = No Impact, no mitigation proposed

LTS = Less than Significant, no mitigation proposed

LTSM = Less than Significant Impact with Mitigation Incorporated

SU = Significant and Unavoidable

Draft EIR Section 3.15, Recreation and Parks

Page 3.15-13 The text for Impact 3.15-1, *New Park Facility*, is revised as follows:

The proposed Project would also allow for large, scheduled public events; ~~including outdoor concerts, movie nights, or luncheons, and requiring amplified sound.~~ It is anticipated that up to approximately 600 visitors would attend such events, with a mixture of approximately 70 percent of attendees coming from the immediate neighborhood by walking or other non-vehicle means, and 30 percent driving in to attend the event.

Page 3.15-16 The text for Impact 3.15-3, *Recreational Facilities*, is revised as follows:

The proposed Project would redesign the SLRC into proposed park zones for recreational use; thereby increasing the quantity and quality of recreational facilities within the community. The proposed Project's physical impacts on the environment associated with operations are analyzed within Chapter 3, *Environmental Setting, Impact Analysis, and Mitigation Measures* of this Draft EIR. The proposed Project would result in impacts related to air quality, biological resources, and transportation. ~~With the implementation of mitigation measures, operational impacts would be less than significant with the exception of noise impacts associated with public events. As discussed in Section 3.12, Noise, operational noise would result in a significant and unavoidable impact even after mitigation. Impacts to noise during public events would remain significant and unavoidable.~~

Page 3.15-16 The text for Impact 3.15-3, *Recreational Facilities*, is revised as follows:

Less than Significant Impact. ~~Significant and Unavoidable related to Operational Noise during special events. While Mitigation Measure NOISE 4, Special Event Permit—Amplified Sound would require a special event permit and establish guidelines for speaker placement and directionality, operating hours, and the use of temporary noise barriers, blankets, or baffles may be required on either side of and behind speakers to limit the amount of excess noise reaching nearby sensitive receptors, noise from the amplified speaker system for special events may still temporarily exceed the significance threshold at sensitive receptors near to the amplified speaker system. Because special events may include outdoor concerts, movie nights, luncheons, or other similar types of events that draw members of the community, it may not be feasible to reduce the volume of the amplified speaker system to a level below the significance threshold while still retaining a sufficient volume level for people in the Meadow park zone to adequately hear and enjoy the special event. Therefore, while Mitigation Measure NOISE 4 would minimize sound from the amplified speaker systems for special events to the extent feasible, noise impacts would be significant and unavoidable even after mitigation is applied.~~

Page 3.15-17 Table 3.15-1 is revised as follows:

TABLE 3.15-1
SUMMARY OF PROPOSED PROJECT IMPACTS TO RECREATIONAL FACILITIES [REVISED]

Impact	Mitigation Measure	Significance
3.15-1: New Park Facility	None Required	LTS
3.15-2: Neighborhood and Regional Parks	None Required	LTS
3.15-3: Recreational Facilities	All mitigation measures listed in the Executive Summary Table ES-4 related to construction and operations	SU during construction (due to construction Noise and groundborne vibration-human annoyance) and during operation (due to Special Events Noise)
3.15-3: Cumulative	None Required	LTS

NOTES:

NI = No Impact, no mitigation proposed

LTS = Less than Significant, no mitigation proposed

LTSM = Less than Significant Impact with Mitigation Incorporated

SU = Significant and Unavoidable

Draft EIR Section 3.16, Transportation

Page 3.16-14 The text for Impact 3.16-1, *Program, Plan, Ordinance, or Policy*, is revised as follows:

To minimize conflict points and address this potential incompatibility, the proposed Project would improve the bike lanes within Silver Lake Boulevard, including the use of lane buffers to create protected bike lanes consistent with LADOT design recommendations. Offsite improvements would occur along Silver Lake Boulevard, between Armstrong Avenue and Duane Street for a length of approximately 3,000 feet. As described in Chapter 2, Project Description, ~~two design options for improvement are proposed along this portion of the proposed Project (see Figure 2-16). Option 1 would include an improved bike lane on the west side of the road, closest to the SLRC, buffered by a 2-foot sidewalk running the length of this segment, followed by the addition of parallel parking on the west side of the road. Option 2~~ the proposed Project would include restriping along Silver Lake Boulevard ~~to~~ with improvements to the bike lane only and no addition of parking. ~~Both options~~ The proposed improvements would result in protected bike lanes which would protect cyclists from conflict points. ~~In addition, Option 1 would increase pedestrian safety by providing parking opportunities adjacent to the site, avoiding the need to cross Silver Lake Boulevard.~~ With these project improvements, the Project would not conflict with a program, plan, (including the Mobility Plan 2035), ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be less than significant.

Page 3.16-15 The text for Impact 3.16-2, *Conflict with CEQA Guidelines section 15064.3, subdivision (b)*, is revised to state as follows:

The Project is considered to be primarily a locally-serving use since it is located in a densely populated residential and commercial area. There are no major regional serving amenities planned such as golf courses, athletic fields complexes (multiple soccer fields and baseball diamonds), boating and fishing. Although the Project would support periodic special events within the SLRC-such as concerts or movie nights (~~without the use of amplified speakers~~) that would have a larger draw, these events would be subject to PDF-TRA-5: Site-Specific Traffic Control and Transit Plan for Large Events. As a result, the proposed Project would not result in a significant impact regarding VMT and no mitigation measures are required.

Page 3.16-17 The text for Impact 3.16-3, *Geometric Design Features*, is revised to state as follows:

To enhance safety in the area, the proposed Project would include improvements to two local intersections-to enhance safety for pedestrians and vehicles. These enhancements would include installing high visibility crosswalks subject to final approval by LADOT ~~flashing beacons at the Silver Lake Boulevard and Armstrong Avenue intersection (JBA, 2022; Section 3.6.3.1) and at the West Silver Lake Drive and Hawick Street intersection (JBA, 2022; Section 3.6.3.2).~~ These improvements are included in the Project description and are described in Appendix K.

Draft EIR Section 3.18, Utilities and Service Systems

Page 3.18-23 The text for Impact 3.18-2, *Water Supplies*, is revised to state as follows:

The Water Quality Model (CWE 202) for the proposed Project estimates that the annual average volume of Basin 4-12 groundwater which is currently pumped into the SLRC is 241 AFY, and would not be changed ~~be reduced to approximately 227 AFY~~ following implementation of the proposed Project. (CWE 2020). Relative to existing Basin 4-12 capacities, the proposed Project would contribute to a beneficial impact on groundwater supplies. Further, over the course of the entire 20-year modeled period from 1999 to 2019, the Water Quality Model found that the maximum groundwater required by the proposed Project would be 338 AFY. If this volume were to be pumped during the operational life of the Proposed project, increased pumping from Pollock Well #3 would be negligible relative to volumes currently pumped from the Pollock Wellfield.

Draft EIR Chapter 4, Other Environmental Considerations

Page 4-2 The following text is removed from Section 4.0, *Other Environmental Considerations*, Subsection 4.2, *Significant Environmental Effects that Cannot be Avoided by the Proposed Project Should it Be Implemented*:

~~While Mitigation Measure NOISE 4, applicable to amplified speaker systems for special events, would require a special event permit and establish guidelines for speaker placement and directionality, operating hours, and the use of temporary noise barriers, blankets, or baffles may be required on either side of and behind speakers to limit the amount of excess noise reaching nearby sensitive receptors, noise from the amplified speaker system for special events may still temporarily exceed the significance threshold at sensitive receptors near to the amplified speaker system at location R3. Because special events may include outdoor concerts, movie nights, luncheons, or other similar types of events that draw members of the community, it may not be feasible to reduce the volume of the amplified speaker system to a level below the significance threshold while still retaining a sufficient volume level for people in the Meadow park zone to adequately hear and enjoy the special event. Therefore, while Mitigation Measure NOISE 4 would minimize sound from the amplified speaker systems for special events to the extent feasible, impacts would be significant and unavoidable.~~

Page 4-3 The text in Section 4.0, *Other Environmental Considerations*, Subsection 4.2, *Significant Environmental Effects that Cannot be Avoided by the Proposed Project Should it Be Implemented* is revised as follows:

As discussed in Section 3.15, *Recreation and Parks*, the proposed Project would result in significant and unavoidable construction and operational impacts related to recreational facilities as construction noise and noise associated with amplified music from special events would remain significant and unavoidable as discussed above.

Draft EIR Chapter 5, Analysis of Alternatives

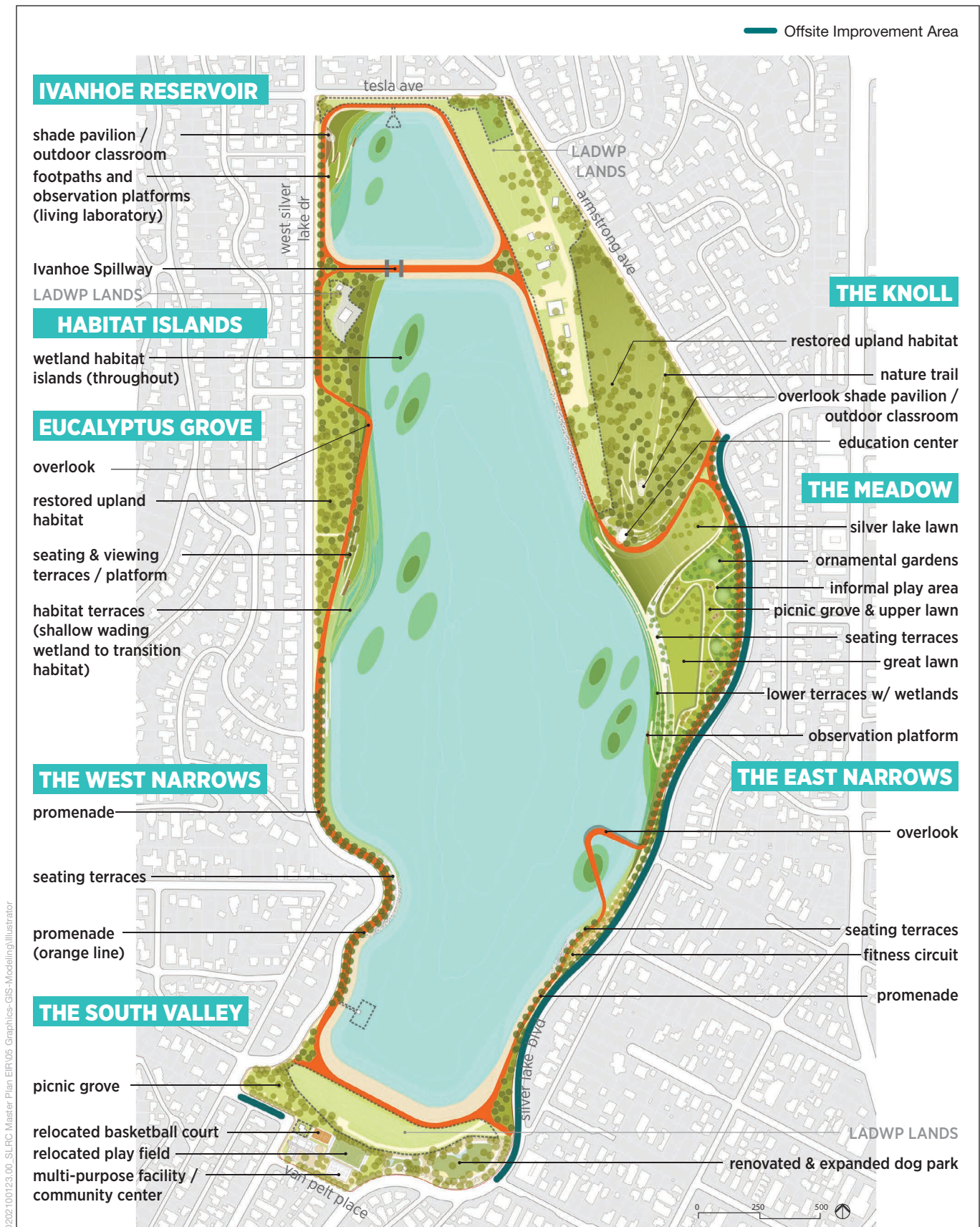
Page 5-2 The text in Section 5.0, *Analysis of Alternatives*, Subsection 5.1.2, *Review of Significant Environmental Impacts* is revised to state as follows:

The proposed Project would result in significant and unavoidable impacts as itemized below:

- Noise during construction and during operation for special events;
- Vibration during construction;
- Recreation and parks due to secondary impacts associated with noise during construction and during operation for special events;
- Cumulative noise during construction and during operation for special events.

- Page 5-3 The text in Section 5.0, *Analysis of Alternatives*, Subsection 5.3, *Alternatives to the proposed Project* is revised as follows:
- As shown in Chapter 3, *Environmental Analysis*, of this Draft EIR, the proposed Project would not have significant long-term impacts due to Project construction that would require consideration of alternatives that would reduce such impacts. However, the proposed Project ~~would have significant and unavoidable noise impacts during operation activities that cannot be fully mitigated through feasible noise control measures, and~~ includes several potential project impacts that were reduced to less than significant with the incorporation of mitigation measures as described in Section 5.1.3 *Review of Significant Environmental Impacts*. The following alternatives to the Project were selected to inform evaluation of the Project in light of the significant and unavoidable environmental impact of the Project (i.e., construction noise and vibration, ~~operational noise during special events, and recreational facilities due to construction noise and operational noise during special event noise~~), significant impacts of the Project that would be mitigated to a level of less than significant, the objectives established for the Project (listed above), the feasibility of the alternatives considered, and public input received during the scoping period:
- Alternative 1 – No Project Alternative
 - Alternative 2 – Reduced Project Alternative
 - Alternative 3 – Silver Lake Reservoirs Natural Lands and Open Space Preserve Alternative
- Page 5-8 Figure 5-1 has been modified to remove the floating docks. This figure would replace Figure 5-1 included in the Draft EIR.
- See updated Figure 5-1 on the following page.*
- Page 5-17 The text in Section 5.0, *Analysis of Alternatives*, Subsection 5.5.1, *No Project Alternative – Noise* is revised as follows:
- Under the No Project Alternative, no physical changes to the environment would occur, and therefore would not have any potential to generate noise or vibration beyond what currently exists. Because this Alternative would not result in any construction activities or planned events and would not modify the existing operation of facilities within the SLRC, no impacts related to noise or vibration would occur. The Alternative would avoid a significant and unavoidable noise impacts associated with ~~planned events at the park and~~ construction and would avoid a significant unavoidable impact of construction vibration. Therefore, noise and vibration impacts would be less than under the proposed Project.

Offsite Improvement Area



SOURCE: Hargreaves Jones Landscape Architects, 2023

Silver Lake Reservoir Complex Master Plan Project

Figure 5-1
Proposed Project Components

Page 5-17 The text in Section 5.0, *Analysis of Alternatives*, Subsection 5.5.1, *Alternative 1 – No Project Alternative, Recreation and Parks* is revised as follows:

The No Project Alternative would not involve the construction or operation of a new recreational facilities at the project site. As such, because Alternative 1 would not provide new recreational facilities to meet the existing or future demand, this alternative could result in the increased use of existing neighborhood or regional parks or other recreational facilities such that substantial deterioration could occur, or could require the construction of new or expanded parks elsewhere, which might have adverse impacts on the environment not already identified in this EIR. However, Alternative 1 would avoid all of the significant and unavoidable impacts associated with recreation and parks due to construction ~~and event~~ noise. Therefore, Alternative 1 would result in fewer impacts related to recreation compared to the proposed Project.

Page 5-20 to
5-21

The text in Section 5.0, *Analysis of Alternatives*, Subsection 5.5.2, *Alternative 2 – Reduced Project Alternative, Noise* is revised as follows:

Fewer construction activities would occur under Alternative 2 that could generate noise or vibration. As a result, construction noise and vibration would be slightly less than the proposed Project. Construction noise would remain significant and unavoidable. However, construction related vibration would be eliminated since no new structures would be built. Once implemented, the Reduced Project Alternative would not allow permitted special events. ~~This would avoid a significant and unavoidable impact of the project related to operational noise. This would reduce the impact of the proposed Project related to operational noise; however, the impacts would remain less than significant. Therefore, operational noise and construction vibration impacts would be less than under the proposed Project.~~

Page 5-21 The text in Section 5.0, *Analysis of Alternatives*, Subsection 5.5.2, *Alternative 2 – Reduced Project Alternative, Recreation and Parks* is revised as follows:

Alternative 2 would support public access of the park similar to the proposed Project. It would not result in increased use of other neighborhood or regional parks or recreational facilities such that substantial deterioration could occur, or could require the construction of new or expanded parks elsewhere, which might have adverse impacts on the environment not already identified in this EIR. Since special events would not occur, Alternative 2 would ~~avoid a significant and unavoidable~~ further reduce the less than significant operation impact to Recreation and Parks, ~~although construction~~. However, construction noise would remain significant and unavoidable. Therefore, Alternative 2 would adversely impact recreation and parks less than the proposed Project.

Page 5-25 The text in Section 5.0, *Analysis of Alternatives*, Subsection 5.5.3, *Alternative 3 – Silver Lake Reservoirs Natural Lands and Open Space Preserve Alternative*, *Noise* is revised to state as follows:

Fewer construction activities would occur under Alternative 3 that could generate noise or vibration. As a result, construction noise and vibration would be less than the proposed Project, but still remain significant and unavoidable. Once constructed, Alternative 3 would not allow permitted special events ~~with the use of amplified sound~~. This would ~~avoid a significant and unavoidable~~ further reduce the less than significant impact of the proposed Project during operations. Therefore, operational noise impacts would be less under Alternative 3 than under the proposed Project.

Page 5-25 The text in Section 5.0, *Analysis of Alternatives*, Subsection 5.5.3, *Alternative 3 – Silver Lake Reservoirs Natural Lands and Open Space Preserve Alternative*, *Recreation and Parks* is revised to state as follows:

Alternative 3 would support public access of the park in certain areas, but less than the proposed Project. It would not result in increased use of other neighborhood or regional parks or recreational facilities such that substantial deterioration could occur, or could require the construction of new or expanded parks elsewhere, which might have adverse impacts on the environment not already identified in this EIR. Since special events would not occur, Alternative 3 would ~~avoid a significant and unavoidable~~ further reduce the less than significant operation impact to Recreation and Parks, although construction noise would remain significant and unavoidable. Therefore, Alternative 3 would impact recreation and parks less than the proposed Project.

Page 5-26 The text in Section 5.0, *Analysis of Alternatives*, Subsection 5.6.1, *Avoidance of Significant Environmental Impacts* is revised to state as follows:

Table 5-5 identifies environmental impacts that would result from the proposed Project and each of the alternatives. **Table 5-6** compares the severity of the impacts resulting from the project alternatives with the proposed Project. The two action alternatives would result in reduced construction impacts ~~and would eliminate the significant and unavoidable impact associated with operational noise during permitted special events at the SLRC.~~

Page 5-27 Portions of Table 5-5 requiring revisions are included below and have been revised as follows (other portions of the table remain the same):

TABLE 5-5
SUMMARY OF CEQA ANALYSIS BY ALTERNATIVE [REVISED]

Environmental Resource	Alternative 1 - No Project Alternative	Proposed Project	Alternative 2 – Reduced Project Alternative	Alternative 3 – Silver Lake Reservoirs Natural Lands and Open Space Preserve Alternative
Noise	No Impact	Significant and Unavoidable Impact for construction noise, construction vibration, operational noise , and cumulative noise <u>Less than significant impact for operational noise</u>	Less than Significant Impact with Mitigation for Operational Noise and construction vibration Significant and Unavoidable for construction noise and cumulative noise	Less than Significant Impact with Mitigation for Operational Noise Significant and Unavoidable for construction noise and vibration and cumulative noise
Recreation and Parks	No Impact	Significant and Unavoidable Impact <u>for construction</u> <u>Less than significant impact during operation</u>	Significant and Unavoidable for construction noise Significant and Unavoidable <u>Less than Significant Impact</u> for operation during special events	Significant and Unavoidable for construction noise Significant and Unavoidable <u>Less than Significant Impact</u> for operation during special events

3.2 Clarifications

In November 2022, the LADWP Board adopted a resolution (No. 023 097) that directed LADWP staff to “provide the Board with a status report pertaining to water usage at non-operating reservoirs, lakes, ponds, and other water features on LADWP properties,” which would include the SLRC. (LADWP 2022, LADWP 2022a.) In addition, the resolution directed LADWP staff to “develop a policy for filling and re-filling of non-operating reservoirs and other LADWP properties containing ponds, lakes, and other water features, that (1) is consistent with state and local mandates and policies regarding the reasonable and beneficial use of water, particularly in times of drought; (2) allows LADWP to property maintain its non-operating reservoirs and the related real property for Departmental purposes, including for emergencies and future water storage; and (3) requires improvements or projects on LADWP properties to be self-sustainable, where feasible.” (LADWP 2022, LADWP 2022a.) As part of its duties to manage the water supply, in particular in times of drought or other water emergencies, LADWP conducts future reviews of water resources (LADWP 2022a), and has determined after review that currently there is no feasible alternate source of water for the SLRC (LADWP 2022b). As of preparation of this Final EIR, any proposed non-operating reservoirs and water features policy has not been considered by the LADWP Board.

The proposed Project analyzes impacts based on current baseline conditions as required by CEQA. Specifically, the Draft EIR on page 2-4 described a historic operational water level elevations “between 440 – 451 above mean sea level” and that future water levels may fluctuate depending on operational considerations and groundwater conditions, such as drought conditions or other emergencies identified by local, state, or federal agencies. In addition, the Draft EIR analyzed the proposed Project based on similar conditions to the baseline, as CEQA requires,

subject to operational fluctuations due to drought and emergency water conditions that would be monitored by the Project's Wetlands Management Plan (Draft EIR, pp, 2-57, 2-58). If in the future, LADWP takes an action consistent with any adopted policy that is in conflict with current baseline conditions related to refilling of the Silver Lake and Ivanhoe Reservoirs, beyond exceptions outlined in Section 2.7.4 of the Draft EIR for drought and other emergency conditions, a new CEQA assessment to analyze the impacts to the changing operational reservoir water levels would be necessary.

CHAPTER 4

Mitigation Monitoring Program

4.1 Introduction

The Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the California Environmental Quality Act (CEQA) Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles (City) is the Lead Agency for the Silver Lake Reservoir Complex Master Plan Project (proposed Project) and, therefore, is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the MMP.

4.2 Purpose

The purpose of the MMP is to do the following:

- Coordinate all mitigation monitoring activities.
- Manage the preparation, approval, and filing of monitoring or permit compliance records.
- Maintain records concerning the status of all approved mitigation measures and project design features (PDF)
- Provide quality control assurance of field monitoring personnel.
- Coordinate with other agencies regarding compliance with mitigation or permit requirements.
- Review and recommend acceptance and certification of implementation documentation.
- Act as a contact for interested parties or surrounding property owners who wish to register concerns regarding environmental issues; verifying any such circumstances; and developing any necessary corrective actions.

4.3 Organization

As shown in the following pages, each identified mitigation measure and PDF for the proposed Project is listed and categorized by environmental issue area, with accompanying discussion of:

- Time Frame for Implementation: When the measure will be implemented.
- Monitoring Period: Indicates when monitoring for compliance with the measure will occur.
- Monitoring Agency: The agency to which reports involving feasibility, compliance, implementation, and development are made.
- Verification of Compliance: The date that monitoring is complete to ensure compliance with the measure.

4.4 Monitoring Procedures

This MMP shall be enforced throughout all phases of the proposed Project. The City shall be responsible for implementing each project design feature and mitigation measure and shall be obligated to provide verification, as identified below, to the appropriate monitoring and enforcement agencies that each project design feature and mitigation measure has been implemented. The City shall maintain records demonstrating compliance with each project design feature and mitigation measure listed below.

All applicable construction-related mitigation measures and best management practices will be included in any bid specification released for construction of the proposed Project. Prior to the release of the bid specifications, construction plans and specifications will be provided to the City of Los Angeles Bureau of Engineering's (BOE) Environmental Management Group (EMG) for review and approval regarding environmental mitigation. Unless otherwise specified herein, the City will be responsible for taking all actions necessary to implement the mitigation measures according to the provided specifications and demonstrating that each action has been successfully completed. The City, at its discretion, may delegate implementation responsibility or portions thereof to a licensed contractor. This MMP for the proposed Project will be in place through design, construction, and operation. The City will be responsible for administering the MMP, ensuring that all parties comply with its provisions. The City may delegate monitoring responsibilities to staff, consultants, or contractors. The construction contractor shall submit an Environmental Compliance Plan for BOE Construction Management and BOE EMG approval prior to the beginning of ground-disturbing construction activities. The Environmental Compliance Plan will document how the contractor intends to comply with all environmental measures applicable to the contract, including application of BMPs. BOE Construction Management will also ensure that monitoring is documented in an Environmental Compliance Report and that deficiencies are promptly corrected. A designated environmental monitor with BOE Construction Management will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to rectify problems. The City will monitor compliance with operational mitigation measures.

4.5 Changes to Mitigation Measures

Under CEQA, mitigation measures may be modified or deleted if the relevant decision-maker approves such action, gives a legitimate reason for making the change, and supports those reasons with substantial evidence, including an appropriate subsequent CEQA document. Any substantive change to the MMP shall be documented in writing. Modifications to the mitigation measures may be made by the BOE subject to one of the following findings and documented by evidence included in the record:

1. The measure included in the EIR and the MMP is no longer required because the significant environmental impact identified in the EIR has been found not to exist, or to occur at a level which makes the impact less than significant as a result of changes in the Project, changes in conditions of the environment, or other factors.

OR

2. The modified or substitute mitigation measure to be included in the MMP provides a level of environmental protection equal to or greater than that afforded by the mitigation measure included in the EIR and the MMP.

AND

3. The modified or substitute mitigation measure/BMP does not have significant adverse effect on the environment in addition to or greater than those which were considered by the City in its decisions regarding the EIR and the Proposed Project.

AND

4. The modified or substitute mitigation measure is feasible, and the City, through measures included in the MMP or other established procedures, can assure its implementation.

Findings and related documentation supporting the findings involving modifications to mitigation measures shall be maintained in the Project file with the MMP and shall be made available to the public upon request.

4.6 Mitigation Monitoring Program

The following tables outline the proposed Project's Mitigation Monitoring Program. Table 4-1 includes mitigation measures required for the proposed Project, and Table 4-2 includes the PDFs associated with the proposed Project.

TABLE 4-1
MITIGATION MONITORING PROGRAM – MITIGATION MEASURES

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Mitigation Measures			
Aesthetic Resources			
AES-1: Shielded Fixtures. All new permanent exterior lighting shall be shielded and directed downward to avoid any light spill onto surrounding land uses including natural habitat areas, open water, residential areas, or into the night skies.	Prior to Construction Operations	City of Los Angeles	EMG Construction Inspector
AES-2: Non-Glare Materials. All new structures and buildings shall be designed to include non-glare exterior materials and coatings to minimize glare or reflection.	Prior to construction	City of Los Angeles	EMG
Air Quality			
<p>AIR-1: Haul Trucks and Construction Equipment. The City shall implement the following requirements for construction equipment operating at each Project site. These requirements shall be included in applicable bid documents and contractor(s) must demonstrate the ability to supply such equipment. Construction equipment shall include the following:</p> <ul style="list-style-type: none"> The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification, BACT documentation, and CARB or Southern California Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment shall be provided. Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited. To import and export of on-site materials shall be scheduled to minimize empty return trips. Use alternatively fueled (e.g., compressed natural gas, liquefied natural gas, propane), gasoline fueled, or electrified construction equipment in place of diesel-fueled equipment to the extent locally available. 	Prior to Construction During Construction	City of Los Angeles	EMG Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Biological Resources			
BIO-1: Pre-Construction Training. Prior to construction, a worker environmental awareness program (WEAP) training will be provided by a qualified biologist/ISA certified arborist to describe biological resources (including protected trees) that could be impacted and summarize the construction BMPs and project design features to be implemented. The WEAP will include all contractors (including grading, tree removal/pruning, and builders). The meeting shall include a focus on instructing the contractors on tree protection practices including information on the location and marking of protected trees, the necessity of preventing damage, and the discussion of work practices that shall accomplish these tasks. All equipment operators and spotters, assistants, or those directing operators from the ground shall provide written acknowledgement of receiving training.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
BIO-2: Preconstruction Surveys and Mitigation for Crotch's Bumble Bee and Monarch Butterfly. Prior to the start of construction activities, the City shall conduct pre-construction surveys for special-status invertebrates, Crotch's bumble bee and monarch butterfly, within 100 feet of construction activities near host plant communities (including nectar plants for Crotch's bumble bee and mature eucalyptus and pines trees for monarch butterfly). The pre-construction surveys shall be conducted 7 days prior to the start of construction activities. If any of these species are determined to be present within 100 feet of construction areas, construction best management practices (BMPs) will be implemented to avoid potential impacts to these species. BMPs shall include limiting construction vehicle speeds to 15 miles per hour when operating within 100 feet of the habitat areas, fencing habitat areas using temporary silt fencing, and cleaning up all trash and debris daily. Construction personnel will be instructed to not directly harm any special-status species on-site by halting activities until the species can move to off-site areas or contact a qualified biologist to move the species out of harm's way.	Prior to construction During Construction	City of Los Angeles	EMG Construction Inspector
BIO-3: Special-Status Bats. Prior to construction activities, bat surveys shall be conducted by a qualified bat biologist 7 days prior to the start of construction activities to determine if the special-status hoary bat, western mastiff bat, or western yellow bat could be impacted by proposed Project implementation. If special-status bat species are determined to be present within the proposed Project impact areas and if removal of roosting habitat (mature trees or palm trees) is required, a qualified biologist (a biologist with the ability to identify bat guano and assess habitat suitability) shall inspect the base of trees and palm skirts for guano prior to removal of skirted palm trees (i.e. palm trees with several layers of accumulated dead fronds). If bats are detected, tree removal shall avoid the bat maternity season (April 1 through August 31). If tree removal cannot avoid the maternity season, bat protection protocols shall be identified and implemented by a qualified bat biologist and approved by CDFW. The protocols may require installation of bat exclusionary devices, followed by up to four weeks of nightly monitoring by a qualified biologist to confirm bats are being excluded without harm until it is determined bats are no longer present. Construction of substitute bat habitat (i.e., bat boxes, artificial tree structures) should take place one month prior to the start of bat exclusion activities. Substitute bat habitat should be in the vicinity of bat-occupied mature trees or palm trees that a qualified biologist has been confirmed that bats are using. Bat boxes manufactured by vendors such as Bat Conservation and Management should be used. The one-month window prior to the start of bat exclusion activities will allow bats sufficient time to acclimate to a new potential roost location. The bat boxes shall be installed in an area that is close to suitable foraging habitat as determined	Prior to construction During Construction	City of Los Angeles	EMG Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
<p>by a qualified bat biologist. Bat boxes should be located on poles 10 to 20 feet off the ground. Additionally, the bat boxes will be oriented to the south or southwest, and the area chosen for the bat boxes must receive sufficient sunlight (at least 6 hours daily) to allow the bat boxes to reach an optimum internal temperature (approximately 80-100°F).</p> <p>At a minimum monitoring by qualified bat biologist should be required each month during construction and quarterly thereafter until it can be established that the bat box is being utilized. A determination needs to be made of what bat species are using the box. If the boxes are unsuccessful adaptive management measures should be developed in coordination with the CDFW.</p>			
<p>BIO-4: Tree Salvage and Replanting Plan. For impacts to trees protected under local policies and ordinances, the City shall prepare and implement a tree salvage and replanting plan. This salvage and replanting plan shall be prepared by a certified arborist familiar with the target species and in compliance with the specifications of the City Tree Ordinance or RAP Tree Policy (dependent on property location). The salvage and replanting plan shall include measures to salvage, replant, and monitor the new trees for a total of 10 years. The replanting plan will specify for planted trees to occur in the most naturalized habitat areas on-site (e.g., the Knoll) to maximize increasing habitat value and establishment success. The replanting plan shall also specify the appropriate spacing of planted trees to accommodate growth horizontally, vertically, and laterally below ground. The plan shall also specify recommended long-term monitoring, maintenance, and inspection until all planted trees survive to produce reproductive structures. Follow up inspections by the project arborist should be conducted after construction is completed for ten years. Preferably, follow up visits should be conducted quarterly during Years 1 and 2, biannually for Years 3 through 5, and annually for Years 6 through 10. More frequent monitoring and/or post-construction steps to improve any trees that are doing poorly should be carried out as recommended by the arborist. The plan will also include a measure to address if observations of stress or potential failure of planted trees occur (e.g., consulting with a certified arborist or tree specialist to provide recommendations so there is no net loss of trees). Any replacement trees that fail will be replaced at 1:1 with 15-gallon tree of like species.</p>	<p>Prior to Construction</p> <p>During construction</p> <p>Post construction</p>	City of Los Angeles	<p>EMG</p> <p>Construction Inspector</p>
<p>BIO-5: Native Oak Trees. Native oak trees removed as a result of the Project with a trunk at DSH less than 12 inches shall be replaced at a 4:1 ratio, and if the diameter is between 12-24 inches at a 5:1 ratio, and greater than 24 inches at a 10:1 ratio.</p>	<p>Prior to Construction</p> <p>During construction</p> <p>Post construction</p>	City of Los Angeles	<p>EMG</p> <p>Construction Inspector</p>
Cultural Resources			
<p>CR-1: Archaeological Monitoring. The City shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for professional archaeology (qualified Archaeologist) to carry out and ensure proper implementation of mitigation measures that address archaeological resources. The qualified Archaeologist shall oversee an archaeological monitor who shall be present during construction activities on the Project Site deemed by the qualified Archeologist to have the potential for encountering archeological resources, such as demolition, clearing/grubbing, drilling/auguring, grading, trenching, excavation, or other ground disturbing activity associated with the Project in areas of historic fill or previously undisturbed sediments, and in the vicinity of the Canal & Reservoir Ditch, within the South Valley, the East West Narrows, the Eucalyptus Grove, and areas of quaternary alluvium within the Knoll. The archeological monitor shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or</p>	<p>Prior to construction</p> <p>During construction</p>	City of Los Angeles	<p>EMG</p> <p>Construction Inspector</p>

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
halt ground disturbance activities to allow identification, evaluation, and potential recovery of archaeological resources in coordination with the qualified Archaeologist. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the qualified Archaeologist.			
CR-2: Archaeological Resources Sensitivity Training. Prior to commencement of construction activities, a Sensitivity Training shall be given by the qualified Archaeologist for construction personnel. The training shall focus on how to identify archaeological resources that may be encountered during construction activities, and the procedures to be followed in such an event. Within 5 days of completing the training, a list of those in attendance shall be provided by the qualified Archaeologist to the City.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
CR-3: Discovery of Archaeological Resources. In the event that historic-period (e.g., bottles, foundations, early infrastructure, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work may continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. If any prehistoric archaeological sites are encountered within the project area, consultation with consulting Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment and shall be explored to see if Project activities can avoid archaeological resources, such as: if the archaeological site can be deeded into a permanent conservation easement, if the resources can be capped with chemically stable soil or if the resource can be incorporated within open space. If, in coordination with the City, it is determined that preservation in place is not feasible, and in order to mitigate potential impacts to significant resources pursuant to Section 15064.5 of CEQA, data recovery is feasible. Appropriate treatment of the resource shall be developed by the Qualified Archaeologist in coordination with the City. A data recovery plan shall be implemented. A data recovery plan will make provision for adequately recovering the scientifically consequential information from and about the historical resources. and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing, analysis, and commemoration in the form of signage or other public education and awareness. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
CR-4: Archeological Monitoring Reports. At the conclusion of the archaeological monitoring, the qualified Archaeologist shall prepare a memorandum stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memorandum shall be submitted to the City. Following submittal of the memorandum, the qualified Archaeologist shall prepare a technical report that follows the format and content guidelines provided in California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR). The technical report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Appropriate California Department of Parks and Recreation Site Forms (Site Forms) shall also be prepared and provided in an appendix to the report. The technical report shall be prepared under the supervision of the qualified Archaeologist and submitted to the City within 150 days of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
Geology, Soils, and Mineral Resources			
PALEO-1: Construction Personnel Paleontological Resources Sensitivity Training. The City shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP 2010) definition for Qualified Professional Paleontologist (Qualified Paleontologist) to carry out all mitigation related to paleontological resources. Prior to the start of ground-disturbing activities, the Qualified Paleontologist or their designee shall conduct construction worker paleontological resources sensitivity training for all construction personnel. Construction personnel shall be informed on how to identify the types of paleontological resources that may be encountered, specific Project activities that would require paleontological monitoring, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The City shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
PALEO-2: Paleontological Monitoring. Paleontological monitoring shall be conducted during ground-disturbing activities that produce visible spoils or cuts for project construction below 10-feet in previously undisturbed Quaternary alluvium or at any depth in the Miocene Monterey Formation. Monitoring shall be conducted by a qualified paleontological monitor (SVP, 2010) working under the direct supervision of the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting sediment samples to wet or dry screen to test promising horizons for smaller fossil remains. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, the Qualified Paleontologist may recommend that monitoring be reduced to periodic spot-checking or cease entirely.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
PALEO-3: Paleontological Resource Discovery. If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If a fossil is	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
<p>determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). If the discovery is considered scientifically significant, the monitor will collect the fossil specimen(s) and associated data. For this Project, the SVP (2010) criteria of scientific significance will be used to make this determination in the field. In general, small unidentifiable vertebrate fossils will not be collected and only well-preserved or representative invertebrates or plants will be salvaged if avoidance is not feasible. Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at an accredited repository.</p> <p>If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 25-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described in this measure.</p>			
<p>PALEO-4: Reporting. At the conclusion of paleontological monitoring, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and any salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the proposed project and required mitigation measures.</p>	<p>Prior to construction During construction</p>	<p>City of Los Angeles</p>	<p>EMG Construction Inspector</p>
Noise			
<p>NOISE-1: Equipment Controls. Noise and vibration construction equipment whose specific location on the Project site may be flexible (e.g., compressors and generators) shall be located away from the nearest off-site noise-sensitive land uses (at least 100 feet away) if sufficient distance on the implementing Project site is available. If 100 feet is not feasible, the equipment shall have natural and/or manmade barriers (e.g., berms, intervening construction trailers, etc.) or a noise enclosure around the specific equipment location that screens the receptor from propagation of noise from such equipment. The barrier and/or enclosure shall block the line-of-sight from the construction equipment to any similarly elevated noise-sensitive receptors. Noise enclosures shall provide sufficient space and gate access as needed for the safe operation of equipment, construction activities, material deliveries, and equipment access by construction personnel. A noise enclosure is not required if it would pose a safety risk or unreasonably prevent access to the construction equipment as deemed by the on-site construction manager such as in areas that have limited equipment maneuvering space or access. The contractor shall provide documentation verifying compliance with this measure.</p>	<p>Prior to construction During construction</p>	<p>City of Los Angeles</p>	<p>EMG Construction Inspector</p>
<p>NOISE-2: Mobile Noise Barriers. For construction areas within 500 feet of a residential land use or other sensitive receptor, the contractor shall install temporary noise barriers between the active construction area and the off-site noise-sensitive receptors. The mobile noise barriers shall achieve sound level reductions of a minimum of 10 dBA between the Project construction sites and the sensitive receptor location. These temporary noise barriers shall be used to block the line-of-sight between the construction equipment and similarly elevated ground-level noise-sensitive receptors. The barriers should allow for repositioning in order to block the noise at the sensitive receptor as construction activities move along the Project boundary. A noise barrier is not required if it would pose a safety risk or unreasonably prevent access to the construction area as deemed by the on-site construction manager such as in areas that have limited equipment maneuvering</p>	<p>Prior to construction During construction</p>	<p>City of Los Angeles</p>	<p>EMG Construction Inspector</p>

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
space or access. Any barrier capable of a reduction greater than 10 dBA would require greater height and heavier noise insulation which would make mobility of the barrier infeasible and cause safety concerns related to barrier stability. Further, noise barriers would only be effective if they block the line-of-sight to sensitive receptors. The elevation of the surrounding area increases quickly and receptors within the vicinity of all identified sensitive receptors may still have a direct line-of-sight to the Project site and may not benefit from the use of a mobile noise barrier. The contractor shall provide documentation verifying compliance with this measure.			
NOISE-3: Construction Equipment Noise Shielding and Muffling Devices. Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. Prior to the issuance of demolition permits, certification of muffler installation shall be submitted to the applicable City for review. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The primary source of noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA. The contractor shall use muffler systems that provide a minimum reduction of 10 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. Contractors shall include the muffler requirements in contract specifications. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure. Mufflers providing a noise reduction greater than 10 dBA would be technically infeasible or cost prohibitive given the current best available technologies. Further, mufflers are only effective on equipment with internal combustion engines and would not result in noise reductions for hand tools and other light-duty construction equipment. Therefore, NOISE-3 incorporates muffling devices to the maximum extent feasible.	During construction	City of Los Angeles	Construction Inspector
NOISE-4: Equipment Setbacks. The operation of construction equipment that generates high levels of vibration during any phase of construction occurring in the South Valley will be limited to setback distances from receptor V8. Receptor V8 includes the South Outlet Chlorination Station and Meter House. Setback distances apply in all directions surrounding the two buildings identified as V8. The following equipment shall be prohibited from operating within their respective setback distances: <ul style="list-style-type: none"> • Large bulldozers shall be prohibited within 21 feet of receptor V8 • Loaded Trucks shall be prohibited within 19 feet of receptor V8 • Jackhammers shall be prohibited within 12 feet of receptor V8 • Small bulldozer shall be prohibited within 3 feet of receptor V8 The contractor(s) shall require and document compliance with the minimum allowable setbacks in a construction vibration management plan, which shall be provided to the City prior to issuance of a demolition permit. The construction vibration management plan shall detail the types of equipment to be used during demolition, grading, and building construction, estimated vibration velocities, and distance to vibration receptor V8. Equipment and or alternative construction techniques to be used within the required setbacks for large bulldozers, loaded trucks, jackhammers, and small bulldozers shall be identified to ensure that vibration velocities will not exceed thresholds for potential structural damage.	During construction	City of Los Angeles	Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Tribal Cultural Resources			
<p>TCR-1: Native American Monitoring. Prior to the commencement of any ground disturbing activity at the project site, the City shall reach out to retain a Native American Monitor from both the Gabrieleno Band of Mission Indians-Kizh Nation and the Gabriellino Tongva Indians of California Tribal Council to provide a Native American monitor. Should neither Tribe be available to monitor during ground disturbance, work may continue but should Tribal Cultural Resources be encountered work will stop and both Tribes will be immediately notified. The Tribal monitors will only be present on-site during the construction phases that involve ground-disturbing activity in areas of quaternary alluvium within the Knoll, and will not be necessary in portions of the Knoll where the Puente Sandstone bedrock formation is present either at depth or at the surface. In addition, any ground disturbance required in the Eucalyptus Grove will be subject to Tribal monitoring. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing, or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the areas above. The on-site Tribal monitoring shall end when all ground-disturbing activities within the Knoll and the Eucalyptus Grove are completed, or when the Tribal representatives and Tribal Monitors have indicated that the project site has little to no potential for impacting Tribal Cultural Resources.,</p> <p>In the event that cultural resources of Native American origin are identified during construction, the City will coordinate with the qualified archaeologist (who meets the Secretary of the Interior's Professional Qualifications Standards), and both tribes that participated in consultation. If the City, in consultation with the Gabrieleno Band of Mission Indians-Kizh Nation and the Gabriellino Tongva Indians of California Tribal Council, determines that the resource is a Tribal Cultural Resource and thus significant under CEQA, a treatment plan shall be prepared and implemented in accordance with state guidelines and in consultation with the two Native American tribes. The treatment plan may include, but would not be limited to, avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon measure.</p>	<p>Prior to construction</p> <p>During construction</p>	<p>City of Los Angeles</p>	<p>EMG</p> <p>Construction Inspector</p>
Utilities and Service Systems			
<p>UTIL-1: Underground Utilities Search and Coordination. During design and prior to construction of Project facilities, the City shall conduct an underground utilities search and coordinate with all utility providers that operate in the same public rights-of-way impacted by construction activities. The City shall ensure that any temporary disruption in utility service caused by construction is minimized and that any affected parties are notified in advance.</p>	<p>Prior to construction</p> <p>During construction</p>	<p>City of Los Angeles</p>	<p>EMG</p> <p>Construction Inspector</p>

TABLE 4-2
MITIGATION MONITORING PROGRAM – PROJECT DESIGN FEATURES (PDFs)

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Biological Resources			
PDF-BIO-1: Ornamental Native Plants. If the proposed Project impacts native planted species within the Community Restoration Area, including Nevin's barberry, showy island snapdragon, and Coulter's matilija poppy, these species will be replanted onsite at a 1:1 ratio.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-2: Nesting Birds. If construction and vegetation removal is proposed between February 1 and August 31, a qualified biologist shall conduct a pre-construction survey for breeding and nesting birds and raptors 30 days prior to the start of construction, and then weekly, within 300-feet of the construction limits (or to the outer limits of the park area bounded by West Silver Lake Drive, Van Pelt Place, and Silver Lake Boulevard) to determine and map the location and extent of breeding birds that could be affected by the Project. Nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Weekly surveys will take place with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work." If Project activities are delayed or suspended for more than 7 days after the last survey, surveys shall be repeated before work can resume. If an active nest is located, clearing and construction within appropriate buffers as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. Due to the urbanized nature of the Project site, 300-feet for raptors and 150-feet for passerine birds could suffice for nesting bird buffers; however, it will be at the discretion of the qualified biologist. The buffer zone from the nest shall be established in the field with flagging and stakes. The qualified biologist shall retain the ability to increase buffers if needed to protect the nesting birds. Temporary fencing and signage shall be maintained for the duration of the Project. Construction personnel shall be instructed on the sensitivity of the area and be advised not to work, trespass, or engage in activities that would disturb nesting birds near or inside the buffer. On-site construction monitoring may also be required to ensure that no direct or indirect impacts occur to the active nest. Project activities may encroach into the buffer only at the discretion of the qualified biologist.	Prior to construction	City of Los Angeles	EMG
	During construction		Construction Inspector
PDF-BIO-3: Wildlife Fencing Signage. Interpretive signage will be installed near all wildlife friendly fencing to educate the public on wildlife and habitat sensitivity, and to encourage the public to not enter the restricted areas.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-4: Tree Protection Fencing. Establish tree protection fencing around the tree protection zone (TPZ). This area will be marked and avoided during all construction activities near the protected trees. This area will be kept clear of any construction material, debris, equipment, portable toilets, and foot or equipment traffic. Fencing will be installed prior to construction at the edge of the TPZ and remain in place until the entire project is complete. The fence will be chain link and a minimum of five feet in height.	During construction	City of Los Angeles	Construction Inspector

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
PDF-BIO-5: Grading/Trenching in TPZ. Grading/trenching will be restricted to areas outside the TPZ of the trees. All grubbing and clearing within the TPZ of a tree will be done manually. All soil removal will be done with hand tools, using an air spade or comparable equipment that will excavate soil without damaging the roots. Jack hammers will not be used to remove the soil. When a root is encountered, soil removal will be done without chipping, marring, or damaging the root bark in any way (damaging the root bark will open up the bark barrier so that disease can enter the tree, allowing rot to develop or fungus to take over, and can result in root death).	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-6: Avoiding Root Damage. If tree roots must be cut, cuts will be less than one inch. If any roots over one inch in diameter are damaged, they will be clean-cut with a sharp and sterilized hand tool. Any roots permanently exposed from grading or scraping of topsoil will be cleanly cut just below the new soil grade.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-7: Soil Grade. Soil levels will be returned to the original grade, at which trees' roots were first established. Existing fill soil above that original grade will be removed to the extent possible; no additional fill soil will be placed over the original grade. If soil is filled back to the original grade, compaction will be done manually only (no equipment will be used). Compaction will be done in layers of three to six inches depending on soil structure. No gaps or pockets will remain in the soil.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-8: Irrigation. During construction, trees will only be watered under the guidance of the project arborist. Where it is needed, temporary irrigation (drip, leaking tube, or other) will be installed at intervals throughout the fenced protection zone to allow periodic deep watering during construction. The entire TPZ of the trees will be watered to a soil depth of four feet. This may require slow irrigation for 8-24 hours or more, or may require repeat waterings of shorter duration to promote saturation. The soil will be allowed to dry out completely before watering is repeated. The period between waterings may be a month or more. The project arborist will monitor the protected trees and provide recommendations on the effectiveness and duration of temporary irrigation.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-9: Landscaping Around Native Trees. Landscaping near protected trees will be drought-tolerant only unless trees are already accustomed to current landscape irrigation (to be confirmed by arborist). Irrigation overspray or runoff, as a result of lawn or ornamental irrigation, will be avoided in the TPZ of any protected tree with the noted exception above. All landscaping will be kept away from the trunk of any protected tree by a minimum of two feet.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-10: Tree Pest Inspection. Prior to tree removal, the City will have a certified arborist evaluate the trees to ensure they are free of pests.	Prior to construction	City of Los Angeles	EMG
PDF-BIO-11: Development of Pest Management Plan. If the certified arborist determines trees are impacted by infectious pests or diseases, the City will work with the certified arborist to prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list will provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from the Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or the list of preventative measures.	During construction	City of Los Angeles	Construction Inspector

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
PDF-BIO-12: Prevention of Pathogen Spread. All tree material, especially infected tree material, will be left on site, chipping the material for use as ground cover or mulch. Cleaning and disinfecting pruning and power tools before use will be completed to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-13: City Tree Ordinance. Any tree or shrub covered under the City Tree Ordinance which may be impacted by proposed Project construction, either through removal or encroachment within the TPZ, shall be replaced with nursery stock at a minimum 4:1 mitigation ratio of like species and 15-gallon in size. The City will work with a certified arborist and/or tree specialist to acquire appropriately sized, locally sourced trees from a local native plant nursery that implements Phytophthora/Clean Nursery Stock protocols. This may reduce the probability of introducing replacement trees contaminated with pests, diseases, and pathogens that could spread and infect native trees or habitats. A certified arborist and/or tree specialist should inspect and potentially quarantine nursery stock before bringing them into the Project site. Replacement tree plantings shall be located in areas protected by the habitat fencing to ensure their protection from the public.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
PDF-BIO-14: RAP Tree Policy. Any tree or shrub covered under the RAP Tree Policy which may be impacted by the proposed Project construction, either through removal or encroachment within the TPZ, shall be replaced with nursery stock. The City at a minimum will be required to replace impacted trees at a 1:1 ratio for trunk diameter. The impacted trees' aggregate diameter, measured at DSH (multi-trunk trees are to be measured immediately below the lowest trunk) shall be replaced at an equal or greater rate of caliper of new trees. Each one-inch DSH of existing tree shall be replaced with a minimum one-inch caliper new tree.	During construction	City of Los Angeles	Construction Inspector
Cultural Resources			
PDF-CR-1: Archaeological Resource Discovery During Construction. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with State and local guidelines, including those set forth in California PRC Section 21083.2. Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with State and local guidelines, including those set forth in California PRC Section 21083.2. If the discovery proves significant under CEQA (Section 15064.5f; PRC 21082), additional work such as testing or data recovery may be warranted. Should any Native American artifacts be encountered, additional consultation with NAHC-listed tribal groups should be conducted immediately. The process for contacting the tribal group and the timing of the contact should be addressed in the management plan.	During construction	City of Los Angeles	Construction Inspector

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
<p>PDF-CR-2: Human Remains Discovery During Construction. If human remains are encountered unexpectedly during construction demolition and/or grading activities, Section 7050.5 of the California Health and Safety Code requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California PRC 5097.98. Remains suspected to be Native American are treated under CEQA at CCR 15064.5; PRC 5097.98 illustrates the process to be followed if remains are discovered. If human remains are discovered during excavation activities, the following procedure shall be observed:</p> <ul style="list-style-type: none"> • Stop immediately and contact the County Coroner: <ul style="list-style-type: none"> – 1104 N. Mission Road – Los Angeles, CA 90033 – 323-343-0512 (8 am to 5 pm Monday through Friday) or – 323-343-0714 (After hours, Saturday, Sunday, and Holidays) • If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC. • The NAHC will immediately notify the person it believes to be the MLD of the deceased Native American. • The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. • If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. 	During construction	City of Los Angeles	Construction Inspector
Noise			
<p>PDF-NOISE-1: Haul Route. Prior to commencement of construction and operational maintenance activities, the City shall establish approved truck haul routes that avoid or minimize, to the extent feasible, unnecessary truck travel on local roadways through residential neighborhoods or adjacent to schools, and prioritize travel on collector and arterial streets.</p>	Prior to construction	City of Los Angeles	EMG
<p>PDF-NOISE-2: Construction Noticing and Community Liaison. Prior to commencement of construction activities, the City shall notify in writing adjacent residents and businesses along the Project route or worksite of proposed construction activities and the tentative schedule. The City shall require the construction contractor to designate a community liaison to respond to any issues and/or concerns related to construction activities, including any noise or vibration complaints. The community liaison shall maintain a log of communications and resolutions of issues or concerns and share the log with the City. Notices and construction signs will include a hotline and website address which will be updated quarterly and will include project-related information.</p>	Prior to construction	City of Los Angeles	EMG

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Public Services			
PDF-PS-1: Construction Security Measures. During construction, on-site security measures will include security lighting and a construction security fence with gated and locked entry around active construction areas.	During construction	City of Los Angeles	Construction Inspector
PDF-PS-2: Operational Security Measures. For Special Events that occur during the nighttime hours, security lighting will be provided.	Post construction	City of Los Angeles	EMG
Transportation			
PDF-TRA-1: Construction Traffic Management Plan. A Construction Traffic Management Plan will be prepared for the phases of the proposed Project that affect offsite components or require increased vehicle access consistent with the LADOT Construction Traffic Control Guidelines. This plan will address the planned Project construction phasing, sequence of construction activities, access, and circulation. In addition, the plan would include planned detour routes and BMPs, as well as coordination with and advance notice to local emergency providers.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-2: Construction Staging Plan. A construction staging plan shall be developed to reduce impacts related to noise, dust, traffic, and other health hazards. In addition, construction site BMPs (e.g., fencing, signs, and detours) shall be implemented to minimize hazards and prevent safety issues on the roadways and sidewalks surrounding the construction site.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-3: Construction Traffic. Construction-related trips shall be scheduled with increased frequency during off-peak hours to minimize impacts to commuters.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-4: Access to Parcels. It is not anticipated that access to existing parcels outside of the proposed Project impact areas would be impacted. However, if access to any existing parcels is removed during proposed construction activities, temporary access shall be provided, and/or new points of access shall be constructed.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-5: Site-Specific Traffic Control and Transit Plan for Large Events. Large event permittees shall develop a site-specific traffic control plan to provide information on parking and circulation and highlight transit options for event attendees to minimize congestion and vehicle miles traveled. Traffic control strategies for events will include inbound/outbound flex lanes and sheriff-controlled intersections. Traffic control plans will also identify nearby public parking facilities and identify passenger pick-up/drop-off locations. Permittees will be required to consider the cumulative traffic impacts of their event in relation to other events in the Project Area. The traffic control plans will also identify emergency services egress and access.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-6: Expand Public Transit Connections. The future site operator and relevant City departments (LADOT, Recreation and Parks Department, City Planning, etc.) shall work together to explore options for expanding public transit connections to the Project site to expand community access and reduce VMT.	Post construction	City of Los Angeles	EMG

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Utilities and Service Systems			
PDF-UTIL-1: Drought-Tolerant Landscaping. The Project will use a mix of native and drought-tolerant plants appropriate to the Los Angeles region to provide a plant palette adapted to climate change. Lawn would be used sparingly and strategically distributed where needed to support multifunctional cultural and recreational uses.	During construction	City of Los Angeles	Construction Inspector
PDF-UTIL-2: Water-Efficient Irrigation. Irrigation water would be pumped from the reservoirs to wetland habitat areas which would then flow back into the reservoirs. Transition habitat zones would also be irrigated with reservoir water on a separate cycle appropriate for the drought-tolerant, coastal scrub planting palette. Remaining upland habitat, lawn areas, and ornamental gardens would be irrigated via a potable water supply available from the LADWP distribution system which would require a dedicated meter. Recycled water may also be used to irrigate ornamental planting, should such water supplies become available in the future.	Post construction	City of Los Angeles	EMG
PDF-UTIL-3: Decentralized Drainage Strategy. To prevent untreated surface runoff from entering the reservoir waters, proposed Project will implement decentralized drainage facilities to capture and filter or infiltrate stormwater runoff from the developed portions of the Project site.	During construction	City of Los Angeles	Construction Inspector
Wildfire			
PDF-WF-1: Fire Code. The Project Manager is responsible for compliance with applicable LAMC Fire Code Section 57 et seq. for construction sites on, adjacent to or in the immediate vicinity of a VHFHSZ as designated through LAMC Sections 57.4908.1.1 through 57.4908.1.3 and identified on City maintained databases such as NavigateLA and Zone information and Map Access System (ZIMAS) (which maintain digitalized LA General Plan and zoning maps).	During construction	City of Los Angeles	Construction Inspector
PDF-WF-2: Open Flame. Pursuant to LAMC Section 57.4908.5 open flame is prohibited upon any road, street, or fire road with the VHFHSZ.	During construction	City of Los Angeles	Construction Inspector
PDF-WF-3: Smoking Prohibited. No smoking is allowed where conditions are such as to make smoking a hazard and in spaces where flammable or combustible materials are stored or handled per Section 310.2 of the California Fire Code. Further, it shall be unlawful for any person to light, ignite or smoke any cigar, cigarette, tobacco in a pipe or other form of smoldering substance within the VHFHSZ compliant with LAMC Section 57.4908.6. The Section also prohibits open flame upon any road, street, or fire road within the VHFHSZ.	During construction	City of Los Angeles	Construction Inspector
PDF-WF-4: Signage. No person, except one authorized and acting within the scope of his official duties, shall remove, deface, mar, mutilate, or change the position of any sign, installed by the Chief pursuant to this article, designating "CLOSED AREA," "NO SMOKING," "NO OPEN FIRES," "RESTRICTED ENTRY," or other sign or device installed to give warning and to regulate persons' actions within the VHFHSZ as stated in Section 57.4908.9.1.	During construction	City of Los Angeles	Construction Inspector

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
<p>PDF-WF-5: Brush Clearance Activities. Pursuant to Ordinance No. 185789 which added Sections 57.305.5.2, 57.305.5.2.1, 57.322.1.1.10 and 57.322.1.1.10.1, and amended Section 57.322.1.1 to Article 7, Chapter V of the LAMC, the applicable requirements for brush clearing activities in the VHFHSZ would apply including, but not limited to:</p> <ul style="list-style-type: none"> • Use of metal cutting blades for grass or brush clearance shall be limited to those which are nonferrous/non-sparking. • Brush clearance cannot be done on red flag days, when fire weather conditions are at their peak. • Individuals engaged in brush clearance operations shall not engage in any other activities during their actual clearance of grass or brush. • Individuals engaged in grass or brush clearance operations shall use an appropriate extinguishing agent immediately to extinguish a fire. • All fires, regardless of size, shall be reported immediately via the 9-1-1 system to the Fire Department. • An approved fire extinguisher, or a pressurized garden hose with attached nozzle shall be within 10 feet of any grass or brush clearance operation, to quickly extinguish a small fire before it burns out of control. • Where a gasoline container is present at the site of the grass or brush clearance operation, a minimum 4A 60 BC dry chemical fire extinguisher shall be within 10 feet of the brush clearance operation. • A cell phone capable of dialing 9-1-1 shall be charged and readily accessible to the grass or brush clearance operation. • A safety strap shall be used at all times for any tool or appliance with hot exhaust. Hot exhaust shall not come in contact with any brush, grass, flash fuels, or other flammable material. 	During construction	City of Los Angeles	Construction Inspector

Appendix A

Draft EIR Public Meeting Transcript



WEBVTT

1

00:00:36.420 --> 00:00:44.019

Nicolle Steiner: Hello, welcome! We are just giving folks a little bit of time here to join the call.

2

00:00:44.080 --> 00:00:46.969

Nicolle Steiner: Um! You'll see some instructions on the screen.

3

00:00:47.030 --> 00:00:50.880

Nicolle Steiner: Um! I'll talk about that in a few seconds. Here,

4

00:00:50.940 --> 00:00:54.940

Nicolle Steiner: skip people a little bit. Time to join the meeting.

5

00:01:11.390 --> 00:01:19.039

Nicolle Steiner: So before we start the presentation, I like you to give you a quick overview here on this meeting format

6

00:01:19.150 --> 00:01:31.509

Nicolle Steiner: first. Everyone will need to pick their preferred language for the meeting today. Um! You can go ahead and click on that interpretation button. You'll see at the bottom of your screen

7

00:01:31.600 --> 00:01:34.550

Nicolle Steiner: and pick either English or Spanish.

8

00:01:34.630 --> 00:01:42.580

Nicolle Steiner: Then you'll have to click that interpretation button One more time and click mute, original audio from the drop down. Menu!

9

00:01:43.830 --> 00:01:53.110

Nicolle Steiner: Zeke is here with us. Today is our Spanish translator. Um! We'll be going over the instructions in Spanish on how to pick your language.

10

00:01:53.870 --> 00:01:54.920

Seek.

11

00:02:37.370 --> 00:02:39.890

Thank you, and we'll start our presentation.

12

00:02:45.050 --> 00:03:03.000

Deborah Weintraub: Good evening, everyone. Thank you for joining us. My name is Deborah Weinter I'm. The Chief Deputy City engineer for the city of Los Angeles, the Bureau of Engineering. Welcome to the Draft Environmental Impact report Public meeting for the Silver Lake Reservoir Complex Master Plan Project.

13

00:03:03.310 --> 00:03:14.319

Deborah Weintraub: We are joined tonight with representatives from Council, Member Brahmins office, which is Council District Four, and from Council, Member of Farrell's Office Council District Thirteen,

14

00:03:14.710 --> 00:03:19.179

Deborah Weintraub: the Bureau. We are also joined by the Bureau of Engineering's Project management team,

15

00:03:19.350 --> 00:03:26.869

Deborah Weintraub: and we are supported by our design firm Harvey Jones, who are present, and the environmental consulting for an Esa

16

00:03:27.400 --> 00:03:35.489

Deborah Weintraub: Boe is acting as the Sequa lead agency and administering the environmental review process for this project

17

00:03:35.880 --> 00:03:45.040

Deborah Weintraub: We also have representatives from Dwp or the La Department of Water and Power, who will continue to be stakeholders for the project

18

00:03:45.500 --> 00:03:56.279

Deborah Weintraub: we are gathered this evening to continue the environmental review process. We started earlier this year in January, where we met for a public scoping meeting on the nineteenth.

19

00:03:56.320 --> 00:04:02.259

Deborah Weintraub: You submitted scoping comments. You will hear how to find that input reflected in the draft. Ir.

20

00:04:02.490 --> 00:04:15.909

Deborah Weintraub: Many of you have also been engaged earlier than that during our master Plan process, which which we um initially back in July of two thousand and nineteen, and worked on together with the Community August of two thousand and twenty.

21

00:04:16.470 --> 00:04:24.290

Deborah Weintraub: It's good to be here to be making progress on this project, and to be together as an important milestone of the planning concept.

22

00:04:24.370 --> 00:04:31.189

Deborah Weintraub: We're going to make a presentation tonight on the proposed project and the draft Environmental impact report,

23

00:04:31.280 --> 00:04:35.249

Deborah Weintraub: and we'll follow. Follow that presentation with public comment.

24

00:04:35.670 --> 00:04:52.469

Deborah Weintraub: Uh, we will receive verbal comments, as you will hear later in the presentation. This is not the only way you can comment on the draft, e ion, and with that i'm going to turn it over to Nicole from Esa to uh take us to the presentation. Thanks and welcome,

25

00:04:53.970 --> 00:04:55.319

Nicolle Steiner: thanks, Deborah.

26

00:04:56.550 --> 00:05:09.939

Nicolle Steiner: So i'll just go over quickly. The meeting format today. Um. As Deborah mentioned, we'll first have a presentation followed by um public comment period, where we'll be accepting verbal comments today,

27

00:05:10.400 --> 00:05:15.580

Nicolle Steiner: all participants are currently currently muted, and the chat feature has been disabled.

28

00:05:16.100 --> 00:05:22.300

Nicolle Steiner: The entire meeting is being recorded, and that recording will be posted on the project website.

29

00:05:22.400 --> 00:05:34.769

Nicolle Steiner: In addition, the recording will be used to create a transcript, and all comments received today will be part of the public record and responded to um in the final environmental impact report or eir.

30

00:05:35.560 --> 00:05:39.680

Nicolle Steiner: After the conclusion of that presentation, we will open it up to comments.

31

00:05:39.720 --> 00:05:45.359

Nicolle Steiner: The common portion is a big part of this meeting, and we look forward to hearing your comments today

32

00:05:45.910 --> 00:05:52.739

Nicolle Steiner: at this time for this meeting we're only collecting verbal comments, and will not be responding to questions.

33

00:05:53.080 --> 00:05:57.439

Nicolle Steiner: As I mentioned, we'll be responding to those comments in the final ir.

34

00:05:58.250 --> 00:06:11.819

Nicolle Steiner: There are other opportunities to provide written comments throughout the Eir Comment period which has been extended until December second, and we'll talk about that and and show you how to do that a little bit later in the presentation.

35

00:06:12.960 --> 00:06:20.090

Nicolle Steiner: Once we do open the meeting to comments. Um interested participants will be asked to raise their virtual hand.

36

00:06:20.190 --> 00:06:32.030

Nicolle Steiner: Um! And in order to do that you will just click the little virtual hand, icon at the bottom of your screen, or if you are, if you have dialed into this meeting, you'll dial star nine.

37

00:06:32.850 --> 00:06:41.299

Nicolle Steiner: We'll then start at the top of the list to kind of systematically go down the list and either call out your name or the last three digits of your phone number

38

00:06:42.450 --> 00:06:52.580

Nicolle Steiner: at that point. That's when we'll unmute you, and you'll be prompted to accept to be unmuted. If you're on the phone in order to do that, you'll have to press Star Six.

39

00:06:52.920 --> 00:06:55.719

Nicolle Steiner: You'll state your name and provide your comment. At that time

40

00:06:56.830 --> 00:07:14.079

Nicolle Steiner: we're anticipating Today We'll be limiting comments to two minutes since we have a limited amount of time. We want to make sure we get to as many comments as we can. Um, If we have a large number of

speakers today, we might limit the um comments to a little bit less,
Maybe one minute

41

00:07:15.020 --> 00:07:21.639

Nicolle Steiner: again. We'll go over all of these instructions at the end of the meeting. Um, but we just wanted to give you a little overview at the beginning.

42

00:07:21.710 --> 00:07:29.599

Nicolle Steiner: Now i'll hand it over to um the Vo project Manager Wendy Delgado, who will review the proposed project.

43

00:07:34.410 --> 00:07:35.850

Wendy Delgado: Hello, everyone.

44

00:07:36.760 --> 00:07:40.780

Wendy Delgado: The media agenda is as follows: The purpose of the meeting,

45

00:07:41.330 --> 00:07:55.389

Wendy Delgado: the proposed project overview the California Environmental quality act also known as sqa overview, and how to provide comments, both written comments and verbal comments which you can do today.

46

00:08:02.800 --> 00:08:14.779

Wendy Delgado: The purpose of the meeting is to notify stakeholders that the City of Los Angeles has prepared a draft Environmental impact report for the Silver Lake Reservoir Complex Master Plan Project

47

00:08:15.270 --> 00:08:32.030

Wendy Delgado: for information sharing to inform stakeholders of the proposed project draft tir contents and project impacts, and to provide stakeholders with an opportunity to provide verbal comments on the content and analysis included in the draft. Eir.

48

00:08:36.380 --> 00:08:47.890

Wendy Delgado: Again, If you are just joining us, I want to remind everyone to please, be sure to pick your preferred language by clicking on the interpretation button at the bottom of the screen. You will need to click

49

00:08:47.900 --> 00:08:56.550

Wendy Delgado: the button twice, once to pick your language, either on English or Spanish, and the second time to mute original audio.

50

00:09:01.000 --> 00:09:03.010

Wendy Delgado: How to provide Comments.

51

00:09:03.820 --> 00:09:10.419

Wendy Delgado: The comment period is from October sixth, and has been extended to December second at five Pm.

52

00:09:16.050 --> 00:09:19.450

Wendy Delgado: Or on the Project website at the following link.

53

00:09:19.510 --> 00:09:22.349

Wendy Delgado: You can also provide verbal comments. Today.

54

00:09:28.450 --> 00:09:45.149

Wendy Delgado: The funnel pro fundamental project that jack objectives are to create a clear, full design, to repurpose Silver Lake Reservoir complex into a public park, and to allow the City's department of water and power to continue its operations and facilities.

55

00:09:45.380 --> 00:09:52.100

Wendy Delgado: If you want to read the full text, please seen pages two to six at the draft eir text.

56

00:09:57.490 --> 00:10:11.219

Wendy Delgado: Other objectives are as follows: to preserve and enhance the unique character of the Silver Lake reservoir complex with increased points of access, improved internal circulation and access. The water's edge one hundred and fifty,

57

00:10:11.840 --> 00:10:15.939

Wendy Delgado: and increased spaces for community and family gatherings,

58

00:10:16.950 --> 00:10:23.909

Wendy Delgado: also to expand existing active recreational uses and increase passive recreational uses

59

00:10:24.280 --> 00:10:32.300

Wendy Delgado: to enhance and expand wildlife habitat by introducing wetland and aquatic ecologies and improving upland habitat

60

00:10:33.000 --> 00:10:49.319

Wendy Delgado: to provide opportunities for the public to connect with nature and provide facilities for onsite environmental education and

stewardship while limiting human wildlife interaction through design and operations to protect habitat,

61

00:10:49.760 --> 00:10:53.289

Wendy Delgado: and finally to allow for continued underlying,

62

00:10:53.360 --> 00:10:55.840

Wendy Delgado: led to the

63

00:10:56.560 --> 00:11:09.030

Wendy Delgado: operations, access and future use of designated areas of the site, thereby allowing continued use of the reservoirs and adjacent facilities that are intended to remain for

64

00:11:09.890 --> 00:11:12.800

Wendy Delgado: proprietary use By

65

00:11:17.800 --> 00:11:30.750

Wendy Delgado: these objectives were a result of the Master Plan development that included a year's long community engagement process, beginning in June of two thousand and nineteen, and ended in August of two thousand and twenty.

66

00:11:30.890 --> 00:11:35.000

Wendy Delgado: During this process the master Plan design was created which

67

00:11:37.620 --> 00:11:41.599

Wendy Delgado: formed the foundation of the proposed project Details

68

00:11:41.740 --> 00:11:43.570

Wendy Delgado: in the draft er

69

00:11:46.680 --> 00:11:53.620

Wendy Delgado: The proposed project consists of a series of parks, spaces, or zones organized around the reservoirs.

70

00:11:53.760 --> 00:12:08.830

Wendy Delgado: The orange line represents a promenade that would provide a continuous walking loop throughout all of the proposed spaces the existing perimeter fence would be removed. As each parkspace is completed and operational.

71

00:12:09.680 --> 00:12:15.389

Wendy Delgado: A detailed description of the proposed project is available in Chapter two of the draft eir

72

00:12:15.470 --> 00:12:24.959

Wendy Delgado: to highlight features of the proposed project. I will walk you through these park zones, starting at the meadow and moving counterclockwise around the site

73

00:12:30.100 --> 00:12:36.520

Wendy Delgado: for each of the following views: There is a key plan in the upper right corner that shows the location of the view,

74

00:12:37.050 --> 00:12:42.290

Wendy Delgado: beginning at the intersection of Silver Lake Drive and Armstrong Avenue would be the meadow,

75

00:12:42.490 --> 00:12:53.990

Wendy Delgado: a gently sloping lawn and walkways that take visitors close to the water's edge. In this view the promenade is in the foreground, and the null is in the background. On the right

76

00:12:58.410 --> 00:13:09.089

Wendy Delgado: the lawn would terminate in a series of seeding terraces with wetland terraces at their edge, and small footpaths for education and exploration.

77

00:13:09.510 --> 00:13:13.020

Wendy Delgado: Floating wetland habitat islands would also be included,

78

00:13:13.310 --> 00:13:26.320

Wendy Delgado: creating new well-in habitat for local and migratory waterfowl, as well as operate opportunities for environmental education or high community priorities. During the master plan process,

79

00:13:31.010 --> 00:13:47.490

Wendy Delgado: moving north is a null, an approximately forty foot hill, next to the meadow which enhances and expands the quality of Auckland habitat areas, a universal accessible pathways proposed leading to an overlook at the top of the null

80

00:13:47.630 --> 00:14:04.559

Wendy Delgado: with a small sheet structure for gathering and outdoor education. A tree succession plan is proposed to gradually replace trees

in poor health with native trees, such as oaks to increase food and nesting resources for birds and small mammals.

81

00:14:08.930 --> 00:14:23.210

Wendy Delgado: At the base of the Noel a small environmental education center is proposed that would be comprised of two indoor outdoor classrooms, a restroom, and a small outdoor seating area and plaza.

82

00:14:23.230 --> 00:14:32.889

Wendy Delgado: The roofs of both classrooms would be connected to the null with one proposed as an observation deck, and one proposed as a green roof.

83

00:14:37.350 --> 00:14:45.760

Wendy Delgado: This bird's eye view shows the meadow and the null with the proposed wetland terraces and floating islands. In the foreground

84

00:14:45.950 --> 00:14:55.469

Wendy Delgado: a second lawn is proposed, connected to the seating terraces with a picnic row and ornamental gardens. Next to it along Silver Lake Boulevard,

85

00:15:01.900 --> 00:15:11.169

Wendy Delgado: moving north to Ivanhoe Reservoir, an overlook is proposed with a second shade structure and integrated seating for outdoor education.

86

00:15:11.520 --> 00:15:16.460

Wendy Delgado: Wetland terraces and floating islands are proposed at the edge of the Overlook.

87

00:15:22.110 --> 00:15:33.820

Wendy Delgado: Elevated pathways would be located within the wetland terraces for a more immersive education experience, and to allow for potential wetland research collaboration.

88

00:15:39.670 --> 00:15:45.080

Wendy Delgado: Moving south along West Silver Lake Boulevard is the existing eucalyptus grove

89

00:15:45.120 --> 00:15:58.820

Wendy Delgado: similar to the null. A tree succession plan is proposed to gradually replace existing trees and poor health with native species that would provide high quality, food, and nesting resources for birds and small mammals

90

00:15:58.880 --> 00:16:04.750

Wendy Delgado: to pathways, Take visitors through the eucalyptus grow to the water's edge.

91

00:16:04.780 --> 00:16:15.270

Wendy Delgado: These pathways would be lined with low, wildlife, friendly fences to keep visitors out of these habitat areas, but to allow for easy movement by the wildlife.

92

00:16:15.550 --> 00:16:25.979

Wendy Delgado: The null would also have the same fences along its pathways. Both areas would be closed at night, and as needed seasonally to protect wildlife.

93

00:16:31.600 --> 00:16:38.549

Wendy Delgado: This pathway would lead to an overlook, with views of the wetland terraces and floating islands below.

94

00:16:43.350 --> 00:16:58.309

Wendy Delgado: Continuing south along West Silver Lake Boulevard, the land area becomes quite narrow. Here the tree line promenade would be the primary feature of the site, with occasional seating terraces that take advantage of the views across the reservoir

95

00:17:03.800 --> 00:17:11.330

Wendy Delgado: at the southern end of the project referred to as South Valley is the existing Silver Lake Recreation Center,

96

00:17:11.500 --> 00:17:23.540

Wendy Delgado: based on wreck and parking community. Input, A new multi-purpose building is proposed at the corner of Van Help Place and silver lake boulevard that would house an indoor basketball court

97

00:17:23.560 --> 00:17:26.820

Wendy Delgado: which could also serve as a community center.

98

00:17:27.140 --> 00:17:37.370

Wendy Delgado: The existing outdoor basketball court and play field would be relocated to the north of the space. The existing dog part would be expanded and upgraded.

99

00:17:42.560 --> 00:17:52.349

Wendy Delgado: Here you see the proposed location of the multi-purpose building which would have a small plaza, and is entry next to the existing playground.

100

00:17:57.650 --> 00:18:09.790

Wendy Delgado: Moving north along Silver Lake Boulevard towards the meadow, is the East Narrows. This area would be comprised primarily of the tree line promenade, with occasional seating terraces

101

00:18:09.930 --> 00:18:15.449

Wendy Delgado: where the land becomes wider, a fitness circuit is proposed.

102

00:18:21.070 --> 00:18:34.580

Wendy Delgado: Finally, an overlooked south of the meadow is proposed that projects visitors over the water to take advantage of the long reservoir views, as well as the views of the San Gabriel mountains. Beyond

103

00:18:39.840 --> 00:18:45.360

Wendy Delgado: In addition, several off-site improvements would be included as part of the project.

104

00:18:45.570 --> 00:18:52.659

Wendy Delgado: New parking on West Sa Silver Lake Drive is proposed adjacent to the existing Recreation Center.

105

00:18:57.290 --> 00:19:00.900

Wendy Delgado: Approximately fifteen new spaces would be added.

106

00:19:01.670 --> 00:19:13.699

Wendy Delgado: The proposed project also includes two improvement options along Silver Lake Boulevard, between Armstrong Avenue and Dwayne Street for a length of approximately three thousand feet

107

00:19:19.700 --> 00:19:28.810

Wendy Delgado: currently. The existing roadway includes one particular lane in each direction, with parallel parking on the east side of the street.

108

00:19:28.890 --> 00:19:39.019

Wendy Delgado: Existing bike lanes are located on either side of the street, and a buffer sits between the southbound bike lane and the reservoir complex.

109

00:19:39.360 --> 00:19:45.919

Wendy Delgado: Both options along this area the northbound bike lane would be relocated to the west side,

110

00:19:46.080 --> 00:19:55.819

Wendy Delgado: so that the bike lanes are together closest to the Silver Lake Reservoir complex for ease of accessing the proposed project areas

111

00:19:56.300 --> 00:20:04.699

Wendy Delgado: for option. One, the bike lanes would be buffered by five foot wide, sidewalk running the length of this. This segment,

112

00:20:04.860 --> 00:20:11.490

Wendy Delgado: followed by the addition of parallel parking on the west side of the road and reduced traffic lanes

113

00:20:16.820 --> 00:20:36.410

Wendy Delgado: for option two. The roadway would be restriped, and the bike lanes would be buffered by a proximate four foot painted buffer from the traffic lanes no additional parking is included as part of option two. This figure you see here is included in the project description, chapter two

114

00:20:36.420 --> 00:20:38.789

Wendy Delgado: as figure two over sixteen.

115

00:20:41.040 --> 00:20:51.490

Wendy Delgado: Next Dr. Jan Green, Redstock Ue Environmental Affairs Officer will review the sequel process and provide an overview of the draft r context and findings.

116

00:20:54.610 --> 00:20:56.329

Jan Green: Thank you, Wendy.

117

00:20:56.530 --> 00:21:04.359

Jan Green: Okay. So Uh Sqla requires public agencies to conduct environmental reviews of proposed projects.

118

00:21:04.800 --> 00:21:10.830

Jan Green: This review discloses potentially significant impacts. The projects may have on the environment

119

00:21:11.160 --> 00:21:17.559

Jan Green: and sequel also requires public agencies to consider these impacts prior to approving a project,

120

00:21:17.580 --> 00:21:22.189

Jan Green: and they need to consider if the project benefits outweigh those as project impacts.

121

00:21:23.050 --> 00:21:30.550

Jan Green: During the sequel process. We are able to identify feasible mitigation measures and project alternatives to reduce impacts,

122

00:21:31.080 --> 00:21:41.459

Jan Green: and Sql also provides a platform for obtaining input from interested stakeholders on the proposed project and its environmental impacts. And that's why we're here this evening.

123

00:21:44.100 --> 00:21:56.920

Jan Green: Okay. So the next slide kind of gives an overview of the Eir process, which happens in three phases, the scoping phase, the draft dir phase, and the final vir

124

00:21:57.840 --> 00:22:09.769

Jan Green: Before we review the sequel process, though i'd also like to acknowledge the committee planning process that occurred to shape the master plan as an input, to the scope of the proposed project being considered

125

00:22:09.880 --> 00:22:24.310

Jan Green: as part of the public outreach for the master plan that occurred in two thousand and nineteen, through two thousand and twenty eight stakeholder. Working group meetings were held. There were five community workshops, with an attendance of one thousand five hundred and seventy community members,

126

00:22:24.320 --> 00:22:36.909

Jan Green: and more than eight thousand four hundred questionnaire responses were received. So the proposed project that you're seeing as part of the Eir is a reflection of that uh community planning process.

127

00:22:37.300 --> 00:22:50.880

Jan Green: So regarding the secret process. We started the scoping phase at the beginning of this year. In early January there was a thirty day, public review period and a public meeting that discussed the proposed project and potential environmental impacts.

128

00:22:51.070 --> 00:22:57.590

Jan Green: Twenty six comments were made at the public scoping meeting. Two hundred and six comment letters were submitted,

129

00:22:57.990 --> 00:23:08.369

Jan Green: and there is a detailed summary table and appendix, a of the draft Ir. Regarding how it's received, and where those are responded to in the draft. The Ir.

130

00:23:09.370 --> 00:23:12.490

Jan Green: We are now in the draft ir phase.

131

00:23:12.580 --> 00:23:17.119

Jan Green: I will review the contents of the eir and highlight some of the findings shortly.

132

00:23:17.510 --> 00:23:20.590

Jan Green: The draft ir is currently under public review.

133

00:23:20.760 --> 00:23:25.710

Jan Green: The The comment period has been extended until December second.

134

00:23:26.270 --> 00:23:35.299

Jan Green: You can download a copy of the draft er for review from the Voe's website, and the link is there at the bottom of all of the slides for your reference.

135

00:23:36.100 --> 00:23:44.570

Jan Green: Once the comment period on the draft Eir closes, we will review the comments submitted and begin preparing the final environmental impact report.

136

00:23:44.960 --> 00:23:54.360

Jan Green: The final ar will include a copy of all the comments that we've received, both verbal comments from this public meeting and written comments submitted,

137

00:23:54.400 --> 00:23:58.830

Jan Green: and the city will provide direct written responses to those comments.

138

00:23:58.950 --> 00:24:07.939

Jan Green: The final Eir will also include any revisions needed to the project description, or the technical analysis that came to light during the public review period.

139

00:24:08.240 --> 00:24:16.360

Jan Green: Once the final eir is ready, it will be posted to the voe website, and presented to city council for their consideration.

140

00:24:16.680 --> 00:24:30.309

Jan Green: If city council chooses to certify the eir and approve the proposed project, and a notice of determination will be filed, and we anticipate. This process would occur in early spring, two thousand and twenty-three

141

00:24:32.290 --> 00:24:36.740

Jan Green: so moving on to discuss the contents of the draft Ir.

142

00:24:37.870 --> 00:24:46.170

Jan Green: So I want to touch on how the draft Ei is organized, so that hopefully can find the information regarding the issues that you're interested in.

143

00:24:46.970 --> 00:25:00.960

Jan Green: The Eir includes an executive summary which includes a very condensed project. Description: a summary of the Environmental impacts project design, features and mitigation measures, as well as project Alternatives

144

00:25:01.220 --> 00:25:12.749

Jan Green: Table Ed. S. One is a good reference to get an overall feel of the various environmental resource areas that were analyzed and in mitigation measures that would be applied to reduce impacts.

145

00:25:13.330 --> 00:25:21.630

Jan Green: Table Es: two summarizes the project design features that have been integrated into the project design, and I will speak more about those shortened

146

00:25:22.420 --> 00:25:41.829

Jan Green: chapter two. The project Description provides a detailed description of the proposed project indicating the project locations, setting background history as well as the proposed project elements, objectives, the construction, phasing, and the approval actions that are required to implement the proposed project.

147

00:25:41.840 --> 00:25:54.519

Jan Green: If you want to know if something is included as part of the proposed project, either during the construction phase for the operation space, you should look in Chapter Two to see if it's discussed there.

148

00:25:55.430 --> 00:26:02.520

Jan Green: We have tried to be very transparent about our assumptions regarding what it would take to construct and operate the project.

149

00:26:02.640 --> 00:26:09.920

Jan Green: We identified those assumptions in the project description, and they relied on them later in the environmental impact analysis.

150

00:26:11.070 --> 00:26:20.840

Jan Green: In Chapter three we analyze potential project impacts related to all environmental resource areas contained in the Appendix G. Of the Sql. Guidelines.

151

00:26:20.930 --> 00:26:25.229

Jan Green: There are sections in Chapter three related to each of these topics,

152

00:26:25.260 --> 00:26:43.330

Deborah Weintraub: and any of the technical studies that we're prepared to support. The analysis are included in the

153

00:26:45.070 --> 00:26:48.529

Jan Green: I will highlight some of the impacts for you.

154

00:26:48.750 --> 00:26:57.390

Jan Green: But again, Table Es: one summarizes all of the environmental impacts associated with the proposed project.

155

00:26:57.570 --> 00:27:01.409

Jan Green: The mitigation measures that are applied to reduce those impacts.

156

00:27:02.250 --> 00:27:07.410

Jan Green: Cumulative impacts are also analyzed within each environmental resource. Section

157

00:27:08.550 --> 00:27:21.910

Jan Green: In chapter four we discuss growth, inducing impacts, and note that the proposed project is not intended to facilitate growth, but instead to serve the recreational needs of the surrounding communities.

158

00:27:22.590 --> 00:27:32.630

Jan Green: And in Chapter five. The Eir includes a discussion about project alternatives that have also been considered, and i'll spend more time uh talking about that later.

159

00:27:33.370 --> 00:27:34.710

Jan Green: See? Next slide.

160

00:27:36.780 --> 00:27:50.429

Jan Green: Okay. So here i'd like to touch on some areas of initial concern that we're raised by the public and regulatory agencies during the scoping process, and during our consultations.

161

00:27:50.900 --> 00:28:10.400

Jan Green: Each of these issues are further evaluated in the Er. And addressed in either the project, description, or in chapter three, which includes the impact analysis related to these various environmental resource areas, biology, noise, transportation, population, and housing, public services and water quality.

162

00:28:11.170 --> 00:28:13.739

Jan Green: So i'll just touch on some of these Now,

163

00:28:13.850 --> 00:28:22.369

Jan Green: as part of the proposed project, the perimeter security fencing would be removed as construction of each park zone is complete

164

00:28:22.910 --> 00:28:30.880

Jan Green: as discussed in Section Two point. Seven of the project. Description as part of an as part of the operations phase

165

00:28:31.470 --> 00:28:39.270

Jan Green: security plan to address the safety of park visitors would be implemented. As the fence is removed.

166

00:28:39.680 --> 00:28:58.120

Jan Green: Other operations plans were but required for the proposed project include a wildlife management plan, a Wetlands management plan, a tree succession plan, and a brush clearance plan, and all of those address interest around protecting trees, habitat, and biological resources

167

00:28:58.860 --> 00:29:08.289

Jan Green: for concerns about traffic parking by connectivity and safety. First, I would note tables, two d, seven,

168

00:29:08.470 --> 00:29:12.279

Jan Green: two over eight, and two minus nine in the project description.

169

00:29:12.750 --> 00:29:23.389

Jan Green: These tables identify the number of visitors to the project that we anticipate what happened on the weekends during the week, and for special events

170

00:29:23.470 --> 00:29:33.389

Jan Green: which would need to be permitted, and could occur up to twelve times a year. But we anticipate. They would mostly be focused during the summer months of June and July and August.

171

00:29:33.840 --> 00:29:50.980

Jan Green: So I will note the offsite improvement design options identified in the project description that Wendy discussed earlier. Uh, she referenced figure two dash sixteen, which showed those two design options uh being considered along Silver Lake Boulevard.

172

00:29:51.300 --> 00:30:00.020

Jan Green: So option One added the street, parking with the protected bike lanes and option two focused on adding the protected by claims. But we're wider.

173

00:30:00.340 --> 00:30:06.700

Jan Green: These options are open for public comment about what will best serve the needs of interested stakeholders.

174

00:30:07.440 --> 00:30:13.120

Jan Green: Section Three point, one, six. In chapter three discusses transportation impacts

175

00:30:13.490 --> 00:30:21.799

Jan Green: and project design features that we have added related to managing construction, traffic and traffic related to special events.

176

00:30:22.340 --> 00:30:29.760

Jan Green: Later, I will spend some time highlighting noise impacts from construction and special events during the operation. Space

177

00:30:30.620 --> 00:30:45.550

Jan Green: regarding the drought conditions as Section two point seven point. Four of the project. Description does discuss how, under certain drought conditions or emergencies declared by public agencies that water levels in Solar Lake

178

00:30:45.560 --> 00:30:53.520

Jan Green: and the Ibaho uh, wherever it's, maybe lower to conform to emergency water conservation requirements

179

00:30:54.120 --> 00:30:55.820

Jan Green: a next slide, please.

180

00:30:58.170 --> 00:31:03.840

Jan Green: So here I just want to spend a little time talking about the project design features

181

00:31:03.970 --> 00:31:18.659

Jan Green: that have been integrated into the project, and they've been applied either during the construction or operations phase to demonstrate how thoughtful the project team has been to try to design the project to address various concerns.

182

00:31:18.800 --> 00:31:24.270

Jan Green: These are listed in Section Two point five point eight of the project description,

183

00:31:24.470 --> 00:31:30.369

Jan Green: and we also highlight any Pdfs at the beginning of each impact analysis. Section in chapter three.

184

00:31:30.700 --> 00:31:40.499

Jan Green: So there's thirty-three project design features all together and again those are summarized in table. Es two in the executive summary

185

00:31:40.600 --> 00:32:00.319

Jan Green: um three that I just wanted to highlight for you uh one was around biological resources. So with uh, requiring wildlife fencing signage which will require interpretive signage to be installed near wildlife, friendly fencing, to educate the public on wildlife and habitat sensitivity,

186

00:32:00.330 --> 00:32:03.760

Jan Green: and to encourage the public not to enter restricted areas.

187

00:32:05.000 --> 00:32:09.500

Jan Green: Uh another. One is related to construction activities

188

00:32:10.430 --> 00:32:27.430

Jan Green: so requiring a prior to the start of construction, the the city would notify Ah! Adjacent businesses and residents about the proposed construction activities and tentative schedule, and the city would require the construction contractor to designate a community Renaissance

189

00:32:27.440 --> 00:32:42.030

Jan Green: to respond to any issues related to construction activities, including noise or vibration concerns, and the community. Liaison would have to manage a log of these communications and show resolution of those issues

190

00:32:42.040 --> 00:32:48.040

Jan Green: and make a uh telephone hotline number available with the signage on the project site.

191

00:32:49.280 --> 00:32:58.149

Jan Green: Another project design feature is having a special site-specific traffic control and transit plan for large events.

192

00:32:58.410 --> 00:33:02.549

Jan Green: So um. Large events would require a permit,

193

00:33:02.870 --> 00:33:15.869

Jan Green: and they would be required to do a site, specific traffic control, plan to provide information on parking and circulation and highlight transit options for event attendees to minimize congestion

194

00:33:15.900 --> 00:33:20.390

Jan Green: um and vehicle Miles travel associated with the the project,

195

00:33:21.720 --> 00:33:28.660

Jan Green: and we're going to move on now and talk generally about the in impact analysis, methodology that's applied

196

00:33:28.710 --> 00:33:30.620

Jan Green: uh during the sequel process.

197

00:33:31.450 --> 00:33:32.509

Jan Green: So next five.

198

00:33:35.850 --> 00:33:46.979

Jan Green: Okay. So how do we calculate secret impacts? So here's the framework that we use? We look at the baseline environmental conditions that are established for each environmental resource area.

199

00:33:47.530 --> 00:33:54.330

Jan Green: We consider the regulatory requirements and any project design features that have been integrated into the project.

200

00:33:54.600 --> 00:33:59.759

Jan Green: And then we look at potential impacts due to project construction and operation

201

00:34:00.120 --> 00:34:06.599

Jan Green: and then significance. Determinations are made for each project impact in these following categories.

202

00:34:06.700 --> 00:34:09.040

Jan Green: So there's either no impact

203

00:34:09.630 --> 00:34:18.129

Jan Green: uh. There are less than significant impacts where the impact does not exceed a an established threshold

204

00:34:18.330 --> 00:34:27.970

Jan Green: or um. It is less than significant with mitigation, where impacts can be reduced to below the threshold with the application of indication measures.

205

00:34:28.409 --> 00:34:44.810

Jan Green: And finally, there is a category called significant and unavoidable impacts. And this is where impacts cannot be reduced below the threshold. And even with the application of reasonable and feasible mitigation measures

206

00:34:46.300 --> 00:34:47.290

Jan Green: next slide, please.

207

00:34:49.080 --> 00:34:59.119

Jan Green: Okay. So now i'm going to briefly summarize the findings of the draft, ir and highlight some specific environmental impacts to certain resource areas.

208

00:34:59.880 --> 00:35:11.210

Jan Green: So we conducted our analysis, and found that the project did not result in any impacts where impacts were found to be less than significant in these resource areas.

209

00:35:11.450 --> 00:35:16.949

Jan Green: Um, I do want to highlight here. That transportation is included on this list.

210

00:35:17.200 --> 00:35:24.549

Jan Green: The Oe consulted with led ot on our traffic study, and the project was found to result in no impacts to

211

00:35:24.600 --> 00:35:34.599

Jan Green: transportation and no mitigation Measures were required. In fact, none of the environmental resource areas on this list required mitigation. We applied to reduce impacts.

212

00:35:35.090 --> 00:35:40.469

Jan Green: There are project design features again identified in table es two

213

00:35:40.530 --> 00:35:45.939

Jan Green: um with, and those are highlighted again in the beginning of each section. In Chapter three

214

00:35:46.020 --> 00:35:56.410

Jan Green: um, and they are implemented because they are either standard best practices or the city is trying to design the project in the thoughtful way to respond to stakeholder concern.

215

00:35:57.830 --> 00:36:00.979

Jan Green: Okay, let's move on to the next uh impact category.

216

00:36:01.230 --> 00:36:04.709

Jan Green: So those are less than significant with mitigation.

217

00:36:05.680 --> 00:36:14.640

Jan Green: So for these environmental resource areas we do need to apply mitigation measures to reduce environmental impacts to the below the threshold of significance.

218

00:36:15.400 --> 00:36:18.549

Jan Green: There's twenty four mitigation measures identified.

219

00:36:18.610 --> 00:36:23.949

Jan Green: So just to step through these briefly for aesthetics. The concern is light and glare,

220

00:36:23.980 --> 00:36:35.290

Jan Green: and we require mitigation measures that address shield the use of shielded light fixtures, and the use of non glare materials for buildings and structures.

221

00:36:35.790 --> 00:36:44.400

Jan Green: Okay? Ah, for air quality. We require mitigation measures to reduce the construction emissions from hall trucks and construction equipment

222

00:36:45.680 --> 00:36:54.069

Jan Green: related to biology. Uh, I'm going to spend a little time on this, because I know there's a high level of interest around biological resources

223

00:36:54.200 --> 00:37:01.299

Jan Green: for the project design. We conducted tree surveys. We identified several type of protected trees on site,

224

00:37:01.420 --> 00:37:04.320

Jan Green: so we have Southern California, Black Walnut

225

00:37:04.360 --> 00:37:08.219

Jan Green: Coast, live oak, Mexican, elder, Berry, and Toyon.

226

00:37:08.420 --> 00:37:23.059

Jan Green: There are twelve project design features that focus on managing biological issues, such as nesting birds, best practices for trees related to fencing, avoiding root damage, irrigation, pest, management, et cetera.

227

00:37:24.380 --> 00:37:32.450

Jan Green: The proposed project will require tree removals, and those will be administered under the jurisdiction of the recreation and Parks department,

228

00:37:32.780 --> 00:37:47.370

Jan Green: and the project is proposing tree replacement ratios that are consistent with raft's, requirements, and in relation to some species like the coast by oak uh, based on consultation with the California Department of efficient wildlife.

229

00:37:47.880 --> 00:37:50.840

Jan Green: The project also includes a tree succession plan.

230

00:37:51.100 --> 00:37:54.220

Jan Green: You can read more about that in the project. Description,

231

00:37:54.370 --> 00:38:07.639

Jan Green: mitigation measures required to reduce construction impacts um include requiring a qualified biologist to conduct a worker. Environmental awareness, training with construction, Personnel

232

00:38:07.730 --> 00:38:15.919

Jan Green: surveys are going to be required prior to construction to look for the presence of the crotch's, bumblebee, and monarch butterflies;

233

00:38:16.240 --> 00:38:22.119

Jan Green: and if those species are found, protocols will be uh put in place to manage impacts

234

00:38:22.360 --> 00:38:36.600

Jan Green: that surveys myself would be conducted prior to construction, and there will be protocols uh put in place if bats are identified, and you can learn more about that by reviewing mitigation measure uh bio, three special status backs.

235

00:38:37.860 --> 00:38:51.700

Jan Green: Um. Regarding cultural resources, we have four mitigation measures that discuss archaeological monitoring requirements during construction, training for construction personnel and what to do in the event that um resources are discovered.

236

00:38:51.710 --> 00:39:01.220

Jan Green: And this also applies to paleontological resources and tribal cultural resources which will require native American monitoring. And

237

00:39:13.300 --> 00:39:15.269

Jan Green: so um

238

00:39:15.470 --> 00:39:22.949

Jan Green: we did end up with a significant and unavoidable impact related to noise

239

00:39:23.900 --> 00:39:24.750

Jan Green: at

240

00:39:44.730 --> 00:39:45.839

Jan Green: um.

241

00:39:45.870 --> 00:39:55.690

Jan Green: But we do have construction impacts related to noise and vibration especially related to um human annoyance,

242

00:39:55.990 --> 00:40:07.319

Jan Green: and we do have noise impacts associated with the the operations phase when amplified speakers are used during special events.

243

00:40:07.970 --> 00:40:14.209

Jan Green: There are cumulative noise impacts also related to those construction and operation phases.

244

00:40:14.530 --> 00:40:29.749

Jan Green: So we have applied for mitigation measures to uh reduce sound and vibration from construction equipment, and we do have a mitigation measure related to um, the amplified speaker. Use, but regardless of that

245

00:40:29.760 --> 00:40:35.349

Jan Green: um, we are not able to reduce those impacts to a level of less than significant

246

00:40:35.600 --> 00:40:54.000

Jan Green: Um. So what that means uh is that the city, you know, would be presented with this information, and then make a decision about whether the project benefits outweigh um those impacts, and whether a statement of overwriting considerations should be adopted.

247

00:40:58.670 --> 00:41:15.489

Jan Green: So I will mention, uh, there are recreation impacts that also result in a significant, unavoidable finding, because this is a

recreation facility, and it's a secondary impact associated with the noise that occurs.

248

00:41:16.710 --> 00:41:17.970

Jan Green: Um,

249

00:41:18.120 --> 00:41:23.559

Jan Green: I wanted to just talk again a little bit about the operational noise impact.

250

00:41:24.070 --> 00:41:29.680

Jan Green: So the special events the assumption we made is that these would occur in the meadow

251

00:41:29.980 --> 00:41:40.740

Jan Green: they would be concerts or outdoor movie screenings or luncheons, something um that would require that could accommodate up to six hundred people.

252

00:41:40.870 --> 00:41:48.190

Jan Green: They could occur up to twelve times a year. Um! But again likely they would uh be concentrated in the summer months,

253

00:41:48.700 --> 00:42:00.830

Jan Green: and for those type of events a permit would be required, and there would be controls around the duration of the events, the direction of the speakers. Um, they would have to avoid facing north or south,

254

00:42:01.030 --> 00:42:10.990

Jan Green: and the use of temporary noise, barriers might be required. But again, with even with all of those requirements we're not able to reduce the anticipated noise

255

00:42:11.030 --> 00:42:13.929

Jan Green: to a less significant levels,

256

00:42:15.020 --> 00:42:23.509

Jan Green: and if we were to move to the next slide, we can just kind of get a sense of the challenge that we're facing here, which is

257

00:42:23.530 --> 00:42:27.380

Jan Green: the project area, and then the area in

258

00:42:27.620 --> 00:42:34.999

Jan Green: uh light yellow are the sensitive noise receptors which are basically residents that surround the project site.

259

00:42:35.560 --> 00:42:54.350

Jan Green: Um, so it's. And then just based on the geography, too, with the higher elevations and the the hill surrounding the site, it's very hard to control um and manage the attenuation of noise that would be coming from the site, either from construction or operations. Um, at least with the amplified sound.

260

00:42:55.810 --> 00:42:58.270

Jan Green: So uh next slide.

261

00:42:59.230 --> 00:43:13.929

Jan Green: I'd like to spend a little time now moving on to the alternatives analysis. Which is It's again saying, Slow down. You got it. Yeah, thank you.

262

00:43:16.840 --> 00:43:17.840

Jan Green: So

263

00:43:18.490 --> 00:43:24.710

Jan Green: under Sqa, we are required to consider a reasonable range of alternatives to the project

264

00:43:24.900 --> 00:43:35.419

Jan Green: or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen,

265

00:43:35.610 --> 00:43:37.899

Jan Green: any of the effects of the project,

266

00:43:37.950 --> 00:43:42.079

Jan Green: and evaluate the comparative merits of those alternatives.

267

00:43:43.060 --> 00:43:48.140

Jan Green: So for this analysis we looked at three project alternatives in detail.

268

00:43:48.930 --> 00:43:52.559

Jan Green: We have alternative one and no project. Alternative

269

00:43:52.790 --> 00:43:56.849

Jan Green: Alternative to the reduced project. Alternative

270

00:43:57.530 --> 00:44:04.919

Jan Green: Alternative Three the Silver Lake Reservoir, natural lands and open space preserve alternative.

271

00:44:05.900 --> 00:44:18.529

Jan Green: If you look at Table five four, we identify the concepts considered during the master plan and the feedback that we received during the scoping process.

272

00:44:24.230 --> 00:44:26.589

Jan Green: Uh limiting, lighting,

273

00:44:27.040 --> 00:44:37.839

Jan Green: keeping the perimeter fence in place, reducing hardscape. So we considered all of those ideas in the formation of these that project alternatives

274

00:44:39.130 --> 00:44:49.819

Jan Green: in the alternatives analysis. We look at how well each of these alternatives addresses the project objectives. You can look at, uh that analysis and table five set,

275

00:44:50.650 --> 00:45:03.560

Jan Green: and we considered how each of the project alternatives may result in reduced impacts compared to the proposed project. And again, tables, five, five and five point six percent. This analysis.

276

00:45:03.680 --> 00:45:04.950

Jan Green: And then

277

00:45:04.980 --> 00:45:09.009

Jan Green: we select an environmentally superior alternative.

278

00:45:09.380 --> 00:45:15.899

Jan Green: So i'm going to talk a little bit about the environmentally superior alternative. Now and then. I'm. Going to move on to just

279

00:45:16.100 --> 00:45:19.620

Jan Green: giving some more details about these alternatives.

280

00:45:20.600 --> 00:45:21.839

Jan Green: Okay, So

281

00:45:22.250 --> 00:45:33.049

Jan Green: section one point five, section, one, five, two, six point, six of the sequel guidelines requires that an environmentally superior alternative be identified.

282

00:45:33.330 --> 00:45:39.739

Jan Green: The environmentally superior alternative is the alternative that would be expected to generate the least amount

283

00:45:39.810 --> 00:45:41.959

Jan Green: of environmental, significant impacts,

284

00:45:42.590 --> 00:45:51.909

Jan Green: as shown in Table Five Point five. Each of the alternatives to the proposed project would eliminate the significant and unavoidable impacts of the proposed project,

285

00:45:51.930 --> 00:45:55.379

Jan Green: which is the noise impacts on permitted special events.

286

00:45:56.250 --> 00:46:08.279

Jan Green: Although the no project alternative would result in the fewest impacts on the existing environment. This alternative would not result in the benefits anticipated under the proposed project

287

00:46:09.340 --> 00:46:12.850

Jan Green: alternative to or alternative three,

288

00:46:13.390 --> 00:46:19.179

Jan Green: or meet the fundamental project objective of repurposing the project site into a public

289

00:46:36.330 --> 00:46:48.580

Jan Green: as you loaded in table. Five six impacts associated with alternative to an alternative three would be less than the proposed project due to the reduced amount of construction

290

00:46:48.600 --> 00:46:51.559

Jan Green: and elimination of permitted special events,

291

00:46:56.750 --> 00:47:00.040

Jan Green: it would result in the least amount of construction

292

00:47:00.310 --> 00:47:04.019

Jan Green: and least noise, vibration, and air missions,

293

00:47:04.070 --> 00:47:10.140

Jan Green: However alternative three would result in a greater benefit to habitat value.

294

00:47:18.640 --> 00:47:24.600

Jan Green: Sequel guidelines do not require an agency to select the environment superior alternative

295

00:47:45.930 --> 00:47:50.019

Jan Green: to increase spaces for community and family gatherings,

296

00:47:51.070 --> 00:48:01.650

Jan Green: in addition, by eliminating all new built structures alternative to, would not provide all of the recreational and community benefits included in the proposed project

297

00:48:01.670 --> 00:48:05.280

Jan Green: and envisions in the primary project objective.

298

00:48:06.320 --> 00:48:14.129

Jan Green: Okay. So i'm going to move on now to spend a little more time talking about um alternative two and three,

299

00:48:26.070 --> 00:48:29.880

Jan Green: which would modify the existing um

300

00:48:30.040 --> 00:48:36.240

Jan Green: at Silver Lake Reservoir Complex into a public park similar to the proposed project.

301

00:48:36.300 --> 00:48:47.629

Jan Green: But it would not build a new structures that there is a it's a little hard to see. But when you look at the figure in the document, there's a a laundry list of items that are included,

302

00:48:47.770 --> 00:48:52.660

Jan Green: or i'm sorry that are removed from the project uh as compared to the proposed project

303

00:48:53.770 --> 00:48:59.690

Jan Green: alternative to would be constructed within a similar overall footprint as the proposed project,

304

00:48:59.840 --> 00:49:03.210

Jan Green: and would only focus on the habitat enhancement

305

00:49:03.410 --> 00:49:16.969

Jan Green: aspect of the proposed project. For example, recreational facilities, such as new multi purpose, facility. The play field, the expanded dog park, or the reconfiguration of the existing representer, would not be constructed

306

00:49:28.670 --> 00:49:36.830

Jan Green: an under alternative to the seeding terraces. The informal play area and the floating dock would not be implemented in the meadow.

307

00:49:37.380 --> 00:49:44.330

Jan Green: The Education Center the multi-purpose facility and shade structures would also not be constructed

308

00:49:45.170 --> 00:49:52.770

Jan Green: with the removal of the Education Center in the meadow and the new multi-purpose facility in the south valley.

309

00:50:03.300 --> 00:50:05.840

Jan Green: But the center would not be reconfigured

310

00:50:06.340 --> 00:50:12.260

Jan Green: updates to the dog park would include improvements within the existing footprint of the dog Park,

311

00:50:12.530 --> 00:50:15.700

Jan Green: adding grass and some seeding areas for owners.

312

00:50:16.460 --> 00:50:19.319

Jan Green: Lighting throughout the project site would be reduced.

313

00:50:19.990 --> 00:50:23.709

Jan Green: Special events would not be allowed as part of this alternative

314

00:50:24.150 --> 00:50:34.199

Jan Green: similar to the proposed project alternative, two would remove the perimeter fence to allow for increased public access and improve wildlife. Access to the water

315

00:50:34.560 --> 00:50:39.759

Jan Green: alternative to would also be operated similarly to the proposed project.

316

00:50:40.060 --> 00:50:46.890

Jan Green: Tree removals would still be required of still required similar to the proposed project. Those replacement ratios

317

00:50:47.720 --> 00:50:54.359

Jan Green: off-site bike improvements would occur along Silverlay Beauregard, and no new parking would be added

318

00:50:54.420 --> 00:50:58.380

Jan Green: near the South Valley along West Silver Lake Drive.

319

00:51:07.520 --> 00:51:09.159

Jan Green: Okay. So next slide

320

00:51:09.620 --> 00:51:15.740

Jan Green: uh. So Alternative three is the Silver Lake Reservoir, Natural land and open Space Preserve

321

00:51:16.760 --> 00:51:35.830

Jan Green: for alternative free. Uh. This was proposed during the public scoping period, as it is a result of essentially of a hybrid of project components, focusing on improving and maintaining current habitat values in much of the park, while maintaining some recreational features, such as the multi purpose facility. In the South Valley

322

00:51:36.040 --> 00:51:47.990

Jan Green: alternative three would be constructed within a similar overall footprint as the proposed project, and would focus on limiting public access to the null, the eucalyptus grow and the water's edge.

323

00:51:48.500 --> 00:52:03.450

Jan Green: It would include a reconfigured and expanded line in the meadow, with expanded, ornamental and green gardens in the null only damaged or dying trees would be removed, and as a result the Tree succession plan for tree planting would be reduced.

324

00:52:03.530 --> 00:52:11.899

Jan Green: There would be no public access to the Knoll and the Education Center. Nature trails and seeding terraces would not be constructed

325

00:52:12.140 --> 00:52:16.670

for the I of her reservoir. Only the walking paths would be expanded,

326

00:52:16.940 --> 00:52:22.010

Jan Green: and eucalyptus grow only damaged or dying trees would be removed.

327

00:52:23.910 --> 00:52:28.709

Jan Green: Um! And the succession plan for tree planting would be reduced,

328

00:52:29.230 --> 00:52:34.120

Jan Green: and then east and west narrows. The walking path will be updated in the expand

329

00:52:35.140 --> 00:52:42.079

Jan Green: as part of this alternative, an eight foot high, non-scalable, continuous perimeter fence,

330

00:52:42.470 --> 00:52:45.090

Jan Green: with access gates would be constructed

331

00:52:45.580 --> 00:52:51.999

Jan Green: alternative. Three would focus on improving up one habitat and would include wetland creation along the shoreline.

332

00:52:52.210 --> 00:53:00.269

Jan Green: The proposed promenade and walking paths would be constructed under this alternative, but they would be moved further away from the water's edge as feasible.

333

00:53:00.860 --> 00:53:08.519

Jan Green: This alternative would retain all current public use facilities while improving the more heavily used facilities in the South Valley.

334

00:53:09.760 --> 00:53:18.669

Jan Green: Okay. So i'm gonna uh move on to the next slide. And just uh generally review again where we are and next steps,

335

00:53:18.940 --> 00:53:32.769

Jan Green: which are um. The comment period is open on the draft, the Ar. I hopefully, by identified um some helpful references for you while you do. Your review and comments are due on December the second

336

00:54:11.680 --> 00:54:17.299

Jan Green: um, so you can send written comments to me, or submit them uh to the website.

337

00:54:17.770 --> 00:54:32.549

Jan Green: And with that I think i'm going to hand it over to Nicole, who is going to get ready um to moderate our public comment process, and we are going to give our a little break in the Enter

338

00:54:34.820 --> 00:54:53.160

Nicolle Steiner: Thanks, Jan um while we're doing that. If you've joined the call um recently, please be sure to select your preferred language. Um, you will do that by clicking on that interpretation button at the bottom of your screen and select either English or Spanish,

339

00:54:53.580 --> 00:55:00.650

Nicolle Steiner: and then click that interpretation button one more time, um, and select mute original audio,

340

00:55:00.990 --> 00:55:04.090

Nicolle Steiner: and that way you'll be listening to the correct language.

341

00:55:07.900 --> 00:55:10.150

Nicolle Steiner: Um! At this time

342

00:55:14.710 --> 00:55:25.079

Nicolle Steiner: you can raise your virtual hand, and we'll get folks a few minutes to raise their hand here while we give the interpreter a few minutes. Um!

343

00:55:26.370 --> 00:55:33.220

Nicolle Steiner: Again. We are only taking verbal comments. We are not going to be responding to any questions today.

344

00:55:33.570 --> 00:55:43.210

Nicolle Steiner: You can raise your virtual hand by clicking that little raised hand button at the bottom of your screen or dialing star nine on the phone.

345

00:55:43.750 --> 00:55:46.180

Nicolle Steiner: I will be going down the list in order

346

00:55:46.370 --> 00:55:53.850

Nicolle Steiner: Um! In which they appear on my screen, and we'll call out your name or the last three digits of your phone number.

347

00:55:55.020 --> 00:56:07.339

Nicolle Steiner: Um. At that time we will then unmute you and you'll have to accept to unmute yourself. And again, if you're on the phone. You'll have to press Star Six to unmute yourself.

348

00:56:08.730 --> 00:56:13.689

Nicolle Steiner: Um, Once you're unmuted, go ahead and state your name and your comment.

349

00:56:14.010 --> 00:56:19.209

Nicolle Steiner: So we mentioned. Please stay within the two minute allotment that we have

350

00:56:19.240 --> 00:56:24.210

Nicolle Steiner: um, so that we give everyone a chance to provide their verbal comments tonight.

351

00:56:24.460 --> 00:56:32.600

Nicolle Steiner: You'll see the clock over here. It'll run down your time, so please start wrapping up your comments. As you see the time running out

352

00:56:34.930 --> 00:56:45.150

Nicolle Steiner: again. We have a Spanish translator, so we'll give them a few minutes. And also when you are giving your comment, please speak clearly and into your mic, so he can hear you.

353

00:56:45.270 --> 00:56:46.880

Nicolle Steiner: We'll get folks some time

354

00:56:46.950 --> 00:56:48.609
Nicolle Steiner: to raise their hand.

355
00:57:09.800 --> 00:57:11.370
Nicolle Steiner: All right.

356
00:57:17.540 --> 00:57:19.949
Nicolle Steiner: We will start with Andrew.

357
00:57:26.210 --> 00:57:43.580
Thomas, Andrew: Hello! Can you hear me?

358
00:57:43.590 --> 00:58:03.529
Thomas, Andrew: My comment is that the draft eir accurately and comprehensively describes the impacts of and potential mitigation strategies for the proposed project, and I support the City Council approving the draft Eir, or the Eir at that point of the types of impacts considered the most significant and unavoidable impact, as you mentioned, is a noise

359
00:58:03.540 --> 00:58:21.079
Thomas, Andrew: associated with construction and operation of the complex. I think the mitigation measures of the Ei are good, but I do urge you to prohibit amplified music in the complex at all times, and I also urge the construction, noise, mitigation, measures are here too strictly and expanded upon wherever possible.

360
00:58:21.180 --> 00:58:33.559
Thomas, Andrew: Years of experience in the community have convinced me that the community members support the goals of the master plan, which are an enhanced walking experience, a serene, natural retreat, and a place to interact with the neighbors

361
00:58:33.580 --> 00:58:50.869
Thomas, Andrew: as a participant in the development of the master plan. I believe the elements of the plan are all there for the reason for this reason, and they'll all uh help achieve these goals. Without these elements the goals will not be met, and the benefits will not be realized. And i'm aware of the proposals to maintain the status quo,

362
00:58:50.910 --> 00:59:08.730
Thomas, Andrew: which would mean the reservoirs property, would remain mainly used as a dwp, storage, and staging facility, and also, as a quote you, Lake Unquote, and I think it's unfair to restrict the use of the complex to these exclusive and exclusionary uses. When one la needs parks,

363

00:59:08.740 --> 00:59:22.370

Thomas, Andrew: two birds need areas to nest and feed three. The planet needs carbon, sequestration and cooling from things like water and more trees, and for the city needs stormwater capture. So we have all these needs, and we have this opportunity.

364

00:59:22.380 --> 00:59:36.830

Thomas, Andrew: I think it's unwise not to seize this opportunity to realize these benefits. Of course, construction will be necessary, which will result, as we said, an unavoidable noise. But we can accept this if the noise, mitigation measures are it here too,

365

00:59:36.840 --> 00:59:53.759

Thomas, Andrew: and I want to also mention that I support the off-site improvements that mitigate the transportation impacts, including the parking and bicycle lanes that are included in the draft. The ir um I think the the the plan pro poses a parking lane along Silver Lake Drive and a reconfigured parking area on west over Lake Drive,

366

00:59:53.770 --> 00:59:57.269

Thomas, Andrew: and I support these measures because I think they should believe

367

00:59:57.390 --> 01:00:14.580

Thomas, Andrew: the parking pressures on the neighborhood residents, and because the proposed protected bike lanes will increase safety for pedestrians and bicyclists. So proposed improvements to the Dock Park and rec center, too, as well as the regrading and restoration of the pedestrian paths, will address safety concerns two hundred and fifty

368

01:00:14.590 --> 01:00:21.070

Thomas, Andrew: in the area and serve the recreational needs of the community. So to them up quickly, I accept the findings of the Eir

369

01:00:21.300 --> 01:00:28.580

Thomas, Andrew: with the additional noise, mitigation measures, and I will ultimately urge the city council to approve the eir. Thank you.

370

01:00:30.450 --> 01:00:35.700

Nicolle Steiner: Thank you for your comment. You got a few extra seconds there. Forgot the clock.

371

01:00:40.180 --> 01:00:42.410

Nicolle Steiner: Um, Scott Sternberg!

372

01:00:45.850 --> 01:00:48.889

Scott Sternberg: Hi! Can you hear me? Yes,

373

01:00:49.060 --> 01:00:57.459

Scott Sternberg: uh, okay. I'll start. I think you know. I guess the first thing I want to start with i'm a I've looked for thirteen years of a homeowner.

374

01:00:57.510 --> 01:01:09.330

Scott Sternberg: I'm not a stakeholder uh it seems like the stakeholders you're referring to, or the people on this call, and the people who who have done a great job of putting this plan together, and I realized you spent a lot of time doing that. But

375

01:01:10.190 --> 01:01:16.969

Scott Sternberg: the first thing I want to say is this community does not have recreational needs. We might have recreational once we

376

01:01:17.050 --> 01:01:36.660

Scott Sternberg: right. We might want to have a nice place to walk around, but we don't have recreational needs. Our needs are to mitigate the homeless problem. These are people who are part of our community, and our tax dollars should be going towards them, not making a nice place for us to walk and walk our dogs. I have a dog I love walking around the reservoir.

377

01:01:36.670 --> 01:01:54.989

Scott Sternberg: Um! Our needs are around an imminent drought. The drought that we're in the drought that's getting worse. We don't have recreational needs. We have Recreational W. So let's be clear about that. And as a community member, I don't want this. I think maybe alternative to really alternative. Three sound

378

01:01:55.010 --> 01:02:11.649

Scott Sternberg: same to me when we're living living at a time that we're living in right now. When I look around every day and nobody is talking about homelessness, we're talking about this. I feel like I'm in a in the twilight zone. Uh in terms of your study. I appreciate all the work you've been into it

379

01:02:11.660 --> 01:02:30.860

Scott Sternberg: that went into it. But honestly, the fact that transportation uh showed up as low impact makes me question the efficacy of that impact analysis. I've lived here again. For thirteen years I've

been on all these streets. I've walked around all these streets. The parking solutions that you've suggested are completely insufficient.

380

01:02:30.870 --> 01:02:39.880

Scott Sternberg: We should not be trying to make this special event arena for people to be driving through this place, parking It's going to ruin

381

01:02:39.980 --> 01:02:44.420

Scott Sternberg: our neighborhood. It's going to kill local businesses.

382

01:02:44.430 --> 01:03:00.139

Scott Sternberg: Uh nobody wants this. I appreciate. All of you have done this hard work. You stakeholders. You want this, You've done this work. I get it, but nobody wants this. Take the fence down, Plan some trees. Let's do stuff for wildlife, but let's really focus on our needs. Not at once. Thank you for your time.

383

01:03:01.380 --> 01:03:03.119

Nicolle Steiner: Thank you for your comment,

384

01:03:10.010 --> 01:03:11.229

Nicolle Steiner: Cindy.

385

01:03:11.770 --> 01:03:15.059

Nicolle Steiner: I'll back back. I'm sorry i'm gonna

386

01:03:16.450 --> 01:03:18.320

Nicolle Steiner: mess up some of these names.

387

01:03:18.620 --> 01:03:25.330

Cyndi Hubach: Hi, Thank you. That was perfect. Well, hubach um I'm Cindy, you back I love on the way. Can you hear us?

388

01:03:25.640 --> 01:03:28.750

Nicolle Steiner: Uh, yes, you are unmuted.

389

01:03:29.930 --> 01:03:32.550

Cyndi Hubach: Yes, I hear you.

390

01:03:33.340 --> 01:03:37.580

Tamseel Mir: I can hear you, Cindy, I can hear you.

391

01:03:38.570 --> 01:03:39.819

Cyndi Hubach: Um

392

01:03:40.330 --> 01:04:00.280

Cyndi Hubach: so. Yes, Hi, I'm Cindy Hubbach. I live on the west side of the Reservoir, and I'm. A member of the Silver Lake Reservoirs Conservancy Um actually joined the Conservancy because of my concerns about wildlife Um! Every spring I would see ducklings walking down the road to their doom or getting picked off in the reservoir

393

01:04:00.290 --> 01:04:07.970

Cyndi Hubach: uh migratory birds were stopping in, but finding no real place for food or shelter. Uh! There was water, and there were trees, but it wasn't working

394

01:04:08.080 --> 01:04:10.319

Cyndi Hubach: for any of them. And um!

395

01:04:10.480 --> 01:04:18.049

Cyndi Hubach: And I actually thought at the time what we need are some floating islands. That's why I got involved actually um in the conservancy and

396

01:04:18.500 --> 01:04:22.030

Cyndi Hubach: the reservoir improvements in general,

397

01:04:22.160 --> 01:04:30.200

Cyndi Hubach: the reservoir is, there are not habitat When they were built at the turn of the century the banks were earthen and gently sloped in the fiftys. They were

398

01:04:30.320 --> 01:04:44.419

Cyndi Hubach: um steepened and short up with asphalt and cement. We see today to increase capacity. So what we have been left with are the remnants of an industrial water facility, those steep banks, the ugly striped asphalt that one hundred and fifty

399

01:04:44.490 --> 01:04:50.689

Cyndi Hubach: people have complained about as long as I've lived here, and the large, sterile, inhospitable pools.

400

01:04:50.970 --> 01:05:00.300

Cyndi Hubach: Um! It's true that we've been through a lot of construction in this neighborhood, and none of us really wants to go through it again. But the fact is that we didn't benefit from most of that construction.

401

01:05:00.540 --> 01:05:05.640

Cyndi Hubach: These improvements will benefit all of us. The plans, the animals, the people

402

01:05:05.790 --> 01:05:12.899

Cyndi Hubach: um, and there will be some pain. But there will be something of your lasting value and beauty at the end of it

403

01:05:12.910 --> 01:05:36.499

Cyndi Hubach: this project meets the objectives of the community plan to increase some um. It is carefully to consider the desires and preferences of the process of selecting something we can. Maybe we could give her instructions to if you could go down. I would also like to say that while we may disagree on aspects of the plan, or on the value of having any plan at all

404

01:05:36.510 --> 01:05:45.249

Deborah Weintraub: as neighbors and stakeholders, I know we all want um what is best for our community to work through this and remain friends.

405

01:05:45.260 --> 01:06:01.020

Cyndi Hubach: Um! As with anything in a democracy. If we do this right um, none of us will be completely happy when it's over. But I hope we can create something that we all come up with, and that makes our neighborhood a better place. Maybe we should go to another person and come back to Cindy.

406

01:06:01.490 --> 01:06:03.550

Nicolle Steiner: Okay, Yup, we can do that.

407

01:06:03.910 --> 01:06:08.639

Nicolle Steiner: So, Cindy, you have to click the interpretation button, as it says on this screen.

408

01:06:09.470 --> 01:06:16.639

Nicolle Steiner: And if everyone could take a time to just look at the screen more time and click that interpretation button so that we can all hear you.

409

01:06:16.720 --> 01:06:17.870

Nicolle Steiner: Um!

410

01:06:17.980 --> 01:06:27.760

Nicolle Steiner: We'd appreciate that. So you have to click the button twice one to pick the language, and the second time to the original audio. That's an important step.

411

01:06:29.410 --> 01:06:31.660

Nicolle Steiner: All right, Frida. Sham

412

01:06:42.020 --> 01:06:44.460

Nicolle Steiner: Steven, Can you on me? There we go.

413

01:06:47.980 --> 01:06:49.689

Freda Shen: Okay, You got it.

414

01:06:49.760 --> 01:06:59.309

Freda Shen: Yes, we can hear you. Thank you. Hi! I'm Frida Shan, originator and co-founder of Silver Lake wildlife sanctuary and twenty-four year. Silver Lake resident

415

01:06:59.320 --> 01:07:14.929

Freda Shen: I would like to request a second meeting a few weeks from now to give people time to review the complex draft eir. It is very complex, especially Chapter five, which has just recently become available on the Project website

416

01:07:14.940 --> 01:07:31.530

Freda Shen: Chapter Five. The analysis of alternatives is critical to understanding our options. Going forward. It has found two alternatives which are acknowledged to be environmentally superior to the proposed project. Why should we care?

417

01:07:31.540 --> 01:07:44.339

Freda Shen: Because we are in a time of severe decline in bird numbers and a time of increasing danger of multiple species going extinct. This earth needs our care.

418

01:07:44.350 --> 01:08:00.440

Freda Shen: These species need space. Our values may be global, but we must act locally. The reservoir complex is one of the best open habitat spaces left in crowded Los Angeles. It is in our care

419

01:08:00.450 --> 01:08:17.809

Freda Shen: we had mitigations for her, and nesting during earlier construction. They did not work, and the herons left their eucalyptus grove nests only coming back years later in a different location. Pictures are pretty, but reality may have different outcomes.

420

01:08:17.990 --> 01:08:46.159

Freda Shen: At this point in our review we urge the city to choose alternative three with elements from alternative to please email us at Silver Lake Wildlife sanctuary at Gmail Dot Com. For information about alternatives three and two with questions. Details will go in our written comments. These two alternatives are environmentally superior alternatives to the proposed project, and together are the best choice

421

01:08:46.170 --> 01:08:52.049

Freda Shen: for the future of our reservoir complex and the lives that depend on it. Thank you.

422

01:08:53.790 --> 01:08:55.850

Nicolle Steiner: Thank you for your comment today,

423

01:08:59.990 --> 01:09:01.759

Debbie Slater.

424

01:09:07.450 --> 01:09:26.160

Debbie Slater: Hello! Can you hear me? All right? Thank you so much for uh allowing us to speak tonight. I'm going to start off by saying, just because you can build something doesn't mean that you should build something, and I so appreciate the gentleman who spoke second,

425

01:09:26.220 --> 01:09:36.460

Debbie Slater: and bringing up this idea of recreational needs. Uh, the idea of turning the silver, like reservoir into a public park,

426

01:09:36.470 --> 01:09:48.110

Debbie Slater: is not really what the city as a whole needs, with the amount of density, building and Tsc. Projects that are going around Los Angeles.

427

01:09:48.120 --> 01:10:03.369

Debbie Slater: There are areas that are desperately in need of green space, of park Space Silver Lake is very green space rich, and this is not something that the city should be spending their money on

428

01:10:03.420 --> 01:10:14.739

Debbie Slater: um for me. I agree also that the idea of them saying that the traffic increase is not an environmental impact

429

01:10:14.910 --> 01:10:29.020

Debbie Slater: is really naive and and quite insulting to those of us who live here, and operate here on a daily basis, to think that adding an additional one hundred and thirty-five parking spaces is not going to bring congestion

430

01:10:29.210 --> 01:10:34.080

Debbie Slater: a hundred times the worse than it already is. Uh, it is fairly

431

01:10:34.210 --> 01:10:38.030

Debbie Slater: angry. Um! On top of which

432

01:10:38.510 --> 01:10:40.700

Debbie Slater: I really wish that

433

01:10:40.840 --> 01:10:47.510

Debbie Slater: the reservoir had not been taken offline to begin with, because this never would have even become a vision.

434

01:10:47.560 --> 01:10:55.180

Debbie Slater: So, along with the previous speaker, I really would encourage this environmental report to

435

01:10:55.260 --> 01:11:09.530

Debbie Slater: be presented to the city, emphasizing the alternatives, Uh personally, I in favor of alternative one. But as a sort of compromise I would say alternative Three is some place that we can start

436

01:11:09.720 --> 01:11:17.620

Debbie Slater: um not to mention the expense again back to Speaker to our city, has so many more important issues at hand.

437

01:11:18.180 --> 01:11:19.320

Debbie Slater: Thank you.

438

01:11:21.350 --> 01:11:22.970

Nicolle Steiner: Thank you for your comment,

439

01:11:26.940 --> 01:11:28.150

Nicolle Steiner: Sandy.

440

01:11:29.600 --> 01:11:37.689

Deborah Weintraub: Um, Nicole. I think that um Steven wanted you to call on Adam. See? Next to the accident and lower.

441

01:11:37.710 --> 01:11:43.709

Nicolle Steiner: Oh, okay, sorry, Sandy, when you'll be next Adam safe.

442

01:11:44.100 --> 01:11:45.579

Nicolle Steiner: Can I mute yourself?

443

01:11:47.140 --> 01:11:49.780

Adam Sieff: Hi! Can you hear me? Yes,

444

01:11:50.530 --> 01:12:01.539

Adam Sieff: thank you. Thanks, for let me, despite inadvertently lowering my hand. Um. My name is Adam Steve. My wife and I own a home on kennel worth one block from the project.

445

01:12:01.590 --> 01:12:09.949

Adam Sieff: I have the privilege of serving as chair of silver like forward, a community nonprofit, representing hundreds of community stakeholders

446

01:12:10.470 --> 01:12:24.760

Adam Sieff: with the understanding that today's meeting is focused only on the adequacy of the draft environmental impact report, and not to relitigate the content of the master plan, or whether it should move forward. I just wanted to make three points.

447

01:12:25.000 --> 01:12:37.020

Adam Sieff: First, we broadly agree with the draft Eir's findings that the master Plan alternative best achieves the designated project goals with only de minimis impacts.

448

01:12:37.030 --> 01:12:50.769

Adam Sieff: In particular, we agree with the Dei I's findings that the master Plan alternative would have no significant impacts other than noise impacts from construction and potential noise impacts from amplified sound, from special events,

449

01:12:50.910 --> 01:13:04.060

Adam Sieff: especially because the possibility of amplified events sound is a discretionary aspect of the plan that the community could control or prohibit, and we would be open to, uh removing that from the plan.

450

01:13:04.350 --> 01:13:14.479

Adam Sieff: Uh, we agree with the drafts conclusion that the benefits of the master Plan alternative far outweigh these limited, sporadic and temporary noise impacts.

451

01:13:14.820 --> 01:13:24.069

Adam Sieff: Second, we also agree with the drafts findings that each of the other project alternatives fail to achieve the designated project goals.

452

01:13:24.220 --> 01:13:33.179

Adam Sieff: These alternatives only marginally reduce adverse impacts and yet drastically undercut the project benefits the master plan is intended to achieve.

453

01:13:33.900 --> 01:13:45.889

Adam Sieff: Third and finally, I just want to highlight the master plan alternatives, positive environmental benefits, not just as adverse impacts, and these include creating new habitat wetlands and increased biodiversity.

454

01:13:45.960 --> 01:13:58.610

Adam Sieff: I want to thank you all for your consideration and time. We encourage the city to approve the master Plan alternative, and we look forward to submitting a formal comment before the deadline. Thank you,

455

01:14:00.190 --> 01:14:01.790

Nicolle Steiner: Thank you so much,

456

01:14:04.380 --> 01:14:05.639

Nicolle Steiner: Sandy.

457

01:14:09.200 --> 01:14:21.270

Sandy: Hi! Can you hear me?

458

01:14:21.360 --> 01:14:26.899

Sandy: The Silver Lake Reservoir formally reservoir? So I've been here a while,

459

01:14:26.950 --> 01:14:33.220

Sandy: and i'm a pretty cool person. I'm pretty chill, and I like people, and I like parks, but you people aren't

460

01:14:33.420 --> 01:14:37.519

Sandy: almost really fraudulent on this traffic data.

461

01:14:37.910 --> 01:14:53.730

Sandy: Wow! I'm not surprised. I'm not surprised, especially with what's going on with Mitchell, Farrell and Nurse Guy and uh the City Council Right now. Good job, man, Good job! Letting this project go forward with all that. Okay. So

462

01:14:53.750 --> 01:15:00.590

Sandy: I surmise that the criteria that the outlaw to determine that the uh

463

01:15:00.650 --> 01:15:15.199

Sandy: there's no significant traffic impact from turning Lake into a party zone. Uh, they probably use the criteria uses that the traffic is already capacity. So cramming more cars and trucks and school buses into our faces wouldn't be noticeable

464

01:15:15.350 --> 01:15:17.329

Sandy: because we're already dying.

465

01:15:17.370 --> 01:15:35.239

Sandy: But I would like it noted for the record that street services, at least city street services already doesn't and cannot maintain Dwayne Street for the amount of traffic that it bears as witnessed by this facts, my house in yard being run into a run through

466

01:15:35.250 --> 01:15:42.640

Sandy: at least ten times by falling trucks and cars on the hill street that is called Duane Street.

467

01:15:43.400 --> 01:15:46.440

Sandy: Nobody is contacting me for this information,

468

01:15:46.510 --> 01:15:54.360

Sandy: So this dot data sounds a little bit fraudulent, and um not least so. No,

469

01:15:54.570 --> 01:15:56.240

Sandy: don't do this

470

01:15:57.750 --> 01:15:59.050

Sandy: this

471

01:15:59.560 --> 01:16:08.869

Sandy: unless you address this. We can't get away with this. You cannot get away with this. It's obviously gonna have a traffic impact.

472

01:16:10.830 --> 01:16:20.230

Sandy: Oh, so sad! I'm so sad and depressed. I can't even take it. You guys had a chance to do something cool. And you're lying to us. That's how I feel, and i'm sad.

473

01:16:20.520 --> 01:16:29.220

Sandy: So it looks like I got thirty-eight more seconds to complain. I don't want to complain. I'm just bombed out, and i'm so exhausted

474

01:16:29.310 --> 01:16:40.699

Sandy: from being lied to. Why don't you do something about the freeway cut through? Why don't you do something about the horrible condition of silver like Boulevard.

475

01:16:49.110 --> 01:16:51.459

Sandy: Why, it do something real

476

01:16:51.690 --> 01:16:59.110

Sandy: and be honest with us. This has been may sorry about it, but Yeah, i'm against it.

477

01:16:59.300 --> 01:17:00.309

Sandy: Bye,

478

01:17:01.880 --> 01:17:04.130

Nicolle Steiner: Thank you for your comments. Sandy

479

01:17:05.760 --> 01:17:07.599

Nicolle Steiner: Andres K.

480

01:17:07.770 --> 01:17:09.250

Nicolle Steiner: Here, next.

481

01:17:12.810 --> 01:17:29.070

Andras K: Can you hear me? Hi! So my name is Andrea Kenixen and I'm a twenty one year resident of Silver Lake, and I live within five hundred feet of the Reservoir Complex. I've been to every master plan meeting, and to several of the related neighborhood council meetings, one hundred and fifty

482

01:17:29.080 --> 01:17:47.329

Andras K: erez agmoni. For years I've thought that the master plan was unrealistically grandiose and overwhelming for our little hillside neighborhood, and I've heard the majority of neighbors who spoke at the meetings likewise voiced serious concerns. But these concerns never seem to be reflected in the plan, as it was developed, and repeatedly presented one hundred and fifty.

483

01:17:47.990 --> 01:17:57.540

Andras K: Given the alternative between the master plan and doing nothing, I would enthusiastically choose doing nothing, because I see the reservoir as beautiful as it is,

484

01:17:57.560 --> 01:18:10.660

Andras K: but for the first time, because the Eir mandates providing reasonable alternatives, i'm seeing a compromise option that begins to respond to the concerns we've been stating for years. It's called alternative three one

485

01:18:10.860 --> 01:18:25.689

Andras K: without getting too much into the weeds. The single most important new feature, I see is a new eight foot non-scalable, continuous perimeter fence with gates that would limit public access from dust to Don.

486

01:18:25.930 --> 01:18:44.969

Andras K: This would be a key step toward preserving neighborhood peace and security. Other compromises include keeping the Noel, the eucalyptus grove and the waters edge dedicated for wildlife, not adding new building structures anywhere but the South valley, and naturalizing some banks for wildlife, habitat,

487

01:18:44.980 --> 01:18:47.999

Andras K: habitat, but keeping the water open, as it is now,

488

01:18:48.600 --> 01:19:02.320

Andras K: all other master plan options would radically change the reservoir complex into a twenty, four over seven open venue, with weekly events and new and unnecessary buildings. Alternative. Three or similar,

489

01:19:02.330 --> 01:19:09.899

Andras K: would be best for preserving the most natural space, and have it in the least negative impact, mainly because of the non-scalable fence

490

01:19:09.910 --> 01:19:32.890

Andras K: the dawn to dust public access and the Reduced and consolidated Uh Consolidated Development and built structures. To be clear Alternative three is a compromise. By no means is it complete and perfect, but it addresses important concerns. Personally, I could not accept any plan that didn't have the security fence and the daily access limitation Alternative three can be found on page five, ten.

491

01:19:32.900 --> 01:19:34.850

Andras K: Check it out. Thank you.

492

01:19:36.060 --> 01:19:37.290

Nicolle Steiner: Thank you.

493

01:19:39.410 --> 01:19:41.350

Nicolle Steiner: London widow.

494

01:19:43.570 --> 01:19:45.080

Nicolle Steiner: Unmute yourself,

495

01:19:53.560 --> 01:19:57.509

Nicolle Steiner: London, when prompted. You'll have to accept to unmute yourself.

496

01:20:04.380 --> 01:20:06.559

Nicolle Steiner: It looks like you are still muted.

497

01:20:18.990 --> 01:20:24.309

Nicolle Steiner: Um, I think we'll go down to the next person. We'll come back to you. Okay, Linden.

498

01:20:24.410 --> 01:20:25.900

Nicolle Steiner: Uh Rachel.

499

01:20:26.100 --> 01:20:28.720

Nicolle Steiner: You'll be prompted to unmute yourself.

500

01:20:35.040 --> 01:20:37.820

Rachel: Hi! My name is Rachel.

501

01:20:37.900 --> 01:20:44.680

Rachel: Hi, um! I'm fortunate to be a resident of Silver Lake, and I currently serve on the Board of Silver Lake forward.

502

01:20:44.770 --> 01:21:00.710

Rachel: Our organization is excited to see this community-driven project continue to move forward and based on the findings outlined in the draft eir. We are pleased. The Silver Lake master plan project poses no significant adverse environmental impacts.

503

01:21:00.850 --> 01:21:16.879

Rachel: It's clear that the long-term project benefits to the community the environment and all Angelina's outweigh any temporary inconveniences like noise during the construction things. The mitigations the Eir carefully considers, are adequate in addressing the short term impacts.

504

01:21:17.120 --> 01:21:30.969

Rachel: Furthermore, alternatives that reduce the scope of the project undermines the needs and desires of the community which were consistently expressed throughout the community engagement process. In the development of the plan

505

01:21:30.980 --> 01:21:38.129

Rachel: we look forward to working together to make the master plan a reality for all Angelinos present and future to enjoy.

506

01:21:38.170 --> 01:21:42.760

Rachel: We appreciate everyone participating in the public process. Thank you.

507

01:21:46.400 --> 01:21:48.419

Nicolle Steiner: Thank you for your comments,

508

01:21:49.540 --> 01:21:54.120

Nicolle Steiner: London. You'll be prompted again to unmute yourself. Nope,

509

01:21:57.690 --> 01:21:59.110

Nicolle Steiner: Um!

510

01:22:00.150 --> 01:22:07.170

Nicolle Steiner: Linden's hand is down, so we will move on to mark Hernestus.

511

01:22:17.990 --> 01:22:32.529

Marc Ernestus: Hello! Can you hear me?

512

01:22:32.540 --> 01:22:42.450

Marc Ernestus: We talk about security, and they talk about environmental impact. Um, which all of which has been addressed in the Master Plan, and it's supported by all the empirical data that we have on the subject. Um,

513

01:22:42.610 --> 01:22:58.119

Marc Ernestus: if you're complaining about traffic. Um, I see I would. I would argue that you have a much larger issue on your hands. Um! And I would suggest that you start convincing people to start riding bikes. Um, because we live in Los Angeles. This is a car centered city. Um! You

514

01:22:58.130 --> 01:23:14.130

Marc Ernestus: uh! You have a much larger issue. If you're complaining about noise again, you live in a city of millions of people. Uh, this is unequivocally a good thing, a little bit of noise, for at the end of the day what's going to be a long term benefits to this community. Again i'll argue You get over yourself.

515

01:23:14.150 --> 01:23:39.310

Marc Ernestus: Um. I just want to say to the City Council members that you are elected officials. It is on you to understand these issues at a fundamental level at a better level than the average citizen. The people who come on here and complain. They're usually the loudest voices. But um! I think that this is unequivocally a good project it should. One hundred percent go forward. I'm glad to hear that all the environmental concerns have been addressed.

516

01:23:39.320 --> 01:23:52.190

Marc Ernestus: And um yeah, I just think that it is on the City Council to be brave and to stand up to these people, and to explain to them either wrong to understand the issues and to continue to move forward. This. So thank you.

517

01:23:53.940 --> 01:23:55.219

Nicolle Steiner: Thank you,

518

01:23:56.600 --> 01:24:00.440

Nicolle Steiner: Steven. I see that Lyndon Tams back up. Can we try

519

01:24:00.830 --> 01:24:04.060

Nicolle Steiner: um again to unmute London?

520

01:24:12.010 --> 01:24:24.779

Linden Waddell: Hi! Can you hear me? Hello, Yes, i'm sorry we have a a couple of people using different computers for this zoom meeting in my

house, and I think our profiles were messed up. I apologize. No problem.
Okay,

521

01:24:25.410 --> 01:24:42.179

Linden Waddell: All right. What I wanted to say is, I've been a resident in Silver Lake for forty years. I love it here, and we are a fantastic neighborhood, but we are not built to support a recreational commercial destination.

522

01:24:42.190 --> 01:25:00.369

Linden Waddell: You know I cherish it as it is, this is one of the last remaining serene, passive places in a very busy city. The reservoir for us is already a huge win, you know. I looked up. Um

523

01:25:00.380 --> 01:25:05.340

Linden Waddell: parks in nine zero, zero, three, nine and nine zero, zero, two, six,

524

01:25:05.350 --> 01:25:34.140

Linden Waddell: and we already have the Silver Lake Walking Path Wreck Center, two Dog Parks basketball playground, Meadow, Tesla Park apart, Pocket Park, Sunny Nook River Park, Glennhurst Park, North Atwater Park, Bomb Park, Red Car River Park, Marsh Street, Nature Park, Chevy Chase Park, Rattlesnake Park, Elysion Valley Gateway Park, and in nine and ah! Two, six. There's Echo Park, Bellevue, Laurel and Hardy, Part Park, Rockview Community Park, a Lesion Park, six Section six,

525

01:25:34.150 --> 01:25:42.399

Linden Waddell: I mean. We have. We are a gold mine here, and I just can't see how

526

01:25:42.470 --> 01:26:00.599

Linden Waddell: you know bringing this to our lovely, serene neighbourhood is going to be good for the community, You know we can't fix a sidewalk outside the basketball court, and we think something like this can be made and maintained.

527

01:26:00.610 --> 01:26:02.769

Linden Waddell: I mean, you know,

528

01:26:02.780 --> 01:26:23.220

Linden Waddell: forget the noise, Forget all those things. I'm not a big naysayer. I'm not a nimbyist, but I am an imbeist. I am proud of Silver Lake as it is, and I don't think we need to be a Disneyland. We've got Griffith Park right next door. We've got the La River. I think we have an overflow of things already,

529

01:26:23.230 --> 01:26:29.219

Linden Waddell: and it's just not necessary. I would vote for no alternative. Thank you.

530

01:26:30.940 --> 01:26:32.610

Nicolle Steiner: Thank you for your comment.

531

01:26:32.900 --> 01:26:38.360

Deborah Weintraub: Um, Nicole. I wondered about getting back to Cindy. Did she raise her hand again.

532

01:26:41.020 --> 01:26:47.809

Mary Nemick: No, I don't. She's not going to make a comment again, because she knows it was recorded.

533

01:26:47.980 --> 01:26:51.300

Deborah Weintraub: Okay, no problem, thank you.

534

01:26:54.960 --> 01:26:57.000

Leslie Edmonds.

535

01:27:06.600 --> 01:27:16.150

Leslie Edmonds: Yes, Um, yes, I am a twenty one year member of this community, and I can recall when the metal was being proposed

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01:27:16.160 --> 01:27:35.629

Leslie Edmonds: uh about seventeen years ago, and many of the same concerns that we hear now. I heard then where people did not want to have two acres of dead rotten trees opened up to the community. And now I see that it is now the serene place that people want to protect.

537

01:27:35.640 --> 01:27:49.379

Leslie Edmonds: So I am definitely for the Eir as it stands. I believe it. It deals with all the issues um in terms of adding wildlife uh protection and habitat.

538

01:27:49.390 --> 01:28:18.069

Leslie Edmonds: Uh in terms of capturing a rain water that now just flows down the street is the vehicle for us to uh reclaim that water. It is a way for us to enhance the tree canopy because trees are dying. Those eucalyptus trees are at the end of their life cycle, and they're dying, and we need to be able to replace replenish the tree canopy to to create that cooling center that now is so required for human life.

539

01:28:18.150 --> 01:28:28.830

Leslie Edmonds: Um! I believe that any short term problems and I know that noise from construction is going to be a short term issue, and I know that um

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01:28:28.860 --> 01:28:57.300

Leslie Edmonds: that those things can be handled, and it looks like the Eir has realized that I think traffic is going to be something that needs to be looked at, so that people have confidence in it. But I think There is certainly short term problems that have long term benefits, and those long term benefits will last us into decades of benefits. And so I want to support the eir, the draft eir as it stands, and I

541

01:28:57.310 --> 01:29:01.660

Leslie Edmonds: hope that we can accomplish all that it is set out to accomplish.

542

01:29:05.090 --> 01:29:07.079

Nicolle Steiner: Thank you for your comment today,

543

01:29:12.200 --> 01:29:14.050

Nicolle Steiner: Chip Mcdonald.

544

01:29:14.430 --> 01:29:16.739

Nicolle Steiner: It'll be prompted to unmute yourself.

545

01:29:19.190 --> 01:29:38.800

Chip McDonald: Uh hello! Can you hear me? Yes, Great um! I wanted to thank everyone uh that was involved in presenting this to us it was presented very thoroughly, and it's good to have uh an opportunity to voice uh opinions. It's very important that we have civil discourse around this. Um,

546

01:29:39.880 --> 01:29:53.289

Chip McDonald: yeah, I've I am a silver like resident. I have been for seventeen years. Um, I rented for many of those years, and uh have recently uh decide made the conscious decision as difficult as it was

547

01:29:53.300 --> 01:30:13.189

Chip McDonald: for me and my family to uh stay in silver like um. It is. Some is a neighborhood that I love, and I feel like it is uh my home. And uh, I I just had to say, and and this has been said before by a couple of people. Um! But I also wanted to add my voice to that. That

548

01:30:13.800 --> 01:30:17.940

Chip McDonald: um I have yet to speak to anyone

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01:30:17.970 --> 01:30:34.750

Chip McDonald: uh that actually wants this. I'm sure that there are people that do. I've heard someone calling people nimb's. And you know, calling the people that are opposed to this these people. Um, which is a remarkably rude

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01:30:34.790 --> 01:30:52.310

Chip McDonald: Um, But there are a lot of people who do not want this to happen for a lot of the reasons that people have talked about. Uh, and it does seem like that's just overlooked. Uh, by every time I come to one of these things It is as if there is no push back. But there is,

551

01:30:52.350 --> 01:31:02.880

Chip McDonald: I think, the main reason for me is that, uh, I have no faith that there will be a security plan implemented other than the speaker who pointed out this perimeter fence.

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01:31:02.890 --> 01:31:29.850

Chip McDonald: It could be tempted to go with alternative three. But uh! In the end. Having no faith in that uh security issue being taken care of due to experience in Silver Lake, I would have to uh firmly be against and go with alternative one, and risking my two minutes here, I will say that the idea that there will be no traffic impact is preposterous, and it is if that person has never been to silver like. Thank you.

553

01:31:31.450 --> 01:31:32.639

Nicolle Steiner: Thank you,

554

01:31:34.920 --> 01:31:36.719

Nicolle Steiner: Nina Woodson.

555

01:31:44.460 --> 01:31:49.540

Nina Woodson (she/her): Hello, um! I just I couldn't um,

556

01:31:50.580 --> 01:32:02.169

Nina Woodson (she/her): you know. Echo, what Chip McDonald just said more and twenty year long, Resident and Silver Lake, and my main concern is that

557

01:32:02.490 --> 01:32:11.279

Nina Woodson (she/her): this the civil, like reservoir right now, is a habitat for migrating birds. And

558

01:32:11.330 --> 01:32:17.360

Nina Woodson (she/her): how much of that do we have left in the world in our dying earth?

559

01:32:17.730 --> 01:32:19.679

Nina Woodson (she/her): I I

560

01:32:19.990 --> 01:32:22.870

Nina Woodson (she/her): We really need to protect

561

01:32:23.090 --> 01:32:35.340

Nina Woodson (she/her): um it as a natural habitat. Um. And if that means fencing, if that me,

562

01:32:35.550 --> 01:32:45.989

Nina Woodson (she/her): we don't need more recreational opportunities in Los Angeles, I. You can go to the beach. You can go to the mountains there.

563

01:32:46.070 --> 01:32:55.619

Nina Woodson (she/her): You don't need a recreational opportunity. Um in the center of Los Angeles, and I just

564

01:32:56.310 --> 01:33:02.240

Nina Woodson (she/her): I appreciate all the effort that's been put into this um

565

01:33:03.740 --> 01:33:07.759

Nina Woodson (she/her): draft proposal. But um,

566

01:33:08.890 --> 01:33:11.590

Nina Woodson (she/her): we don't have to rethink the wheel.

567

01:33:11.630 --> 01:33:23.119

Nina Woodson (she/her): Let's just leave it as it is um simple things. I recently was at the Silver Lake reservoir at the Dog Park this last weekend, and

568

01:33:23.290 --> 01:33:24.360

Nina Woodson (she/her): a

569

01:33:24.540 --> 01:33:32.179

Nina Woodson (she/her): you know people use it, but there's ways to use it without it being super intrusive. And

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01:33:32.740 --> 01:33:35.850

Nina Woodson (she/her): I just really hope that um

571

01:33:36.330 --> 01:33:42.409

Nina Woodson (she/her): some thought and consideration will be put into that. We don't have to overthink this.

572

01:33:43.670 --> 01:33:44.790

Nina Woodson (she/her): Thank you.

573

01:33:47.490 --> 01:33:48.689

Nicolle Steiner: Thank you,

574

01:33:52.270 --> 01:33:53.940

Nicolle Steiner: David Whitley

575

01:33:54.230 --> 01:33:55.429

Nicolle Steiner: Weekly.

576

01:34:00.370 --> 01:34:01.890

David Wheatley: Hi! Can you hear me?

577

01:34:04.290 --> 01:34:06.250

Nicolle Steiner: I can't hear, David.

578

01:34:09.050 --> 01:34:10.519

David Wheatley: How about now,

579

01:34:10.930 --> 01:34:17.210

Nicolle Steiner: David? I still can't hear you, and it looks like you're unmuted. Maybe you were on the wrong channel.

580

01:34:19.350 --> 01:34:23.050

Nicolle Steiner: Can you hear me now?

581

01:34:24.060 --> 01:34:28.850

Nicolle Steiner: Pick English and then click it again and put pick, mute, original audio.

582

01:34:37.210 --> 01:34:39.480

David Wheatley: Can you. Can you hear me now?

583

01:34:39.910 --> 01:34:40.940

David Wheatley: Hello,

584

01:34:43.950 --> 01:34:54.920

Tamseel Mir: David! So I I think only a few of us can hear you, so i'm not sure if you can um in in the option below where it's interpretation if you want to click English.

585

01:35:01.330 --> 01:35:09.379

David Wheatley: Okay. My name is David Wheatley i'm the co-chair of the Urban design and Preservation Advisory Committee to the Silver. Like Neighborhood Council,

586

01:35:09.520 --> 01:35:17.709

David Wheatley: we have not had a chance to uh discuss this matter in our group, so i'm here, speaking on my own.

587

01:35:17.900 --> 01:35:28.370

David Wheatley: I've been involved in appeals of a burdensome, overbearing projects that come to Silver Lake and other committees, other communities,

588

01:35:28.620 --> 01:35:39.930

David Wheatley: and I'm. Uh I've noticed the city planning commission for it. Yes, on every application brought by usually a developer enthusiastically supported by the Government,

589

01:35:40.390 --> 01:35:42.530

David Wheatley: and they deny every appeal,

590

01:35:42.930 --> 01:35:45.879

David Wheatley: however angry the neighbors are.

591

01:35:46.080 --> 01:35:50.090

David Wheatley: Turn them down, and then it goes to planning land, use management,

592

01:35:50.240 --> 01:35:53.549

David Wheatley: and we've had some corruption over there. So

593

01:35:53.940 --> 01:35:56.840

David Wheatley: um, I do not trust at all

594

01:35:57.720 --> 01:36:04.649

David Wheatley: anything in this particular presentation, because it reminds me so immediately

595

01:36:05.170 --> 01:36:08.550

David Wheatley: of what our city government has said to us

596

01:36:08.750 --> 01:36:15.269

David Wheatley: these projects, that they so unfairly, and, I believe, cruelly supported the

597

01:36:15.290 --> 01:36:21.850

David Wheatley: and however these many appeals that have been denied, So when I hear things like

598

01:36:22.430 --> 01:36:33.230

David Wheatley: uh the security, if they're going to be six hundred people out there twelve times a year, and let's say there's no amplified sound. We really think those six hundred people are going to sit there and be quiet.

599

01:36:33.550 --> 01:36:52.140

David Wheatley: What about them? What sort of noise impact are they going to be making? Are we going to end up with our own version of the Hollywood Bowl, where they have noise problems for the neighbors all the time. I agree with everyone who opposes this project. The best alternative is the one that says, don't do it. Number four

600

01:36:52.150 --> 01:36:58.579

David Wheatley: that needs to be on there as well. It's perfectly fine the way it is. It's a nature enclave

601

01:36:58.910 --> 01:37:15.370

David Wheatley: uh people get to meditate, relax, chill after a hard day. We don't need to turn this into six flags over whatever Nots very far Disneyland or anything else. Let's keep it nice, quiet, calm, and relaxed,

602

01:37:15.380 --> 01:37:22.529

David Wheatley: and all the Government speak, and this thing needs to be challenged every single word of the way. Thank you for letting me speak.

603

01:37:23.390 --> 01:37:24.539

Nicolle Steiner: Thank you.

604

01:37:25.320 --> 01:37:33.530

Deborah Weintraub: I'm Nicole. This is Deborah again. I couldn't hear, David. It seems like some of you could hear him

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01:37:34.090 --> 01:37:35.070

Deborah Weintraub: right.

606

01:37:35.150 --> 01:37:38.320

Nicolle Steiner: Yes, I heard him once he fixed the audio,

607

01:37:38.440 --> 01:37:47.980

Deborah Weintraub: so I i'm not sure why. I couldn't hear, but I don't know whether the other members of the public are hearing when some of us can't hear them.

608

01:37:48.830 --> 01:37:57.310

Deborah Weintraub: So maybe you could go through one more time what's needed for each speaker again and choosing their language.

609

01:37:59.210 --> 01:38:01.170

Nicolle Steiner: Okay, no problem.

610

01:38:01.560 --> 01:38:17.650

Nicolle Steiner: So if everyone could that wants to speak today could take the time to click on this interpretation, Icon, at the bottom of your screen and select English or Spanish um, whatever language you want to listen in.

611

01:38:17.810 --> 01:38:31.519

Nicolle Steiner: And then, once you've done that click the interpretation button a second time and click, mute original audio, so that will put you in the main audio um room, where we can all hear you.

612

01:38:35.980 --> 01:38:40.299

Nicolle Steiner: All right. Let's get the next

613

01:38:42.150 --> 01:38:47.880

Nicolle Steiner: next commenter, David Jones. You'll be prompted to unmute yourself.

614

01:38:52.200 --> 01:38:57.500

David Jones: Yeah. Hello, uh, My name is David. Can you hear me?

615

01:38:57.510 --> 01:39:17.040

David Jones: All right? Thank you. Uh, yeah. I've lived in Silver Lake for more than twenty years um both across from the Dog Park on Silver Lake Boulevard, and now in West Silver Lake Drive along the path. I support the comments from the folks with, uh several lake forward. I'm. In favor of enhancing public enjoyment while taking measures for serve wildlife.

616

01:39:17.050 --> 01:39:24.790

David Jones: I realize you can't have your cake and eat it too, and noise levels are, and of oil and out of oil unavoidable. Excuse me,

617

01:39:24.800 --> 01:39:43.750

David Jones: but for me the long term benefits outweigh the nuisance from temporary development. I'm. In favor of no fencing natural landscapes that replace this met, and bankments improve dog parks and increase walking past. Um, and of Of course, the measures outlined to support wildlife

618

01:39:43.760 --> 01:39:49.899

David Jones: want the community and wildlife to thrive and believe. This plan serves all. Um, thank you.

619

01:39:51.430 --> 01:39:55.539

Nicolle Steiner: I can give you time back

620

01:39:57.570 --> 01:40:00.290

Nicolle Steiner: I see that Cindy has her hand up.

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01:40:00.310 --> 01:40:04.519

Nicolle Steiner: Um, so maybe, even if we can go to her,

622

01:40:05.770 --> 01:40:08.849

Nicolle Steiner: since we didn't all hear a comment for the last time.

623

01:40:12.360 --> 01:40:26.730

Cyndi Hubach: Hi! Can you hear me? Yes, we can. Hello, Hi! Great! Sorry about that. I miss the instructions. I apologize. Um, I'm Cindy Hubak. I live on the west side of the reservoir, and I'm. A member of the Silver Lake Reservoirs

624

01:40:26.870 --> 01:40:32.490

Cyndi Hubach: Conservancy. I I actually joined the Conservancy because of my concern about wildlife.

625

01:40:32.530 --> 01:40:38.860

Cyndi Hubach: Every spring I would see ducklings walking down the road to their doom, or getting picked off in the reservoir.

626

01:40:38.970 --> 01:40:55.130

Cyndi Hubach: Um! Migratory birds were stopping in, but finding no real place for food or shelter. Um! There was water, and there were trees, but it wasn't working for the birds and the animals. Um! I really observed Wildlife, so I could see that they were struggling. Um!

627

01:40:56.180 --> 01:41:05.819

Cyndi Hubach: So I thought we could do something better, and I actually thought of floating islands uh before they were a glimmer in the eye of the uh Silver Lake. Master Plan um, and that's why I got involved.

628

01:41:05.930 --> 01:41:15.149

Cyndi Hubach: Um, the reservoirs, as they are, are not habitat. When they were built at the turn of the century, the twentieth century, the banks were earthen and gently sloped,

629

01:41:15.160 --> 01:41:28.319

Cyndi Hubach: but in the early nineteen fifties to increase capacity. The banks were made steeper and short up with the as fault and the cement that we see today, and what we have been left with are the remnants of an industrial water facility. The steep

630

01:41:28.450 --> 01:41:33.539

Cyndi Hubach: thanks, the ugly striped asphalt, the large, sterile, inhospitable

631

01:41:33.710 --> 01:41:43.440

Cyndi Hubach: pools. Um! It's true that we've been through a lot of construction in this neighborhood, and none of us wants to go through it again. I I I hear that i'm with you,

632

01:41:43.500 --> 01:41:51.430

Cyndi Hubach: but The fact is that we didn't benefit from most of that construction; and as I see it, this will benefit all of us. The plants, the animals, the people.

633

01:41:51.520 --> 01:41:57.399

Cyndi Hubach: Um! There will be some pain, but there can be something of real lasting value and beauty at the end of it.

634

01:41:57.690 --> 01:42:04.770

Cyndi Hubach: This project meets the objectives of the community plan to increase our parkspace, our natural habitats, and improve our climate. Resilience!

635

01:42:05.000 --> 01:42:17.629

Cyndi Hubach: Um! I don't think it's perfect. I don't think anyone thinks it's, perfect, but it is a carefully thought out plan. It has attempted to consider the desires and preferences of the community, and I think it's something we can work with

636

01:42:17.790 --> 01:42:27.350

Cyndi Hubach: um. And finally, I would also like to say that while we may disagree on aspects of the plan, or on the value of having any plan at all, as we have heard um

637

01:42:27.840 --> 01:42:33.170

Cyndi Hubach: as neighbors and stakeholders. I know we all want the best for our community and for each other,

638

01:42:33.210 --> 01:42:46.759

Cyndi Hubach: and I hope we can work through this and remain friends. Um! As with anything in a democracy. If we do this right. Um, none of us will be completely happy when it's over. That's what compromise is all about.

639

01:42:47.020 --> 01:42:47.980

Thank you.

640

01:42:48.910 --> 01:42:50.230

Nicolle Steiner: Thank you.

641

01:42:52.080 --> 01:42:54.910

Nicolle Steiner: Keep pressing this button. I apologize,

642

01:42:55.890 --> 01:43:03.969

Nicolle Steiner: Lyndon. I see you have your hand raised, if you could. Please wait till we had a chance for everyone to make a comment. Um,

643

01:43:04.200 --> 01:43:06.919

Nicolle Steiner: then we can get back to you if we have time at the end.

644

01:43:07.980 --> 01:43:10.339

Nicolle Steiner: Ainslie Cohen! Cohen!

645

01:43:15.070 --> 01:43:34.120

Ainsley Cohen: Hi! Can you hear me? Hi! Um! I've also been a member of this community for a long time now, and i'd like to agree with Uh, Scott, Sternberg and Chip, and so many others who have just voiced all their concerns about what kind of an impact this type of a project would have on our community. I

646

01:43:34.130 --> 01:43:38.989

Ainsley Cohen: I think it's very short-sighted of the team to assume that there would be no

647

01:43:39.000 --> 01:43:56.419

Ainsley Cohen: mit ctl and impact with traffic. Traffic is already a huge issue. Um! And while everybody in our neighborhood loves to jump on a bike or walk, people coming from outside of the neighborhood would definitely be driving in. And I think that's what everybody is talking about when they refer to the traffic concerns one hundred and fifty

648

01:43:56.430 --> 01:44:03.310

Ainsley Cohen: originally. But in speaking with all my neighbors and and people in the community and people that I see out around the reservoir.

649

01:44:03.320 --> 01:44:29.759

Ainsley Cohen: When this plan was originally presented to us. Uh, I don't think that people were actually given a choice to just say no change. Um! It always seemed like you could choose option one or two, but many people seemed confused, and it didn't seem like there was an option to just choose. We don't want to do anything, and so I urge us to have a vote um within our community for people who live in our neighborhood who live within the

650

01:44:29.770 --> 01:44:51.630

Ainsley Cohen: zip codes, that we all agree with that we should actually have a vote to see who really really wants to do this, because I haven't spoken to anybody that wants to do this. Um, I think we're all really concerned when we see what happened with Echo Park, and I think the money

needs to be put into underserved communities that need green space. Those there are plenty of those communities

651

01:44:51.640 --> 01:45:06.700

Ainsley Cohen: uh within Los Angeles that need the money for their own version of green space. Um, the caller who listed all the parks we have plenty, and also um the homeless crisis that we're facing, and no one seems to be talking about it. But it's

652

01:45:06.710 --> 01:45:13.099

Ainsley Cohen: we need to put the money there. That's who needs it. Those people need help. We do not need um

653

01:45:13.200 --> 01:45:19.000

Ainsley Cohen: concerts or fanfare. This neighborhood is already beautiful. Thank you.

654

01:45:22.900 --> 01:45:24.150

Thank you,

655

01:45:26.960 --> 01:45:29.030

Nicolle Steiner: Mike Gross.

656

01:45:35.970 --> 01:45:36.860

mike krose: Bye.

657

01:45:37.150 --> 01:45:43.530

mike krose: Um, my name is uh Micro, and i'm a on the board of Silver Lake Wildlife Sanctuary.

658

01:45:43.560 --> 01:45:46.420

mike krose: Can you hear me? Oh, Yeah, there you go. Okay?

659

01:45:46.490 --> 01:45:53.109

mike krose: Um, I wanted to speak uh about transportation. Uh, specifically the

660

01:45:53.140 --> 01:45:58.109

mike krose: twenty-five uh ninety degree parking spaces by the Rec. Center.

661

01:45:58.170 --> 01:46:17.559

mike kroser: Um, I wanted to reference first from Section three point sixteen dash, eight uh transportation from the D eir uh where it talks about the Silver Lake Echo Park, or Asian Valley Community plan that cited uh from two thousand and four

662

01:46:17.570 --> 01:46:19.359

mike kroser: uh, which I think is

663

01:46:19.850 --> 01:46:32.170

mike kroser: reasonable, since things haven't actually gotten better since then. Uh, and some of the issues stated uh residential neighborhood streets are being used to avoid traffic on congested major thoroughfares,

664

01:46:32.270 --> 01:46:44.059

mike kroser: disturbing the quality of life and making neighborhood streets unsafe for children at pedestrians and traffic injection uh congestion and circulation issues um

665

01:46:44.070 --> 01:46:58.570

mike kroser: that reflect regional transportation problems and the narrow and substandard residential streets in the hillsides that hinder circulation and create problems for parking and access by safety vehicle

666

01:46:59.230 --> 01:47:08.969

mike kroser: and in Section Es Five and areas of known controversy. Although I don't know Why, it's a controversy. Um!

667

01:47:09.240 --> 01:47:17.370

mike kroser: Some of the issues are increased parking and trapping circulation on local streets. And uh pedestrian safety.

668

01:47:17.570 --> 01:47:27.609

mike kroser: So I wanted to reference. Oh, my goodness, only twenty-five seconds uh that street that's being talked about is only fifty feet wide, and some of the cars and trucks are up to twenty-five feet,

669

01:47:27.620 --> 01:47:41.490

mike kroser: and they would be sticking out into the street themselves, and we know that parking at ninety degrees requires dangerous backing out and and stopping of traffic. And i'm sorry I ran out of time. I

670

01:47:41.590 --> 01:47:42.940

mike kroser: talk to you slow,

671

01:47:43.160 --> 01:47:47.789

mike kroser: but I would hope that this part of the Uh.

672

01:47:47.970 --> 01:47:53.919

mike kroser: The project is not done, because I think it would be terrible for the community. Thank you.

673

01:47:55.090 --> 01:48:02.729

Nicolle Steiner: Thank you for your comment. You always have the opportunity to submit a written comment. Um, anytime during the comment period.

674

01:48:05.780 --> 01:48:07.340

Nicolle Steiner: Hugh Kenny,

675

01:48:14.990 --> 01:48:18.119

Nicolle Steiner: you should be prompted to unmute yourself

676

01:48:20.800 --> 01:48:22.349

There you can

677

01:48:22.690 --> 01:48:23.750

um

678

01:48:26.880 --> 01:48:31.120

Nicolle Steiner: queue. I can't hear you

679

01:48:32.330 --> 01:48:33.219

any good.

680

01:48:33.910 --> 01:48:39.820

Nicolle Steiner: I kind of can hear you, which sounds really really far away, very faint.

681

01:48:41.150 --> 01:48:47.240

Nicolle Steiner: I'm not sure if you have gone through the process of selecting a language

682

01:48:50.890 --> 01:48:54.230

Nicolle Steiner: we can't hear you. I'm sorry.

683

01:49:02.980 --> 01:49:03.830

Nicolle Steiner: Nope,

684

01:49:03.940 --> 01:49:06.440

Nicolle Steiner: Still can't hear you, Hugh.

685

01:49:08.890 --> 01:49:14.530

Nicolle Steiner: We're going to go down to the next person. We'll try you again. Um in a in two minutes,

686

01:49:15.630 --> 01:49:17.820

Nicolle Steiner: Stephanie Barton.

687

01:49:23.870 --> 01:49:33.109

Stephanie Bartron: Hi, everyone! Thank you for being here. Um, i'm a thirty. One year resident of Silver Lake. I've lived in different parts of the neighborhood, but I've lived

688

01:49:33.120 --> 01:50:00.649

Stephanie Bartron: around the reservoir for a while. Um, and i'm also on the board of this over like reservancy. So i'm gonna say first of all that I've talked to lots of people who do support this, and are really excited about all of the improvements that we will be getting to our neighborhood, especially all of the wildlife and habitat improvements. Um! The migrating birds will be so much better served by the wetland habitats and the floating islands. The biodiversity um

689

01:50:00.660 --> 01:50:07.449

Stephanie Bartron: for the plants. Specifically we'll support the birds. Um, and be really great.

690

01:50:07.900 --> 01:50:25.370

Stephanie Bartron: Let's see what else on my list. Um, also um I There's been a lot of comments. We i'm sorry I'm trying to stay positive here, but we've had a lot of people who don't seem to think that they want bike lanes, but then they're afraid of uh sorry, not afraid.

691

01:50:25.520 --> 01:50:53.169

Stephanie Bartron: They want bike lanes. They want to increase the walkability. We want public safety. We want public health. Um, and we do have a lot of people in our neighborhood that don't have backyards, and Don't have front yards. Some people live in houses with really steep hillsides, and they don't have places to walk. I know there's no sidewalks in my part of Silver Lake, so we do need the sort of part where we can. We can all get, not just get together, but but we can exercise and walk and walk with our neighbors.

692

01:50:53.180 --> 01:51:17.919

Stephanie Bartron: So um! I just want to say I really am excited about the master plan. I think the er does a great job. Um, I've read both of them cover to cover, and I think that it does a really great job of talking about the concerns and the mitigations needed for that. Um! It was really effective, and I look forward to seeing this all gradually happen over the next five or ten years. Okay, Thank you very much.

693

01:51:19.690 --> 01:51:21.809

Nicolle Steiner: Thank you for your comment today,

694

01:51:23.360 --> 01:51:24.780

Nicolle Steiner: Hugh Kenny,

695

01:51:25.390 --> 01:51:26.859

Nicolle Steiner: try it again.

696

01:51:32.970 --> 01:51:33.860

My name,

697

01:51:38.070 --> 01:51:39.120

that one

698

01:51:40.490 --> 01:51:46.720

Nicolle Steiner: I'm: sorry. I look here, very faint something, but we can't make out any sound.

699

01:51:46.890 --> 01:51:51.180

Wendy Delgado: Yeah, here, you sure we hear you very faintly. Maybe try

700

01:51:51.340 --> 01:51:53.309

Wendy Delgado: uh raising your volume.

701

01:51:55.060 --> 01:51:56.160

Um,

702

01:52:00.220 --> 01:52:02.199

okay, If I yell,

703

01:52:03.390 --> 01:52:05.320

that's that. That's not enough

704

01:52:05.830 --> 01:52:13.490

Nicolle Steiner: kind of I heard you say if you yell, but it's still very far away. It's it's we can't really make out all the words.

705

01:52:16.090 --> 01:52:24.909

Nicolle Steiner: Okay, cute. What you can do is you can try to dial in

706

01:52:25.160 --> 01:52:26.260

Nicolle Steiner: um

707

01:52:27.050 --> 01:52:28.399

Nicolle Steiner: on a phone.

708

01:52:28.470 --> 01:52:31.280

Nicolle Steiner: Um, and we can try you again.

709

01:52:33.350 --> 01:52:35.070

Nicolle Steiner: Sorry about that.

710

01:52:35.550 --> 01:52:39.160

Nicolle Steiner: Let's move on to James Ellsworth.

711

01:52:39.240 --> 01:52:42.109

Nicolle Steiner: You can You'll be prompted to unmute yourself.

712

01:52:51.750 --> 01:52:56.000

Nicolle Steiner: Hi! Hello! Can you hear me? Yes,

713

01:52:56.010 --> 01:53:14.629

James Ellsworth: Great sorry. The jobs um started barking right as I unmute it. Um, hey? So I just wanted to say that I have been living in silver life for fifteen years. And right when we moved here was when the introduction of the meadow happened, and

714

01:53:14.640 --> 01:53:19.880

James Ellsworth: we went to a lot of meetings, and there were a lot of people that said,

715

01:53:19.970 --> 01:53:39.199

James Ellsworth: You know what no one's gonna go to the beach. There's gonna be so much traffic. There's gonna be so many people that are parking um. There were so many people that were against, you know, the

the meadow, and I think it's really such an example of like, how successful

716

01:53:39.310 --> 01:53:49.099

James Ellsworth: this kind of project can be. Um, I also just you know I feel like It's sad that we are so used to seeing

717

01:53:49.110 --> 01:54:01.080

James Ellsworth: a chain link fence with barbed wire around the park that we want to keep it that way. Um, I don't know any place that you know, has chain link fences with barbed wire, and wants to keep it.

718

01:54:01.210 --> 01:54:14.100

James Ellsworth: So I I really want to thank you all for all the work. I know there's been a ton of resistance, and it's been really beautiful to see the evolution. It's been nice to, you know, When I first moved here

719

01:54:14.150 --> 01:54:30.949

James Ellsworth: everyone was walking on the street on Silver Lake Boulevard, because there wasn't a path, and there were so many people that were against the path, and so I guess. Um, I just wanted to say thank you, and that I really believe in the future. And the proposals that you're putting together. Thanks.

720

01:54:33.760 --> 01:54:35.099

Nicolle Steiner: Okay.

721

01:54:42.010 --> 01:54:47.020

Nicolle Steiner: Okay. Sorry, Bob, that are strong, so to Strong

722

01:54:47.520 --> 01:54:49.759

Nicolle Steiner: do we prompt it to unmute yourself.

723

01:54:51.070 --> 01:55:08.579

Bob Soderstrom: Hey, Nicole, How are you? Can you hear me? Hello! Yes, welcome, hey? Very good thanks for having us tonight. My name is Bob. So to i'm a co-founder of silver, like Forward, i've lived in the neighborhood for eleven years. My wife and I live in a house. Um, just just a few steps up from the locking path on Armstrong.

724

01:55:08.590 --> 01:55:25.659

Bob Soderstrom: Um, i'd like to thank everyone involved for the hard work. I know a lot goes into this. Um! What an amazing opportunity! One hundred and twenty acres uh that has come available because of an

abandoned public utility in the middle of this huge city, at such a unique opportunity

725

01:55:25.670 --> 01:55:35.440

Bob Soderstrom: that we have, we can either embrace a creative vision for the future, or we can hold that into the rusty fences and the big concrete bathtub of the past.

726

01:55:35.470 --> 01:55:49.580

Bob Soderstrom: What if we wrap the reservoir and the spirit of the meadow. Wouldn't that be really beautiful? And that's part of the questions that came up in this extensive master Plan Survey process that happened in two thousand and nineteen and two thousand and twenty, that we all voted on many times.

727

01:55:49.910 --> 01:56:08.200

Bob Soderstrom: I'd like to say that I support the proposed plan in the Cir and encourage the city council to adopt it. I will next spring, and i'll remind you that the master Plan process had many large public meetings and five or six public surveys, and the proposed plan reflects what the neighborhood voted for.

728

01:56:08.210 --> 01:56:22.470

Bob Soderstrom: There were many features that were voted down. I'll remind people like swimming and boats, and there were features that were voted for and approved, that have now been incorporated into this plan uh, like more access, and the environmental ed center and the and the floating islands.

729

01:56:22.590 --> 01:56:33.039

Bob Soderstrom: I spend a lot of time at the reservoir with my children and a lot of their friends. I've got a ten year old and a four year old, all their school friends who congregate there every day. I appreciate

730

01:56:33.050 --> 01:57:01.880

Bob Soderstrom: the person who mentioned that some people don't have yards at their own homes, and they go out walking in the neighborhood looking for spaces to to be uh our group. Silver, like forward, also worked with King Middle School over the hill, which has one of La Usd's environmental, very few environmental magnets. There are five hundred students there in an environmental magnet, and they're surrounded by a sea of asphalt. They're planting plants and learning about the environment by pushing seeds into soil in Folgers cans.

731

01:57:01.890 --> 01:57:15.930

Bob Soderstrom: So when we talk about underserved communities needing green space. It's right here where we live, and what an opportunity for

those students to have access to this reservoir uh to learn about environmental stewardship in our own city.

732

01:57:15.940 --> 01:57:32.120

Bob Soderstrom: Um! I just like to mention that a lot of these meetings are held when parents are putting their kids to bed or bathing their kids or giving their kids dinners, and so often the meetings are sometimes skewed towards different voices in the community. But I just like to remind people that There are a lot of parents,

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01:57:32.130 --> 01:57:43.199

Bob Soderstrom: uh, with families and children in this neighborhood that voted for these features, and are very, very excited about the proposed plan, and i'm one of them. Thank you very much for the time to speak.

734

01:57:45.020 --> 01:57:47.359

Nicolle Steiner: Thank you for your comment.

735

01:57:49.680 --> 01:57:53.690

Nicolle Steiner: Next up is Nicole Anton.

736

01:57:57.790 --> 01:58:17.029

Nicole Antoine: Hi! Can you hear me. Yes, great Hi! Thank you. Um. So my name is Nicole. I've lived in Silver Lake for ten years, and I actually live in a region that is very park deprived. It's region two. It goes up against the one on one. There is no green space in that area. Um, basically just a freeway

737

01:58:17.440 --> 01:58:23.470

Nicole Antoine: and a hill, and you have to walk to the lake, of course, to see any green space, or to this little triangle park

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01:58:23.520 --> 01:58:33.500

Nicole Antoine: that we called the little triangle, dog, park, laurel, and hardy park over there. So anyways um I work with the silver lip, wild wildlife sanctuary to um

739

01:58:33.720 --> 01:58:45.129

Nicole Antoine: analyze this uh, and I think that the best option is definitely alternative. Three um, with some elements of alternative to, I do think that we should

740

01:58:45.140 --> 01:58:54.809

Nicole Antoine: um have nothing built on the null or meadow. Um, just to mention also I'm. I am a landscape designer, and although I love the threed renderings of

741

01:58:54.920 --> 01:59:11.579

Nicole Antoine: everything Um, that's in the plan. Um. I also looked at their other renderings, and it seems like those other parks that they have developed are very, very busy compared to what we have at the meadow now, so I encourage everybody to go to their website.

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01:59:11.600 --> 01:59:15.329

Nicole Antoine: Um, I believe it's pronounced

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01:59:15.460 --> 01:59:31.110

Nicole Antoine: Hargreaves and Jones, and you could see all of their other designs, and although they're really beautiful, I don't think it's really what the neighborhood is looking for. We're looking to maintain um the wildlife protections that we have now, and um

744

01:59:31.120 --> 01:59:38.830

Nicole Antoine: at least replace the fence with something that's wildlife, friendly featuring gates that have uh,

745

01:59:39.290 --> 01:59:54.340

Nicole Antoine: you know, time limits so that we don't have something that gets out of control like Echo Park, which, after they spent all the money in Echo Park Lake, they had to replace all of it. So in. Look last, a comment is about the budget. So in looking at the budget for the project,

746

01:59:54.350 --> 02:00:10.369

Nicole Antoine: I see that even the meadow alone is about sixty million dollars. Um, we're asking for seventy thousand dollars to rehab a concrete asphalt circle in region to silver, like. So everyone please think about this project.

747

02:00:11.280 --> 02:00:12.150

Nicole Antoine: Thank you.

748

02:00:13.080 --> 02:00:14.200

Nicolle Steiner: Thank you.

749

02:00:19.350 --> 02:00:21.089

Nicolle Steiner: Next is Pam

750

02:00:31.380 --> 02:00:34.909

Nicolle Steiner: Pam. You'll be prompted to unmute yourself, and you have to accept that,

751

02:00:47.020 --> 02:00:52.459

Nicolle Steiner: Pam. You'll have to unmute yourself on your end when you are prompted to do so,

752

02:01:01.630 --> 02:01:06.379

Nicolle Steiner: we'll come back to you. Um! Let's go to Glen David. Gold.

753

02:01:13.160 --> 02:01:16.930

Glen David Gold: I don't know if you can hear me now

754

02:01:17.140 --> 02:01:22.319

Glen David Gold: tremendous. Uh, I uh am a silver like resident, and I feel

755

02:01:22.790 --> 02:01:30.280

Glen David Gold: well, I guess I feel inadequate because I've only been here about four and a half years. Um! But before that I was living in Oakland,

756

02:01:30.700 --> 02:01:34.759

Glen David Gold: and I lived on the shores of Lake Merritt, and i'm sure

757

02:01:34.980 --> 02:01:38.630

Glen David Gold: a lot of you know this already. But Lake Murray was the first

758

02:01:38.680 --> 02:01:45.509

Glen David Gold: wildlife sanctuary in America, started one thousand eight hundred and seventy. Something like that kind of

759

02:01:46.340 --> 02:01:52.180

Glen David Gold: it started before almost any of the other wildlife sanctuaries in the country, and one of the things that

760

02:01:52.340 --> 02:01:55.420

Glen David Gold: what's interesting about it is that it wasn't planned at all.

761

02:01:55.540 --> 02:02:00.110

Glen David Gold: And excuse me. I need to turn this off here right My uh my dinner is telling me it's ready.

762

02:02:00.300 --> 02:02:04.730

Glen David Gold: I'll keep this quick. I always wondered what would happen if it had been planned.

763

02:02:04.880 --> 02:02:11.740

Glen David Gold: What if there had been community environment? What if there had been sort of the idea that we could have influenced this in some way,

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02:02:11.990 --> 02:02:24.940

Glen David Gold: and I've been excited all the way along attending the meetings and uh, all the way up to this one, just hearing people's, opinions, and hearing people's input into it, because there's so much thoughtfulness in the community that I feel that

765

02:02:25.500 --> 02:02:32.040

Glen David Gold: when you walked around the shores of Lake Merritt and you saw that there was birds that were interacting in the worlds of people,

766

02:02:32.080 --> 02:02:35.190

Glen David Gold: that everything was okay. And it worked out.

767

02:02:35.390 --> 02:02:39.119

Glen David Gold: I'm just a i'm really thrilled to know what the future will bring to us.

768

02:02:39.260 --> 02:02:43.960

Glen David Gold: And what I would just say is that as we live in a community

769

02:02:44.280 --> 02:02:46.350

Glen David Gold: and an environment in which

770

02:02:47.010 --> 02:02:52.089

Glen David Gold: we don't know what the future is going to be, except it's going to be drier. It could be more dire.

771

02:02:52.580 --> 02:02:55.639

Glen David Gold: Any attempt we make to face that head on

772

02:02:55.690 --> 02:02:59.470

Glen David Gold: rather than not plan, for it can only be a good thing.
Thank you.

773

02:03:02.190 --> 02:03:03.849

Nicolle Steiner: Thank you for your comment,

774

02:03:04.480 --> 02:03:05.590

Nicolle Steiner: Pam.

775

02:03:05.890 --> 02:03:08.760

Nicolle Steiner: Let's try that again. Um!

776

02:03:09.350 --> 02:03:13.180

You should be prompted to unmute yourselves by our moderator.

777

02:03:25.270 --> 02:03:29.269

Nicolle Steiner: All right. It It doesn't look like you are unmuted,

778

02:03:29.520 --> 02:03:33.719

Nicolle Steiner: so we'll we'll jump to the next comment Turn and we'll
come back to you,

779

02:03:34.280 --> 02:03:36.160

Nicolle Steiner: Amory Johnson.

780

02:03:44.700 --> 02:03:47.309

Anne-Marie Johnson: Good evening, everyone. I hope you can hear me.

781

02:03:49.330 --> 02:03:51.109

Anne-Marie Johnson: I'm assuming you can hear me.

782

02:03:51.300 --> 02:04:03.920

Nicolle Steiner: I'm, Marie, we can't hear you. It looks like your mic is
going, and you might be speaking. Um, not sure if you have followed. I
did click on interp the interpretation button,

783

02:04:03.930 --> 02:04:12.210

Nicolle Steiner: select English, and then click on it one more time and
mute the original audio, so we can hear you here in the main channel.

784

02:04:16.630 --> 02:04:19.620

Nicolle Steiner: Hello! I'm not able to hear you.

785

02:04:22.000 --> 02:04:23.290

Anne-Marie Johnson: Hello!

786

02:04:26.520 --> 02:04:42.279

Anne-Marie Johnson: Hello! You're still not in the main channel. Um! Hello! There you go! Hello! My name is Amory Johnson. I'm the co-founder of Silver Lake together. Advocacy Team. I've lived in silver like my whole life.

787

02:04:42.290 --> 02:05:04.700

Anne-Marie Johnson: Uh, thank you for holding this meeting. I believe the Boe hard graves and the special interest groups have ignored the concerns of the majority of the public who oppose this proposed global tourist destination. I am a firm supporter of alternative one, and please consider the following suggestions: that may or may not be included in alternative: Three

788

02:05:05.410 --> 02:05:33.459

Anne-Marie Johnson: top and thin, all trees, and replace dead or dying trees with native trees. Um maintain and improve all landscaping, minimal remodeling of the Rec center. Replace all perimeter fences with a tasteful rod. Iron similar to the La River fences fences must be designed for unencumbered movements of wildlife. Replace the meadow grass with hybrid uh drought, tolerant grasses

789

02:05:33.470 --> 02:06:03.449

Anne-Marie Johnson: hire a permanent park ranger to service silver Lake rec center hire additional full time. Staff for the rec center improved the dog park with heat, resistant artificial turf, plant, shade trees, build pergola, and adventures. Hire a full time. Biologist and urban wildlife officer provide dash buses to transport people from the Rec. Center to the La River Griffith Park facilities and activities. The Pool soccer Field tennis courts and play area

790

02:06:03.460 --> 02:06:33.360

Anne-Marie Johnson: on Riverside Drive, enforce all lam, seek um with assistance of the Lapd. If necessary. There are other areas in the city who are Park deprived. Silver Lake Rec Center is already a park. It is already a park, and it didn't Take long for someone to throw the Nimby bomb, which is just another term for Races old white person uh the stay off of my long. We better stay away from that type of dialogue.

791

02:06:33.370 --> 02:06:42.130

Anne-Marie Johnson: We don't need this other areas. Do I support a alternative one with a few adjustments and thank you for the opportunity.

792

02:06:44.070 --> 02:06:45.949

Nicolle Steiner: Thank you for your comment,

793

02:06:48.610 --> 02:06:50.729

Nicolle Steiner: Pam. Let's try one more time.

794

02:06:51.360 --> 02:06:55.499

Nicolle Steiner: We are going to prompt you to unmute yourself.

795

02:07:03.060 --> 02:07:05.749

Nicolle Steiner: I still see that you're muted.

796

02:07:10.470 --> 02:07:17.400

Nicolle Steiner: We'll keep moving and get back to you. Um! If we are not able to unmute yourself, you can provide a

797

02:07:17.680 --> 02:07:24.610

Nicolle Steiner: written comment. Um! And we can put that screen up um at the end of the commentary,

798

02:07:26.240 --> 02:07:28.510

Nicolle Steiner: Alex. Magman.

799

02:07:37.880 --> 02:07:49.390

Alex Magnin: Hi, there! Can you hear me

800

02:07:52.370 --> 02:07:57.870

Nicolle Steiner: today? We are really only taking comments. We are not responding to questions.

801

02:07:57.970 --> 02:08:12.180

Alex Magnin: Oh, okay, um, yeah. So I I scan the report as best I could, and I didn't see those stats which which seem pretty pretty crucial to being able to assess the project. Um,

802

02:08:12.260 --> 02:08:40.669

Alex Magnin: you know I don't know if i'm for and against it, but I just read a seven hundred page report about like bats and whatnot. It was missing some pretty key facts, you know, like how many people are going

to come, and that's knowable stuff, right like you can. You know there's there's been undoubtedly tons of like urban studies research about that sort of thing. So, anyway, look, I know that there's like a movement against nimbies, and that's probably a good thing for society in general,

803

02:08:40.680 --> 02:09:00.520

Alex Magnin: but it doesn't mean, like, you know, that there's a specific rightness to like building this park, you know, who wouldn't want to Park. I get it. Um. Unfortunately, when we read reports where you know, if they don't have basic facts like how many people might visit this park, it creates a little bit of a crisis of faith, right?

804

02:09:00.530 --> 02:09:13.969

Alex Magnin: And so, anyway, I would sort of i'm neutral on on the park. Um, but i'm not impressed by the process, I suppose, is what I'm saying, and I have no doubt that everyone here is like a a smart person. But

805

02:09:13.980 --> 02:09:21.509

Alex Magnin: you know, when you don't have skin in the game for getting outcomes right. It's really hard for good decisions to happen. Um.

806

02:09:21.590 --> 02:09:24.499

Alex Magnin: So. Yeah, I don't know. I guess uh

807

02:09:24.720 --> 02:09:36.010

Alex Magnin: this stuff is hard, and then i'm sorry. But um, we'd like to know how many people are going to come every day. You can definitely get that right within, you know, twenty or something. So yeah, please do.

808

02:09:37.820 --> 02:09:41.850

Nicolle Steiner: Thank you for your comment. The presentation did mention

809

02:09:41.960 --> 02:09:43.160

Nicolle Steiner: um The

810

02:09:43.860 --> 02:09:53.900

Nicolle Steiner: I believe the table or page number in the Eir, where that information can be found. Um! So I read you to look at the project description,

811

02:09:53.910 --> 02:10:10.270

Nicolle Steiner: and your comment today will be responded to um in the final eir, and i'll point you in the right direction as well. I believe Jan mentioned tables two, seven, two, eight, and two nine um of the draft, Ir: with that information.

812

02:10:15.330 --> 02:10:16.570

Nicolle Steiner: Jan.

813

02:10:22.840 --> 02:10:25.529

Gian: Hello! Hello! Welcome!

814

02:10:25.800 --> 02:10:29.409

Gian: Hi! I'm just wondering if I have My!

815

02:10:31.000 --> 02:10:33.640

Nicolle Steiner: I'm sorry. Can you repeat that I didn't catch it.

816

02:10:34.160 --> 02:10:38.819

Gian: Oh, how well can you guys hear me? Yes, okay.

817

02:10:39.630 --> 02:10:48.090

Gian: Hi, um. My name is Jion. I have lived here. I am in just outside of Serbia since I was five years old. I'm now thirty, three.

818

02:10:48.190 --> 02:10:51.309

Gian: Um. So I've seen this neighborhood change um.

819

02:10:52.690 --> 02:10:55.989

Gian: I basically wanted to speak about um

820

02:10:56.260 --> 02:10:57.260

Gian: just

821

02:10:57.610 --> 02:11:02.340

Gian: creating another alternative to the use of the money for this and the finances of it.

822

02:11:02.510 --> 02:11:15.980

Gian: Now i'm all for improving the neighborhood, and looking towards the future, and and having this as a foundational basis for it. Um! But at the same time I also don't want to disturb what we already have that's going well for us.

823

02:11:17.850 --> 02:11:27.229

Gian: I'm: i'm thinking about Griffith Park, and user like using their existing infrastructure over there, such as the Greek Theater for the six hundred.

824

02:11:27.500 --> 02:11:37.980

Gian: He um then you do. You guys want to put at the meadow? Um. And I say that because I have experience in entertainment venues and

825

02:11:38.580 --> 02:11:41.760

Gian: the amount of noise that might have like the traffic. I'm kind of

826

02:11:41.950 --> 02:11:52.319

Gian: everything that comes along with that set up that happens hours and sometimes days before an event or an event that happens is pretty disturbing. Um,

827

02:11:52.620 --> 02:11:58.320

Gian: and especially for a neighborhood that, like hours of tranquility, and this for any other people come here for, is going to be

828

02:11:58.640 --> 02:12:02.810

Gian: to serve for the for the least of of anybody's worries.

829

02:12:02.840 --> 02:12:03.889

Gian: So

830

02:12:04.450 --> 02:12:08.179

Gian: you know, for for my own personal experience, having that

831

02:12:09.110 --> 02:12:19.060

Gian: having that applicator over there in the middle is not a good thing now concerning the the two of the buildings that are going to be built to i'm. I'm. Not for that either

832

02:12:19.150 --> 02:12:21.450

Gian: I would like to have just.

833

02:12:21.600 --> 02:12:30.610

Gian: And then there's an improvement of the current buildings that we do have, and also probably some parking abatement rather than increasing the parking.

834

02:12:30.670 --> 02:12:41.989

Gian: I don't know how many people here have actually been up and been around the reservoir lately, but even when you try to go for a walk, and you're trying to park around there. You're gonna have to park a few blocks away. Just so you can get around,

835

02:12:43.490 --> 02:12:46.370

Gian: and there's like two minutes. Sorry. Thank you.

836

02:12:47.680 --> 02:12:49.770

Nicolle Steiner: Thank you for your comment today,

837

02:12:52.430 --> 02:12:53.830

Betsy.

838

02:13:00.820 --> 02:13:02.109

Betsy Isroelit: Can you hear me?

839

02:13:03.810 --> 02:13:08.349

Nicolle Steiner: Hello, Betsy! I am not able to hear you.

840

02:13:08.610 --> 02:13:13.580

Nicolle Steiner: I um. If you could follow the instructions on this slide,

841

02:13:13.640 --> 02:13:17.180

Nicolle Steiner: click on the interpretation button and select English

842

02:13:17.280 --> 02:13:22.659

Nicolle Steiner: and click that interpretation button one more time and select mute, original audio,

843

02:13:23.610 --> 02:13:25.190

Nicolle Steiner: and that she fix it.

844

02:13:26.420 --> 02:13:27.370

Betsy Isroelit: I

845

02:13:27.510 --> 02:13:29.689

Betsy Isroelit: did both of those

846

02:13:41.320 --> 02:13:51.870

Nicolle Steiner: you can. You need to select the that? But interpretation button twice, first to select the language and then again to mute the original audio.

847

02:14:05.350 --> 02:14:12.040

Nicolle Steiner: We'll give you a minute to two minutes to figure that out. We'll go to the next

848

02:14:12.400 --> 02:14:14.919

Nicolle Steiner: um, Martin Gray.

849

02:14:21.810 --> 02:14:24.910

Martin Grey: Hey, can you hear me?

850

02:14:25.340 --> 02:14:33.599

Martin Grey: So? I have so many thoughts and so little time? Uh, I've lived in Silver Lake for thirty, six years,

851

02:14:33.920 --> 02:14:37.889

Martin Grey: and uh, as much as I love the reservoir,

852

02:14:38.230 --> 02:14:40.050

Martin Grey: I love it as it is

853

02:14:40.590 --> 02:14:41.889

Martin Grey: the

854

02:14:42.610 --> 02:14:46.330

Martin Grey: scary things about this project,

855

02:14:46.720 --> 02:14:53.690

Martin Grey: aside from the obvious which is traffic having lived through the repiping. The sewer lines.

856

02:14:53.860 --> 02:14:55.110

Martin Grey: Um!

857

02:14:55.400 --> 02:14:59.440

Martin Grey: And everybody complained. You know we all We all needed that

858

02:14:59.690 --> 02:15:03.589

Martin Grey: without a doubt we needed to upgrade our our infrastructure.

859

02:15:04.260 --> 02:15:08.449

Martin Grey: Um! This is not a need so much as a desire for what,

860

02:15:08.690 --> 02:15:12.720

Martin Grey: and I hate to say it. But for what really seems like

861

02:15:13.690 --> 02:15:16.149

Martin Grey: a community that has become

862

02:15:16.520 --> 02:15:24.639

Martin Grey: filled with with with just people that seem so entitled that we should. We should have this. It's just

863

02:15:25.050 --> 02:15:33.169

Martin Grey: so. We're like, was always a community of diversity uh working class as well as well to do. Um.

864

02:15:33.190 --> 02:15:34.449

Martin Grey: I've seen it

865

02:15:34.580 --> 02:15:36.430

Martin Grey: just uh

866

02:15:36.740 --> 02:15:40.219

unfortunately deteriorate. In my opinion. I know

867

02:15:40.340 --> 02:15:41.859

Martin Grey: I may be alone.

868

02:15:41.890 --> 02:15:48.810

Martin Grey: I understand it. I grew up in Brooklyn. Um saw that community change. I've been out here for

869

02:15:49.170 --> 02:15:51.259

Martin Grey: almost forty years now,

870

02:15:51.330 --> 02:15:53.110

Martin Grey: and um

871

02:15:53.150 --> 02:15:56.050

Martin Grey: I am so against this project, for,

872

02:15:56.380 --> 02:15:58.810

Martin Grey: uh, not only the traffic, but

873

02:15:59.010 --> 02:16:02.669

Martin Grey: people have talked about the cost. I think that could be

874

02:16:02.830 --> 02:16:10.970

Martin Grey: better served to help the underserved communities. We live so close to Griffith Park we live so close to E Echo Park,

875

02:16:11.190 --> 02:16:12.889

Martin Grey: which, by the way,

876

02:16:13.100 --> 02:16:16.889

Martin Grey: didn't get cleaned up until Mitchell Farrell put a fence around it.

877

02:16:17.200 --> 02:16:22.169

Martin Grey: Um! I can't imagine this reservoir with no fence. Um!

878

02:16:22.200 --> 02:16:31.140

Martin Grey: I I kind of feel like i'm freely associating, so pardon me. I see the time is up. Those are my comments. I'm: against this. Thank you for the opportunity to speak.

879

02:16:32.790 --> 02:16:35.539

Nicolle Steiner: Thank you for your comments today,

880

02:16:41.629 --> 02:16:42.860

Nicolle Steiner: Mary.

881

02:16:48.370 --> 02:16:55.419

Mary: Hi, Can you hear me? Hello, Yes, Great. Okay, Thank you.

882

02:16:55.520 --> 02:17:11.400

Mary: I'll be brief. Okay, This project is not tethered to any reality. We'll be facing in the next fifteen, twenty years. Many of the ideas and renderings are fantastical, and wouldn't be out of place on a vision board for saudi arabia is the line

883

02:17:11.490 --> 02:17:30.270

Mary: uh i'm not hearing any strategies for long-term climate change, adoption, seeing many strategies that are not relevant in the upcoming decades um seeing unshaded concrete more lights, more cars more missions more disruption to biodiversity.

884

02:17:30.280 --> 02:17:39.530

Mary: Twenty-four access, with no fences, will ensure this area will become completely trashed, like so the supportive Basin and the Bologna wetlands

885

02:17:40.180 --> 02:17:54.979

Mary: uh the images of children waiting in the water and the draft Eri are completely ridiculous. We've had summers since two thousand and ten that I've hit one hundred and eight, a hundred, eleven and one hundred and thirteen degrees. The reservoir has no water.

886

02:17:55.049 --> 02:17:56.729

Mary: You can see the bottom

887

02:17:56.799 --> 02:18:13.339

Mary: uh this project on the surface is being spoken about like. It's an infrastructural initiative, but it's very obviously an economic initiative for what i'm assuming are a few very lucky contractors and developers who are going to be gone in fifteen years. When this project is pushed through,

888

02:18:13.480 --> 02:18:30.999

Mary: we, the people who actually live in the neighborhood and people my age, who are in our thirties. We will be the ones facing the long term consequences of this project. It's completely ridiculous. It's completely untenable. I urge you not to push this through. Thank you.

889

02:18:34.799 --> 02:18:36.969

Nicolle Steiner: Thank you for your comment,

890

02:18:39.150 --> 02:18:40.420

Nicolle Steiner: Betsy,

891

02:18:41.059 --> 02:18:43.459

Nicolle Steiner: and try again.

892

02:18:46.730 --> 02:18:48.010

Betsy Isroelit: Can you hear me?

893

02:18:49.250 --> 02:18:52.560

Nicolle Steiner: I'm still not able to hear you, Betsy.

894

02:18:52.610 --> 02:18:59.729

Betsy Isroelit: Unfortunately I do bring up that slide one more time

895

02:18:59.770 --> 02:19:01.330

Nicolle Steiner: you'll need to click

896

02:19:01.900 --> 02:19:03.549

Nicolle Steiner: interpretation

897

02:19:03.830 --> 02:19:09.970

Nicolle Steiner: English, and then once again interpretation and mute The original audio.

898

02:19:12.809 --> 02:19:14.150

Betsy Isroelit: Is it working?

899

02:19:17.959 --> 02:19:24.029

Nicolle Steiner: I think the mute original audio might be what you're missing from that step.

900

02:19:25.160 --> 02:19:26.359

Nicolle Steiner: Try that

901

02:19:26.520 --> 02:19:29.539

Nicolle Steiner: interpretation and meet the original audio.

902

02:19:29.889 --> 02:19:33.220

Betsy Isroelit: I did it for about the tenth time, so never mind.

903

02:19:39.559 --> 02:19:43.909

Nicolle Steiner: Sorry we're still not able to hear you.

904

02:19:46.049 --> 02:19:50.980

Nicolle Steiner: We'll try again at the end. Here, let's get to Hugh Kenny.

905

02:19:56.530 --> 02:19:57.769

I do anything

906

02:19:58.950 --> 02:20:00.130

Nicolle Steiner: so

907

02:20:04.930 --> 02:20:11.260

Nicolle Steiner: could you maybe talk like right next to your computer or audio device. Or maybe

908

02:20:11.800 --> 02:20:13.469

yeah, I guess.

909

02:20:13.500 --> 02:20:15.070

Does that do anything? I

910

02:20:15.720 --> 02:20:17.369

I got to over it again.

911

02:20:18.820 --> 02:20:19.780

Okay,

912

02:20:19.940 --> 02:20:22.910

Nicolle Steiner: it's really not

913

02:20:23.210 --> 02:20:24.420

Nicolle Steiner: audible.

914

02:20:30.590 --> 02:20:31.480

Thank you.

915

02:20:32.450 --> 02:20:34.580

Nicolle Steiner: We really can't hear you

916

02:20:41.010 --> 02:20:42.949

Nicolle Steiner: try one more time.

917

02:20:46.220 --> 02:20:50.280

Nicolle Steiner: Sorry. Unfortunately, we really can't here

918

02:20:50.810 --> 02:20:54.150

Nicolle Steiner: or decipher your words.

919

02:20:54.510 --> 02:20:56.150

Nicolle Steiner: We will

920

02:20:56.710 --> 02:21:13.739

Nicolle Steiner: jump back to jump down to Paul Hugh. If if you would like to provide a comment, we will put up on the screen the um ways. You can provide a written comment during the comment period.

921

02:21:14.110 --> 02:21:23.010

Nicolle Steiner: Or again, you can try to dial in to this call. Um,

922

02:21:32.700 --> 02:21:33.810

Nicolle Steiner: Paul.

923

02:21:39.410 --> 02:21:40.690

Paul Tzanetopoulos: Hello, everyone!

924

02:21:41.960 --> 02:21:57.679

Paul Tzanetopoulos: Hello, thanks. Everybody Um. Let's see. I'm a forty-five. Well, at least forty-five years residents of of Silver Lake and uh the community is obviously very precious to me. I own a a number of homes. Here.

925

02:21:57.710 --> 02:21:58.880

Paul Tzanetopoulos: Um!

926

02:21:59.280 --> 02:22:09.559

Paul Tzanetopoulos: First of all that I just think it's a little offensive when people say this is a community-driven project I that's just completely false.

927

02:22:09.790 --> 02:22:21.020

Paul Tzanetopoulos: I I hate hearing things like that when it doesn't include the community. Uh, and it's just i'm pulling this regard for reality. I just this is really

928

02:22:21.130 --> 02:22:31.790

Paul Tzanetopoulos: hard to uh understand, but the the a lot of the practical things like people that have mentioned the meadow. Uh, I clearly, you know I certainly

929

02:22:31.890 --> 02:22:37.420

Paul Tzanetopoulos: uh would accept the fact that some there's been some benefits from the meadow. But, um!

930

02:22:37.550 --> 02:22:57.460

Paul Tzanetopoulos: The quality of life, since the meadow has really decreased for myself and my neighbors and parts of the neighborhood. Watch. It's very. It's almost unbearable. Here, Post Post meadow. It's a traffic uh getting out. You just can't get out of your house. You can't get it, anyway. It's just awful

931

02:22:57.470 --> 02:23:13.200

Paul Tzanetopoulos: uh. So I don't know uh how close people live. That's say the matter has been a plus thing. Um, it's. It's been very tough on us, uh, and in terms of transportation. Um! Those of you on the committee that uh look at the d ot uh

932

02:23:13.210 --> 02:23:29.380

Paul Tzanetopoulos: information. Please look at it carefully. The chances that they they looked at the traffic. Um, during the pandemic. Are we relevant? And you know this the driving in this community. We're in gridlock even today.

933

02:23:29.500 --> 02:23:34.249

Paul Tzanetopoulos: Uh, twice a day. Great actual gridlock today

934

02:23:34.260 --> 02:23:56.469

Paul Tzanetopoulos: uh day to day is what is my point? So the idea that there's no effect is just just preposterous. So please check the dates on the dots data, cause they uh they simply can't be true. The quality of life. Uh is, uh, adversely effective. We can't leave our homes or come home or invite somebody over to visit. Uh, thank you very much.

935

02:23:58.780 --> 02:24:00.870

Nicolle Steiner: Thank you for your comment.

936

02:24:02.230 --> 02:24:12.509

Nicolle Steiner: If you have joined by phone. Um, please press Star nine in order to raise your virtual hand and and be in the virtual line.

937

02:24:15.510 --> 02:24:17.530

Nicolle Steiner: Paul Newman,

938

02:24:17.640 --> 02:24:20.589

Nicolle Steiner: Here's what I found.

939

02:24:20.760 --> 02:24:21.690

Okay,

940

02:24:22.750 --> 02:24:25.909

Nicolle Steiner: My watch is trying to find all in it.

941

02:24:26.130 --> 02:24:27.619

Paul Neuman: Hi! Can you hear me?

942

02:24:27.960 --> 02:24:29.640

Paul Neuman: Hello!

943

02:24:29.940 --> 02:24:31.350

Paul Neuman: Hello!

944

02:24:32.630 --> 02:24:35.850

Paul Neuman: Hello! We can't hear you.

945

02:24:35.960 --> 02:24:39.100

Nicolle Steiner: You

946

02:24:39.790 --> 02:24:45.470

Nicolle Steiner: could please click on the interpretation button at the bottom of your screen and play, pick English,

947

02:24:45.800 --> 02:24:53.629

Nicolle Steiner: and then again click the interpretation button a second time and click mute, original audio.

948

02:24:54.290 --> 02:25:08.660

Paul Neuman: Can you hear me? I uh, I join this midway through so because of work stuff. But uh, so I didn't know all the instructions. So that was my fault. I want mostly want to point out, though, that

949

02:25:08.670 --> 02:25:26.689

Paul Neuman: at least with two of the callers and Marie and Betsy, I was repeatedly. We were here. We're more than one here. Hearing them say, Hello, Hello! Hello! Hello! And the call. You were instructing them that they were not to that they had not done things, and that the problem in effect was theirs. We were hearing them. So I suggest,

950

02:25:26.700 --> 02:25:42.760

Paul Neuman: maybe as a parable, that rather than assuming that the problem is elsewhere, that sometimes innocently and and you know no, no, no offense, but uh, not in any way immoral or amoral, but that the problem sometimes is

951

02:25:42.770 --> 02:26:04.119

Paul Neuman: the expectations of people who are managing a process who project onto them What they think is the case, and they don't necessarily. Uh I mean somebody I heard was talking about other stats. I know I heard somebody else say that they are in the uh the I guess Rfp. Or the proposal expectations. But a lot of Times expectations can be wildly uh out of uh,

952

02:26:04.130 --> 02:26:14.459

Paul Neuman: out of actual reality, in terms of what to what might occur, or what is actually occurring at that moment. Um, i'm! Probably being obscure and rambling. But i'm saying, first of all, that yes, we could hear those people

953

02:26:14.590 --> 02:26:25.909

Paul Neuman: that which is important to know. We could hear them here. If you can't hear them. Maybe that's an issue you guys are having, and you should look at your at your communications there, but i'll make a quick point about um

954

02:26:25.920 --> 02:26:39.269

Paul Neuman: expectations. Having lived in Silver Lake a long time, The bike path. It's great to have bypass. I'm all for bypass. But uh, for all the years it's been in place, i'm surprised if I see more than one person a month.

955

02:26:39.380 --> 02:27:08.100

Paul Neuman: I I saw one group of naked bicyclists, which is a thing, I guess, and I saw more people in that one group for twenty seconds going by. Then I've seen in twenty years, or however long the bike path has been there uh ten years. I don't know uh, so it it's. Obviously it's invalid. It's just to say that that aspiration does not always meet reality, and sometimes the problems that approve are far more severe than than have ever been allowed to be a possible possible outcome.

956

02:27:08.110 --> 02:27:08.960

Paul Neuman: Thank you.

957

02:27:10.700 --> 02:27:12.750

Nicolle Steiner: Thank you for your comment,

958

02:27:12.850 --> 02:27:28.469

Nicolle Steiner: and to just address the issue with the audio. I I just want to make sure that the comments are part of the recording, and if you're not in the right audio um, then it won't. Be recorded as part of the the record.

959

02:27:34.820 --> 02:27:41.959

Nicolle Steiner: Um, I see. Hold on Number one zero eight.

960

02:27:42.570 --> 02:27:50.179

Nicolle Steiner: But in order to raise your virtual hand, you'll have, I mean, in order to accept. You have to press Star Six.

961

02:27:52.190 --> 02:27:55.200

1213***108: Hello! It's Betsy. It's really right.

962

02:27:56.210 --> 02:27:57.570

1213***108: Can you hear me?

963

02:27:58.310 --> 02:28:00.610

Nicolle Steiner: I can't hear the audio. But

964

02:28:03.030 --> 02:28:04.500

1213***108: who is speaking?

965

02:28:07.460 --> 02:28:08.530

1213***108: I

966

02:28:10.800 --> 02:28:13.039

1213***108: find Paul's parable,

967

02:28:13.390 --> 02:28:18.600

1213***108: brilliant, and the best slides I've had in a week, so i'm just going to hang up,

968

02:28:18.980 --> 02:28:20.330

1213***108: not working.

969

02:28:26.570 --> 02:28:31.550

Nicolle Steiner: I couldn't hear the audio. I'm not sure is that still on seems to have hung up.

970

02:28:38.770 --> 02:28:42.040

Nicolle Steiner: All right. Let's try, Hugh Kenny.

971

02:28:53.030 --> 02:28:58.229

Nicolle Steiner: Here you still have the same problem.

972

02:28:58.820 --> 02:29:04.110

Nicolle Steiner: Sorry we cannot decipher what you are saying,

973

02:29:04.570 --> 02:29:06.920

i'm gonna to control my life so, General,

974

02:29:12.990 --> 02:29:19.569

Nicolle Steiner: and we'll put up the slide again on how to provide written comments here after we try. Betsy.

975

02:29:27.880 --> 02:29:29.380

Betsy Isroelit: Hello, Hello,

976

02:29:33.700 --> 02:29:36.979

Nicolle Steiner: Betsy! I can't hear you on the

977

02:29:37.370 --> 02:29:39.740

regular channel.

978

02:29:40.190 --> 02:29:58.880

Nicolle Steiner: I've I've done what i'm supposed to do at least six times um my screen says Maybe if someone can note her comment down that can hear her, Wendy, I think you can hear her Um, if you could write down her comments so we can have it for the public record. Um,

979

02:29:58.890 --> 02:30:00.329

Nicolle Steiner: that might be helpful.

980

02:30:00.480 --> 02:30:16.730

Betsy Isroelit: Thank you. I'll start the clock. Go ahead. Thank you. I appreciate that. Um. I just just for the record. I at least six times I did as the instruction said. It didn't work, so I find Paul's comment about parables

981

02:30:16.870 --> 02:30:29.380

Betsy Isroelit: growing in, and the best laugh I've had in about a week. So thank you, Paul. Um, I think Frida and Chip expressed out very eloquently, concerns about wildlife and

982

02:30:29.420 --> 02:30:46.200

Betsy Isroelit: um the impact on the neighborhood as far as traffic noise. Um, But I would like to just reference. What ships said uh wants versus needs, and I think there's some very basic questions that all the people I talk to are asking,

983

02:30:46.570 --> 02:30:51.859

Betsy Isroelit: which is how many people are going to come. A day which has been asked

984

02:30:51.920 --> 02:31:05.939

Betsy Isroelit: How much money like, really, how much money is this gonna cost? And really, truly, how long is this gonna last? Is it going to last five years, ten years, twenty years, two years, three days, I mean, that's

985

02:31:05.950 --> 02:31:24.940

Betsy Isroelit: It's impossible for the average person to determine that. Based on what's been presented. Um, I'd also like to comment on being less selfish and thinking about people who actually don't have parks in their communities, and it's easy to find that information.

986

02:31:25.430 --> 02:31:32.250

Betsy Isroelit: Um, Griffith Park Swimming Pool. One example. There's kids who need to learn to swim,

987

02:31:32.370 --> 02:31:47.490

Betsy Isroelit: and the pool has been closed because there's not a little bit of money to fix it. There's no way for people to get to Griffith Park. Don't have cars or bicycles, but yet it's right around the corner,

988

02:31:47.510 --> 02:32:00.269

Betsy Isroelit: so I think we should just open our hearts and think of people who aren't as wealthy as the people who live in this community, and who actually need

989

02:32:00.750 --> 02:32:07.620

Betsy Isroelit: who really truly need a place to play a place to swim a place to hike.

990

02:32:07.790 --> 02:32:08.740

Betsy Isroelit: Thank you.

991

02:32:14.110 --> 02:32:15.589

Wendy Delgado: Thank you, Betsy.

992

02:32:18.280 --> 02:32:20.989

Nicolle Steiner: The cool. It's ready. Thank you.

993

02:32:21.420 --> 02:32:22.920

Nicolle Steiner: P. Feldman.

994

02:32:29.650 --> 02:32:31.920

Nicolle Steiner: Hello, hello!

995

02:32:33.290 --> 02:32:45.170

pfeldman: Can you hear me? Our last caller?

996

02:32:45.180 --> 02:32:59.479

pfeldman: And I just want to make clear that the plan at this point is just still filled with negative environmental impacts, several of which can be remedied only if the plan is just completely scuttled. And so i'd say i'll turn it to another. One

997

02:32:59.550 --> 02:33:10.069

pfeldman: is the best solution. I think the plan is selfish, and it's near-sighted. The report talks about approximately thirty one

998

02:33:10.080 --> 02:33:29.320

pfeldman: uh green spaces parks uh within a couple of miles of of of Silver Lake. I don't think that even includes Griffith Park. It also doesn't include the Reservoir area itself, which we now have. The meadow. We have the Rec center area, including the basketball courts and uh, the

999

02:33:29.330 --> 02:33:37.409

pfeldman: uh children's facilities and um soccer field, Whatever the dog park we have,

1000

02:33:37.580 --> 02:33:47.629

pfeldman: the green space Here we're looking at it, and we also have the water here which is protected uh the wildlife, and so forth, are protected, as is one hundred and fifty.

1001

02:33:47.640 --> 02:34:17.090

pfeldman: Um! I think it's just selfish and near-sighted for uh people to say, we need this. We may want it. But there's other bigger needs in this city where there's so much homelessness where there's just not enough resources for other things. But basically the other thing I want to address is traffic. It's ludicrous to say that there's no significant uh impact, and that needs to be mitigated with traffic, because that also includes parking

1002

02:34:17.100 --> 02:34:24.209

pfeldman: uh in in other factors, right now on the streets to the west of uh the reservoir. It's

1003

02:34:24.220 --> 02:34:42.540

pfeldman: very hard for one car to even get through, because there's so many cars parked for people using the reservoir for people whose homes are there, and so forth. Fire trucks can't get through at times if it if they had to. Uh garbage trucks can't get through ambulance. Can't get through

1004

02:34:42.550 --> 02:34:55.380

pfeldman: uh to to put in this kind of so-called world-class amenity, and expect all these people here, and have at most one hundred and fifty more parking spaces is absolutely bogus.

1005

02:34:55.580 --> 02:35:03.049

pfeldman: Uh, I could go on and on, but I guess i'm out of time, so I i'll just continue making uh written comments.

1006

02:35:04.200 --> 02:35:07.279

Nicolle Steiner: Thank you very much for your comment,

1007

02:35:07.300 --> 02:35:16.819

Nicolle Steiner: and with that let me show one more time here on the screen, where and how you can provide written comments on the draft. Tir

1008

02:35:17.000 --> 02:35:25.450

Nicolle Steiner: um. The comment period is extended through December second two thousand and twenty-five, and we'll take in comments until five Pm. On that day

1009

02:35:25.480 --> 02:35:32.850

Nicolle Steiner: you could send written comments to the address on your screen as well as going to the project website.

1010

02:35:35.450 --> 02:35:45.009

Nicolle Steiner: We really appreciate um your availability tonight to join us and be part of the draft dir process.

1011

02:35:47.170 --> 02:35:49.790

Nicolle Steiner: Thank you. Hope you have all a good night.

Appendix B

Air Quality Emission Memorandum



SLRC Operations - South Coast Air Basin, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

SLRC Operations
South Coast Air Basin, Annual

1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Library	3.76	1000sqft	0.09	3,760.00	0
Other Asphalt Surfaces	3.85	Acre	3.85	162,687.00	0
City Park	21.40	Acre	21.40	937,153.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	12	Operational Year	2027		
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	563.83	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CO2 intensity factor linearly adjusted to account for SB100 RPS by year 2027.

Land Use - see operational assumptions

Sequestration - Project: 500 new trees, (assumes miscellaneous broad species class).

Table Name	Column Name	Default Value	New Value
tblLandUse	LandUseSquareFeet	167,706.00	162,687.00
tblLandUse	LandUseSquareFeet	932,184.00	937,153.00
tblProjectCharacteristics	CO2IntensityFactor	691.98	563.83
tblSequestration	NumberOfNewTrees	0.00	500.00

SLRC Operations - South Coast Air Basin, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**2.0 Emissions Summary**

2.3 Vegetation**Vegetation**

	CO2e
Category	MT
New Trees	354.0000
Total	354.0000

11.0 Vegetation

	Total CO2	CH4	N2O	CO2e
Category	MT			
Unmitigated	354.0000	0.0000	0.0000	354.0000

11.2 Net New Trees**Species Class**

	Number of Trees	Total CO2	CH4	N2O	CO2e
		MT			
Miscellaneous	500	354.0000	0.0000	0.0000	354.0000
Total		354.0000	0.0000	0.0000	354.0000

CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

Introduction

The Environmental Impact Report (EIR) prepared by the City of Los Angeles (City) for the Silver Lake Reservoir Complex Master Plan Project (proposed Project) analyzes the potential environmental effects associated with the redesign of approximately 116 acres of the 127-acre Silver Lake Reservoir Complex (SLRC) with community park amenities, which includes the City constructing various community park facilities and allowing some new public park uses within portions of the SLRC.

These findings have been prepared to comply with requirements of the California Environmental Quality Act (CEQA), California Public Resources Code Sections 21000 through 21189.57, and CEQA Guidelines, California Code of Regulations, Title 14, Chapter 3. Pursuant to Public Resources Code Section 21081, and CEQA Guidelines, Section 15091, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings that must be supported by substantial evidence in the record are as follows:

- Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Environmental Review Process

A Notice of Preparation (NOP) was prepared pursuant to Section 15082 of the CEQA Guidelines, to notify agencies and interested parties that the City will be preparing a Draft EIR to evaluate potential environmental impacts of the proposed Project (see Appendix A of the Draft EIR). The NOP was also posted by the County Clerk in Los Angeles and was mailed on January 6, 2022, to a total of approximately 6,500 properties within an approximately 0.5-mile radius of the proposed Project area. In addition, the NOP was mailed to 23 interested parties, including local, state, and federal agencies and tribes, and emailed to a total of approximately 1,100 agencies, interested parties, groups, or individuals who had previously expressed interest in the proposed Project. A

Notice of Completion (NOC) was prepared by the City and uploaded to the State Clearinghouse website, and information on the proposed Project was posted on the CEQAnet Database. The NOP was made available online at the City's website and at two public libraries: Silver Lake Branch Library at 2411 Glendale Boulevard in Los Angeles, and the Los Angeles County City Terrace Library at 4025 East City Terrace Drive in Los Angeles. The NOP was published in the Los Angeles Times on January 6, 2022, and La Opinión on January 9, 2022, and available on the EastSider, a neighborhood news blog and website, for the duration of the 30-day scoping period starting January 6, 2022.

Similarly, after completion of the Draft EIR, an NOC was prepared along with a Notice of Availability of a Draft EIR (NOA) by the City and uploaded to the State Clearinghouse website and posted with the Los Angeles County Clerk. The public comment period started on October 6, 2022, and was extended through December 16, 2022. The NOA was made available online at the City's website, and the same two public libraries. The NOA was published in the Los Angeles Times on October 6, 2022, and La Opinión on October 9, 2022, and available on the EastSider for the duration of the public comment period. In addition, the NOA was mailed to approximately 1,100 agencies, interested parties, groups, or individuals who had previously expressed interest in the proposed Project, and an eBlast was sent to over 3,000 additional interested parties. A virtual public comment meeting was held in English and Spanish on October 26, 2022 to present the proposed Project, discuss the findings of the Draft EIR, and obtain verbal comments from the public.

Record of Proceedings

For the purposes of CEQA and these findings, the record of the administrative proceedings for the proposed Project includes, but is not limited to, the following:

Notice of Preparation	January 6, 2022
Public Scoping Meeting	January 19, 2022
Draft EIR and Notice of Availability	October 6, 2022
Draft EIR Public Meeting	October 26, 2022
Final EIR	July 19, 2023

Pursuant to CEQA Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Office of the City Clerk, 200 North Spring Street, 3rd Floor, Los Angeles, CA; the Bureau of Engineering, 1149 South Broadway, Suite 600, Los Angeles CA; and any other relevant City department.

Project Summary

The proposed Project would re-develop the SLRC with a contemporary design that would create park zones blending vegetated areas with public spaces. The design would enhance the visual and recreational quality of the area to be consistent with goals and objectives of the Silver Lake–Echo

Park–Elysian Valley Community Plan (Community Plan) and provide the opportunity for the public to access natural park space. None of the existing public park facilities within the SLRC would be removed; rather, public spaces and facilities would be expanded, renovated, and redesigned to improve visitor experience, including the perimeter walking path/promenade. The proposed Project would impact approximately 116 acres of the 127-acre SLRC, including approximately 77 acres of open water. The existing area would be organized into a series of new spaces (park zones) surrounding the reservoirs. The proposed Project design would consist of seven park zones connected by a 2.5-mile, tree-lined promenade. These zones would include the Meadow, the Knoll, Ivanhoe Reservoir, the Eucalyptus Grove, the East and West Narrows, the South Valley, and Habitat Islands.

The proposed Project would remove portions of the existing perimeter fence over time as the park zones are constructed while maintaining or introducing new fencing needed to secure existing Los Angeles Department of Water and Power (LADWP) facilities, protect habitat, and protect the public. Fences around LADWP facilities would be approximately 8 feet high and with a minimum 6-inch clear zone along the bottom for small mammals to pass through.

The proposed Project would include off-site improvements along areas surrounding the SLRC. One improvement would include the addition of 90-degree parking along the north side of West Silver Lake Drive, east of Redesdale Avenue along the grassy area adjacent to the Silver Lake Recreation Center. Trees would be avoided along this area and parking would be added in a way that it would not encroach on trees. Currently, there are 10 parallel parking spaces along this segment of West Silver Lake Drive. By converting to 90-degree parking, a total of approximately 25 parking spaces would be added, resulting in a net increase in parking of 15 spaces at this location. Two of the new parking spaces would be dedicated to electric vehicle (EV) parking.

Additionally, bike lane improvements would occur along Silver Lake Boulevard, between Armstrong Avenue and Duane Street for a length of approximately 3,000 feet. The final configuration for the bike lane improvements along this area would be determined by a design committee during the development of final design drawings, which would include other City entities such as City Planning, City of Los Angeles Department of Transportation (LADOT), and the local Council Districts, to determine the final configuration.

Project Objectives

As set forth in Chapter 2, *Project Description*, of the Draft EIR, the fundamental objective of the proposed Project is to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character. The underlying purpose of the proposed Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

Other objectives of the proposed Project are as follows:

- Preserve and enhance the unique character of the SLRC with increased points of access, improved internal circulation and access to the water's edge, and increased spaces for community and family gatherings.
- Expand existing active recreational uses and increase passive recreational uses.
- Enhance and expand wildlife habitat by introducing wetland and aquatic ecologies and improving upland habitat.
- Provide opportunities for the public to connect with nature and provide facilities for on-site environmental education and stewardship while limiting human/wildlife interactions through design and operations to protect habitat.
- Allow for continued underlying LADWP operations, access, and future use of designated areas of the site, thereby allowing continued use of the reservoirs and adjacent facilities that are intended to remain for proprietary use by LADWP.

Findings of Fact Required Under CEQA

Public Resources Code, Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” The same provision states that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” Section 21002 goes on to state that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

The mitigation measures and/or the design features and construction measures set forth in the Final EIR are included in the Mitigation Monitoring Program (MMP) adopted concurrently with these findings. The City will use the MMP to ensure compliance with proposed Project mitigation measures.

The CEQA Guidelines define a significant impact on the environment as “a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the projects, including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance” (Section 15382). The Final EIR identified all potentially significant environmental effects resulting from implementation of the proposed Project. However, these significant effects can be fully mitigated through the adoption of feasible mitigation measures, except for temporary noise and vibration impacts during construction, and recreation impacts associated with those construction impacts. The Final EIR determined that the proposed Project will result in significant and unavoidable construction noise, vibration (human annoyance), and recreation impacts.

The findings provided in this document are based on substantial evidence in the entire record before the City. The references set forth in these findings to certain pages or sections of the

environmental documents for the proposed Project are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings. These findings do not attempt to describe the full analysis of each environmental impact contained in the Final EIR, its appendices, and additional documents in the case files for the proposed Project. Instead, a full explanation of these environmental findings and conclusions can be found in the Final EIR and those documents, and these findings hereby incorporate by reference and adopt the discussion and analysis in the Final EIR, its appendices, and additional documents in the case files for the proposed Project supporting the determination regarding the impacts of the proposed Project. In making these findings, the determinations and conclusions of the Final EIR relating to environmental impacts are hereby ratified, adopted, and incorporated in these findings, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings. In the event these findings inadvertently omit or inaccurately reflect facts stated in the Final EIR due to a clerical error, such statements are nevertheless hereby adopted and incorporated in the findings below by reference, and the language set forth in the Final EIR shall control.

Project Impacts

The analyses presented in Chapter 3 of the Draft EIR concluded that the proposed Project would result in no impact or a less-than-significant impact, without any required mitigation, for the following resource areas: agriculture and forestry resources, energy; greenhouse gas (GHG) emissions, hydrology and water quality, land use, population and housing, public services, transportation, and wildfire.

Based on comments received during the Draft EIR comment period, the City has decided to remove the option to have amplified speakers during special events as part of the proposed Project. Special events would still be allowed up to 12 times per year as detailed in the Draft EIR. Due to the removal of amplified speaker use from the proposed Project, the significance determinations related to operational noise in Section 3.12, *Noise and Vibration*, and operational impacts to recreation in Section 3.15, *Recreation and Parks*, of the Draft EIR have been reduced to less than significant.

Chapter 3 of the Final EIR identifies revisions, clarifications, and corrections as a result of the responses to public and agency comments received on the Draft EIR, new information that has become available since publication of the Draft EIR, or due to recognition of inadvertent errors or omissions.

Significant Adverse Impacts Mitigated to Less-than-Significant Levels Under CEQA

Having reviewed and considered the information contained in the Final EIR, and the proposed Project as designed and proposed for approval, the City did find that several significant adverse impacts (from construction or implementation of the proposed Project) were able to be avoided or reduced through implementation of feasible mitigation measures pursuant to Public Resources

Code Section 21081 and CEQA Guidelines Section 15091 (a)(1). Significant adverse impacts not mitigated to less-than-significant levels are discussed below.

The analyses presented in Chapter 3 of the Draft EIR concluded that the proposed Project would result in a less-than-significant impact with mitigation incorporated, for the following resource areas: aesthetics; air quality; biological resources; cultural resources; geology, soils, and minerals; hazards and hazardous materials; tribal cultural resources; and utilities and service systems.

Significant and Unavoidable Adverse Impacts Under CEQA

Having reviewed and considered the information contained in the Final EIR and the record of proceedings, and pursuant to Public Resources Code Section 21081 and CEQA Guidelines Sections 15093 and 15091(a)(3), the City adopts the following findings regarding the significant and unavoidable effects of the proposed Project.

The following significant and unavoidable effects of the proposed Project impacts were found to occur. The below findings are appropriate because there are no feasible mitigation measures available that would reduce the identified effects to below a level of significance. “Feasible” is defined in Section 15364 of the CEQA Guidelines to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” Section 15019(a)(3) of the CEQA Guidelines also provides that “other” considerations may form the basis for a finding of infeasibility.

Noise and Vibration

Significant Adverse Environmental Impacts (Noise Standards):

As described under Impact 3.12-1 (pp. 3.12-30 to 3.12-39 of the Draft EIR), construction activities would generally include demolition, site grading, trenching, excavation, paving, landscaping, building construction, and off-site improvements. For the purposes of the environmental analysis, the following park zones are assumed to be constructed simultaneously within groupings, with the second grouping constructed sequentially after the first:

1. Ivanhoe Overlook, the Eucalyptus Grove, Habitat Islands, the Knoll, the Meadow (1st half).
2. The East and West Narrows, the South Valley, Ivanhoe Spillway and Promenade, the Meadow (2nd half), and off-site improvements.

Construction noise levels on the proposed Project site and at noise-sensitive receptors would fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment. Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are being operated concurrently. The proposed Project’s estimated construction noise levels were calculated for a scenario in which all pieces of construction equipment would operate simultaneously, with the loudest type of equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. The modeled worst-case construction scenario is presented in Table 3.12-11 and Table 3.12-12 in Section 3.12 of the Draft EIR. As shown, construction noise levels

would exceed the threshold of 5 dBA (i.e., A-weighted decibels) over ambient noise levels at noise-sensitive receptors R1 through R5, R7, and R8 for the first park zone grouping and at R1 through R8 for the second park zone grouping. Based on the modeled worst-case construction scenario presented in Table 3.12-11 and Table 3.12-12, the proposed Project could potentially exceed applicable thresholds, and impacts would be potentially significant¹.

Project Design Features:

PDF-NOISE-1: Haul Route. Prior to commencement of construction and operational maintenance activities, the City shall establish approved truck haul routes that avoid or minimize, to the extent feasible, unnecessary truck travel on local roadways through residential neighborhoods or adjacent to schools, and prioritize travel on collector and arterial streets.

PDF-NOISE-2: Construction Noticing and Community Liaison. Prior to commencement of construction activities, the City shall notify in writing adjacent residents and businesses along the Project route or worksite of proposed construction activities and the tentative schedule. The City shall require the construction contractor to designate a community liaison to respond to any issues and/or concerns related to construction activities, including any noise or vibration complaints. The community liaison shall maintain a log of communications and resolutions of issues or concerns and share the log with the City. Notices and construction signs will include a hotline and website address which will be updated quarterly and will include project-related information.

Mitigation Measures:

NOISE-1: Equipment Controls. Noise and vibration construction equipment whose specific location on the Project site may be flexible (e.g., compressors and generators) shall be located away from the nearest off-site noise-sensitive land uses (at least 100 feet away) if sufficient distance on the implementing Project site is available. If 100 feet is not feasible, the equipment shall have natural and/or manmade barriers (e.g., berms, intervening construction trailers, etc.) or a noise enclosure around the specific equipment location that screens the receptor from propagation of noise from such equipment. The barrier and/or enclosure shall block the line-of-site from the construction equipment to any similarly elevated noise-sensitive receptors. Noise enclosures shall provide sufficient space and gate access as needed for the safe operation of equipment, construction activities, material deliveries, and equipment access by construction personnel. A noise enclosure is not required if it would pose a safety risk or unreasonably prevent access to the construction equipment as deemed by the on-site construction manager such as in areas that have limited equipment maneuvering space or access. The contractor shall provide documentation verifying compliance with this measure.

NOISE-2: Mobile Noise Barriers. For construction areas within 500 feet of a residential land use or other sensitive receptor, the contractor shall install temporary noise barriers between the active construction area and the off-site noise-sensitive receptors. The mobile noise barriers shall achieve sound level reductions of a minimum of 10 dBA between the Project construction sites and the sensitive receptor location. These

¹ ESA, *CEQA Findings of Fact – Significant and Unavoidable Noise and Groundborne Vibration Impacts with Implementation of Feasible Mitigation Measures Memorandum*. 2023.

temporary noise barriers shall be used to block the line-of-sight between the construction equipment and similarly elevated ground-level noise-sensitive receptors. The barriers should allow for repositioning in order to block the noise at the sensitive receptor as construction activities move along the Project boundary. A noise barrier is not required if it would pose a safety risk or unreasonably prevent access to the construction area as deemed by the on-site construction manager such as in areas that have limited equipment maneuvering space or access. Any barrier capable of a reduction greater than 10 dBA would require greater height and heavier noise insulation which would make mobility of the barrier infeasible and cause safety concerns related to barrier stability. Further, noise barriers would only be effective if they block the line-of-sight to sensitive receptors. The elevation of the surrounding area increases quickly and receptors within the vicinity of all identified sensitive receptors may still have a direct line-of-sight to the Project site and may not benefit from the use of a mobile noise barrier. The contractor shall provide documentation verifying compliance with this measure.

NOISE-3: Construction Equipment Noise Shielding and Muffling Devices.

Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. Prior to the issuance of demolition permits, certification of muffler installation shall be submitted to the applicable City for review. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The primary source of noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA.² The contractor shall use muffler systems that provide a minimum reduction of 10 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. Contractors shall include the muffler requirements in contract specifications. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure. Mufflers providing a noise reduction greater than 10 dBA would be technically infeasible or cost prohibitive given the current best available technologies. Further, mufflers are only effective on equipment with internal combustion engines and would not result in noise reductions for hand tools and other light-duty construction equipment. Therefore, NOISE-3 incorporates muffling devices to the maximum extent feasible.

Finding:

Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required or incorporated into the proposed Project that will avoid or substantially lessen the significant environmental effects associated with construction noise as identified in the EIR.

Pursuant to CEQA Guidelines Section 1509(a)(3), specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the EIR.

² FHWA, *Special Report – Measurement, Prediction, and Mitigation*, Chapter 4 Mitigation, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm. Accessed July 16, 2021.

Facts in Support of Findings:

While implementation of Mitigation Measures NOISE-1 through NOISE-3 would reduce noise levels and associated impacts at noise-sensitive receptors, noise levels could still exceed local jurisdiction significance thresholds when taking into account the potential worst-case overlap of the various construction phases as shown in Table 3.12-11 and Table 3.12-12, in Section 3.12 of the Draft EIR. Table 3.12-14 and Table 3.12-15 in the Draft EIR show the construction noise levels at each receptor after the implementation of Mitigation Measures NOISE-1 through NOISE-3. All receptors would experience a 10 dBA noise level reduction from implementation of muffling devices under Mitigation Measure NOISE-3. Mufflers under Mitigation Measure NOISE-3 providing a noise reduction greater than 10 dBA would be technically infeasible or cost prohibitive given the current best available technologies. Further, mufflers are only effective on equipment with internal combustion engines and would not result in noise reductions for hand tools and other light-duty construction equipment. Therefore, NOISE-3 incorporates muffling devices to the maximum extent feasible. Noise barriers implemented under Mitigation Measure NOISE-2 are assumed to reduce noise levels by 10 dBA at receptors where a noise barrier would block the line-of-sight between the receptor and the proposed Project site (e.g., R1 through R4, R6, and R8). However, the elevation of the surrounding residential areas increases moving away from the proposed Project site, and elevated receptors may still have a direct line-of-sight to the proposed Project site and may not benefit from the installation of a noise barrier. Noise barriers are not capable of blocking noise at noise-sensitive receptors that are elevated above a construction work site, such as residential units that are above grade of the proposed Project site. It is not feasible to install noise barriers with height sufficient to block the line-of-sight for all noise-sensitive receptors located at higher elevation residential units due to barrier foundation and wind load restrictions.

Because there could be receptors elevated above the construction work sites throughout the proposed Project area within the upper levels of a noise-sensitive receptor building (R1 through R8), construction noise would represent a temporary noise increase in excess of standards for receptors R1, R2, R3, R4, R6, and R8, and would be a significant and unavoidable impact. The City did not identify any other feasible mitigation available to render the effects less than significant. The City concludes, however, that the proposed Project's benefits outweigh its significant and unavoidable impacts, as set forth in the *Statement of Overriding Considerations*, below.

Chapter 3, *Revisions, Clarifications, and Corrections to the Draft Environmental Impact Report*, of the Final EIR further clarifies on page 3-31 that the predicted noise levels at the nearest receptors would not exceed 85 dBA, with the exception of occasional use of concrete saws and operation of individual pieces of construction equipment. Consequently, the significant and unavoidable noise impact is not generated by virtue of noise levels that would be considered harmful but, rather, as a result of the magnitude of the increase over existing ambient noise levels without construction at certain receptor locations. Therefore, proposed Project construction noise would not result in adverse health effects related to pain, the onset of hearing loss, or other significant health effects.

Significant Adverse Environmental Impacts (Groundborne Vibration-Human Annoyance):

As described under Impact 3.12-2 (pp. 3.12-53 through 3.12-56 of the Draft EIR), the proposed Project could potentially exceed applicable thresholds for human annoyance related to groundborne vibration. Table 3.12-24 provides the estimated vibration levels at the off-site sensitive uses due to construction equipment operation and compares the estimated vibration levels to the specified significance criteria for human annoyance. As shown, the estimated groundborne vibration levels from off-road construction equipment would exceed the significance criteria for human annoyance at the adjacent sensitive-receptor locations V1, V2, and V4 through V7. Therefore, potential vibration impacts with respect to human annoyance that would result from temporary vibration from off-road construction equipment would be significant prior to the implementation of mitigation measures at sensitive-receptor locations V1, V2, and V4 through V7.

Finding:

Pursuant to CEQA Guidelines Section 1509(a)(3), specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the EIR.

Facts in Support of Findings:

As stated in the significance determination on page 3.12-56 of the Draft EIR, impacts regarding human annoyance at nearby sensitive receptors could exceed the significance thresholds (72 VdB [decibel notation] at residential uses). Potential mitigation measures to reduce vibration impacts from on-site construction activities with respect to human annoyance include the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered feasible for temporary applications, such as proposed Project construction. Constructing a wave barrier to reduce the proposed Project's construction-related vibration impacts would, in and of itself, generate groundborne vibration from the excavation equipment. In addition, it is not possible to prohibit the use of construction equipment within certain distances of sensitive receptors as such equipment would be required to construct the various proposed Project components at the proposed locations. Thus, it was concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors. Therefore, vibration impacts from proposed Project construction activities with respect to human annoyance would be significant and unavoidable. The City concludes, however, that the proposed Project's benefits outweigh its temporary significant and unavoidable impacts during construction, as set forth in the *Statement of Overriding Considerations* below.

Recreation***Significant Adverse Environmental Impacts (Recreational Facilities):***

As described under Impact 3.15-3 (pp. 3.15-15 and 3.15-16 of the Draft EIR), the proposed Project is itself a recreational facility, and thus the impacts associated with recreational facilities

are analyzed throughout Chapter 3, *Environmental Setting, Impact Analysis, and Mitigation Measures*, of the Draft EIR. With implementation of all proposed Project design features listed in Chapter 2, *Project Description*, Section 2.5.8, *Project Design Features* (pp. 2-34 through 2-40 of the Draft EIR), and mitigation measures listed in Executive Summary Table ES-1 of the Draft EIR, all impacts from the proposed Project except for those related to construction noise and vibration would be less than significant. The Draft EIR concluded that impacts related to noise levels at sensitive receptors and vibration (human annoyance) would remain following implementation of mitigation measures, as discussed above and in Section 3.12 of the Draft EIR, *Noise and Vibration*.

Finding:

Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required or incorporated into the proposed Project that will avoid or substantially lessen the significant environmental effects associated with construction noise and vibration as identified in the EIR.

Pursuant to CEQA Guidelines Section 1509(a)(3), specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the EIR.

Project Design Features:

Implement PDF-NOISE-1 and PDF-NOISE-2, as shown above.

Mitigation Measures:

Implement Mitigation Measures NOISE-1 through NOISE-3, as shown above.

Facts in Support of Finding:

While implementation of Mitigation Measures NOISE-1 through NOISE-3 would reduce noise and vibration levels and associated impacts at sensitive receptors, to the extent feasible, temporary noise and vibration impacts (associated with human annoyance) during construction would be significant and unavoidable even after mitigation is applied. Facts in support of this finding are described above under *Significant and Unavoidable Adverse Impacts Under CEQA, Noise and Vibration*, with relevant conclusions from the Draft EIR incorporated therein by reference.

The City did not identify any feasible mitigation available to render temporary noise and vibration (human annoyance) effects less than significant. The effects therefore remain significant and unavoidable. The City concludes, however, that the proposed Project's benefits outweigh its significant and unavoidable impacts, as set forth in the *Statement of Overriding Considerations* below.

Cumulative Impacts

Cumulative impacts on aesthetics; agriculture and forestry resources; air quality; biological resources; cultural resources; energy; geology, soils, and mineral resources; GHG emissions; hazards and hazardous materials; hydrology and water quality; land use; population and housing;

public services; transportation; tribal cultural resources; and wildfire were found to be less than significant or less than significant with mitigation.

Significant Adverse Environmental Impacts (Construction Noise):

The proposed Project's contribution to cumulative impacts would be less than significant with implementation of mitigation measures, except for impacts to noise levels at nearby sensitive receptors during construction, which would remain significant and unavoidable despite implementation of feasible mitigation measures. It should be noted that only cumulative impacts related to on-site construction noise and associated sensitive receptors would remain significant and unavoidable. As shown in Table 3.12-13 of the Draft EIR, the proposed Project would not result in any significant off-site construction noise impacts due to construction trips. Further, based on revisions included in Chapter 3 of the Final EIR, operational noise and vibration impacts would be less than significant with implementation of Mitigation Measure NOISE-4.

As discussed under Impact 3.12-4 (pp. 3.12-57 through 3.12-60 of the Draft EIR), noise from the construction of two development projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. As described on page 3.12-57 of the Draft EIR, Related Projects No. 4, No. 12, and No. 13 are located within 1,000 feet of the proposed Project site. Of those three related projects, the discussion under Impact 3.12-4 states that only one project (Related Project No. 4, the 2280 North Glendale Boulevard Project) would have the potential to create construction noise impacts to nearby sensitive receptors should its construction schedule overlap with the construction of the proposed Project. Residences located at the corner of Tesla Avenue and Armstrong Avenue Drive and residential receptors along Armstrong Avenue and Silver Lake Boulevard are located between the proposed Project site and Related Project No. 4 and could be exposed to construction noise from both the proposed Project and the related project. Therefore, cumulative impacts related to on-site noise generation would be potentially significant.

Mitigation Measures:

Implement Mitigation Measures NOISE-1 through NOISE-3 above.

Finding:

Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required or incorporated into the proposed Project that will avoid or substantially lessen the significant environmental effects associated with construction noise and vibration as identified in the EIR.

The City did not identify any feasible mitigation available to render these cumulative effects less than significant. The cumulative effects therefore remain significant and unavoidable. The City concludes, however, that the proposed Project's benefits outweigh its significant and unavoidable impacts, as set forth in the *Statement of Overriding Considerations* below.

Facts in Support of Finding:

As discussed on page 3.12-57 of the Draft EIR, the estimated construction noise levels from the proposed Project could exceed the 5-dBA significance threshold and contribute to cumulative noise impacts if constructed simultaneously with Related Project No. 4 at 2280 North Glendale

Boulevard. While implementation of Mitigation Measures NOISE-1 through NOISE-3 would reduce noise levels and associated impacts at noise-sensitive receptors during construction, noise levels could still exceed local jurisdiction significance thresholds when taking into account the potential worst-case overlap of the various construction phases as shown in Table 3.12-11 and Table 3.12-12, in Section 3.12 of the Draft EIR, with cumulative noise that would be generated from potential simultaneous construction of Related Project No. 4.

Furthermore, as discussed above for *Significant and Unavoidable Adverse Impacts Under CEQA, Noise and Vibration*, noise barriers are not capable of blocking noise at noise-sensitive receptors that are elevated above a construction work site, such as residential units that are above grade of the proposed Project site. It is not feasible to install noise barriers with height sufficient block the line-of-sight for all noise-sensitive receptors located at higher elevation residential units due to barrier foundation and wind load restrictions. The City did not identify any feasible mitigation available to render the effects less than significant. The City concludes, however, that the benefits of the proposed Project outweigh its significant and unavoidable impacts, as set forth in the *Statement of Overriding Considerations*, below.

Land Use Findings

The City hereby finds that the proposed Project is in substantial conformance with the purposes, intent, and provisions of the City's Framework Element, the City of Los Angeles General Plan (General Plan), the Community Plan, as well as development standards in the Los Angeles Municipal Code's (LAMC) Planning and Zoning Code. The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area are provided in Table 3.11-1, and discussed in Section 3.11, *Land Use*, Section 3.11.5, *Impacts and Mitigation Measures*, *Land Use Plans* (pp. 3.11-11 through 3.11-20) of the Draft EIR. In summary, the analysis concluded that the proposed Project is consistent with the adopted land use designation for the site in the Community Plan, the General Plan, and adopted environmental goals or policies contained in other applicable plans described in Table 3.11-1.

As discussed on page 3.11-19 of the Draft EIR, the proposed Project would be consistent with applicable provisions of the LAMC – which include Open Space Zoning. The entirety of the proposed Project area is zoned as Open Space (OS), which allows for the following applicable uses of the SLRC: parks and recreation facilities (including bicycle trails, walking trails, nature trails, park land/lawn areas, children's' play areas, child care facilities, picnic facilities, and athletic fields); public water supply reservoirs (uncovered) and accessory uses that are incidental to the operation and continued maintenance of such reservoirs; and water conservation and floodplain areas. The proposed Project would redesign existing park facilities. The zoning designation of the entire proposed Project area will not change with implementation of the proposed Project. The proposed uses would continue to be consistent with existing uses described above, which are permitted under the LAMC. Therefore, the proposed Project would not result in significant environmental impacts related to inconsistency with the LAMC's land use regulations. As such, impacts with respect to the land use provisions of the LAMC would be less than significant.

Project Alternatives

Where significant impacts are identified, Section 15126.6 of the CEQA Guidelines requires EIRs to consider and discuss alternatives to the proposed actions. Subsection (a) states:

- (a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subsection 15126.6(b) states the purpose of the alternatives analysis:

- (b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

In Subsection 15126.6(c), the CEQA Guidelines describe the selection process for a range of reasonable alternatives:

- (c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the proposed Project. Of those alternatives,

the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the proposed Project.

Based on the requirements of CEQA Guidelines Section 15126.6, the proposed Project objectives, and community input, a total of five project alternatives were identified during the EIR process. As described in Chapter 5, Section 5.3, *Alternatives to the Proposed Project*, of the five project alternatives, three alternatives – the required No Project Alternative (Alternative 1), Alternative 2, and Alternative 3 – were selected by the City to inform evaluation of the proposed Project in light of the significant and unavoidable impact of the proposed Project (i.e., construction noise and vibration and recreational facilities due to construction noise). For more information on the infeasibility of the two rejected alternatives and other hybrid alternatives, see *Alternatives Rejected from Further Consideration*, below. The findings regarding the alternatives are based on the Final EIR and the entire record of proceedings.

Based on the following analysis, and as further supported in Chapter 5, *Analysis of Alternatives*, and in Chapter 3, *Environmental Setting, Impact Analysis, and Mitigation Measures*, of the Draft EIR, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or mitigation measure will substantially lessen all significant effect of the proposed Project, reduce the significant unavoidable impacts of the proposed Project to a level that is less than significant, or avoid any significant effect the proposed Project would have on the environment. Alternative 2 would reduce one significant and unavoidable impact of the proposed Project, vibration impacts as they relate to human annoyance, but would not reduce the two other impacts of noise during construction, and recreation. In addition, Alternative 2 would still result in a cumulative significant and unavoidable impact related to construction noise. Also, as set forth below, Alternative 2 would meet the project objectives to a lesser degree than the proposed Project.

Alternative 1 – No Project Alternative

Under the No Project Alternative, improvements to the SLRC would not occur and existing operations by LADWP and the City of Los Angeles Recreation and Parks Department (RAP) would continue. The Project site would not be redesigned with new community park amenities. The perimeter fence would not be removed, and additional areas within the SLRC would not be open to the public. The SLRC would remain as an enclosed facility, with public access limited to the existing areas managed by RAP. The existing amenities (the Meadow and South Valley Recreation Center facilities and Dog Park) would continue to be operated and maintained by RAP similar to existing conditions. Under the No Project Alternative, no wetland or upland habitat improvements, new lighting, pedestrian, or off-site improvements would occur. LADWP facilities would continue to operate under existing protocols, including maintenance of the dams and reservoirs. Access and use of existing facilities by LADWP would be maintained. Table 5-1 in Chapter 5, *Analysis of Alternatives*, of the Draft EIR provides a comparison of the proposed Project components to Alternative 1, No Project Alternative.

Impacts as Compared to the Proposed Project

Under Alternative 1, the proposed Project would not be implemented. Impacts to agriculture and forestry resources, land use and planning, and population and housing were analyzed to have similar impacts when compared with the proposed Project. Alternative 1 would result in fewer impacts than the proposed Project to the following resources areas, and it was analyzed that Alternative 1 would result in a significance determination of no impact to: aesthetics; air quality; biological resources; cultural resources; energy; geology, soils, and mineral resources; GHG emissions; hazards and hazardous materials; hydrology and water quality; noise; public services; recreation and parks; transportation; tribal cultural resources; utilities and service systems; and wildfire. The severity of the impacts resulting from Alternative 1 are summarized below.

Aesthetics

Under the No Project Alternative, no project components would be constructed, and the SLRC would continue to operate as under existing conditions. As such, no impacts to scenic vistas or scenic resources would result from this alternative since no construction or physical improvements would occur. However, the beneficial effect of the proposed Project relative to visual character and quality through an expanded and improved upland habitat with implementation of the Tree Succession Plan, improved recreational opportunities, and off-site safety improvements would not occur under Alternative 1. This alternative would avoid impacts associated with additional lighting and reflective surfacing of new structures. As such, overall, the No Project Alternative would result in fewer impacts than the proposed Project relative to aesthetics.

Air Quality

Under Alternative 1, no construction activities would be necessary and no addition of various community park facilities would occur. Accordingly, no additional air pollutant emissions would be generated by implementation of this alternative, and therefore no impacts to localized or regional construction emissions would occur. Similarly, given no net increase in air pollutant emissions, no impacts related to consistency with the Air Quality Management Plan (AQMP) would occur. Operational emissions associated with existing maintenance activities would continue. Impacts would be less than the proposed Project relative to air quality. At the same time, by not building the proposed recreational facilities, opportunities for vehicular trips to be replaced by trips by foot and bicycle would be reduced, which would potentially reduce any offsetting reduction in vehicular emissions and associated improvement in long-term air quality. In general, however, the No Project Alternative would result in fewer impacts than the proposed Project relative to air quality.

Biological Resources

Under the No Project Alternative, no new construction would occur and existing operations and maintenance activities would continue. Construction activities would not result in any physical changes to the environment. Additionally, the lack of physical impacts under this alternative would serve to avoid impacts to wildlife corridors and conflicts with local ordinances protecting biological resources. Construction impacts to biological resources would be less than under the proposed Project due to the lack of any physical development or ground disturbance or need for

tree removal. However, the proposed Project, which would result in the addition of approximately 500 trees to the Project site, and the proposed wetland and upland habitat improvements would not be realized. In general, however, the No Project Alternative would result in fewer impacts and fewer habitat improvements compared with the proposed Project.

Cultural Resources

Due to the lack of ground-disturbing activities or physical development under Alternative 1, no impacts to archaeological, paleontological, or historic resources would occur. Existing resources at the Project site, both known and undiscovered, would not be affected by implementation of this alternative. As such, impacts to cultural resources would be less than the proposed Project.

Energy

The No Project Alternative would not involve any changes to the Project site and would, therefore, not involve construction activities that have the potential to result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Because the No Project Alternative would not introduce any new uses, there would be no change in energy consumption under this alternative, and no impacts would result related to energy. However, existing energy demands on site would be met with older, less energy-efficient fixtures. Therefore, the increased energy demand would be avoided, but the opportunity to increase energy efficiency would not occur. Impacts under the No Project Alternative may be slightly reduced compared to the proposed Project.

Geology, Soils, and Mineral Resources

The No Project Alternative would not result in any physical changes to the Project site and therefore would not have the potential to expose people or structures to increased risks associated with seismic ground shaking or seismic-related ground failure. Similarly, no impacts related to landslides, soil erosion, geologic stability, or alternative wastewater disposal systems would result from this alternative since no additional development would occur. This alternative would not result in any ground-disturbing activities, so no impact to paleontological resources or unique geologic features would occur. In addition, this alternative would not result in any impact related to mineral resources. Geology, soils, and minerals impacts under this alternative would be less than the proposed Project.

Greenhouse Gas Emissions

No new development would occur under the No Project Alternative, and existing operations and maintenance activities would continue. As such, no new additional GHG emissions would result from its construction. Therefore, this alternative would not result in any adverse impacts related to GHG emissions or consistency with any applicable plan, policy, or regulation to reduce GHG emissions, and impacts would be less than the proposed Project.

Hazards and Hazardous Materials

The No Project Alternative would not involve any construction activities and would not include ground-disturbing activities that could result in the release of hazardous materials into the

environment. This alternative would not result in construction activities or operations that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school. Similarly, this alternative would not interfere with an emergency response plan or emergency evacuation plan since no construction or operation would occur under this alternative. In addition, the No Project Alternative would not involve any changes to the Project site and, therefore, would not introduce new conditions that have the potential to exacerbate wildfire risks. Therefore, no impacts related to hazards and hazardous materials would occur under the No Project Alternative, and impacts would be reduced compared to the proposed Project.

Hydrology and Water Quality

Implementation of the No Project Alternative would not involve any physical changes to the environment, including construction activities or operational activities that could result in impacts regarding drainage patterns and flooding potential or increased stormwater runoff. Alternative 1 would not affect groundwater recharge or groundwater supplies or alter the drainage of the Project site. No impacts related to hydrology and water quality would occur under the No Project Alternative. Therefore, impacts would be reduced compared to the proposed Project.

Noise and Vibration

Under the No Project Alternative, no physical changes to the environment would occur, and therefore it would not have any potential to generate noise or vibration beyond what currently exists. Because this alternative would not result in any construction activities or planned events and would not modify the existing operation of facilities within the SLRC, no impacts related to noise or vibration would occur. The alternative would avoid the significant and unavoidable noise impacts associated with planned events at the park and construction and would avoid a significant unavoidable impact of construction vibration. Therefore, noise and vibration impacts would be less than under the proposed Project.

Public Services

The No Project Alternative would not involve any construction or operational activities at the Project site and would not result in any increased demand on public services. Alternative 1 would result in no impacts related to public services, and impacts would be reduced compared to the proposed Project.

Recreation and Parks

The No Project Alternative would not involve the construction or operation of new recreational facilities at the Project site. As such, because Alternative 1 would not provide new recreational facilities to meet the existing or future demand, this alternative could result in the increased use of existing neighborhood or regional parks or other recreational facilities such that substantial deterioration could occur, or could require the construction of new or expanded parks elsewhere, which might have adverse impacts on the environment not already identified in this EIR. However, Alternative 1 would avoid all of the significant and unavoidable impacts associated with recreation and parks due to construction and event noise. Therefore, Alternative 1 would result in fewer impacts related to recreation and parks compared to the proposed Project.

Transportation

Under the No Project Alternative, no construction activities would occur, and therefore it would not result in construction truck trips that would have the potential to conflict with a program, plan, ordinance, or policy addressing the circulation system. Alternative 1 would not introduce any new uses at the site and, as such, would not generate any new sources of traffic traveling to or from the Project site. The No Project Alternative would not substantially increase hazards due to a geometric design feature. In addition, this alternative would not result in inadequate emergency access. The No Project Alternative would not improve the bike lanes along Silver Lake Boulevard. As a result, this alternative would not improve conditions or implement priorities of the City's Mobility Plan. However, since fewer visitors would visit the site under Alternative 1, impacts would be reduced compared to the proposed Project.

Tribal Cultural Resources

The No Project Alternative would not involve any ground-disturbing activities. Therefore, this alternative would not have the potential to damage or destroy any previously unidentified archaeological resources. No impacts would occur on tribal cultural resources under the No Project Alternative, and impacts would be reduced compared to the proposed Project.

Utilities and Service Systems

Alternative 1 would not introduce any new uses at the Project site and would not increase demand on any utilities. No impacts related to utilities would occur under Alternative 1, and impacts would be reduced compared to the proposed Project.

Wildfire

Alternative 1 would not introduce any new uses at the Project site and would not increase potential human-related ignition sources. No impacts related to wildfire would occur under Alternative 1, and impacts would be reduced compared to the proposed Project.

Alternative 1 Effectiveness in Meeting Project Objectives

Alternative 1 would avoid or reduce impacts related to the majority of the resource areas. However, Alternative 1 would not meet the fundamental Project objective to repurpose the SLRC into a public park. Alternative 1 would meet one of the Project objectives, related to continued use by LADWP, because LADWP is required to maintain the reservoirs and dams. Alternative 1 would not achieve any of the other objectives, including to preserve and enhance the unique character of the SLRC with increased points of access, improved internal circulation and access to the water's edge, and increased spaces for community and family gatherings; expand existing active recreational uses and increase passive recreational uses; enhance and expand wildlife habitat by introducing wetland and aquatic ecologies; or provide opportunities for the public to connect with nature and provide facilities for on-site environmental education and stewardship.

Alternative 2 – Reduced Project Alternative

The Reduced Project Alternative, Alternative 2, would modify the existing SLRC into a public park, similar to the proposed Project, but it would not build any new structures. Alternative 2 would

be constructed within a similar overall footprint as the proposed Project and would focus only on the habitat enhancement aspect of the proposed Project. For example, recreational facilities such as a new Multi-Purpose Facility, play field, expanded Dog Park, or reconfiguration of the existing Recreation Center would not be constructed. Refer to Table 5-1 in Chapter 5 of the Draft EIR, *Analysis of Alternatives*, for a comparison of the proposed Project components to Alternative 2.

Alternative 2 would reduce the overall construction and operation intensity by eliminating some of the public-use built structures. Under Alternative 2, the seating terraces and informal play area would not be implemented in the Meadow. The Education Center, Multi-Purpose Facility, and shade structures would not be constructed. With the removal of the Education Center in the Meadow and the new Multi-Purpose Facility in the South Valley, educational and recreational opportunities would be reduced compared to the proposed Project.

This alternative would include some updates to the South Valley's existing Recreation Center, but the center would not be reconfigured. Updates to the Dog Park would include improvements within the existing footprint of the Dog Park, adding grass and some seating areas for owners. Lighting throughout the Project site would be reduced. Special events would not be allowed as part of this alternative. Similar to the proposed Project, Alternative 2 would remove the perimeter fence to allow for increased public access and improve wildlife access to the water. Alternative 2 would also be operated similarly to the proposed Project. Tree removals would still be required, similar to the proposed Project. Off-site bike improvements would occur along Silver Lake Boulevard, and no new parking would be added near the South Valley along West Silver Lake Drive.

Impacts as Compared to the Proposed Project

Under Alternative 2, the proposed Project would be reduced in size by eliminating several built structures. Impacts to aesthetics; agriculture and forestry resources; biological resources; cultural resources; energy; geology, soils, and mineral resources; hazards and hazardous materials; hydrology and water quality; land use and planning; population and housing; public services; transportation; tribal cultural resources; utilities and service systems; and wildfire were analyzed to have similar impacts when compared with the proposed Project. Impacts to air quality, GHG emissions, noise and vibration, and recreation and parks were analyzed to be less than the proposed Project. Although impacts to these environmental resources would be reduced, the significance determinations would not change for any resource area under Alternative 2, except for vibration (construction vibration impacts related to human annoyance), which would be reduced from significant and unavoidable to less than significant with mitigation. The severity of the impacts resulting from Alternative 2 that differ from the proposed Project are summarized below.

Air Quality

Under Alternative 2, the duration of construction activities would be less than the proposed Project since no new structures would be built. Although daily emissions during peak grading days would be similar to the proposed Project, the duration of construction would be reduced. Once constructed, visitorship to the park would be slightly less due to the elimination of special

events. Operational air pollutant emissions from vehicle traffic generated by the park would be similar to the proposed Project. Impacts on air quality would be less than the proposed Project.

Greenhouse Gas Emissions

Under Alternative 2, construction durations would be similar or slightly shorter than the proposed Project. GHG emissions associated with construction would be slightly less than the proposed Project. Similar to the proposed Project, this alternative would be consistent with applicable plans, policies, and regulations to reduce GHG emissions. Impacts would be slightly less than the proposed Project.

Noise and Vibration

Fewer construction activities would occur under Alternative 2 that could generate noise or vibration. As a result, construction noise and vibration would be slightly less than the proposed Project. Construction noise would remain significant and unavoidable. However, construction-related vibration would be eliminated since no new structures would be built. Once implemented, the Reduced Project Alternative would not allow permitted special events. This would reduce the impact of the proposed Project related to operational noise; however, the impacts would remain less than significant. Therefore, construction vibration impacts would be less than under the proposed Project.

Recreation and Parks

Alternative 2 would support public access of the park, similar to the proposed Project. It would not result in the increased use of other neighborhood or regional parks or recreational facilities such that substantial deterioration could occur, or could require the construction of new or expanded parks elsewhere, which might have adverse impacts on the environment not already identified in this EIR. Since special events would not occur, Alternative 2 would further reduce the less-than-significant operation impact to recreation and parks. However, construction noise would remain significant and unavoidable. Therefore, Alternative 2 would adversely impact recreation and parks less than the proposed Project.

Alternative 2 Effectiveness in Meeting Project Objectives

As described in Section 5.6.2 of the Draft EIR, *Ability to Meet Project Objectives*, Table 5-7, Alternative 2 – Reduced Project Alternative, meets all of the Project objectives but some less so than the proposed Project. Specifically, the following objectives would not be met to the same extent as under the proposed Project, for the reasons provided below for each objective:

- Preserve and enhance the unique character of the SLRC with increased points of access, improved internal circulation and access to the water's edge, and increased spaces for community and gatherings.

Improvements to the South Valley would occur. However, seating terraces or shade structures within the park would be limited. Alternative 2 would increase spaces for community and family gatherings, but less so than under the proposed Project.

- Expand existing active recreational uses and increase passive recreational uses.

Alternative 2 would implement some of the Master Plan's enhancement concepts, but would exclude seating terraces and shade pavilions. The Dog Park would not be improved and fewer improvements to the South Valley would be implemented. The multi-purpose facility would not be constructed.

- Provide opportunities for the public to connect with nature and provide facilities for on-site environmental education and stewardship.

Alternative 2 would enhance natural habitats including upland, wetland, and aquatic habitats, providing opportunities for connection with nature. However, the alternative would not include the construction of the Educational Center.

Alternative 3 – Silver Lake Reservoirs Natural Lands and Open Space Preserve Alternative

Alternative 3 would be a hybrid of Project components. Alternative 3 would be constructed within a similar overall footprint as the proposed Project and would focus on limiting public access to the Knoll, Eucalyptus Grove, and the water's edge. It would include a reconfigured and expanded lawn in the Meadow, with expanded ornamental and rain gardens. In the Knoll, only damaged or dying trees would be removed and, as a result, the tree succession plan for tree planting would be reduced. There would be no public access to the Knoll, and the Education Center, nature trails, and seating terraces would not be constructed. For the Ivanhoe Reservoir, only the walking path would be expanded. In the Eucalyptus Grove, only damaged or dying trees would be removed, and the tree succession plan for tree planting would be reduced. In the East and West Narrows, the walking path would be updated and expanded. An 8-foot high, non-scalable, continuous perimeter fence with gates for pedestrian and wildlife access would be constructed. The reservoirs would remain similar to existing conditions, with some new wetland habitat around the perimeter of the Silver Lake Reservoir. Promenades and walking paths would be constructed under this alternative, but would be moved farther away from the water's edge at both reservoirs where feasible. This alternative would retain all current public use facilities while improving the more heavily used facilities in the South Valley.

Impacts as Compared to the Proposed Project

Under Alternative 3, impacts to cultural resources; energy; geology, soils, and mineral resources; hazards and hazardous materials; hydrology and water quality; land use and planning; population and housing; public services; transportation; tribal cultural resources; utilities and service systems; and wildfire would be similar when compared with the proposed Project. While impacts to aesthetics, air quality, agriculture and forestry resources, biological resources, cultural resources, GHG emissions, noise, and recreation and parks were analyzed to be less than the proposed Project, as described below and as further supported in Chapter 5, *Analysis of Alternatives*, of the Draft EIR, the significance determinations would not change for any resource area under Alternative 3. The severity of the impacts resulting from Alternative 3 that differ from the proposed Project are summarized below.

Aesthetics

Under Alternative 3, the intensity of the proposed Project would be reduced and habitat areas (without the habitat islands) would provide some opportunities to create and conserve greenspace and open space, and encourage growth of native plant species to create habitat. This alternative would limit public access to the water and would not include habitat islands or other built facilities. Impacts to scenic vistas or scenic resources would be similar to the proposed Project. Retention of the fence would affect views of the SLRC from off site, but would remain consistent with land use plans and policies for visual resources and character of park land uses. However, since this alternative would avoid impacts associated with additional lighting and reflective surfacing of new structures, it would result in fewer aesthetic impacts than the proposed Project.

Agriculture and Forestry Resources

The Project site is currently not used for agriculture and does not contain agricultural resources that meet the Prime and Statewide soil criteria. The Project site does not contain lands zoned for forest land or timberland. Under Alternative 3, impacts on agriculture or forestry resources would be similar to the proposed Project.

Air Quality

Under Alternative 3, the duration of construction activities would be reduced slightly since fewer community park facilities would be built. However, daily emissions during peak construction days would be similar to the proposed Project. Once constructed, visitorship to the park would be less due to fewer facilities and no special events. However, operational air pollutant emissions from vehicle traffic generated by the park would be similar to the proposed Project. Impacts would be slightly less than the proposed Project.

Biological Resources

Alternative 3 would promote natural features of the park and reduce public access to areas that could support wildlife. Fewer visitor-serving structures would be constructed, and the reservoirs would remain similar to existing conditions. Wetland habitat would be created around the perimeter of the Silver Lake Reservoir, although habitat islands would not be installed. Also, similar to the proposed Project, wildlife corridors would not be adversely affected, and no impact to habitat conservation plans would occur under this alternative. Since only damaged or dying trees would be removed, the tree succession plan for tree planting would be reduced. Once constructed, Alternative 3 would create new wetland habitat and modestly improve existing upland habitat. Some areas would have limited public access and the perimeter fence would be retained, reducing disturbance to habitat. In summary, although some biological values would be prioritized under Alternative 3, impacts to biological resources from construction would be similar to the proposed Project, but the enhancements and reduced public access would benefit wildlife resulting in reduced impacts compared to the proposed Project.

Cultural Resources

Due to ground-disturbing activities and physical development under this alternative, impacts to archaeological, paleontological, or historic resources would be similar to the proposed Project,

although to a lesser extent. Impacts to existing resources at the Project site, both known and undiscovered, would be slightly less under Alternative 3.

Greenhouse Gas Emissions

Fewer construction activities would occur under this alternative, and as a result, GHG emissions associated with construction would be slightly less than the proposed Project. Similar to the proposed Project, this alternative would be consistent with applicable plans, policies, and regulations to reduce GHG emissions. Impacts would be slightly less than the proposed Project.

Noise and Vibration

Fewer construction activities would occur under Alternative 3 that could generate noise or vibration. As a result, construction noise and vibration would be less than the proposed Project, but still remain significant and unavoidable. Once constructed, Alternative 3 would not allow permitted special events. This would further reduce the less-than-significant impact of the proposed Project during operations. Therefore, operational noise impacts would be less under Alternative 3 than under the proposed Project.

Recreation and Parks

Alternative 3 would support public access of the park in certain areas, but less than the proposed Project. It would not result in increased use of other neighborhood or regional parks or recreational facilities such that substantial deterioration could occur, or could require the construction of new or expanded parks elsewhere, which might have adverse impacts on the environment not already identified in this EIR. Since special events would not occur, Alternative 3 would avoid a significant and unavoidable operation impact to recreation and parks, although construction noise would remain significant and unavoidable. Therefore, Alternative 3 would impact recreation and parks less than the proposed Project.

Alternative 3 Effectiveness in Meeting Project Objectives

Alternative 3 – Silver Lake Reservoirs Natural Lands and Open Space Preserve would meet some of the Project objectives. It would not enhance the public points of access to the water's edge or improve community and family gathering opportunities. Alternative 3 would also not enhance and expand wildlife habitat by introducing wetland and aquatic ecologies. The habitat enhancements that would occur under Alternative 3 would be focused on limiting public access to the Knoll, Eucalyptus Grove, and the water's edge.

Environmentally Superior Alternative

Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be identified. The environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. As shown in Table 5-5 of the Draft EIR, and as further supported by the revisions to the Draft EIR Table 5-5 shown in Final EIR Chapter 3, *Revisions, Clarifications, and Corrections to the Draft Environmental Impact Report* (pp 3-48 and 3-49), Alternative 2 to the proposed Project would eliminate the significant and unavoidable impact of the proposed Project, which is the construction vibration (human annoyance) impact.

Although the No Project Alternative would result in the fewest impacts on the existing environment, this alternative would not result in the benefits expected under the proposed Project, Alternative 2, or Alternative 3, or meet the fundamental project objective of repurposing the Project site into a public park.

Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, when the No Project Alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from the remaining alternatives. As noted in Table 5-6 of the Draft EIR, impacts associated with Alternative 2 and Alternative 3 would be less than the proposed Project due to the reduced amount of construction and elimination of permitted special events. Since Alternative 2 would construct the fewest structures, it would result in the least amount of construction and least noise, vibration, and air emissions. Nonetheless, Alternative 2 is considered the environmentally superior alternative. CEQA Guidelines do not require an agency to select the environmentally superior alternative (CEQA Guidelines Sections 15042-15043), and allow for the selection of alternatives that more effectively meet project objectives and obtain project benefits. Alternative 2 would meet all of the Project objectives, but to a lesser degree than the proposed Project. Eliminating the ability to provide special events at the park diminishes the objective to “increase spaces for community and family gatherings.” In addition, by eliminating all built structures, Alternative 2 would not provide all the recreational and community benefits included in the proposed Project and envisioned in the primary Project objective.

Alternatives Rejected from Further Consideration

Section 15126.6(c) of the CEQA Guidelines requires that an EIR “identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process,” as well as explain the reasons for the lead agency’s determination. An alternative may be eliminated from consideration if it: (1) fails to meet most of the project’s basic objectives, (2) is infeasible, or (3) is unable to avoid significant environmental impacts.

As set forth Draft EIR, Section 5.2, *Alternatives Rejected from Further Consideration*, and as further supported in Final EIR, Section 2.2.11, *Alternatives Analysis*, and other evidence in the record, the following alternatives were eliminated from further consideration and were not subject to detailed analysis in the EIR:

Recreation Focused Alternative

Under the Recreation Focused Alternative, the Project would include more intensive active recreational uses identified in the SLRC Master Plan such as a new playground, pool, splashpad, boat house, pool house, and café. Public water activities including boating and swimming would be permitted. Under this alternative, the Project site would be intended to accommodate special events on a regular basis, and extended hours would be allowed with additional lighting for nighttime activities. Project elements related to wildlife habitat creation, including wetland terraces, islands, and embankment enhancements, would not occur.

This alternative was rejected and not considered further because it: (1) would not serve to reduce any of the proposed Project’s significant impacts; (2) would increase operational noise impacts

with the increase in park attendance focused around the reservoir and active recreational activities and increase water use related to swimming pool and splashpad operations; and (3) would not meet the Project objectives of enhancing and expanding wildlife habitat by introducing wetland and aquatic ecologies and improving upland habitat and providing opportunities for connecting with nature, environmental education, and stewardship.

Alternative Project Site

The proposed Project is the redevelopment of the SLRC. Creating new recreational facilities in a different location would not meet the fundamental Project objective to repurpose the site. The City already owns the Project site and cannot reasonably be expected to acquire, control, or access an alternative site that would meet the Project's basic objectives in a timely fashion. It is expected that significant and unavoidable impacts associated with noise for any other site within Los Angeles where land is available for use as a park would still occur, as the City is built out, and funds for acquiring a new property are not available. Therefore, this alternative site is not considered feasible since the City does not own another suitable site that would achieve the underlying purpose and objectives of the proposed Project.

Hybrid Alternatives

As discussed in Section 5.5.4 of the Draft EIR, hybrids of the evaluated alternatives were considered, but they were rejected because, if the components of any of these alternatives were combined to create a new alternative, the new Project alternative would not result in a substantially different conclusion when comparing environmental impacts and meeting the Project objectives relative to the proposed Project and the alternatives considered. An EIR need not consider multiple hybrid variations on the alternatives when the relative advantages and disadvantages of other alternatives can be assessed from a review of the alternatives presented in an EIR. Furthermore, the EIR allows for a wide range of choices with varying degrees of environmental impacts. An EIR may support the ultimate approval by decision-makers of hybrid alternatives whose features and impacts occur within the analytical continuum between the "bookends" created by the least-impacting and most impacting alternatives.

Statement of Overriding Considerations

As set forth in the preceding sections, the City's approval of the proposed Project will result in significant and unavoidable effects relating to construction noise and vibration (associated with human annoyance), depending on the proximity of sensitive receptors. In addition, the proposed Project will also result in significant and avoidable impacts to recreation, as they relate to the noise and vibration (human annoyance) impacts. Despite the occurrence of these significant effects, however, the City, in accordance with CEQA Guidelines Section 15093, chooses to approve the proposed Project because, in the City's view, the economic, social, and other benefits that the proposed Project will produce will render the significant effects acceptable.

The following statement identifies the specific reasons why, in the City's judgment, the benefits of the proposed Project as approved outweigh its unavoidable significant effects. Any one of these reasons is sufficient to justify approval of the proposed Project. Thus, even if a court were

to conclude that not every reason is supported by substantial evidence, the City would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding CEQA findings, which are incorporated by reference into this section and in the documents found in the Record of Proceedings, *supra*.

1. The proposed Project is consistent with the City’s goal to create a clear, bold design that repurposes the SLRC into a public park, while preserving and enhancing its unique character.

As discussed in Section 2.4, *Project Objectives*, of the Draft EIR, the underlying purpose of the proposed Project is to put the SLRC to a beneficial public park use because it is no longer usable for storing potable water due to government regulations. Because LADWP is required to maintain the reservoirs for other environmental purposes, including maintaining the dams, the proposed Project would use the reservoirs as part of a park to benefit area residents.

As described in Section 2.5, *Project Description*, of the Draft EIR (p. 2-7), the proposed Project would re-develop the SLRC with a contemporary design that would create park zones, blending vegetated areas with public spaces. The design would enhance the visual and recreational quality of the area to be consistent with goals and objectives of the Community Plan and provide the opportunity for the public to access natural park space. Existing public spaces would be removed with the intent of expanding, renovating, and redesigning them to improve visitor experience.

As set forth in Table 3.1-1 in Draft EIR Section 3.1, *Aesthetics*, the SLRC footprint and shape would remain intact; its significant landscape features would be preserved; and no significant viewsheds would be detrimentally affected as a result of the proposed Project’s new construction or alterations. While there would be some changes to the grading and orientation of these open spaces, the overall footprint, feeling, and setting would remain intact. These spaces would remain green open spaces for passive recreation. The existing mature trees and plants would remain, and the overall footprint of these open spaces would not change. Further, the open water views of both reservoirs would remain intact.

For these reasons, the City concludes that the Project’s benefits in repurposing the SLRC into a public park outweigh its significant and unavoidable impacts.

2. The proposed Project will preserve and enhance the unique character of the SLRC with increased points of access, improved internal circulation and access to the water’s edge, and increased spaces for community and family gatherings.

As set forth in Section 2.5.2, *Off-site Improvements*, of the Draft EIR, the proposed Project would include the addition of 90-degree parking along the north side of West Silver Lake Drive, east of Redesdale Avenue adjacent to the Silver Lake Recreation Center. A total of approximately 25 parking spaces would be added, resulting in a net increase in parking of 15 spaces. Furthermore, additional off-site improvements under the Project would include two new pedestrian-activated flashing beacon crossings added along West Silver Lake Drive and near the corner of Silver Lake Boulevard and Armstrong Avenue, as shown in Figure 2-17 of the Draft EIR.

As described in Section 2.5.6, *Circulation*, of the Draft EIR, the proposed Project includes a total of approximately 33 acres of redeveloped useable space, including approximately 10 acres for active and passive recreation and approximately 5.5 miles of walking paths and trails to provide public access throughout the Project area. Table 2-2 of the Draft EIR provides a summary of all circulation improvements that would be implemented. Connections to the proposed Project area from the surrounding neighborhood were informed by the existing bus stop locations along West Silver Lake Drive and Glendale Boulevard, as well as the existing pedestrian pathways in the neighborhood. This network is depicted in Figure 2-17 and Figure 3.16-1 of the Draft EIR.

Furthermore, as set forth on page 2-30 of the Draft EIR, an accessible vehicle and bus parking area would be located at the corner of Silver Lake Boulevard and Armstrong Avenue to allow for public access to park amenities as well as accommodate larger group education programs. Multimodal transportation would be encouraged through the inclusion of mobility hub elements such as bike share and drop-off locations for ride share services. New pedestrian-activated flashing beacon crossings would be added along Silver Lake Boulevard and West Silver Lake Drive. In addition, strategic openings would be proposed along the low concrete wall that currently surrounds the SLRC to create additional entry points into the proposed Project site. The proposed pathways, described in Table 2-2 and shown on Figure 2-17 of the Draft EIR, would be implemented as pedestrian-only with bike circulation around the perimeter. Bike parking and/or bike share stations would be located at all key pedestrian connection points.

As described in Section 2.5.1, *Proposed Park Zones*, of the Draft EIR (pp. 2-7 through 2-25) the various improvements at the seven park zones proposed by the Project would provide increased access to the water's edge and provide increased spaces for community and family gatherings. Such improvements would include, but are not limited to, constructing a new Multi-Purpose Facility and expanding the existing Dog Park; providing seating terraces, overlook areas, and promenade enhancements; expanding the existing lawn in the Meadow; and constructing an Education Center, picnic grove, and informal play areas at the Project site.

For these reasons, the City concludes that the Project's benefits in increasing points of access, improving internal circulation and access to the water's edge, and increasing spaces for community and family gatherings outweigh its significant and unavoidable impacts.

3. The proposed Project will expand existing active recreational uses and increase passive recreational uses.

As described above, and as further supported in Chapter 2, *Project Description*, of the Draft EIR, the proposed Project includes a total of approximately 33 acres of redeveloped useable space, including approximately 10 acres for active and passive recreation and approximately 5.5 miles of walking paths and trails to provide public access throughout the Project area. For these reasons, the City concludes that the Project's benefits in expanding existing active recreational uses and increasing passive recreational uses outweigh its significant and unavoidable impacts.

4. The proposed Project will enhance and expand wildlife habitat by introducing wetland and aquatic ecologies and improving upland habitat.

As set forth in Section, 2.5.1, *Proposed Park Zones, Habitat Islands*, the proposed Project would construct approximately 3.5 acres of floating habitat islands that would introduce wetland plants to the open water area, and provide nesting and foraging habitat for birds with minimal disturbance from humans and predatory wildlife on land. As a habitat enhancement feature, Silver Lake Reservoir would be stocked with fish species that would provide food supply for wading birds. Introduced fish species may include piscivorous (predator) fish such as small bass, and planktivorous (prey) fish such as minnows and crappies. Marine invertebrates would also be introduced to the reservoir. Fish would likely be introduced at a ratio of three prey fish for every predator fish.

As set forth in Table 2-1 of the Draft EIR, the proposed Project includes upland habitat improvements at the Knoll and Eucalyptus Grove park zones. The proposed Project would implement a replanting strategy over time to enhance and restore the upland habitat value within the Knoll and Eucalyptus Grove, with implementation of habitat fencing to protect wildlife and keep people out of upland planted areas (Draft EIR pp. 2-15 and 2-16).

For these reasons, the City concludes that the Project's benefits in enhancing and expanding wildland habitat by introducing wetland and aquatic ecologies and improving upland habitat outweigh its significant and unavoidable impacts.

5. The proposed Project will provide opportunities for the public to connect with nature and provide facilities for on-site environmental education and stewardship while limiting human/wildlife interactions through design and operations to protect habitat.

As described in Section 2.5.1, *Proposed Park Zones, The Meadow*, the proposed Education Center would include small indoor and outdoor teaching and assembly spaces, including two interior classrooms. The proposed Education Center would be connected directly to Silver Lake Reservoir via an accessible pathway. This area would provide educational opportunities for visitors. Additionally, as set forth in Section 2.5.1, *Proposed Park Zones, Ivanhoe Overlook*, an approximately 1,200-square-foot shade pavilion would be added to the northwestern perimeter of the reservoir, sitting on a deck that projects over the existing reservoir edge to provide a sheltered space for outdoor education or community gathering. The shade pavilion/outdoor education classroom would include signage to educate visitors about the wetlands.

Section 2.5.8, *Project Design Features*, of the Draft EIR provides a list of design features that would be implemented as part of the Project to limit human/wildlife interaction and protect habitat. Specifically, PDF-BIO-1 through PDF-BIO-14 include various design measures that would be implemented to support this objective, such as those requiring wildlife fencing signage, tree protective fencing, restrictions on grading/trenching in proximity to tree protection zones, and others (refer to pp. 2-34 through 2-36 and Section 3.4, *Biological Resources*, of the Draft EIR). As described in Section 2.7.1, *Operation and Maintenance Plans*, of the Draft EIR, a Wildlife Management Plan would be created and implemented to protect wildlife during landscape maintenance activities or any type of event that has the potential to impact wildlife.

For these reasons, the City concludes that the Project's benefits in providing opportunities for the public to connect with nature and providing facilities for on-site environmental education and stewardship outweigh its significant and unavoidable impacts.

6. The proposed Project will allow for continued underlying LADWP operations, access, and future use of designated areas of the site, thereby allowing continued use of the reservoirs and adjacent facilities that are intended to remain for proprietary use by LADWP.

As described in Section 2.5, *Project Description*, of the Draft EIR, The proposed Project would remove portions of the existing perimeter fence over time as the park zones are constructed while maintaining or introducing new fencing needed to secure existing LADWP facilities, protect habitat, and protect the public. Figure 2-4 of the Draft EIR provides a conceptual plan for locating fences and guardrails. Fences around LADWP facilities would be approximately 8 feet high and with a minimum 6-inch clear zone along the bottom for small mammals to pass through. Further, as set forth in Table 2-2 of the Draft EIR, the proposed promenade would be required to maintain a 15-foot clear pathway, at minimum, for LADWP maintenance and operations. As discussed in the Draft EIR Section 2.7.3, *Horticulture Maintenance and Water Management, Park Water Systems*, the proposed Project, through LADWP, would continue to replenish reservoir water as needed through the existing Pollock Well No. 3, similar to existing conditions.

For these reasons, the City concludes that the Project's benefits outweigh its significant and unavoidable impacts.

Other CEQA Considerations

- A. The City is the lead agency under CEQA for the proposed Project evaluated in the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the information in the EIR for the proposed Project prior to approving the Project, that the Draft EIR which was circulated for public review reflected its independent judgement, and that the Final EIR reflects the independent judgement and analysis of the City.
- B. The City finds that the EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the proposed Project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.
- C. Textual refinements and errata were compiled and presented to the decision-makers for review and consideration. The City has determined that City staff made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents associated with Project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require

clarifications and corrections. Second, textual clarifications were necessitated to describe refinements suggested as part of the public participation process.

- D. The City has determined that it has evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the City prepared written responses describing the disposition of key environmental issues raised. The Final EIR provides adequate, good-faith, and reasoned response to the comments. The City reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The City has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the Draft EIR.
- E. The City determines that these findings recognize that the determination of significance thresholds and conclusions of significance and non-significance are judgments within the discretion of the City; the significance thresholds and determinations of significance and nonsignificance used in the Final EIR are supported by substantial evidence in the record, including the expert opinion of the Final EIR preparers and City staff; and the significance thresholds used in the Final EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project.
- F. The City finds that, in weighing the evidence on the whole record, the conclusions of the Final EIR are supported by substantial evidence, including evidence from the expert opinion of the Final EIR preparers and City staff. The City also finds that the level of detail is sufficient to provide an informed understanding of the issues presented, and that conclusions stated in the comment letters disputing the expert opinion, data, analysis, and conclusions of the Final EIR preparers and City staff, including but not limited to comment letters received from Amy Minter (Chatten Brown Carstens & Minter LLP); Travis Longcore (Los Angeles Audubon Society); Daniel Cooper (Resource Conservation District of the Santa Monica Mountains); Amanda Zellmer (Occidental College); and Benjamin Harris (Los Angeles Waterkeeper), are not credible based on evidence presented in the Final EIR and the whole record, including but not limited to the fact that any contrary opinions presented were not supported based on expert analysis and modeling conducted in the Final EIR on the specific facts and circumstances of the Project. Notwithstanding the lack of credibility of the comments, the City finds that disagreements on issues in question have been adequately and in good faith discussed, and substantial evidence in the whole record supports the reasonably explained approach in the Final EIR regarding the scope of analysis, methodology, and accuracy of data relied upon.
- G. The Final EIR documents changes to the Draft EIR, and the Final EIR provides additional information that was not included in the Draft EIR. Having reviewed the information contained in the Draft EIR and the Final EIR and in the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there are no new significant impacts, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings, or other criteria under CEQA that would require recirculation of the Draft EIR, or preparation of a

supplemental or subsequent EIR. Recirculation is not required where new information added makes insignificant modifications in an adequate EIR (CEQA Guidelines Section 15088.5 [b]). The City finds that substantial evidence supports the decision not to recirculate the EIR (CEQA Guidelines Section 15088.5[e]).

1. The changes to the Project description do not deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the proposed Project or a feasible way of mitigating or avoiding such effects, because no such significant impacts have been identified from either the circulated draft Project description or the final modification in the Project description.
 2. The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the proposed Project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the proposed Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.
 3. The City has thoroughly reviewed the public comments received regarding the proposed Project and the Final EIR as it relates to the Project to determine whether under the requirements of CEQA any of the public comments provide substantial evidence that would require recirculation of the Draft EIR prior to its adoption, and has determined that recirculation of the EIR is not required.
 4. None of the information submitted after publication of the Final EIR constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.
- H. The City finds and declares that substantial evidence is included for each and every finding made herein that is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.
- I. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these findings and in the EIR. as comprising the proposed Project.

Conclusion

As explained above, the City has carefully considered the competing stakeholder interests in the proposed Project, including balancing the benefits of the Project against the potentially significant and unavoidable environmental effects. The City has concluded that these effects are outweighed by the economic, social, environmental, and other benefits the proposed Project will bring to the City and its citizens as discussed herein and as supported by substantial evidence in the record of proceedings.

MITIGATION MONITORING PROGRAM

Introduction

The Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the California Environmental Quality Act (CEQA) Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles (City) is the Lead Agency for the Silver Lake Reservoir Complex Master Plan Project (proposed Project) and, therefore, is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the MMP.

Purpose

The purpose of the MMP is to do the following:

- Coordinate all mitigation monitoring activities.
- Manage the preparation, approval, and filing of monitoring or permit compliance records.
- Maintain records concerning the status of all approved mitigation measures and project design features (PDF)
- Provide quality control assurance of field monitoring personnel.
- Coordinate with other agencies regarding compliance with mitigation or permit requirements.
- Review and recommend acceptance and certification of implementation documentation.
- Act as a contact for interested parties or surrounding property owners who wish to register concerns regarding environmental issues; verifying any such circumstances; and developing any necessary corrective actions.

Organization

As shown in the following pages, each identified mitigation measure and PDF for the proposed Project is listed and categorized by environmental issue area, with accompanying discussion of:

- Time Frame for Implementation: When the measure will be implemented.
- Monitoring Period: Indicates when monitoring for compliance with the measure will occur.
- Monitoring Agency: The agency to which reports involving feasibility, compliance, implementation, and development are made.
- Verification of Compliance: The date that monitoring is complete to ensure compliance with the measure.

Monitoring Procedures

This MMP shall be enforced throughout all phases of the proposed Project. The City shall be responsible for implementing each project design feature and mitigation measure and shall be obligated to provide verification, as identified below, to the appropriate monitoring and enforcement agencies that each project design feature and mitigation measure has been implemented. The City shall maintain records demonstrating compliance with each project design feature and mitigation measure listed below.

All applicable construction-related mitigation measures and best management practices will be included in any bid specification released for construction of the proposed Project. Prior to the release of the bid specifications, construction plans and specifications will be provided to the City of Los Angeles Bureau of Engineering's (BOE) Environmental Management Group (EMG) for review and approval regarding environmental mitigation. Unless otherwise specified herein, the City will be responsible for taking all actions necessary to implement the mitigation measures according to the provided specifications and demonstrating that each action has been successfully completed. The City, at its discretion, may delegate implementation responsibility or portions thereof to a licensed contractor. This MMP for the proposed Project will be in place through design, construction, and operation. The City will be responsible for administering the MMP, ensuring that all parties comply with its provisions. The City may delegate monitoring responsibilities to staff, consultants, or contractors. The construction contractor shall submit an Environmental Compliance Plan for BOE Construction Management and BOE EMG approval prior to the beginning of ground-disturbing construction activities. The Environmental Compliance Plan will document how the contractor intends to comply with all environmental measures applicable to the contract, including application of BMPs. BOE Construction Management will also ensure that monitoring is documented in an Environmental Compliance Report and that deficiencies are promptly corrected. A designated environmental monitor with BOE Construction Management will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to rectify problems. The City will monitor compliance with operational mitigation measures.

Changes to Mitigation Measures

Under CEQA, mitigation measures may be modified or deleted if the relevant decision-maker approves such action, gives a legitimate reason for making the change, and supports those reasons with substantial evidence, including an appropriate subsequent CEQA document. Any substantive change to the MMP shall be documented in writing. Modifications to the mitigation measures may be made by the BOE subject to one of the following findings and documented by evidence included in the record:

1. The measure included in the EIR and the MMP is no longer required because the significant environmental impact identified in the EIR has been found not to exist, or to occur at a level which makes the impact less than significant as a result of changes in the Project, changes in conditions of the environment, or other factors.

OR

2. The modified or substitute mitigation measure to be included in the MMP provides a level of environmental protection equal to or greater than that afforded by the mitigation measure included in the EIR and the MMP.

AND

3. The modified or substitute mitigation measure/BMP does not have significant adverse effect on the environment in addition to or greater than those which were considered by the City in its decisions regarding the EIR and the Proposed Project.

AND

4. The modified or substitute mitigation measure is feasible, and the City, through measures included in the MMP or other established procedures, can assure its implementation.

Findings and related documentation supporting the findings involving modifications to mitigation measures shall be maintained in the Project file with the MMP and shall be made available to the public upon request.

Mitigation Monitoring Program

The following tables outline the proposed Project's Mitigation Monitoring Program. Table 1 includes mitigation measures required for the proposed Project, and Table 2 includes the PDFs associated with the proposed Project.

TABLE 1
MITIGATION MONITORING PROGRAM – MITIGATION MEASURES

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Mitigation Measures			
Aesthetic Resources			
AES-1: Shielded Fixtures. All new permanent exterior lighting shall be shielded and directed downward to avoid any light spill onto surrounding land uses including natural habitat areas, open water, residential areas, or into the night skies.	Prior to Construction Operations	City of Los Angeles	EMG Construction Inspector
AES-2: Non-Glare Materials. All new structures and buildings shall be designed to include non-glare exterior materials and coatings to minimize glare or reflection.	Prior to construction	City of Los Angeles	EMG
Air Quality			
<p>AIR-1: Haul Trucks and Construction Equipment. The City shall implement the following requirements for construction equipment operating at each Project site. These requirements shall be included in applicable bid documents and contractor(s) must demonstrate the ability to supply such equipment. Construction equipment shall include the following:</p> <ul style="list-style-type: none"> The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification, BACT documentation, and CARB or Southern California Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment shall be provided. Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited. To import and export of on-site materials shall be scheduled to minimize empty return trips. Use alternatively fueled (e.g., compressed natural gas, liquefied natural gas, propane), gasoline fueled, or electrified construction equipment in place of diesel-fueled equipment to the extent locally available. 	Prior to Construction During Construction	City of Los Angeles	EMG Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Biological Resources			
BIO-1: Pre-Construction Training. Prior to construction, a worker environmental awareness program (WEAP) training will be provided by a qualified biologist/ISA certified arborist to describe biological resources (including protected trees) that could be impacted and summarize the construction BMPs and project design features to be implemented. The WEAP will include all contractors (including grading, tree removal/pruning, and builders). The meeting shall include a focus on instructing the contractors on tree protection practices including information on the location and marking of protected trees, the necessity of preventing damage, and the discussion of work practices that shall accomplish these tasks. All equipment operators and spotters, assistants, or those directing operators from the ground shall provide written acknowledgement of receiving training.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
BIO-2: Preconstruction Surveys and Mitigation for Crotch's Bumble Bee and Monarch Butterfly. Prior to the start of construction activities, the City shall conduct pre-construction surveys for special-status invertebrates, Crotch's bumble bee and monarch butterfly, within 100 feet of construction activities near host plant communities (including nectar plants for Crotch's bumble bee and mature eucalyptus and pines trees for monarch butterfly). The pre-construction surveys shall be conducted 7 days prior to the start of construction activities. If any of these species are determined to be present within 100 feet of construction areas, construction best management practices (BMPs) will be implemented to avoid potential impacts to these species. BMPs shall include limiting construction vehicle speeds to 15 miles per hour when operating within 100 feet of the habitat areas, fencing habitat areas using temporary silt fencing, and cleaning up all trash and debris daily. Construction personnel will be instructed to not directly harm any special-status species on-site by halting activities until the species can move to off-site areas or contact a qualified biologist to move the species out of harm's way.	Prior to construction During Construction	City of Los Angeles	EMG Construction Inspector
BIO-3: Special-Status Bats. Prior to construction activities, bat surveys shall be conducted by a qualified bat biologist 7 days prior to the start of construction activities to determine if the special-status hoary bat, western mastiff bat, or western yellow bat could be impacted by proposed Project implementation. If special-status bat species are determined to be present within the proposed Project impact areas and if removal of roosting habitat (mature trees or palm trees) is required, a qualified biologist (a biologist with the ability to identify bat guano and assess habitat suitability) shall inspect the base of trees and palm skirts for guano prior to removal of skirted palm trees (i.e. palm trees with several layers of accumulated dead fronds). If bats are detected, tree removal shall avoid the bat maternity season (April 1 through August 31). If tree removal cannot avoid the maternity season, bat protection protocols shall be identified and implemented by a qualified bat biologist and approved by CDFW. The protocols may require installation of bat exclusionary devices, followed by up to four weeks of nightly monitoring by a qualified biologist to confirm bats are being excluded without harm until it is determined bats are no longer present. Construction of substitute bat habitat (i.e., bat boxes, artificial tree structures) should take place one month prior to the start of bat exclusion activities. Substitute bat habitat should be in the vicinity of bat-occupied mature trees or palm trees that a qualified biologist has been confirmed that bats are using. Bat boxes manufactured by vendors such as Bat Conservation and Management should be used. The one-month window prior to the start of bat exclusion activities will allow bats sufficient time to acclimate to a new potential roost location. The bat boxes shall be installed in an area that is close to suitable foraging habitat as determined	Prior to construction During Construction	City of Los Angeles	EMG Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
<p>by a qualified bat biologist. Bat boxes should be located on poles 10 to 20 feet off the ground. Additionally, the bat boxes will be oriented to the south or southwest, and the area chosen for the bat boxes must receive sufficient sunlight (at least 6 hours daily) to allow the bat boxes to reach an optimum internal temperature (approximately 80-100°F).</p> <p>At a minimum monitoring by qualified bat biologist should be required each month during construction and quarterly thereafter until it can be established that the bat box is being utilized. A determination needs to be made of what bat species are using the box. If the boxes are unsuccessful adaptive management measures should be developed in coordination with the CDFW.</p>			
<p>BIO-4: Tree Salvage and Replanting Plan. For impacts to trees protected under local policies and ordinances, the City shall prepare and implement a tree salvage and replanting plan. This salvage and replanting plan shall be prepared by a certified arborist familiar with the target species and in compliance with the specifications of the City Tree Ordinance or RAP Tree Policy (dependent on property location). The salvage and replanting plan shall include measures to salvage, replant, and monitor the new trees for a total of 10 years. The replanting plan will specify for planted trees to occur in the most naturalized habitat areas on-site (e.g., the Knoll) to maximize increasing habitat value and establishment success. The replanting plan shall also specify the appropriate spacing of planted trees to accommodate growth horizontally, vertically, and laterally below ground. The plan shall also specify recommended long-term monitoring, maintenance, and inspection until all planted trees survive to produce reproductive structures. Follow up inspections by the project arborist should be conducted after construction is completed for ten years. Preferably, follow up visits should be conducted quarterly during Years 1 and 2, biannually for Years 3 through 5, and annually for Years 6 through 10. More frequent monitoring and/or post-construction steps to improve any trees that are doing poorly should be carried out as recommended by the arborist. The plan will also include a measure to address if observations of stress or potential failure of planted trees occur (e.g., consulting with a certified arborist or tree specialist to provide recommendations so there is no net loss of trees). Any replacement trees that fail will be replaced at 1:1 with 15-gallon tree of like species.</p>	<p>Prior to Construction During construction Post construction</p>	City of Los Angeles	<p>EMG Construction Inspector</p>
<p>BIO-5: Native Oak Trees. Native oak trees removed as a result of the Project with a trunk at DSH less than 12 inches shall be replaced at a 4:1 ratio, and if the diameter is between 12-24 inches at a 5:1 ratio, and greater than 24 inches at a 10:1 ratio.</p>	<p>Prior to Construction During construction Post construction</p>	City of Los Angeles	<p>EMG Construction Inspector</p>
Cultural Resources			
<p>CR-1: Archaeological Monitoring. The City shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for professional archaeology (qualified Archaeologist) to carry out and ensure proper implementation of mitigation measures that address archaeological resources. The qualified Archaeologist shall oversee an archaeological monitor who shall be present during construction activities on the Project Site deemed by the qualified Archeologist to have the potential for encountering archeological resources, such as demolition, clearing/grubbing, drilling/auguring, grading, trenching, excavation, or other ground disturbing activity associated with the Project in areas of historic fill or previously undisturbed sediments, and in the vicinity of the Canal & Reservoir Ditch, within the South Valley, the East West Narrows, the Eucalyptus Grove, and areas of quaternary alluvium within the Knoll. The archeological monitor shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or</p>	<p>Prior to construction During construction</p>	City of Los Angeles	<p>EMG Construction Inspector</p>

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
halt ground disturbance activities to allow identification, evaluation, and potential recovery of archaeological resources in coordination with the qualified Archaeologist. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the qualified Archaeologist.			
CR-2: Archaeological Resources Sensitivity Training. Prior to commencement of construction activities, a Sensitivity Training shall be given by the qualified Archaeologist for construction personnel. The training shall focus on how to identify archaeological resources that may be encountered during construction activities, and the procedures to be followed in such an event. Within 5 days of completing the training, a list of those in attendance shall be provided by the qualified Archaeologist to the City.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
CR-3: Discovery of Archaeological Resources. In the event that historic-period (e.g., bottles, foundations, early infrastructure, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work may continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. If any prehistoric archaeological sites are encountered within the project area, consultation with consulting Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment and shall be explored to see if Project activities can avoid archaeological resources, such as: if the archaeological site can be deeded into a permanent conservation easement, if the resources can be capped with chemically stable soil or if the resource can be incorporated within open space. If, in coordination with the City, it is determined that preservation in place is not feasible, and in order to mitigate potential impacts to significant resources pursuant to Section 15064.5 of CEQA, data recovery is feasible. Appropriate treatment of the resource shall be developed by the Qualified Archaeologist in coordination with the City. A data recovery plan shall be implemented. A data recovery plan will make provision for adequately recovering the scientifically consequential information from and about the historical resources. and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing, analysis, and commemoration in the form of signage or other public education and awareness. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
CR-4: Archeological Monitoring Reports. At the conclusion of the archaeological monitoring, the qualified Archaeologist shall prepare a memorandum stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memorandum shall be submitted to the City. Following submittal of the memorandum, the qualified Archaeologist shall prepare a technical report that follows the format and content guidelines provided in California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR). The technical report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Appropriate California Department of Parks and Recreation Site Forms (Site Forms) shall also be prepared and provided in an appendix to the report. The technical report shall be prepared under the supervision of the qualified Archaeologist and submitted to the City within 150 days of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
Geology, Soils, and Mineral Resources			
PALEO-1: Construction Personnel Paleontological Resources Sensitivity Training. The City shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP 2010) definition for Qualified Professional Paleontologist (Qualified Paleontologist) to carry out all mitigation related to paleontological resources. Prior to the start of ground-disturbing activities, the Qualified Paleontologist or their designee shall conduct construction worker paleontological resources sensitivity training for all construction personnel. Construction personnel shall be informed on how to identify the types of paleontological resources that may be encountered, specific Project activities that would require paleontological monitoring, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The City shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
PALEO-2: Paleontological Monitoring. Paleontological monitoring shall be conducted during ground-disturbing activities that produce visible spoils or cuts for project construction below 10-feet in previously undisturbed Quaternary alluvium or at any depth in the Miocene Monterey Formation. Monitoring shall be conducted by a qualified paleontological monitor (SVP, 2010) working under the direct supervision of the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting sediment samples to wet or dry screen to test promising horizons for smaller fossil remains. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, the Qualified Paleontologist may recommend that monitoring be reduced to periodic spot-checking or cease entirely.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
PALEO-3: Paleontological Resource Discovery. If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If a fossil is	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
<p>determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). If the discovery is considered scientifically significant, the monitor will collect the fossil specimen(s) and associated data. For this Project, the SVP (2010) criteria of scientific significance will be used to make this determination in the field. In general, small unidentifiable vertebrate fossils will not be collected and only well-preserved or representative invertebrates or plants will be salvaged if avoidance is not feasible. Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at an accredited repository.</p> <p>If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 25-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described in this measure.</p>			
<p>PALEO-4: Reporting. At the conclusion of paleontological monitoring, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and any salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the proposed project and required mitigation measures.</p>	<p>Prior to construction During construction</p>	<p>City of Los Angeles</p>	<p>EMG Construction Inspector</p>
Noise			
<p>NOISE-1: Equipment Controls. Noise and vibration construction equipment whose specific location on the Project site may be flexible (e.g., compressors and generators) shall be located away from the nearest off-site noise-sensitive land uses (at least 100 feet away) if sufficient distance on the implementing Project site is available. If 100 feet is not feasible, the equipment shall have natural and/or manmade barriers (e.g., berms, intervening construction trailers, etc.) or a noise enclosure around the specific equipment location that screens the receptor from propagation of noise from such equipment. The barrier and/or enclosure shall block the line-of-sight from the construction equipment to any similarly elevated noise-sensitive receptors. Noise enclosures shall provide sufficient space and gate access as needed for the safe operation of equipment, construction activities, material deliveries, and equipment access by construction personnel. A noise enclosure is not required if it would pose a safety risk or unreasonably prevent access to the construction equipment as deemed by the on-site construction manager such as in areas that have limited equipment maneuvering space or access. The contractor shall provide documentation verifying compliance with this measure.</p>	<p>Prior to construction During construction</p>	<p>City of Los Angeles</p>	<p>EMG Construction Inspector</p>
<p>NOISE-2: Mobile Noise Barriers. For construction areas within 500 feet of a residential land use or other sensitive receptor, the contractor shall install temporary noise barriers between the active construction area and the off-site noise-sensitive receptors. The mobile noise barriers shall achieve sound level reductions of a minimum of 10 dBA between the Project construction sites and the sensitive receptor location. These temporary noise barriers shall be used to block the line-of-sight between the construction equipment and similarly elevated ground-level noise-sensitive receptors. The barriers should allow for repositioning in order to block the noise at the sensitive receptor as construction activities move along the Project boundary. A noise barrier is not required if it would pose a safety risk or unreasonably prevent access to the construction area as deemed by the on-site construction manager such as in areas that have limited equipment maneuvering</p>	<p>Prior to construction During construction</p>	<p>City of Los Angeles</p>	<p>EMG Construction Inspector</p>

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
space or access. Any barrier capable of a reduction greater than 10 dBA would require greater height and heavier noise insulation which would make mobility of the barrier infeasible and cause safety concerns related to barrier stability. Further, noise barriers would only be effective if they block the line-of-sight to sensitive receptors. The elevation of the surrounding area increases quickly and receptors within the vicinity of all identified sensitive receptors may still have a direct line-of-sight to the Project site and may not benefit from the use of a mobile noise barrier. The contractor shall provide documentation verifying compliance with this measure.			
NOISE-3: Construction Equipment Noise Shielding and Muffling Devices. Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. Prior to the issuance of demolition permits, certification of muffler installation shall be submitted to the applicable City for review. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The primary source of noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA. The contractor shall use muffler systems that provide a minimum reduction of 10 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. Contractors shall include the muffler requirements in contract specifications. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure. Mufflers providing a noise reduction greater than 10 dBA would be technically infeasible or cost prohibitive given the current best available technologies. Further, mufflers are only effective on equipment with internal combustion engines and would not result in noise reductions for hand tools and other light-duty construction equipment. Therefore, NOISE-3 incorporates muffling devices to the maximum extent feasible.	During construction	City of Los Angeles	Construction Inspector
NOISE-4: Equipment Setbacks. The operation of construction equipment that generates high levels of vibration during any phase of construction occurring in the South Valley will be limited to setback distances from receptor V8. Receptor V8 includes the South Outlet Chlorination Station and Meter House. Setback distances apply in all directions surrounding the two buildings identified as V8. The following equipment shall be prohibited from operating within their respective setback distances: <ul style="list-style-type: none"> • Large bulldozers shall be prohibited within 21 feet of receptor V8 • Loaded Trucks shall be prohibited within 19 feet of receptor V8 • Jackhammers shall be prohibited within 12 feet of receptor V8 • Small bulldozer shall be prohibited within 3 feet of receptor V8 The contractor(s) shall require and document compliance with the minimum allowable setbacks in a construction vibration management plan, which shall be provided to the City prior to issuance of a demolition permit. The construction vibration management plan shall detail the types of equipment to be used during demolition, grading, and building construction, estimated vibration velocities, and distance to vibration receptor V8. Equipment and or alternative construction techniques to be used within the required setbacks for large bulldozers, loaded trucks, jackhammers, and small bulldozers shall be identified to ensure that vibration velocities will not exceed thresholds for potential structural damage.	During construction	City of Los Angeles	Construction Inspector

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Tribal Cultural Resources			
<p>TCR-1: Native American Monitoring. Prior to the commencement of any ground disturbing activity at the project site, the City shall reach out to retain a Native American Monitor from both the Gabrieleno Band of Mission Indians-Kizh Nation and the Gabriellino Tongva Indians of California Tribal Council to provide a Native American monitor. Should neither Tribe be available to monitor during ground disturbance, work may continue but should Tribal Cultural Resources be encountered work will stop and both Tribes will be immediately notified. The Tribal monitors will only be present on-site during the construction phases that involve ground-disturbing activity in areas of quaternary alluvium within the Knoll, and will not be necessary in portions of the Knoll where the Puente Sandstone bedrock formation is present either at depth or at the surface. In addition, any ground disturbance required in the Eucalyptus Grove will be subject to Tribal monitoring. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing, or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the areas above. The on-site Tribal monitoring shall end when all ground-disturbing activities within the Knoll and the Eucalyptus Grove are completed, or when the Tribal representatives and Tribal Monitors have indicated that the project site has little to no potential for impacting Tribal Cultural Resources.,</p> <p>In the event that cultural resources of Native American origin are identified during construction, the City will coordinate with the qualified archaeologist (who meets the Secretary of the Interior's Professional Qualifications Standards), and both tribes that participated in consultation. If the City, in consultation with the Gabrieleno Band of Mission Indians-Kizh Nation and the Gabriellino Tongva Indians of California Tribal Council, determines that the resource is a Tribal Cultural Resource and thus significant under CEQA, a treatment plan shall be prepared and implemented in accordance with state guidelines and in consultation with the two Native American tribes. The treatment plan may include, but would not be limited to, avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon measure.</p>	<p>Prior to construction</p> <p>During construction</p>	<p>City of Los Angeles</p>	<p>EMG</p> <p>Construction Inspector</p>
Utilities and Service Systems			
<p>UTIL-1: Underground Utilities Search and Coordination. During design and prior to construction of Project facilities, the City shall conduct an underground utilities search and coordinate with all utility providers that operate in the same public rights-of-way impacted by construction activities. The City shall ensure that any temporary disruption in utility service caused by construction is minimized and that any affected parties are notified in advance.</p>	<p>Prior to construction</p> <p>During construction</p>	<p>City of Los Angeles</p>	<p>EMG</p> <p>Construction Inspector</p>

TABLE 2
MITIGATION MONITORING PROGRAM – PROJECT DESIGN FEATURES (PDFs)

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Biological Resources			
PDF-BIO-1: Ornamental Native Plants. If the proposed Project impacts native planted species within the Community Restoration Area, including Nevin's barberry, showy island snapdragon, and Coulter's matilija poppy, these species will be replanted onsite at a 1:1 ratio.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-2: Nesting Birds. If construction and vegetation removal is proposed between February 1 and August 31, a qualified biologist shall conduct a pre-construction survey for breeding and nesting birds and raptors 30 days prior to the start of construction, and then weekly, within 300-feet of the construction limits (or to the outer limits of the park area bounded by West Silver Lake Drive, Van Pelt Place, and Silver Lake Boulevard) to determine and map the location and extent of breeding birds that could be affected by the Project. Nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Weekly surveys will take place with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work." If Project activities are delayed or suspended for more than 7 days after the last survey, surveys shall be repeated before work can resume. If an active nest is located, clearing and construction within appropriate buffers as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. Due to the urbanized nature of the Project site, 300-feet for raptors and 150-feet for passerine birds could suffice for nesting bird buffers; however, it will be at the discretion of the qualified biologist. The buffer zone from the nest shall be established in the field with flagging and stakes. The qualified biologist shall retain the ability to increase buffers if needed to protect the nesting birds. Temporary fencing and signage shall be maintained for the duration of the Project. Construction personnel shall be instructed on the sensitivity of the area and be advised not to work, trespass, or engage in activities that would disturb nesting birds near or inside the buffer. On-site construction monitoring may also be required to ensure that no direct or indirect impacts occur to the active nest. Project activities may encroach into the buffer only at the discretion of the qualified biologist.	Prior to construction	City of Los Angeles	EMG
	During construction		Construction Inspector
PDF-BIO-3: Wildlife Fencing Signage. Interpretive signage will be installed near all wildlife friendly fencing to educate the public on wildlife and habitat sensitivity, and to encourage the public to not enter the restricted areas.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-4: Tree Protection Fencing. Establish tree protection fencing around the tree protection zone (TPZ). This area will be marked and avoided during all construction activities near the protected trees. This area will be kept clear of any construction material, debris, equipment, portable toilets, and foot or equipment traffic. Fencing will be installed prior to construction at the edge of the TPZ and remain in place until the entire project is complete. The fence will be chain link and a minimum of five feet in height.	During construction	City of Los Angeles	Construction Inspector

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
PDF-BIO-5: Grading/Trenching in TPZ. Grading/trenching will be restricted to areas outside the TPZ of the trees. All grubbing and clearing within the TPZ of a tree will be done manually. All soil removal will be done with hand tools, using an air spade or comparable equipment that will excavate soil without damaging the roots. Jack hammers will not be used to remove the soil. When a root is encountered, soil removal will be done without chipping, marring, or damaging the root bark in any way (damaging the root bark will open up the bark barrier so that disease can enter the tree, allowing rot to develop or fungus to take over, and can result in root death).	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-6: Avoiding Root Damage. If tree roots must be cut, cuts will be less than one inch. If any roots over one inch in diameter are damaged, they will be clean-cut with a sharp and sterilized hand tool. Any roots permanently exposed from grading or scraping of topsoil will be cleanly cut just below the new soil grade.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-7: Soil Grade. Soil levels will be returned to the original grade, at which trees' roots were first established. Existing fill soil above that original grade will be removed to the extent possible; no additional fill soil will be placed over the original grade. If soil is filled back to the original grade, compaction will be done manually only (no equipment will be used). Compaction will be done in layers of three to six inches depending on soil structure. No gaps or pockets will remain in the soil.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-8: Irrigation. During construction, trees will only be watered under the guidance of the project arborist. Where it is needed, temporary irrigation (drip, leaking tube, or other) will be installed at intervals throughout the fenced protection zone to allow periodic deep watering during construction. The entire TPZ of the trees will be watered to a soil depth of four feet. This may require slow irrigation for 8-24 hours or more, or may require repeat waterings of shorter duration to promote saturation. The soil will be allowed to dry out completely before watering is repeated. The period between waterings may be a month or more. The project arborist will monitor the protected trees and provide recommendations on the effectiveness and duration of temporary irrigation.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-9: Landscaping Around Native Trees. Landscaping near protected trees will be drought-tolerant only unless trees are already accustomed to current landscape irrigation (to be confirmed by arborist). Irrigation overspray or runoff, as a result of lawn or ornamental irrigation, will be avoided in the TPZ of any protected tree with the noted exception above. All landscaping will be kept away from the trunk of any protected tree by a minimum of two feet.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-10: Tree Pest Inspection. Prior to tree removal, the City will have a certified arborist evaluate the trees to ensure they are free of pests.	Prior to construction	City of Los Angeles	EMG
PDF-BIO-11: Development of Pest Management Plan. If the certified arborist determines trees are impacted by infectious pests or diseases, the City will work with the certified arborist to prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list will provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from the Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or the list of preventative measures.	During construction	City of Los Angeles	Construction Inspector

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
PDF-BIO-12: Prevention of Pathogen Spread. All tree material, especially infected tree material, will be left on site, chipping the material for use as ground cover or mulch. Cleaning and disinfecting pruning and power tools before use will be completed to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	During construction	City of Los Angeles	Construction Inspector
PDF-BIO-13: City Tree Ordinance. Any tree or shrub covered under the City Tree Ordinance which may be impacted by proposed Project construction, either through removal or encroachment within the TPZ, shall be replaced with nursery stock at a minimum 4:1 mitigation ratio of like species and 15-gallon in size. The City will work with a certified arborist and/or tree specialist to acquire appropriately sized, locally sourced trees from a local native plant nursery that implements Phytophthora/Clean Nursery Stock protocols. This may reduce the probability of introducing replacement trees contaminated with pests, diseases, and pathogens that could spread and infect native trees or habitats. A certified arborist and/or tree specialist should inspect and potentially quarantine nursery stock before bringing them into the Project site. Replacement tree plantings shall be located in areas protected by the habitat fencing to ensure their protection from the public.	Prior to construction During construction	City of Los Angeles	EMG Construction Inspector
PDF-BIO-14: RAP Tree Policy. Any tree or shrub covered under the RAP Tree Policy which may be impacted by the proposed Project construction, either through removal or encroachment within the TPZ, shall be replaced with nursery stock. The City at a minimum will be required to replace impacted trees at a 1:1 ratio for trunk diameter. The impacted trees' aggregate diameter, measured at DSH (multi-trunk trees are to be measured immediately below the lowest trunk) shall be replaced at an equal or greater rate of caliper of new trees. Each one-inch DSH of existing tree shall be replaced with a minimum one-inch caliper new tree.	During construction	City of Los Angeles	Construction Inspector
Cultural Resources			
PDF-CR-1: Archaeological Resource Discovery During Construction. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with State and local guidelines, including those set forth in California PRC Section 21083.2. Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with State and local guidelines, including those set forth in California PRC Section 21083.2. If the discovery proves significant under CEQA (Section 15064.5f; PRC 21082), additional work such as testing or data recovery may be warranted. Should any Native American artifacts be encountered, additional consultation with NAHC-listed tribal groups should be conducted immediately. The process for contacting the tribal group and the timing of the contact should be addressed in the management plan.	During construction	City of Los Angeles	Construction Inspector

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
<p>PDF-CR-2: Human Remains Discovery During Construction. If human remains are encountered unexpectedly during construction demolition and/or grading activities, Section 7050.5 of the California Health and Safety Code requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California PRC 5097.98. Remains suspected to be Native American are treated under CEQA at CCR 15064.5; PRC 5097.98 illustrates the process to be followed if remains are discovered. If human remains are discovered during excavation activities, the following procedure shall be observed:</p> <ul style="list-style-type: none"> • Stop immediately and contact the County Coroner: <ul style="list-style-type: none"> – 1104 N. Mission Road – Los Angeles, CA 90033 – 323-343-0512 (8 am to 5 pm Monday through Friday) or – 323-343-0714 (After hours, Saturday, Sunday, and Holidays) • If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC. • The NAHC will immediately notify the person it believes to be the MLD of the deceased Native American. • The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. • If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. 	During construction	City of Los Angeles	Construction Inspector
Noise			
<p>PDF-NOISE-1: Haul Route. Prior to commencement of construction and operational maintenance activities, the City shall establish approved truck haul routes that avoid or minimize, to the extent feasible, unnecessary truck travel on local roadways through residential neighborhoods or adjacent to schools, and prioritize travel on collector and arterial streets.</p>	Prior to construction	City of Los Angeles	EMG
<p>PDF-NOISE-2: Construction Noticing and Community Liaison. Prior to commencement of construction activities, the City shall notify in writing adjacent residents and businesses along the Project route or worksite of proposed construction activities and the tentative schedule. The City shall require the construction contractor to designate a community liaison to respond to any issues and/or concerns related to construction activities, including any noise or vibration complaints. The community liaison shall maintain a log of communications and resolutions of issues or concerns and share the log with the City. Notices and construction signs will include a hotline and website address which will be updated quarterly and will include project-related information.</p>	Prior to construction	City of Los Angeles	EMG

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Public Services			
PDF-PS-1: Construction Security Measures. During construction, on-site security measures will include security lighting and a construction security fence with gated and locked entry around active construction areas.	During construction	City of Los Angeles	Construction Inspector
PDF-PS-2: Operational Security Measures. For Special Events that occur during the nighttime hours, security lighting will be provided.	Post construction	City of Los Angeles	EMG
Transportation			
PDF-TRA-1: Construction Traffic Management Plan. A Construction Traffic Management Plan will be prepared for the phases of the proposed Project that affect offsite components or require increased vehicle access consistent with the LADOT Construction Traffic Control Guidelines. This plan will address the planned Project construction phasing, sequence of construction activities, access, and circulation. In addition, the plan would include planned detour routes and BMPs, as well as coordination with and advance notice to local emergency providers.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-2: Construction Staging Plan. A construction staging plan shall be developed to reduce impacts related to noise, dust, traffic, and other health hazards. In addition, construction site BMPs (e.g., fencing, signs, and detours) shall be implemented to minimize hazards and prevent safety issues on the roadways and sidewalks surrounding the construction site.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-3: Construction Traffic. Construction-related trips shall be scheduled with increased frequency during off-peak hours to minimize impacts to commuters.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-4: Access to Parcels. It is not anticipated that access to existing parcels outside of the proposed Project impact areas would be impacted. However, if access to any existing parcels is removed during proposed construction activities, temporary access shall be provided, and/or new points of access shall be constructed.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-5: Site-Specific Traffic Control and Transit Plan for Large Events. Large event permittees shall develop a site-specific traffic control plan to provide information on parking and circulation and highlight transit options for event attendees to minimize congestion and vehicle miles traveled. Traffic control strategies for events will include inbound/outbound flex lanes and sheriff-controlled intersections. Traffic control plans will also identify nearby public parking facilities and identify passenger pick-up/drop-off locations. Permittees will be required to consider the cumulative traffic impacts of their event in relation to other events in the Project Area. The traffic control plans will also identify emergency services egress and access.	During construction	City of Los Angeles	Construction Inspector
PDF-TRA-6: Expand Public Transit Connections. The future site operator and relevant City departments (LADOT, Recreation and Parks Department, City Planning, etc.) shall work together to explore options for expanding public transit connections to the Project site to expand community access and reduce VMT.	Post construction	City of Los Angeles	EMG

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Utilities and Service Systems			
PDF-UTIL-1: Drought-Tolerant Landscaping. The Project will use a mix of native and drought-tolerant plants appropriate to the Los Angeles region to provide a plant palette adapted to climate change. Lawn would be used sparingly and strategically distributed where needed to support multifunctional cultural and recreational uses.	During construction	City of Los Angeles	Construction Inspector
PDF-UTIL-2: Water-Efficient Irrigation. Irrigation water would be pumped from the reservoirs to wetland habitat areas which would then flow back into the reservoirs. Transition habitat zones would also be irrigated with reservoir water on a separate cycle appropriate for the drought-tolerant, coastal scrub planting palette. Remaining upland habitat, lawn areas, and ornamental gardens would be irrigated via a potable water supply available from the LADWP distribution system which would require a dedicated meter. Recycled water may also be used to irrigate ornamental planting, should such water supplies become available in the future.	Post construction	City of Los Angeles	EMG
PDF-UTIL-3: Decentralized Drainage Strategy. To prevent untreated surface runoff from entering the reservoir waters, proposed Project will implement decentralized drainage facilities to capture and filter or infiltrate stormwater runoff from the developed portions of the Project site.	During construction	City of Los Angeles	Construction Inspector
Wildfire			
PDF-WF-1: Fire Code. The Project Manager is responsible for compliance with applicable LAMC Fire Code Section 57 et seq. for construction sites on, adjacent to or in the immediate vicinity of a VHFHSZ as designated through LAMC Sections 57.4908.1.1 through 57.4908.1.3 and identified on City maintained databases such as NavigateLA and Zone information and Map Access System (ZIMAS) (which maintain digitalized LA General Plan and zoning maps).	During construction	City of Los Angeles	Construction Inspector
PDF-WF-2: Open Flame. Pursuant to LAMC Section 57.4908.5 open flame is prohibited upon any road, street, or fire road with the VHFHSZ.	During construction	City of Los Angeles	Construction Inspector
PDF-WF-3: Smoking Prohibited. No smoking is allowed where conditions are such as to make smoking a hazard and in spaces where flammable or combustible materials are stored or handled per Section 310.2 of the California Fire Code. Further, it shall be unlawful for any person to light, ignite or smoke any cigar, cigarette, tobacco in a pipe or other form of smoldering substance within the VHFHSZ compliant with LAMC Section 57.4908.6. The Section also prohibits open flame upon any road, street, or fire road within the VHFHSZ.	During construction	City of Los Angeles	Construction Inspector
PDF-WF-4: Signage. No person, except one authorized and acting within the scope of his official duties, shall remove, deface, mar, mutilate, or change the position of any sign, installed by the Chief pursuant to this article, designating "CLOSED AREA," "NO SMOKING," "NO OPEN FIRES," "RESTRICTED ENTRY," or other sign or device installed to give warning and to regulate persons' actions within the VHFHSZ as stated in Section 57.4908.9.1.	During construction	City of Los Angeles	Construction Inspector

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
<p>PDF-WF-5: Brush Clearance Activities. Pursuant to Ordinance No. 185789 which added Sections 57.305.5.2, 57.305.5.2.1, 57.322.1.1.10 and 57.322.1.1.10.1, and amended Section 57.322.1.1 to Article 7, Chapter V of the LAMC, the applicable requirements for brush clearing activities in the VHFHSZ would apply including, but not limited to:</p> <ul style="list-style-type: none"> • Use of metal cutting blades for grass or brush clearance shall be limited to those which are nonferrous/non-sparking. • Brush clearance cannot be done on red flag days, when fire weather conditions are at their peak. • Individuals engaged in brush clearance operations shall not engage in any other activities during their actual clearance of grass or brush. • Individuals engaged in grass or brush clearance operations shall use an appropriate extinguishing agent immediately to extinguish a fire. • All fires, regardless of size, shall be reported immediately via the 9-1-1 system to the Fire Department. • An approved fire extinguisher, or a pressurized garden hose with attached nozzle shall be within 10 feet of any grass or brush clearance operation, to quickly extinguish a small fire before it burns out of control. • Where a gasoline container is present at the site of the grass or brush clearance operation, a minimum 4A 60 BC dry chemical fire extinguisher shall be within 10 feet of the brush clearance operation. • A cell phone capable of dialing 9-1-1 shall be charged and readily accessible to the grass or brush clearance operation. • A safety strap shall be used at all times for any tool or appliance with hot exhaust. Hot exhaust shall not come in contact with any brush, grass, flash fuels, or other flammable material. 	During construction	City of Los Angeles	Construction Inspector