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Date: Tue, Nov 10, 2015 at 2:26 PM

Subject: Comments PLUM & Transportation Special Joint Agenda No 2-CF 15-0719-S11 Adoption of Mobility Plan and FEIR ENV-2013-0911-EIR

To: Sharon Dickinson <sharon.dickinson@lacity.org>, Adam Lid <adam.lid@lacity.org>, The Honorable Jose Huizar <councilmember.huizar@lacity.org>, The Honorable Mike Bonin <councilmember.bonin@lacity.org>

We object to the substitution of definitions in all COMMUNITY PLANS, as the public in the areas affected have not been notified properly of changes to the LAND USE ELEMENT.

We object to the non-disclosure of the intent of the policies such as GREEN STREETS.

You state the following in the MOBILITY PLAN Policy 5.5 Green Streets:

The City's Green Streets Initiative is a program that seeks to address these interrelated problems through the use of stormwater Best Management Practices (BMPs) that mimic natural hydrological functions. Goals of the program include:

- *Reducing pollutant levels in stormwater through natural filtration, to improve local water quality and meet regulatory requirements*

- *Increasing local water supplies by recharging groundwater basins, thereby decreasing dependence on imported water*
- *Improving air quality and reducing the heat island effect*

- *Enhancing aesthetics, which can increase pedestrian use of sidewalks and encourage the use of bicycles*

- *Reducing stormwater runoff to restore the natural stormwater runoff hydrograph of the land mobility pathways occupy.*

- *Reducing flooding.*

Best Management Practices (BMP) include canopy trees, planters, bioswales, pervious paving, infiltration trenches, curb extensions., designing mobility pathways that daylight and restore creeks and streams where they have been buried underground, and focusing on "parkway" areas between the roadway and sidewalk, where stormwater can be easily directed from streets and sidewalks

These BMPs vary in terms of their cost, effectiveness, and the applications for which they are best suited.

COMMENTS:

This is understated. Green Streets plans to capture and store stormwater under the public streets.

As a sample, DOMINGUEZ CHANNEL WATERSHED GROUP ENHANCED WATERSHED MANAGEMENT PLAN, as part of LA REGIONAL WATER QUALITY CONTROL BOARD LA COUNTY MS4 MUNICIPAL SEPARATE STORM SEWER SYSTEM states the following:

Distributed BMPs for purposes of this EWMP are those BMPs installed directly by one or more of the DC WMG agencies that tend to have smaller footprints and capture and store or infiltrate water from smaller catchments than regional projects. As described above as well, emphasis in this EWMP is on storm water capture, storage, use, and/or infiltration type of BMPs that achieve a volume reduction in the watershed rather than treat and release type BMPs. Thus, the distributed BMPs in this EWMP are primarily:

- *Green Streets*

To be specific, green streets, in the context of this EWMP, are modifications to streets that allow them to capture, store, and/or infiltrate some volume of water from the catchment leading to that street section.

This can include a variety of design features including, but not limited to:

- *Porous/ Permeable Pavers*
- *Bioswales/ Buffer Strips (that infiltrate)*
- *Biofiltration (that infiltrate)*
- *Bioretention (that infiltrate)*
- *Rainfall Harvesting (Rain Barrels & Cisterns) (in the street right of way)*

The Green Streets compliance is part of all City of Los Angeles EWMPs.

This can translate into multiple Rose Bowls of storage, not addressed in the FEIR or the Plan itself.

The MOBILITY PLAN needs to go back to the Department of City Planning to prepare and disclose the true use and not mask the intent.
