# *FINAL Initial Study/ Mitigated Negative Declaration*

# *Los Angeles River Phase IV Bike Path Project*

**State Clearinghouse No. 2025021226**

**May 2025**

**City of Los Angeles** **Bureau of Street Services** **Department of Transportation** **Bureau of Engineering**

# CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, LOS ANGELES, CA 90015

## CALIFORNIA ENVIRONMENTAL QUALITY ACT
## MITIGATED NEGATIVE DECLARATION

(Article I, City CEQA Guidelines)

| | | |
|---|---|---|
| **LEAD AGENCY AND ADDRESS:** | City of Angeles<br>c/o Bureau of Engineering<br>1149 Broadway, Suite 600<br>Los Angeles, CA 90015-2213 | **COUNCIL DISTRICT**<br>4 (Raman) |

**PROJECT TITLE: Los Angeles River Phase IV Bike Path Project**

**PROJECT LOCATION:** The Project Site is located in the Hollywood Community Plan area along the Los Angeles (LA) River, specifically an approximately one-mile alignment along an existing paved equestrian trail/service road owned by the City of Los Angeles Department of Recreation and Parks (RAP). The eastern terminus of the alignment includes a locked gate which is also the western terminus of the existing Los Angeles River Bikeway segment to the east of the Project area, and the western terminus of the Project alignment is located approximately 200 feet east of the northern terminus of Forest Lawn Drive.

**DESCRIPTION:** The proposed Project would upgrade an existing equestrian trail/maintenance road to include a new section of the Los Angeles River Bikeway. The Project would construct a new asphalt concrete pavement Class I bicycle and pedestrian path along the south bank of the Los Angeles River adjacent to an existing equestrian trail. The Project would extend the Los Angeles River Bikeway by approximately one mile from its current western terminus near Riverside Drive and would improve the existing on-site equestrian trail facilities to maintain equestrian access between the Los Angeles Equestrian Center and Griffith Park. The proposed Project would facilitate future connections to the larger active transportation network throughout the region and provide improved pedestrian, bicycle, and equestrian access and connectivity to transit, residential homes, schools, jobs, parks, and other community-serving amenities for the surrounding communities. The proposed Project would add to the region's livability by expanding active transportation options and providing new facilities to promote access to public transit, homes, schools, work, parks, and other community-serving amenities.

**NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:** N/A

**FINDING:** The City of Los Angeles has determined the proposed Project will not have a significant effect on the environment with mitigation incorporated. See attached Initial Study.

**SEE THE ATTACHED PAGES FOR MITIGATION MEASURES IMPOSED**

Any written comments received during the public review period are attached, together with the responses of the CEQA Lead Agency.

**THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED**

| **PERSON PREPARING THIS FORM:** | **ADDRESS:** | **TELEPHONE NUMBER:** |
|---|---|---|
| Christopher Adams, Environmental Specialist III | 1149 S. Broadway, Suite 600, M/S 939<br>Los Angeles, CA 90015 | (213) 485-5910 |

**SIGNATURE (Official):**

Dr. Jan Green Rebstock
Environmental Affairs Officer
Bureau of Engineering

**DATE:** 5/8/2025

Intentionally Blank

# Los Angeles River Phase IV Bike Path Project

## MITIGATION MEASURES

### Biological Resources

**Mitigation Measure MM-BIO-1:** The City shall provide replacement trees on-site and within other suitable locations in accordance with RAP Policy, and shall establish a tree monitoring program to be managed by a qualified arborist in coordination with and to the satisfaction of RAP on behalf of LADOT. The quantity of replacement trees shall be commensurate with RAP Policy and shall mitigate a cumulative total of 299.4 inches of removed Ordinance trees. It is at LA RAP's discretion to determine replacement tree trunk sizes and species palette to be used as replacement plantings. The monitoring program shall cover all phases of construction including: pre-construction, active construction, and post-construction, and shall comply with the Department of Urban Forestry's establishment period of up to three (3) years. During this period, LADOT shall monitor tree watering schedules depending on the season and the soil types, maintain an 18-inch circumference around the trunk base of each tree free of sod, pull vegetation by hand, and remove tree ties and tree stake after 1–3 years, as determined by a qualified arborist. Fertilizers or weed killers shall not be used near the newly planted trees. If any encroached trees fail during construction or post-construction they shall be mitigated at the applicable rate per RAP Policy.

### Noise

**Mitigation Measure MM-NOI-1:** Temporary mobile noise barriers shall be installed along the northern Project boundary ensuring that the Los Angeles Equestrian Center, the Bette Davis Park, and the Mariposa Bridge equine users and residences further northwest of the bridge and the southern Project boundary are protected from both sight and sound from construction. The barrier will be made of sound blanket, plywood or other solid material capable of reducing on-site construction noise levels by at least 9 dBA when measured from the outside of the barrier and is at minimum 8 feet tall. In addition, all applicable construction equipment and vehicles shall be fitted with proper/improved mufflers which will provide a reduction in construction noise levels by 6 dBA and for the construction equipment to have vibration dampers or any other best available noise control technology. It will be impermissible for a construction vehicle to have a muffler that is not in good condition or no muffler. Truck beds and staging areas will have rubber mats as a preventative measure to reduce loud instantaneous noises. Furthermore, given that construction would occur within 500 feet from a sensitive receptor within the City of Los Angeles as well as to those in other jurisdictions the revised construction activity timeline will be used:

- Construction, alteration, movement, enlargement, replacement, repair, equipment, maintenance, removal and demolition work within the project site shall only be allowed between the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and between the hours of 9:00 a.m. to 5:00 p.m. on Saturdays, with no construction activity being allowed on Sundays or on federal holidays.

## Tribal Cultural Resources

**Mitigation Measure MM-TCR-1:** Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. Should the Tribe decide that they no longer wish to provide a monitor or enter into a contracting agreement, or be unable to provide a monitor, work may commence without a Tribal monitor from the Kizh Nation.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

**Mitigation Measure MM-TCR-2:** Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

**Mitigation Measure MM-TCR-3:** Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in PRC 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Intentionally Blank

# BEST MANAGEMENT PRACTICES

## Air Quality

**BMP-AQ-1:** The proposed Project would implement Rule 403 fugitive dust control measures required by the South Coast Air Quality Management District (SCAQMD), which requires reasonable precautions to be taken to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the property from which the emission originates. Reasonable precautions include, but are not limited to, the following:

- Application of water on dirt roads, material stockpiles, and other surfaces that can give rise to airborne dusts; and
- Maintenance of roadways in a clean condition to prevent track-out

**BMP-AQ-2:** The proposed Project would implement Rule 402 measures required by the SCAQMD, which prohibits the discharge from any source whatsoever, such quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.

## Biological Resources

**BMP-BIO-1:** The Contractor will implement the following Best Management Practices during construction to protect any adjacent habitat for special-status species and resources.

- Environmental Training. Prior to Project implementation, a Workers Environmental Awareness Program (WEAP) should be prepared and presented to construction crews regarding the potential for nesting birds and other special-status wildlife species to occur onsite during construction activities. The WEAP training should concentrate on the proper identification of sensitive resources while in the field, suggested strategies in avoiding impact to sensitive resources, and proper reporting methods for field crews if sensitive resources are observed during construction activities.
- Limits of Disturbance. Prior to Project implementation, construction crews should be made aware of the limits of disturbance within the fenced Project site. During construction, all construction activities will remain within the limits of disturbance. Travel to and from the Project site will also be confined to existing roads. Construction activities should also be restricted to daylight hours.
- On-Site Overnight Storage. All construction pipes, culverts, or similar structures that are stored at a construction site for one or more overnight periods should

be covered or thoroughly inspected for birds and other wildlife before the pipe is subsequently buried, capped, or otherwise used or moved.

**BMP-BIO-2:** To avoid impacts to nesting birds protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) resulting from construction activities that may occur during the nesting season, the following will be implemented:

Construction activities, including tree removal shall occur outside of the nesting season (generally February 1 through September 30). If construction activities must occur within this time period, the following measures shall be employed:

- A pre-construction nesting survey shall be conducted by a qualified biologist within 7 days (168 hours) prior to the start of construction activities to determine whether active nests are present within or within 500 feet of the construction zone. All nests found shall be recorded.
- A minimum 300-foot no-work buffer shall be established around any active passerine bird nest. A minimum 500-foot no-work buffer shall be established around any active raptor nest. The qualified biologist shall monitor the nest on a weekly basis, and construction activities within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor shall be postponed until the biologist determines that the nest is no longer active. However, the standard 300/500-foot no-disturbance buffer distance may be adjusted (including increases or reductions to the buffer) by a qualified biologist on a case-by-case basis taking into consideration the location, type, duration and timing, and severity of work, distance of nest from work area, surrounding vegetation and line-of-sight between the nest and work areas (also taking into account existing ambient conditions from human activity within the line of sight), the influence of other environmental factors, and species' site specific level of habituation to the disturbance. If the qualified biologist determines nesting activities may fail as a result of work activities, the biologist shall immediately inform the construction manager and all Project work shall cease (except access along established roadways) within the recommended no-disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site.
- Buffers will be delineated on-site with bright flagging, for easy identification by Project staff. The on-site construction supervisor and operator staff will be notified of the nest and the buffer limits and instructed of the sensitivity of the area to ensure the buffer is maintained. A summary of preconstruction surveys and methodologies employed, monitoring efforts, and any no-disturbance buffers that were installed shall be documented in a report by the qualified biologist at the conclusion of each nesting season.

**BMP-BIO-3:** Wildlife Signage**.** Interpretive signage will be installed to educate the public on LA River wildlife and habitat.

**BMP-BIO-4:** Where appropriate, as determined by a qualified biologist, Project fencing would be designed to provide some opportunities to allow native wildlife to crawl through to access the River.

**Cultural Resources**

**BMP-CUL-1:** Due to the potential to encounter archaeological resources within the Project Site, the City will use a qualified archaeological monitor, working under the supervision of a qualified archaeological Principal Investigator during ground disturbing activities. The monitor will conduct worker training prior to the initiation for ground-disturbing activities in order to inform workers of the types of resources that may be encountered and advise them of the proper handling of such resources. The archaeological monitor will have the authority to redirect construction equipment in the event potential archaeological resources are encountered. In the event archaeological resources are encountered, the County will be notified immediately and work in the vicinity of the discovery will halt within 50 feet of the discovery until appropriate treatment of the resource, will be determined by the qualified archaeological Principal Investigator in accordance with the provisions of CEQA.

Should the resources require it, a treatment plan will be prepared, which will compile existing information, and provide research themes and treatment approaches in order to avoid or mitigate significant impacts to potentially significant archaeological resources as determined to possibly within the project area. The plan will be implemented by the qualified archaeologist in consultation with the City that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource.

The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. Pre-Contact or Native American resources materials determined to be sacred will be reburied if determined feasible. Non-sacred items or if not feasible to be reburied, will be offered to local tribes if they can provide suitable curation for such items. If no institution or the Tribes accept the resources, they may be donated to a local school or historical society in the area for educational purposes.

At the completion of all ground disturbance, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The 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. The report and the Site Forms shall be submitted by the archaeologist to the County and the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

**BMP-CUL-2:** If human remains are discovered, work in the immediate vicinity of the discovery will be suspended and the Los Angeles County Coroner contacted. If the remains are deemed Native American in origin, the Coroner will contact the Native American Heritage Commission and identify a Most Likely Descendant pursuant to Public Resources Code Section 5097.98 and California Code of Regulations Section 15064.5. Work may continue on other parts of the Project site while consultation and treatment are conducted.

**Hazards and Hazardous Materials**

**BMP-HAZ-1:** The City would ensure that all construction crews have fire-suppression equipment (such as fire extinguishers) on site to respond to the accidental ignition of a fire.

**Hydrology and Water Quality**

**BMP-WQ-1:** The proposed Project would implement erosion control in compliance with the state Construction General Permit that may include, but would not be limited to, the following:

- Minimizing the extent of disturbed areas and duration of exposure;
- Stabilizing and protecting disturbed areas;
- Keeping runoff velocities low;
- Retaining sediment within the construction area;
- Use of silt fences or straw wattles;
- Temporary soil stabilization;
- Temporary drainage inlet protection;
- Temporary water diversion around the immediate work area; and
- Minimizing debris from construction vehicles on roads providing construction access.

**BMP-WQ-2:** The following construction-related water quality BMPs from the Los Angeles County Department of Public Works' Construction Site Best Management Practices (BMPs) Manual (2010) would also be implemented, as appropriate, during construction activities:

- <u>SS-1 Scheduling</u>
  - The project will be scheduled to reduce the amount and duration of soil exposed to erosion by wind, rain, runoff, and vehicle tracking.
- <u>SC-6 Gravel Bag Berms</u>
  - Gravel Bag Berms will in installed along the exposed hillsides near the west side of the project, to break up the sheet flow lengths and prevent sediment discharge into the flood channel

- SC-8 Sandbag Barriers
    - Sandbags will be installed below the toe of the exposed hillside adjacent to the flood channel as well as the perimeter of the project site to prevent sediment discharge into the flood channel
- NS-1 Water Conservation Practices
    - Reasonable measures will be taken to prevent water from flowing offsite and into the storm drain system
    - Paved areas will be swept and vacuumed, not washed
    - Vehicles and equipment will not be washed onsite
    - Construction water runoff will be directed to areas where it can infiltrate into the existing ground
- NS-3 Paving and Grinding Operations
    - Plastic materials will be placed under all asphaltic concrete paving equipment when not in use to prevent drips and spills into the pervious soil material
    - No washing of asphalt equipment will be conducted on-site
- NS-8 Vehicle and Equipment Cleaning
    - All vehicles/equipment that regularly enter and leave the construction site will be cleaned off-site.
    - Reasonable measures will be taken to prevent wash or rinse runoff from entering pervious site surfaces and storm drain system
- WM-3 Stockpile Management
    - Stockpiles will be located a minimum of 50 ft away from concentrated flows of storm water and drainage courses
    - Loose stockpiles materials will be covered at all times when not actively in use
    - Soil stockpiles will be protected with a temporary perimeter sediment barrier
- WM-8 Concrete Waste Management
    - Concrete washout areas and other washout areas will not discharge or leak onto the underlying soil or to the surrounding storm drain systems. Concrete washout bins will be recommended.

**BMP-WQ-3:** The following water quality protection measures will be implemented during construction:

- Stationary engines, such as compressors, generators, etc., will have drip pans beneath them to prevent any leakage from entering runoff or receiving waters.

- All construction equipment will be inspected for leaks and maintained regularly to avoid soil contamination. Leaks and smears of petroleum products will be wiped clean prior to use.
- Spill kits capable of containing hazardous spills will be stored on-site. Any grout waste or spills will be cleaned up immediately and disposed of off-site. Re-fueling of equipment should be conducted at least 50 feet from the ephemeral drainage.
- Vehicles will be restricted to existing access roads and approved work areas and will maintain speed limits of no greater than 15 miles per hour on unpaved roads.
- During Project construction activities, all trash that may attract predators shall be properly contained, removed from the work site, and disposed of regularly. Following construction, all spoils, trash, or any debris will be removed off-site to an approved disposal facility or stored appropriately.

**BMP-WQ-4:** Maintenance activities for the proposed bike path and equestrian trail will involve a collaborative effort between various City agencies coordinated by LADOT as the lead agency for Project implementation. LADOT will develop and enter into one or more use agreements with the U.S. Army Corps of Engineers, Los Angeles County Department of Public Works, and other agencies, as appropriate, to maintain all improvements built as part of the Project. Such use agreement(s) would be in place prior to the proposed bike path and equestrian trail being open to the public for use. The activities anticipated to be undertaken by LADOT, or through agreements with other agencies or third-party vendors, as part of long-term operation of the Project include:

1. Regular inspections of the bike path and equestrian trail facilities;
2. Periodic clearing of debris and animal waste;
3. Graffiti removal from walls, fences, and signs;
4. Repairing or replacing fencing, signage, and pavement markings as needed;
5. Ongoing landscape maintenance, encompassing tree trimming, staking, shrub and vine pruning, grass and ground cover upkeep (where applicable);
6. Weed and litter control along the Project's entire bikeway and equestrian trail segments; and
7. Tree monitoring for planted and encroached trees (see discussion under Section 4.4, *Biological Resources*, below, and Mitigation Measure MM-BIO-1).

**BMP-WQ-5:** The operation and maintenance of the proposed Project following the completion of construction activities would at a minimum include the following activities:

- Implementation of Post Construction Best Management Practices and MS4 Public Agency Facility and Activities Program requirements in section VIII.H.1-3.d. in accordance with the Waste Discharge Requirements and National

Pollutant Discharge Elimination System (NPDES) Permit for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles and Ventura Counties.

- This will include:
  - Periodic clearing of debris and trash collection BMPs from the entire length of the Project bikeway and equestrian trail segments; maintenance of the path including striping and signage, retaining walls, fencing, and minor landscaping where needed;
  - Removal of animal waste; and
  - Sediment and trash removal, as needed, but at a minimum once per week.

Intentionally Blank

**FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**
Pursuant to California Environmental Quality Act (Division 12, Public Resources Code)

## Proposed Project

The proposed Project would upgrade an existing equestrian trail/maintenance road to include a new section of the Los Angeles River Bikeway. The Project would construct a new asphalt concrete pavement Class I bicycle and pedestrian path along the south bank of the Los Angeles River adjacent to an existing equestrian trail. The Project would extend the Los Angeles River Bikeway by approximately one mile from its current western terminus near Riverside Drive and would improve the existing on-site equestrian trail facilities to maintain equestrian access between the Los Angeles Equestrian Center and Griffith Park. The proposed Project would facilitate future connections to the larger active transportation network throughout the region and provide improved pedestrian, bicycle, and equestrian access and connectivity to transit, residential homes, schools, jobs, parks, and other community-serving amenities for the surrounding communities. The proposed Project would add to the region's livability by expanding active transportation options and providing new facilities to promote access to public transit, homes, schools, work, parks, and other community-serving amenities.

## Determination

Based on the analysis provided in this Initial Study/Mitigated Negative Declaration (IS/MND), the Bureau of Engineering finds that with incorporation of described revisions to the Project and mitigation measures, the proposed Project would not have a significant effect on the environment.

## ORGANIZATION OF THE FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

This Final IS/MND has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] 21000 et. seq.) and the CEQA Guidelines (California Code of Regulations [CCR] 15000 et. seq.). This Final IS/MND is organized into the following sections:

**Response to Comments on the Draft IS/MND:** This section provides a list of agencies, organizations, and individuals commenting on the Draft IS/MND; copies of the written comments received during the Draft IS/MND public review period; and the CEQA Lead Agency responses to those comments, including Master Responses to address key topics raised in public comments.

**Clarifications and Modifications:** This section provides a detailed description of all clarifications and modifications that were made to the text or graphics of the Draft IS/MND. Clarifications and modifications reflect changes made to the proposed Project, analysis, or mitigation measures due to editorial changes or as a result of comments received during the public review period. These clarifications and modifications do not constitute significant new information and do not change any of the conclusions of the document. This section also reflects changes necessary to combine the Draft IS/MND into this Final IS/MND.

**Draft IS/MND:** This portion of the document includes the Draft IS/MND in its entirety, which was circulated during the public review period from February 28, 2025, through March 31, 2025.

## CONTENTS


Section — Page

RESPONSES TO COMMENTS ..... RTC-1
Introduction ..... RTC-1
Master Responses ..... RTC-4
Master Response No. 1: Separation of Path/Trail User Types ..... RTC-4
Master Response No. 2: Project Site Existing Ownership and Authorized Uses ..... RTC-7
Master Response No. 3: Operations and Maintenance for the Proposed Facilities ..... RTC-9
Master Response No. 4: Tree Replacement and Monitoring ..... RTC-11
Master Response No. 5: Project Design Refinements and Ancillary Facilities RTC-14
Master Response No. 6: Impacts to Nearby Sensitive Species and Habitats.. RTC-15
Master Response No. 7: Alternative Routes for Cyclists and Equestrians ..... RTC-16
Written Comments Received ..... RTC-17
Letter A1 ..... RTC-17
Letter A2 ..... RTC-20
Letter A3 ..... RTC-26
Letter A4 ..... RTC-42
Letter A5 ..... RTC-46
Letter A6 ..... RTC-52
Letter A7 ..... RTC-58
Letter A8 ..... RTC-64
Letter A9 ..... RTC-72
Letter A10 ..... RTC-74
Letter B1 ..... RTC-79
Letter B2 ..... RTC-81
Letter B3 ..... RTC-86
Letter B4 ..... RTC-210
Letter C1 ..... RTC-224
Letter C2 ..... RTC-234
Letter C3 ..... RTC-238
Letter C4 ..... RTC-244
Letter C5 ..... RTC-248
Letter C6 ..... RTC-250
Letter C7 ..... RTC-252
Letter C8 ..... RTC-254
Letter C9 ..... RTC-256
Letter C10 ..... RTC-258
Letter C11 ..... RTC-260
Letter C12 ..... RTC-262
Letter C13 ..... RTC-264
Letter C14 ..... RTC-266
Letter C15 ..... RTC-268
Letter C16 ..... RTC-270

Letter C17 ..... RTC-272
Letter C18 ..... RTC-274
Letter C19 ..... RTC-276
Letter C20 ..... RTC-278
Letter C21 ..... RTC-281
Letter C22 ..... RTC-285
Letter C23 ..... RTC-287
Letter C24 ..... RTC-335
Letter C25 ..... RTC-346
Public Meeting (PM) Comments Received March 12, 2025, 6–7:30 p.m. ..... RTC-352
Comment PM-1 ..... RTC-352
Comment PM-2 ..... RTC-352
Comment PM-3 ..... RTC-353
Comment PM-4 ..... RTC-353
Comment PM-5 ..... RTC-354
Comment PM-6 ..... RTC-354
Comment PM-7 ..... RTC-355
Comment PM-8 ..... RTC-356
Comment PM-9 ..... RTC-357
Comment PM-10 ..... RTC-357
Comment PM-11 ..... RTC-358
Comment PM-12 ..... RTC-358
Comment PM-13 ..... RTC-359
Comment PM-15 ..... RTC-360
Comment PM-16 ..... RTC-361
Comment PM-17 ..... RTC-362
Comment PM-18 ..... RTC-362
Comment PM-19 ..... RTC-363
Comment PM-20 ..... RTC-363
Comment PM-21 ..... RTC-364
Comment PM-22 ..... RTC-364
Comment PM-23 ..... RTC-365
Comment PM-24 ..... RTC-365
Comment PM-25 ..... RTC-366

CLARIFICATIONS AND MODIFICATIONS ..... CM-1

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

1.0 INTRODUCTION ..... 1
1.1 Purpose of an Initial Study ..... 1
1.2 Document Format ..... 1
1.3 CEQA Process ..... 2

2.0 PROJECT DESCRIPTION ..... 3
2.1 Introduction ..... 3
2.2 Project Location ..... 3
2.3 Environmental Setting ..... 4
2.4 Project Background ..... 5

2.5 Purpose ....8
2.6 Proposed Project ....8
2.7 Project Construction ....12
2.8 Operation and Maintenance ....18
2.9 Project Actions and Approvals ....20
3.0 EXISTING ENVIRONMENT ....46
4.0 ENVIRONMENTAL EFFECT/INITIAL STUDY CHECKLIST ....47
ENVIRONMENTAL CHECKLIST ....49
Aesthetics ....49
Agriculture and Forestry Resources ....54
Air Quality ....56
Biological Resources ....66
Cultural Resources ....73
Energy ....77
Geology and Soils ....82
Greenhouse Gas Emissions ....89
Hazards and Hazardous Materials ....98
Hydrology and Water Quality ....101
Land Use and Planning ....104
Mineral Resources ....108
Noise ....110
Population and Housing ....119
Public Services ....120
Recreation ....123
Tribal Cultural Resources ....128
Utilities and Service Systems ....132
Wildfire ....135
Mandatory Findings of Significance ....137
5.0 MITIGATION MEASURES ....139
6.0 PREPARATION AND CONSULTATION ....142
6.1 Preparers ....142
6.2 Coordination and Consultation ....143
7.0 REFERENCES ....144
Chapter 1 ....144
Chapter 2 ....144
Chapter 3 ....144
Chapter 4 ....144
Chapter 5 ....151
Chapter 6 ....151

## APPENDICES


**Appendix A** Geotechnical Engineering Report
**Appendix B** Construction Emissions Calculations and Modeling
**Appendix C-1** Biological Technical Letter Report
**Appendix C-2** Aquatic Resources Delineation Report
**Appendix C-3** Park Tree Inventory Report
**Appendix D** Cultural Resources Assessment Report
**Appendix E** Energy Data
**Appendix F** Paleontological Identification Report
**Appendix G** Initial Site Assessment
**Appendix H** Noise Calculations
**Appendix I** CEQA Analysis of Transportation Impact
**Appendix J** Preliminary Hydrology Report
**Appendix K** Assembly Bill 52 Tribal Consultation
**Appendix L** Equestrian Trail Design Memorandum


## FIGURES


Figure 4f Project Site Conditions [Revised]---------- CM-7
Figure 6a Project Detail Plan [Revised] ---------- CM-9
Figure 6b Project Detail Plan [Revised] ---------- CM-10
Figure 6c Project Detail Plan [Revised] ----------CM-11
Figure 6d Project Detail Plan [Revised] ---------- CM-12
Figure 6e Project Detail Plan [Revised] ---------- CM-13
Figure 6f Project Detail Plan [Revised] ---------- CM-14
Figure 6g Project Detail Plan [Revised] ---------- CM-15
Figure 10 Project Site Jurisdiction [New]---------- CM-16


## TABLES


Table 1 Summary of Public Comments Received ----------RTC-1
Table 2 Summary of Tree Impacts ---------- RTC-12

# RESPONSES TO COMMENTS

## Introduction

The Los Angeles River Phase IV Bike Path Project Draft IS/MND was circulated for public review and comment the City of Los Angeles on February 28, 2025, initiating a 30-day public review period pursuant to CEQA and its implementing guidelines, which concluded on March 31, 2025. The Notice of Availability/Notice of Intent was also distributed to relevant agencies and organizations, published in the Los Angeles Times, and filed with the Los Angeles County Clerk and State Clearinghouse. Additionally, the Draft IS/MND was available for review at the Bureau of Engineering, Environmental Management Division office at 1149 S. Broadway, Los Angeles, CA 90015. The IS/MND was also available online at the Bureau of Engineering's website at: https://engineering.lacity.gov/about-us/divisions/environmental-management/ projects/los-angeles-river-phase-iv-bike-path.

During this public review period, a total of 39 comment letters were received, as summarized below in **Table 1, Summary of Public Comments Received**, as well as 25 public comments provided during a virtual public meeting held on March 12, 2025. This section first provides Master Responses that address key topics raised in one or more comment letters, which are referenced within subsequent individual letter responses. These Master Responses include the following:

1. Master Response No. 1: Separation of Path/Trail User Types
2. Master Response No. 2: Project Site Existing Ownership and Authorized Uses
3. Master Response No. 3: Operations and Maintenance for the Proposed Facilities
4. Master Response No. 4: Tree Replacement and Monitoring
5. Master Response No. 5: Project Design Refinements and Ancillary Facilities
6. Master Response No. 6: Impacts to Nearby Sensitive Species and Habitats
7. Master Response No. 7: Alternative Routes for Cyclists and Equestrians

This section then presents a copy of each of the comment letters received with brackets included indicating the specific letter/number identifier for each of the individual comments (i.e., the first comment in Letter A1 is comment A1-1, second comment is A1-2, and so forth), as well as written responses to each of the identified comments.

**Table 1**
**Summary of Public Comments Received**

| Comment Letter | Affiliation | Commenter Name | Agency/Organization | Date Received |
|---|---|---|---|---|
| A1 | Agency | Chris Buonomo, AICP | City of Burbank | 3/12/2025 |
| A2 | Agency | Fred Ramirez | City of Burbank | 3/26/2025 |
| A3 | Agency | Mary Benson, President | Los Angeles Equine Advisory Committee | 3/27/2025 |
| A4 | Agency | T. Hagans | Los Angeles Equine Advisory Committee | 3/27/2025 |
| A5 | Agency | Alex Crow | Griffith Park Advisory Board | 3/31/2025 |

| Comment Letter | Affiliation | Commenter Name | Agency/Organization | Date Received |
|---|---|---|---|---|
| A6 | Agency | Elena Maggioni | Los Angeles Recreation and Parks | 3/31/2025 |
| A7 | Agency | Alex Crow | Griffith Park Advisory Board | 3/31/2025 |
| A8 | Agency | Jaden Oloresisimo | Caltrans | 4/1/2025 |
| A9 | Agency | Michelle Chan | Caltrans | 3/25/2025 |
| A10 | Agency | Ciara Barnett, PE | Los Angels County Department of Public Works | 4/14/2025 |
| B1 | Organization | Kesper Wang | Streets Are For Everyone | 3/13/2025 |
| B2 | Organization | Gerry Hans | Friends of Griffith Park | 3/30/2025 |
| B3 | Organization | Jamie T. Hall | Mariposa Basin Environmental Alliance | 3/31/2025 |
| B4 | Organization | Liz Radley | Burbank-Glendale-Griffith Park Equestrians | 3/31/2025 |
| C1 | Individual | Alyce Heath Schwartz | N/A | 3/8/2025 |
| C2 | Individual | Alyce Heath Schwartz | N/A | 3/12/2025 |
| C3 | Individual | Alyce Heath Schwartz | N/A | 3/12/2025 |
| C4 | Individual | Alyce Heath Schwartz | N/A | 3/12/2025 |
| C5 | Individual | Alyce Heath Schwartz | N/A | 3/12/2025 |
| C6 | Individual | Benjamin Hillman | N/A | 3/26/2025 |
| C7 | Individual | Brittany Rochford | N/A | 3/26/2025 |
| C8 | Individual | Dave Weinstein | N/A | 3/26/2025 |
| C9 | Individual | Jonathan Wilder | N/A | 3/27/2025 |
| C10 | Individual | Kyle Parkinson | N/A | 3/26/2025 |
| C11 | Individual | Lelan Fernando | N/A | 3/26/2025 |
| C12 | Individual | Mark Martin | N/A | 3/27/2025 |
| C13 | Individual | Nathan Adair | N/A | 3/26/2025 |
| C14 | Individual | Samantha Moulton | N/A | 3/26/2025 |
| C15 | Individual | Sarah Tucker | N/A | 3/26/2025 |
| C16 | Individual | Skylar Chavez | N/A | 3/27/2025 |
| C17 | Individual | Nick Schenck | N/A | 3/28/2025 |
| C18 | Individual | Cal Ramsey | N/A | 3/28/2025 |
| C19 | Individual | Hunter Gibson | N/A | 3/28/2025 |
| C20 | Individual | Emily Gabel | N/A | 3/28/2025 |
| C21 | Individual | Dale Marks | N/A | 3/31/2025 |
| C22 | Individual | Caleb Neubauer | N/A | 3/31/2025 |
| C23 | Individual | Nori Anne Walla | N/A | 3/31/2025 |
| C24 | Individual | Alyce Heath Schwartz | N/A | 3/31/2025 |
| C25 | Individual | Sabrina Silver | N/A | 3/31/2025 |
| PM-1 | Public Meeting | Marian Dodge | N/A | 03/12/25 |
| PM-2 | Public Meeting | Dean Meinen | N/A | 03/12/25 |
| PM-3 | Public Meeting | Damian Kevitt | N/A | 03/12/25 |
| PM-4 | Public Meeting | Jennifer de la Rosa | N/A | 03/12/25 |

| Comment Letter | Affiliation | Commenter Name | Agency/Organization | Date Received |
|---|---|---|---|---|
| PM-5 | Public Meeting | Lois Westfall | N/A | 03/12/25 |
| PM-6 | Public Meeting | Hilary Norton | N/A | 03/12/25 |
| PM-7 | Public Meeting | Karen Kennedy | N/A | 03/12/25 |
| PM-8 | Public Meeting | Nicholas Connon | N/A | 03/12/25 |
| PM-9 | Public Meeting | Emily Gabel | N/A | 03/12/25 |
| PM-10 | Public Meeting | Nori | N/A | 03/12/25 |
| PM-11 | Public Meeting | Sabrina Silver | N/A | 03/12/25 |
| PM-12 | Public Meeting | Eli Lipman | Move LA | 03/12/25 |
| PM-13 | Public Meeting | Pilar Reynaldo | N/A | 03/12/25 |
| PM-14 | Public Meeting | Darcy | N/A | 03/12/25 |
| PM-15 | Public Meeting | Kate Adams | N/A | 03/12/25 |
| PM-16 | Public Meeting | Tyler Barkwill | N/A | 03/12/25 |
| PM-17 | Public Meeting | Samantha Kirkeby | N/A | 03/12/25 |
| PM-18 | Public Meeting | Jean Schamberger | N/A | 03/12/25 |
| PM-19 | Public Meeting | Matt Paulsen | N/A | 03/12/25 |
| PM-20 | Public Meeting | Jennifer Gill | N/A | 03/12/25 |
| PM-21 | Public Meeting | Dan Bednarski | N/A | 03/12/25 |
| PM-22 | Public Meeting | Jill H. | N/A | 03/12/25 |
| PM-23 | Public Meeting | Alyce Heath Schwartz | N/A | 03/12/25 |
| PM-24 | Public Meeting | ES | N/A | 03/12/25 |
| PM-25 | Public Meeting | Philip Armstrong | N/A | 03/12/25 |

## Master Responses

### *Master Response No. 1: Separation of Path/Trail User Types*

Numerous comments were submitted that raised safety concerns regarding potential conflicts between the various users of the proposed bike path and equestrian trail facilities. Of particular note is the concern that cyclists will physically interact with equestrian users either indirectly or directly, causing safety hazards to all user types. Indirect interactions would include cyclists or other non-equestrian users on the pedestrian/bicycle path visually or audibly "spooking" horses due to proximity as they approach or pass by equestrian users located on the equestrian trail portion of the Project, while direct interactions would consist of cyclists or other non-equestrian users physically entering the equestrian portion of the proposed Project or breaching or climbing barriers in order to enter equestrian-only off-site facilities. Under CEQA, the possibility that the project would impact horses is not a cognizable impact; rather, the question is whether a project will affect the environment of persons in general, and not particular persons (see *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161).

Notwithstanding, while it is acknowledged, based on prior meetings with and public comments received from the local equestrian community, that horses are highly sensitive to their surroundings, and as prey animals they can be easily startled by interactions with their surroundings and nearby activities, the Project has been designed to allow for safe operation of the proposed facilities by accommodating the various intended user types through a completely separated right-of-way (ROW) for equestrians to keep horses and their riders continuously separated from cyclists and pedestrians along the entirety of the proposed path/trail segment.

Several comments have been received arguing that the proposed design has not taken into consideration the input provided by the equestrian community at prior community meetings regarding the Project. However, to the contrary, numerous design revisions have been incorporated into the proposed Project in response to community input, as discussed in detail in Section 2.4.3, *Public Outreach and Engagement*, of the Draft IS/MND. As discussed therein, the current design includes a continuous, 8-foot-tall fence along the entire length of the proposed equestrian trail from the Tunnel 6 undercrossing on the east to the connection to the existing trail and Mariposa Bridge on the west where the bike path portion of the Project would terminate in a mandatory turnaround for non-equestrian users. The proposed fencing separating the cyclist/pedestrian path and equestrian trail portions of the Project does not include a visual screening material based on input received by community members arguing that horses need to see oncoming cyclists and other oncoming users so that they do not get surprised; however, feedback from other users indicated that visual screening to prevent the horses from seeing oncoming users (and thus being startled) should be provided. Given the difference of opinion expressed by community members, the City has prepared the design as currently presented based on the best available information and acceptable trail design standards.

In order to gather additional input regarding the design of the Project's equestrian trail component, the City retained a qualified equestrian expert, Kathy Hobstetter of iAssist Equestrians, to conduct a review of the design and provide feedback regarding the concerns raised by the equestrian community regarding potential safety issues and the proposed equestrian trail design. The memorandum summarizing iAssist Equestrian's findings (Equestrian

Trail Design Memorandum) is included as **Appendix L** of this Final IS/MND. Based on their review of the Project and the existing conditions of the equestrian trail, which would be adapted to provide separated bicycle and pedestrian use, iAssist Equestrians determined that the Project design and projected uses would not adversely impact the existing equestrian use of the trail. At Tunnel 6, for instance, the Project would add fencing that currently does not exist that will exclude persons from the tunnel who are not on the new Equestrian Trail, a feature that currently does not exist. Although not allowed by existing applicable law, as discussed further below, pedestrians, bicyclists, and others not authorized to access the Project Site currently improperly utilize the equestrian tunnel. The Project design will make it more difficult for anyone not on the Equestrian Trail to utilize the tunnel and will block users of the Bike Path from the existing equestrian tunnel. Additionally, iAssist Equestrians noted that signage and lighting are included as part of the Project design that will alert the public that it is unlawful for motorized vehicles to utilize the Bike Trail and that only equestrian uses are permitted on the Equestrian Trail. Finally, signage will be installed as part of the Project that alerts bicyclists that they must ride slowly on this segment of the Bike Path. Overall, based on its review of the Project, iAssist Equestrians concluded that the Project, if implemented as planned, will not adversely impact users of the existing equestrian trail, and is adequate to preserve the existing equestrian usages of the trail within the Project Site.

The proposed design for the Project is intended to preclude such activities from occurring during long-term operation. Project signage will conform to Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD) standards as well as recommendations from other agencies. Signage would also be provided along the alignment indicating that graffiti and vandalism are prohibited by the LAMC, and would include a contact phone number to the Office of Community Beautification for graffiti cleanup. The proposed design for the new bike trail terminus would not only provide abundant signage to clearly indicate the authorized (and prohibited) users of the Project's equestrian trail component and the turnaround requirement for non-equestrian users on the bike/pedestrian path component, but it would also physically limit the potential for people to unlawfully damage, climb, or otherwise circumvent the western terminus to access the equestrian ROW and off-site trail or Mariposa Bridge facilities.

Furthermore, as discussed in detail in **Master Response No. 3: Operations and Maintenance of Proposed Facilities**, LADOT (or a designee such as the River Rangers) would ensure that the proposed facilities including fencing, signage, lighting, gates/locks, trees/irrigation, pavement, striping, and other improvements associated with the proposed Project are regularly inspected, maintained, and repaired in accordance with the Memorandum of Understanding (MOU) to be executed between LADOT and the Department of Public Works, Bureau of Engineering (BOE). As the fee owner of the City portion of the Project Site, the City's Department of Recreation and Parks (RAP) intends to approve a Grant of Right/easement for a right of way to Public Works, combined with an MOU between BOE and LADOT for LADOT (and designees as necessary) to manage the Project. This would ensure that the proposed facilities are inspected and maintained so that they operate as intended and will help address potential unlawful trespass or misuse by unintended user groups. The Grant of Rights would also allow the project to operate under a 24/7 hours of operation.

Lastly, community input received during public meetings and in public comments on the Draft IS/MND suggested providing a physical separation of at least 5 feet between the proposed equestrian trail and bicycle/pedestrian path components of the Project. Based on early input on the design from the equestrian community, separation of the two components was considered, but given the physical ROW constraints within the Project Site (i.e., being located between the Los Angeles River channel and the 134 Freeway) and the request by the equestrian community to provide a minimum 10-foot width for the equestrian trail, accommodating any additional physical separation of equestrian and cyclist/pedestrian components was not feasible. As such, the physical separation of the two Project components was achieved through the 8-foot-high fence in lieu of a landscaped buffer or other spatial separation feature.

### *Master Response No. 2: Project Site Existing Ownership and Authorized Uses*

Many public comments suggested that the current ownership, jurisdiction, and authorized uses and activities within the Project Site were mischaracterized in the Draft IS/MND. The following discussion is intended to clarify the ownership, land use authority, and authorized uses and activities relative to the Project and the Project Site. As noted, these clarifications do not result in any new or substantially increased adverse environmental effects.

The Draft IS/MND characterized the existing paved road within the Project Site as a "service road" and "maintenance road", but also notes that the existing road is currently accessed and used by various public user groups (whether authorized or unauthorized on this particularly segment) including equestrians, pedestrians, and cyclists. The California Department of Transportation (Caltrans) owns the adjacent 134 Freeway ROW immediately to the south of the Project alignment as well as a small portion (approximately 3 percent) of the Project Site (which would be utilized by the Project through issuance of an Encroachment Permit by Caltrans), while the City of Los Angeles Department of Recreation and Parks (RAP) is the fee owner of the City-owned portion (approximately 97 percent) of the Project Site immediately adjacent to the River channel.

While it is acknowledged that equestrians have historically and continue to heavily utilize the Project Site for recreation, the paved surface also serves as a primary access road for vehicles and staff from the Los Angeles County Flood Control District (LACFCD), which has an easement across the entire length of the Project alignment for service and maintenance activities within and along the River channel. Such access would also be maintained following Project completion, with the proposed width of the bike path component being a minimum of 11' 2" to allow for service vehicle access along the entire length of the ROW. It should also be noted that while the LACFCD has the primary responsibility for service and maintenance of the River channel, the channel is owned by the United States Army Corps of Engineers (USACE), and thus the USACE also has jurisdiction over channel-related facilities within the Project Site. Accordingly, Project implementation would require issuance of a Section 408 Permit from the USACE for the proposed alterations to the existing equestrian trail/maintenance road adjacent to the channel. Additionally, the Los Angeles Department of Water and Power (LADWP) also has an easement to access the Project Site in order to perform necessary maintenance of the power poles located along the Project alignment, and would continue to access the site for routine maintenance activities under the Project.

Numerous comments received by the public also cited the lack of user data presented in the analysis of impacts in the Draft IS/MND; however, while representative data was gathered in order to understand the existing level of user activity within and near the Project Site, such data was not utilized in the analysis of Project impacts. Rather, this data was gathered at three locations during a single weekday (Wednesday, October 30, 2024) and single weekend day (Sunday, November 3, 2024) with the goal of generally estimating the daily number of each of the various user types, which facilities they are using, which direction they are heading, and at which times, during a given day (7 a.m. to 7 p.m.). Based on the data gathered at the three locations, which included the Project Site at the north exit of Tunnel 6, the existing bridle trail at the south end of Mariposa Bridge to the west of the Project Site, and Griffith Park Main Trail just east of the Forest Lawn Drive tunnel, the vast majority of trail users are equestrians, followed by

pedestrians, and only a relatively small number of cyclists. The summary of existing user data is provided in the table below; as shown in the table, the Main Trail connection and Mariposa Bridge locations are heavily utilized by both equestrians and pedestrians, with only incidental and infrequent use by cyclists. On the other hand, the Tunnel 6 location is utilized mainly by pedestrians, and to a lesser extent cyclists, with only incidental use by equestrians, who appear to prefer to travel westward from Mariposa Bridge to Tunnel 7 and under Forest Lawn Drive to the Main Trail, or vice versa.

| **User Type** | **Weekday Count (7 a.m. to 7 p.m.)** | | | **Weekend Count (7 a.m. to 7 p.m.)** | | |
|---|---|---|---|---|---|---|
| **Location** | **Mariposa** | **Main Trail** | **Tunnel 6** | **Mariposa** | **Main Trail** | **Tunnel 6** |
| *Bicycle* | *0* | *0* | *28* | *6* | *0* | *40* |
| *Pedestrian* | *112* | *87* | *102* | *188* | *232* | *164* |
| *Equestrian* | *226* | *214* | *6* | *698* | *698* | *0* |
| **Totals** | **338** | **301** | **136** | **892** | **930** | **204** |

The Project would formalize the equestrian trail that is currently relatively infrequently used by equestrians (per the data presented above) to maintain continuous access from the existing bridle path and Mariposa Bridge on the west to Tunnel 6 on the east, while also providing a new bike path for use by pedestrians and cyclists, the latter of which are not currently authorized users along this segment. Upon completion of the Project and incorporation of the various physical separation features and signage, authorized user types would utilize the respective equestrian trail and bike/pedestrian path components to maintain the existing equestrian connection between the LA Equestrian Center and Griffith Park via the Project Site while also providing for the safe operation of a new functional segment of the overall LA River Bikeway.

### *Master Response No. 3: Operations and Maintenance for the Proposed Facilities*

As discussed in Draft IS/MND Section 2.8, LADOT has committed to maintaining the proposed bike path and equestrian trail and associated facilities to ensure they remain clean, safe, and functional for the public to utilize. To this end, the operation and maintenance of the proposed Project following the completion of construction would involve the following activities:

1. Regular inspections of the bike path and equestrian trail facilities;
2. Periodic clearing of debris and animal waste;
3. Graffiti removal from walls, fences, and signs;
4. Repairing or replacing fencing, signage, and pavement markings as needed;
5. Ongoing landscape maintenance, encompassing tree trimming, staking, shrub and vine pruning, grass and ground cover upkeep (where applicable);
6. Weed and litter control along the Project's entire bikeway and equestrian trail segments; and
7. Tree monitoring for planted and encroached trees (see discussion under Section 4.4, *Biological Resources*, of the Draft IS/MND and Mitigation Measure MM-BIO-1).

As suggested in feedback provided by the City Department of Recreation and Parks (RAP), the RAP Board will be requested to approve a Grant of Right/easement for a right-of way to Public Works. Under the Grant of Right, the Project would operate 24 hours a day and be more aligned to function as a regional bike facility. LADOT would then execute a MOU with BOE to articulate the roles, responsibilities, activities, and procedures to be employed by LADOT or its designee for the ongoing maintenance and operation of the Project. The MOU would also include details about hours of operation, emergency response, and law enforcement along the proposed Project alignment.

With regard to ongoing maintenance, while this Grant of Right and MOU would be subject to further discussion and approval by RAP, BOE, and LADOT, it should be noted that as recently acknowledged by the City Council, maintenance of public areas of the Los Angeles River within the City of Los Angeles is currently fragmented among multiple entities and internal City departments, which has led to inconsistent service levels, uneven cost distribution, and most critically, confusion and extreme dissatisfaction for community members.

However, the recently established LA River Rangers program, housed with the Department of Public Works's Office of Community Beautification, has demonstrated success in addressing routine maintenance needs. With initial funding from finite state grants, this program has partnered with the LA Conservation Corps to perform essential tasks, including routine landscaping, clean up, and other critical activities that support the River's revitalization. To ensure consistent and effective maintenance, the City Council suggested that these daily activities be consolidated under a permanent LA River Rangers Program. Internal consolidation of daily maintenance activities will also aid the City in its regular collaboration with Los Angeles County, the Mountains Recreation and Conservation Authority, Santa Monica Mountains Conservancy, US Army Corps, and other entities responsible for the Los Angeles River.

To facilitate this transition of duties and resources to the LA River Rangers Program, the City Council has required that all contracts or agreements for services along the LA RiverWay, LA River Greenway, river parks, or other City-maintained areas along the Los Angeles River, be reviewed and considered for consolidation within the scope of the LA River Rangers Program. Furthermore, any and all upkeep work performed by City forces along the LA River and its nearby public spaces and rights-of-way must also be evaluated for consolidation under the LA River Rangers Program, for maximum efficiency and clarity.

Ideally, the City should consolidate maintenance responsibilities in one City entity, i.e., the LA River Rangers. However, certain specialized scopes of operations and maintenance work, such as lighting, major repairs, homelessness services, and public safety, may not be appropriate for the LA River Rangers Program. Still, each topic of work is being evaluated for potential efficiencies and collaboration with the LA River Rangers program, if not for complete handoff of responsibilities.

### *Master Response No. 4: Tree Replacement and Monitoring*

Several comments were submitted suggesting that the removal of existing trees along the proposed Project alignment would result in significant adverse impacts; however, as discussed in detail in the Project's Park Tree Inventory Report (included as Appendix C-3 of the Draft IS/MND), and summarized in Section 4.4, *Biological Resources*, of the Draft IS/MND, impacts regarding tree removals would be less than significant with implementation of applicable mitigation measures that require replacement and monitoring of replacement trees in accordance with the City of Los Angeles Department of Recreation and Parks (RAP)'s Tree Preservation Policy (RAP Policy).

More specifically, as discussed in the Draft IS/MND, the Project would be required to comply with Ordinance 186873 that requires that all development be sited and designed to preserve Protected tree and shrub species with a cumulative trunk diameter at breast height of 4 inches or greater, where feasible. Protected trees include native oaks (*Quercus* species), excluding the scrub oak (*Quercus dumosa*); California (western) sycamore (*Platanus racemosa*); Southern California black walnut (*Juglans californica*); and California bay (*Umbellularia californica*). Protected shrubs include Mexican elderberry (*Sambucus mexicana*) and toyon (*Heteromeles arbutifolia*). The City Planning Division refers to all other private property trees with a cumulative diameter at breast height of 8 inches or greater as Significant trees and requires that they be preserved where feasible, as well. Significant trees are not otherwise regulated by the municipal code. While the City Tree Ordinance applies to protected trees City-wide, the park trees that are located within the Project footprint and adjacent Caltrans ROW are managed by RAP and Caltrans, respectively. The RAP Policy provides protection of specified trees, protect their value, and avoid significant negative impacts to the ecosystem. The RAP Policy regulates protection of trees in four categories:

- **Ordinance Trees** are protected by the City Protected Tree and Shrub Ordinance (Ordinance).
- **Heritage Trees** are individual trees of any size or species that are specifically designated as heritage because of their historical, commemorative, or horticultural significance.
- **Special Habitat Value Trees** are native trees located on RAP managed lands.
- **Common Park Trees** are generally mature exotic trees that have value beyond the shade they provide to park users and are a scenic resource.

As discussed in the Park Tree Inventory Report, when a large number of trees are proposed for removal, the notification protocol in the RAP Policy must be followed. Tree replacement is guided by the RAP Policy and by the objectives and functions as defined by the Department. RAP trees are planted according to the RAP Reforestation Program. In situations where crowding or other physical constraints make it impossible to plant the same tree in the same place where it was removed, an alternate location is found. In addition, undesirable tree species are not replaced.

In addition to RAP trees, all trees located adjacent to the Project Site and within the Caltrans ROW were inventoried as part of the Park Tree Inventory Report. A total of 291 trees consisting of 26 species were observed within and/or adjacent the Project Site. Of the 291 trees, 131 are located within the Project Site and 160 trees are located within the Caltrans ROW. Of the 131

trees located within the Project Site, 46 trees are protected by the City Ordinance, 18 are special habitat value trees, 41 are common park trees, and the remaining 26 are undesirable non-native invasive species. Of the 160 trees located within the Caltrans ROW, 31 trees are protected by the City Ordinance and 129 are common trees. A summary of the trees on the Project Site is provided in Appendix B of the Park Tree Inventory Report.

Multiple trees occur along the Project site including coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), elderberry, Southern California black walnut, and California sycamore. Construction of the Project would likely result in the encroachment into the tree protection zone and the removal of trees within both the Project Site and adjacent Caltrans ROW. The impact to existing trees resulting from Project implementation would vary based on each tree's proximity to construction activities. The determination made in the Park Tree Inventory Report regarding the type and extent of each tree impact is based on the following impact categories:

- *Avoidance* – Proposed construction does not extend within the tree protection zone of a tree.
- *Encroachment* – Proposed construction extends into the <35 percent of the tree protection zone of a tree and is expected to result in impacts but not requiring removal.
- *Removal* – Proposed construction will result in >35 percent of the tree protection zone resulting in the removal of the tree.

The Project was designed in an attempt to minimize tree encroachments and removals; however, based on input from the equestrian community and others, the Project footprint was expanded to accommodate a wider equestrian trail ROW (which also required increased grading and over-excavation of slopes to install retaining walls), which in turn impacted a number of additional trees within the Project Site and adjacent Caltrans ROW. Despite the City's best efforts to minimize tree impacts, a total of 58 trees located within the Project Site would be encroached into the tree protection zone in order to accommodate the proposed construction activities. Similarly, a total of 25 trees located within the Project Site would require removal in order to accommodate the proposed construction activities. In the Caltrans ROW, a total of 15 trees would be encroached and 52 would require removal. The table below provides a summary of the tree impacts by regulated status.

**Table 2**
**Summary of Tree Impacts**

| Assessment Rating Category | RAP – Common Tree | RAP – Ordinance Tree | RAP – Special Habitat Tree | RAP – Undesirable Tree | Caltrans – Ordinance Tree | Caltrans – Unprotected Tree | Totals |
|---|---|---|---|---|---|---|---|
| Avoided | 11 | 28 | 13 | 11 | 10 | 83 | ***156*** |
| Encroached | 19 | 13 | 2 | 9 | 3 | 12 | ***58*** |
| Removed | 11 | 5 | 3 | 6 | 18 | 34 | ***77*** |
| **Totals** | *41* | *46* | *18* | *26* | *31* | *129* | ***291*** |

RAP has its own required tree protection specifications for construction projects. These specifications provide tree protection and mitigation measures for active construction sites and are presented as Appendix D of the Park Tree Inventory Report. RAP Policy will be applied to

determine tree replacement ratios, as required by Mitigation Measure MM-BIO-1. Restoration sites for the planted mitigation trees could include the following locations: (1) on-site where available along the Project ROW; (2) the Bette Davis Picnic Area along the west side of Riverside Drive north of the River; (3) the "Pump 7" City-owned property immediately east of Riverside Drive across from Bette Davis Picnic Area; and (4) the former pony ride area within Griffith Park located along the east side of Crystal Springs Drive between Los Feliz Boulevard on the south and the I-5 on- and off-ramps on the north. In addition to tree plantings to mitigate for tree removals, trees that may be encroached upon during construction would also be monitored for survival and replaced as needed, in accordance with RAP policy. As required by Mitigation Measure MM-BIO-3, LADOT (or its designee such as the River Rangers, see **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**), through a MOU with BOE, would be responsible for the monitoring and maintenance of all Project tree plantings either on-site or within one of the identified off-site planting areas to ensure the establishment and long-term survival of the trees.

In addition, while Caltrans has the ultimate discretion regarding the number and size of replacement trees planted within its jurisdiction, Caltrans staff have identified two replacement tree planting locations in the Project area, including the following: (1) the shoulder along the northbound Interstate 5 (I-5) Freeway near Cohasset Street close to Burbank Airport and (2) a triangular area at the I-5/SR-134 interchange next to the Zoo Drive on- and off- ramps. Additionally, Caltrans has indicated that it will be responsible for monitoring and maintenance of these plantings to ensure the establishment and long-term survival of the trees.

### *Master Response No. 5: Project Design Refinements and Ancillary Facilities*

A number of public comments were received suggesting that the Project should include features to support accessibility for persons with disabilities. While the objective of the Project is to provide a new fully improved bike/pedestrian path and equestrian trail along the Project alignment, the Project has been designed to be compliant with the requirements of the Americans with Disabilities Act (ADA) of 1990. As such, although the Project would not include any features or facilities specifically tailored to persons with disabilities, the proposed facilities would be ADA-compliant and accessible to persons with disabilities.

Other comments were also submitted that asked about the potential for providing parklets or other passive recreational opportunities along the Project ROW. While the City has included such features in other linear trail and bike path projects, and has considered the potential for including such facilities in the Project, the Project Site is highly constrained in terms of available space given its location between the channelized LA River on the north and the 134 Freeway on the south. While the City can explore the potential for including more passive amenities along the ROW, there are very few, if any, locations along the route with adequate space to allow for the installation of any substantial improvements in addition to the proposed trail and path components being constructed as part of the Project.

Similarly, several comments were received that requested that strategic shaded areas be provided for use as rest areas along the path/trail. Again, while the City would consider including such features where feasible, particularly in coordination with the required mitigation tree plantings that will occur both on- and off-site, it is not currently known if adequate space exists along the proposed route when accounting for the construction of the proposed bike path and equestrian trail and the existing physical constraints limiting the available Project ROW.

### *Master Response No. 6: Impacts to Nearby Sensitive Species and Habitats*

Several comments were received that suggested that sensitive biological resources within the Project area had not been adequately studied or that biological resources impacts had not been adequately evaluated. More specifically, comments were submitted regarding nearby habitat areas and associated sensitive species within the River channel itself, and within the larger Griffith Park area, as well as effects on potential bat roosts associated with bridges, trees, and other potential features in the area. To the contrary, a comprehensive analysis of biological resources impacts was conducted as part of the *Los Angeles River Phase IV Bike Path Biological Technical Letter Report*, prepared by Environmental Science Associates (ESA) in January 2025, which was also included as Appendix C-1 of the Draft IS/MND. As discussed therein, ESA biologists conducted extensive database records reviews and a field survey of the Biological Study Area (BSA) that included the Project Site alignment and surrounding 500-foot buffer area, which also captured the northernmost portions of Griffith Park, the Riverside Drive bridge, Bette Davis Picnic Area, and the River channel itself.

The biological resources analysis presented in Appendix C-1 and summarized in Section 4.4, *Biological Resources*, of the Draft IS/MND, discussed impacts of the Project relative to sensitive species and habitats including special status plants and wildlife, sensitive natural communities, aquatic resources and wetlands, wildlife movement, local plans and policies protecting biological resources such as tree ordinances, and conflicts with applicable habitat conservation plans or natural community conservation plans.

With regard to specific comments related to concerns regarding sensitive wildlife species in the River channel and bats in the area, as noted on pages17 and 18 of the Biological Technical Letter Report, a total of four species are expected to have a low potential to occur within the BSA, including the southwestern willow flycatcher, least Bell's vireo, western mastiff bat, and coast horned lizard. One species, yellow warbler, is expected to have a moderate potential to occur within the BSA. However, all special-status wildlife species have a low potential to occur within the heavily disturbed and enclosed Project area. As such, impacts to special-status wildlife species were determined to be unlikely to occur due to the lack of habitat within previously developed or disturbed areas, where all of the proposed construction activity is proposed. However, implementation of BMP-BIO-1, General Best Management Practices, would also ensure that environmental training is provided prior to work, construction is maintained within approved Project limits, speed limits are enforced, and trash and debris are removed offsite, which would further reduce potential impacts to special-status wildlife species. Additionally, work activities are proposed to occur during daylight hours, thereby reducing overall impacts to special-status bats which may occasionally forage within the BSA. Furthermore, the Biological Technical Letter Report acknowledges that the Project construction activities could temporarily negatively impact nesting birds, including yellow warbler, that are protected in accordance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), through the removal of an active nest or the disruption of breeding/nesting activities. Implementation of BMP-BIO-1 requiring environmental awareness training for workers and BMP-BIO-2, Nesting Birds, which recommends limiting construction-related activities to occur outside of the bird breeding season, or requires nesting bird surveys and buffer zones if construction does occur during the nesting season, would reduce potential impacts to potential nesting birds established onsite as well as during travel to and from the Project site and throughout the BSA. Therefore, as concluded in the Draft IS/MND, impacts to nearby sensitive species including bats were determined to be less than significant and no mitigation is required.

### *Master Response No. 7: Alternative Routes for Cyclists and Equestrians*

Various commenters suggested that the City consider alternative routes for either bicycles or equestrians in order to alleviate any potential safety risks, whether perceived or actual, by dedicating the Project alignment to one user group and routing the other user group to another existing or future off-site facility. Suggested approaches included maintaining the existing trail/service road allowing for equestrian and pedestrian access, but prohibiting cyclists, while providing an alternate route for cyclists to circumvent the Project Site and equestrian interactions. Similarly, cyclists have suggested that the Project only include bicycle and pedestrian path facilities and that equestrians be excluded from the Project Site and instead routed through existing trails in Griffith Park or other areas north of the River channel.

Outside the scope of this Project, comments were received from members of the cycling community that reside in the City of Burbank proposing that the City of Burbank should reappropriate funds from another project being planned in that jurisdiction to fund the construction of a new bicycle-accessible bridge to provide convenient access across the River channel for cyclists, since there has been a prohibition of bicycles from the Mariposa Bridge since 2016. The absence of such a connection, commenters suggest, forces cyclists to reach Griffith Park and the existing LA River Bikeway facilities via Riverside Drive, which itself presents a number of safety risks to cyclists under existing conditions. Accordingly, these Burbank residents have expressed support for the construction of a new dedicated bicycle-accessible bridge or shared bicycle/equestrian/pedestrian bridge to provide a safe connection for this user group.

Although the physical separation of bicycle and equestrian facilities would minimize the potential for interactions between these two user groups, one key objective of the Project is to provide a functional extension to the overall Los Angeles River Bikeway to help achieve a continuous bicycle and pedestrian connection along the entire 51-mile length of the Los Angeles River from its headwaters to the Pacific Ocean, while also maintaining existing equestrian connectivity through the Project Site to Griffith Park and the LA Equestrian Center via the Mariposa Bridge. The prohibition of one user group over another in the Project design would not only fail to achieve this key Project objective, but it would also not reduce any significant environmental effects, as the Project would result in less than significant impacts with mitigation incorporated. Furthermore, because the Project was determined to result in less than significant impacts with implementation of appropriate mitigation measures, preparation of an Environmental Impact Report is not necessary and thus a detailed exploration of Project alternatives is not required by CEQA, including evaluation of the alternative routes for different user groups suggested in the public comments received. No further response is necessary.

# LETTER A1

Hello,

Thanks for reaching out.

There is a recording of the presentation at the following link.

https://engineering.lacity.gov/about-us/divisions/environmental-management/projects/los-angeles-river-phase-iv-bike-path

A1-1

Thank you,

Chris Adams
Environmental Management Division | Environmental Specialist III
Bureau of Engineering | Department of Public Works
1149 S. Broadway, Suite 600
Los Angeles, CA 90015
Cell: 818.233.9026 (preferred) Office: 213.485.5910

On Wed, Mar 12, 2025 at 11:58 AM Buonomo, Christopher <CBuonomo@burbankca.gov> wrote:

> Hi – my name is Chris Buonomo, and I'm a senior transportation planner with the City of Burbank.
>
> I'd like to join the zoom meeting tonight for the LA River Path extension, but we have a community meeting here that I will need to attend at the same.
>
> Will there be a recording made available that I can access afterward? Thanks.
>
> Best,
>
> Chris

A1-2

**CHRIS BUONOMO, AICP**
SENIOR PLANNER, TRANSPORTATION DIVISION

COMMUNITY DEVELOPMENT DEPARTMENT

818-238-5251 | BURBANKCA.GOV
*Working together for a safe, beautiful and thriving community.*

**Letter A1**
Chris Buonomo, AICP
Senior Planner, Transportation Division
Community Development Department
**City of Burbank**
March 12, 2025

*Response A1-1*

This comment is a response from City staff to the commenter's inquiry. This comment does not raise a substantive issue regarding the Project or the issues raised in the Draft IS/MND. As such, no further response is warranted.

*Response A1-2*

The commenter requests a recorded version of the virtual public meeting held on March 12, 2025. This comment does not raise a substantive issue regarding the Project or the issues raised in the Draft IS/MND. As such, no further response is warranted.

COMMUNITY DEVELOPMENT

Christopher Adams
Environmental Specialist III
Bureau of Engineering, Public Works Department, City of Los Angeles
1149 S. Broadway, Suite 600, MS939
Los Angeles, CA 90015

Dear Mr. Adams,

On February 28, 2025, the City of Los Angeles Department of Public Works, Bureau of Engineering, released the DRAFT Initial Study/Mitigated Negative Declaration (IS/MND) for the Los Angeles River Phase IV Bike Path Project (Project). The Initial Study (IS) has been prepared to assess the potential environmental impacts of this project, and mitigation measures have been incorporated into the project to reduce potential impacts to a less than significant level. The thirty (30) day public review period ends on March 31, 2025. A2-1

Although the Project Area is not within the City of Burbank, the Mariposa Bridge and portions of the associated equestrian trails are located within the City of Burbank Therefore, the City has an interest in ensuring the safe, continued access of these amenities should the Project be constructed.

The City of Burbank Community Development Department has reviewed IS/MND for the Project and makes the following comments regarding the findings and determinations.

1. Mariposa Equestrian Bridge Usage
    a. The IS/MND notes that "The Mariposa Equestrian Bridge is situated northwest of the Project Area and is listed in the National Register. It will not be altered in any manner because of the project. The equestrian trails it connects to will be expanded and upgraded, but there will be no change in use or material changes to the bridge itself as a result of the Project." If the trail to the bridge is expanded and upgraded, this will likely intensify the use of the bridge. Upgrades to the bridge are not currently proposed as part of the Project. The Project MND should therefore address the need for future upgrades to the Mariposa Bridge to accommodate the anticipated intensification of its use as a result of the Project. A2-2
    b. The IS/MND does not disclose the number of bicyclists, pedestrian, or equestrians utilizing bicycle paths, sidewalks, or equestrian paths in the Project vicinity. What is the ridership for each of these modes nearby, and what is the expected ridership of the proposed Project? A2-3



150 NORTH THIRD STREET
BURBANK, CA 91502

BURBANKCA.GOV
INFO@BURBANKCA.GOV

2. Noise Management
   a. Mitigation measures to address the potential impacts of construction noise should be added to reduce the risk of startling equine users. These measures may include barriers or sound walls (e.g., eight-foot-tall fencing with sound blankets), rubberized mats on the bed of trucks picking up construction debris and materials, and rubberized mats as flooring in areas where construction materials are being staged onsite. A2-4
   b. Use construction vehicles with noise reducing mufflers and preclude the use of construction vehicles with loud exhausts. A2-5
   c. Equip construction equipment with more effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other best available control technology (BACT). A2-6

4. Visual Barriers
   a. Mitigation measures to address the visual construction and operational impacts should be added to further ensure equine safety. These measures may include the use visual barriers, like construction screens or fencing (e.g., screen and fencing that is a minimum of 8 feet in height), that may shield construction activities from the view of horses and equestrians to the greatest extent possible. A2-7

5. Construction Worker Training and Education
   a. Provide a pre-construction educational meeting for construction workers so that they are informed about the presence of horses and the potential risks of startling equine due to construction activities near equestrian trails or areas. A2-8
   b. Implement safety measures, such as secure fencing and signage, to prevent horses from accidentally entering construction zones. A2-9
   c. Providing flagmen at the entrances to the construction site to be able to monitor construction, vehicle staging, and access to the site, as well as monitor neighborhood pedestrian, equestrian, and vehicular traffic that may be entering the immediate vicinity of the construction site. A2-10

6. Notification and Communication:
   a. Notify local equestrian communities well in advance of upcoming construction projects, their timelines (e.g., start date, construction hours, etc.), and potential disruptions resulting from construction vehicle access, construction noise, and limited access and any potential roadway and/or trail closures. The intent of providing enough lead time is so that equestrians can plan the appropriate times to ride as well as their alternate routes accordingly, allowing them to gain access to trails and/or bridges that connect the equestrian neighborhoods to the equestrian facilities in the surrounding area and avoid to the extent possible any activities that may impact their equines. Communicate early and often by providing clear information in the form of mailers, flyers, and signage at the project site perimeters and at entryways to horse trails. This information will prompt equine A2-11



150 NORTH THIRD STREET
BURBANK, CA 91502

BURBANKCA.GOV
INFO@BURBANKCA.GOV

users about the ongoing construction activity as well as provide information on possible alternative routes and access points to equestrian trails or facilities during construction. A2-11 (cont.)

Thank you for receiving these comments and incorporating them into your formulation of a Final Mitigated Negative Declaration. A2-12

Sincerely,

Fred Ramirez
Assistant Community Development Director



150 NORTH THIRD STREET
BURBANK, CA 91502

BURBANKCA.GOV
INFO@BURBANKCA.GOV

**Letter A2**
Fred Ramirez
Assistant Community Development Director
Community Development Department
**City of Burbank**
March 26, 2025

*Response A2-1*

The commenter provides an introduction to the comments contained in the comment letter, noting that the Mariposa Bridge and other related equestrian facilities are located adjacent to the Project Site within the City of Burbank, and thus the City has an interest in the Project. Responses to the comments raised in this letter are provided below in Responses A2-2 through A2-12.

*Response A2-2*

The comment states that the Draft IS/MND suggests that the existing equestrian path/service road would be expanded and upgraded such that increased equestrian traffic would be expected to occur as a result of the Project, thus resulting in increased use of the Mariposa Bridge. However, to the contrary, the Project would expand and upgrade the existing path/road to provide a formal bike path and equestrian trail facility that allows for non-equestrian access along the Project ROW with continuous physical separation from the proposed upgraded equestrian path. The proposed equestrian path would maintain a minimum 10-foot width throughout the alignment and would directly connect Tunnel 6 with the Mariposa Bridge, but would not increase the capacity of the existing trail or otherwise be expected to substantially increase use of this path segment. The Project is intended to provide an extension of the existing LA River Bikeway while maintaining and formalizing a separated continuous equestrian connection through the Project Site, which would not result in a substantial increase in equestrian traffic or utilization of the Mariposa Bridge that would be attributable to the Project. As such the Project would not result in physical impacts to the bridge and no further analysis of this issue in the IS/MND is necessary.

*Response A2-3*

Refer to **Master Response No. 2: Project Site Existing Ownership and Authorized Uses** regarding current user types and typical usage of existing facilities. As discussed therein, user count data were gathered at and near the Project site in order to provide context for existing conditions, but this information was otherwise not utilized to support any analysis of impacts in the Draft IS/MND, as the Project would extend an existing bike path with a dead-end turnaround feature to by less than one mile, returning cyclists back the other direction (as is currently designed at the existing Riverside Drive terminus). Likewise, the Project would separate the existing equestrian trail from the new bicycle/pedestrian path with fencing and limited grade separation to maintain the existing connection. Neither of these proposed facilities would be expected to notably increase the use of the bike path or equestrian trails in the area, as cyclist trips would necessarily originate from locations to the east of the Project Site, and equestrian trips would originate at the LA Equestrian Center or Griffith Park, and thus both bicycle and equestrian users would only be transitory through the Project Site whether the Project is

implemented or not. The Project is not expected to substantially change the demand for or usage of bike paths and equestrian trails in the Project area, but rather, it would separate user types along this segment of the River to allow for safe use of the respective facilities by all user types within the constrained ROW.

*Response A2-4*

The comment suggests additional details to be considered for addressing potential noise impacts of construction activities on nearby equestrian users. As such, as shown in **Clarifications and Modifications** of this Final IS/MND, the text of Mitigation Measure MM-NOI-1 has been revised to include providing noise barriers where equine users may be present and additional best practice methods suggested, such as providing rubberized mats in truck beds and construction staging areas to minimize instances of loud sudden noises which may startle any equine. No further response is warranted.

*Response A2-5*

The commenter suggests noise measures to minimize construction effects on equines in the Project area; however, Mitigation Measure MM-NOI-1 already includes a requirement for improved mufflers for construction equipment. No further response is warranted.

*Response A2-6*

The commenter suggests noise measures to minimize construction effects on equines in the Project area; however, Mitigation Measure MM-NOI-1 already includes a requirement for improved mufflers for construction equipment in addition to compliance with construction hours and installation of noise barriers during construction activities. Nonetheless, as shown in **Clarifications and Modifications** of this Final IS/MND, the text of Mitigation Measure MM-NOI-1 has been revised to include the additional measures to reduce noise as suggested by the commenter. No further response is warranted.

*Response A2-7*

The commenter suggests that visual barriers to reduce adverse effects on equestrian users and horses should be provided during construction and operation of the proposed facilities. Aesthetics and views impacts were determined to be less than significant in the Draft IS/MND, and thus no mitigation measures were required; however, as noted above, the Project would provide noise barriers throughout construction activities in order to reduce noise levels at nearby sensitive receptors, and these same noise barriers would also necessarily provide visual screening for construction activities throughout the construction process. With regard to operations, as noted in the Draft IS/MND in Section 2.4.3, *Stakeholder Outreach and Engagement*, the Project design has been modified multiple times in response to stakeholder input, most significantly from the local equestrian community. However, the input received from the various equestrian users did not provide a clear consensus on the need to provide visual screening on the fencing/barrier separating the proposed bike path and equestrian trail components of the Project. Some stakeholders suggested that the horses need to see oncoming cyclists and other users so as not to suddenly startle the horse, while others argued that they should not be able to see the users on the bike path at all. Despite the conflicting input, the City

remains committed to working with stakeholder groups to design the Project in the most effective way to allow for safe and efficient use of the facilities by all users.

*Response A2-8*

The commenter suggests that construction worker training be conducted to educate workers regarding interactions with equestrian users and horses during construction. As discussed in the Draft IS/MND, BMP-BIO-1 includes a Workers Environmental Awareness Program (WEAP) should be prepared and presented to construction crews regarding the potential for nesting birds and other special-status wildlife species to occur onsite during construction activities. This training would also address potential interactions with existing trail users in the Project area, as suggested by the commenter. However, it should be noted that access to active construction areas would be restricted and managed, as appropriate, to ensure the safety of both the public and construction workers. No further response is warranted.

*Response A2-9*

The comment suggests that equestrians be precluded from entering construction zones through the use of fencing and signage to prevent accidents or injuries. As is standard practice for City construction projects, physical barriers and signage would be employed throughout construction activities in order to prevent any unauthorized persons or trail/path users from entering active construction areas or staging areas. No further response is warranted.

*Response A2-10*

The comment suggests providing flagmen at the entrances to the construction site to be able to monitor construction, vehicle staging, and access to the site, as well as monitor neighborhood pedestrian, equestrian, and vehicular traffic that may be entering the immediate vicinity of the construction site. Based on standard construction practices, including those outlined in the *2024 Greenbook Standard Specifications for Public Works Construction* or similar guidance document, at the discretion of the City and its construction contractor, construction activities could include the use of flagmen at equipment access points or intersections with path and trail facilities (or other appropriate measures) to ensure the safe operation of the surrounding public streets, paths/trails, and Griffith Park facilities throughout construction activities.

*Response A2-11*

The commenter suggests that the City establish a system to notify local equestrian communities well in advance of upcoming construction projects, their timelines (e.g., start date, construction hours, etc.), and potential disruptions resulting from construction vehicle access, construction noise, and limited access and any potential roadway and/or trail closures. The City will maintain communication with the surrounding community, including equestrian users, in the form of mailers, flyers, and/or signage at and near the Project Site perimeters and at entryways to horse trails as suggested by the commenter.

*Response A2-12*

The commenter provides a concluding statement that does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

# LETTER A3

From: **Mary Benson** <mary.benson@lacity.org>
Date: Thu, Mar 27, 2025 at 5:43 PM
Subject: LA River Phase IV Bike Path
To: Christopher Adams <christopher.adams@lacity.org>
Cc: Mayor Karen Bass <mayor.karenbass@lacity.org>, Vince Bertoni <vince.bertoni@lacity.org>, Ted Allen <ted.allen@lacity.org>, Osama Younan <osama.younan@lacity.org>, Jimmy Kim <jimmy.kim@lacity.org>, Joe Salaices <joe.salaices@lacity.org>, Stefanie Smith <stefanie.smith@lacity.org>

Hi Christopher,

This comment letter was approved by the Los Angeles Equine Advisory Committee on March 17, 2025.

Since the City has yet to adopt any trail standards, you might want to check out the USDA Forest Service
EQUESTRIAN DESIGN GUIDEBOOK FOR TRAILS, TRAILHEADS, AND CAMPGROUNDS

A3-1

Designed in cooperation with the USDOT Federal Highway Administration

https://www.fs.usda.gov/t-d/pubs/htmlpubs/htm07232816/toc.htm

Other engineers in BOE are already using it as a reference, and it ensures that any project using these guidelines qualifies for both state and federal grant funding. for equestrian trails

Regards,
Mary Benson

# CITY OF LOS ANGELES

CALIFORNIA

**KAREN BASS**
MAYOR

**DEPARTMENT OF RECREATION AND PARKS**

**STEFANIE SMITH**
COMMITTEE CHAIR

**Los Angeles Equine Advisory Committee**

**SCOTT PEREZ**
MAYOR APPOINTEE

**T HAGANS**
DISTRICT 1
VICE PRESIDENT

**VCANT**
DISTRICT 2

**BRIAN WALSH**
DISTRICT 3

**VACANT**
DISTRICT 4

**DAVID RAMEY, DVM**
DISTRICT 5

**MARY BENSON**
DISTRICT 6
PRESIDENT

**Los Angeles Equine Advisory Committee**

**GERONIMO BUGARIN**
DISTRICT 7

**TODD LAVERGNE**
DISTRICT 8

VACANT
DISTRICT 9

**KEVIN ATKINS**
DISTRICT 10

**LARRY WATTS**
DISTRICT 11
SECRETARY

**STACIA CRANE**
DISTRICT 12

**GENE GILBERT**
DISTRICT 13

VACANT
DISTRICT 14

**SABRINA SILVER**
DISTRICT 15


March 17, 2025

VIA ELECTRONIC MAIL

Christopher Adams
Department of Public Works, Bureau of Engineering
1149 S Broadway, 6th Floor Mail Stop 939
Los Angeles, CA 90015-2213

**COMMENT REGARDING LA RIVERWAY PHASE IV BIKE PATH PROJECT**
**COUNCIL FILE 23- 0722**
**PROPOSED MITIGATED NEGATIVE DECLARATION SCH - 2025021226**

Dear Mr. Adams:

The Los Angeles Equine Advisory Committee would like to thank members of the Bureau of Engineering for presenting the proposed plan for the Phase IV Bikeway along the Los Angeles River. At the 2/28/2025 virtual meeting as we'll as prior meetings, public comment focused on the danger to equestrians by bifurcating the existing Equestrian Trail to add a bikeway to the trail alignment and separate it with fencing. A3-2

This proposal would impact 100% of the equestrian traffic coming from the north side of the Los Angeles River. It is the finding of the LAEAC that the impact to equestrians cannot be mitigated to a level of insignificance by any type of fence or barrier and an EIR should be required. There is no other access afforded to equestrians between where horses are kept and the historic bridle paths in Griffith Park. Access via the Los Angeles River from decomposed granite equestrian ramps was previously removed. The risk of injury to horses or riders passing each other in opposite directions introduces a new risk because of the reduction in the width from 20 feet (Griffith Park Trail Standard width) to 10 feet. A3-3

The volume of equestrian traffic was not taken into account by the Phase IV study. The demographics of which include young children, novice horseback riders and senior citizens. At A3-4

the meeting several women commented on the combative attitude and intimidation employed by current bicyclists illegally using equestrian trails in Griffith Park. The volume and frequency of equestrian use must be studied and a plan for user conflict considered. A3-4 (cont.)

The LAEAC also questions the jurisdiction of the City in its proposed action. According to maps, the area in question is the jurisdiction of Los Angeles County Flood Control via a flood control easement and the Department of Recreation and Parks over which those easements are granted. The trail alignment has been dedicated and deed recorded as an equestrian trail. A3-5

The third issue is cost. The estimated price tag for the one-mile bikeway is now estimated to be $9 million. Further study should be done to investigate improving the existing bike lane on Zoo Drive to Forest Lawn Drive which would leave the historic equestrian access intact. A3-6

In conclusion, the EAC would be pleased to lend its experience and share its comprehensive database of trail documents with all city departments concerning recreational trails. Please feel free to contact me at (818) 720-7062 or Mary.Benson@lacity.org with any additional questions or comments. A3-7

Before proceeding with the project, the LAEAC requests a response to the following comments:

**Safety and Trail Use**

1. Department of Transportation has proposed another bicycle path along the same general route. https://ladotlivablestreets.org/projects/forest-lawn. A3-8
Please provide a statement to justify why this is not a redundancy of providing two bicycle path improvements within 200 feet of one another.
2. Please also describe the signage and any other measures proposed to arbitrate user conflicts and possible aggression by bicyclists. A3-9
3. Please include an analysis of the impacts from LAMC 63.44 related to historic bridle paths and equine animals as Amended by Ord. No. 160,401, Eff. 11/1/85.) and Ord. No. 184,021, Eff. 1/27/16.) A3-10
4. Bike lane improvements are also planned by the City of Los Angeles, Department of Recreation and Parks along Zoo Drive connecting to Forest Lawn Drive. This will give bicyclists two alternative routes along the same alignment through the area. The Zoo Drive alignment gives bicyclists access to the LA Zoo, Travel Town, and the Autry Museum. Define the overriding consideration logic used to provide two rights-of-way to one group of users while removing 50% of the access and creating a sub-standard bridle path for an existing group of users with no other means of access to the park. A3-11
5. Please explain how the proposed bike path is exempt from LAMC 63.44 as Amended by Ord. No. 180,461, Eff. 2/8/09 A3-12
6. Conversion of bridle trails to multi-use trails has resulted in frequent and major injuries from user conflict and resulting in disenfranchisement of equestrians. How will this additional risk be mitigated? A3-13

JURISDICTION

7. Please provide documentation that transfers jurisdiction for the deed-recorded LA COUNTY Bridle Trail easement to the City of Los Angeles. A3-14

8. Please provide documentation granting jurisdiction and authority by the City of Burbank to allow bicycle use of the historic Mariposa Equestrian Bridge. A3-15

9. When was the conversion of a dedicated bridle trail to multi-use allowing bicycles approved by the County of Los Angeles? A3-16

TRAFFIC

10. LADOT Mobility Plan excludes equestrian use from consideration. Please provide an additional equestrian traffic study of the existing use during a time when the trail is not closed. Sections of the trail were closed for maintenance at the time cameras were posted. Please conduct a new traffic survey to assess the current level of equestrian use along the proposed route and the expected bicycle use. A3-17

11. Please describe how emergency access to the proposed trail alignment will be affected and the mitigation proposed in case of the need for emergency access A3-18

12. When will the project include a signal or RRFB crossing for Forest Lawn Drive? A3-19

13. Who will be responsible for maintaining the proposed multi-use trail? A3-20

14. Please include provisions for signage prohibiting bicyclists from using historic bridle trails in Griffith Park. A3-21

15. Are there any current or future plans to convert equestrian tunnels to multi-use? A3-22

HISTORIC RESOURCES

16. Are mapped bridle trails listed as an element of the historic resources of Griffith Park? (HCM942) A3-23

17. Please analyze the footing used on the Mariposa Bridge and its suitability for bicycles. A3-24

18. Was the conversion of a dedicated bridle trail to multi-use approved by the County of Los Angeles Department of Parks and Recreation? A3-25

19. Will any mature trees be removed for the paved bike path? A3-26

20. Please analyze the impact of bicycle traffic and its proximity to Martinez Arena A3-27

DESIGN GUIDELINES

21. What design standards and specifications does the City have for the construction of bridle trails? A3-28

22. What training has the Bureau of Engineering undergone for the design of recreational trails? A3-29

23. Has any member of the current City of Los Angeles, Bureau of Engineering staff ever attended the annual State of California Trails and Greenways Conference? A3-30

24. What is the proposed surface for the reduced-width bridle trail? Would a surface like wood mulch or sand, interspaced with trail bars, be considered to discourage bicycles from using the equestrian side of the trail? A3-31

25. Has there been any study on the increased risk of injury to equestrians, or to their horses for horses passing in opposite directions? A3-32

26. What is the standard width of historic bridle trails in Griffith Park? A3-33

27. Has the City of Los Angeles retained any consultant or firm specializing in equestrian trail design? A3-34

28. Does the Department of Transportation agree to include detailed planning for equestrian trails in their next Mobility transportation plan? A3-35

29. Has the Bureau of Engineering considered including other deed recorded Equestrian trail easements in NavigateLA? A3-36

Sincerely,

Mary Benson

Mary Benson, President
Los Angeles Equine Advisory Committee

cc:
City Council
Karen Bass, Mayor
Vincent Bertoni, Planning
Ted Allen, BOE
Osama Younan, DBS
Jimmy Kim, RAP
Joe Salaices, RAP
Stefanie Smith, RAP

---

LAMC 63.44 (B)(16) No person shall drive or ride any cycle or vehicle, whether powered by a motor or human power, except on paths, roads or drives designed and provided for such purposes

---

**Letter A3**
Mary Benson, President
Los Angeles Equine Advisory Committee
**City of Los Angeles**
March 27, 2025

*Response A3-1*

The commenter notes that the attached letter was approved by the Los Angeles Equine Advisory Committee and provides a link to a reference document prepared by the United States Department of Agriculture (USDA) United States Forest Service (USFS) titled *Equestrian Design Guidebook for Trails, Trailheads, and Campgrounds*, prepared in cooperation with the United States Department of Transportation (USDOT), Federal Highway Administration (FHWA). While the Project design team did refer to the stated guidebook and the City's Complete Streets Guidelines during the design process, this comment does not raise any substantive issues regarding the Project or the Draft IS/MND.

*Response A3-2*

The commenter provides an introduction to the comments provided in the comment letter, noting that public comments provided at prior meetings focused on safety issues related to interactions between equestrian users and other users such as cyclists recreating in the area. Responses to the comments raised in this letter are provided below in **Responses A3-3 through A3-36**.

*Response A3-3*

The commenter suggests that the Project would affect the entirety of equestrian traffic between the Los Angeles Equestrian Center and other equestrian-related uses to the north of the Project Site and the bridle trail network within Griffith Park to the south of the Project Site beyond the 134 Freeway. The commenter further argues that "the impact to equestrians cannot be mitigated to a level of insignificance by any type of fence or barrier", but fails to articulate the nature of the environmental impacts at issue or point to any analysis presented in the Draft IS/MND or any specific impacts that they claim are significant and unavoidable, thus warranting the preparation of an Environmental Impact Report (EIR). With regard to the Project affecting 100 percent of the equestrian traffic between Griffith Park and the LA Equestrian Center, to the contrary, as noted in **Master Response No. 2: Project Site Existing Ownership and Authorized Uses**, trail user count data gathered at three locations within and near the Project Site show that the vast majority of equestrian users travel between Griffith Park and the equestrian uses north of the River channel via the Mariposa Bridge westward to Tunnel 7 and then under Forest Lawn Drive to the larger Griffith Park Trails system. Likewise, equestrians traveling from Griffith Park overwhelmingly follow the same route when traveling back to the north side of the River channel via Tunnel 7 and the Mariposa Bridge. More specifically, based on the weekday and weekend count data gathered in late October and early November 2024, only 6 equestrian users were noted during a 12-hour period on a weekday at the Tunnel 6 outlet to the Project alignment, and zero equestrian users were recorded during the entire 12-hour weekend day at this location. This is contrasted by the nearly 200 equestrian user counts at the Mariposa Bridge and Main Trail locations on a weekday and nearly 700 equestrian user counts on weekends at these two locations. As such, these empirical data demonstrate that equestrians users traveling between

the north side of the River channel and Griffith Park rarely utilize the Project alignment for access to or from Griffith Park; while it is acknowledged that this segment of trail is utilized by equestrians and other users, it is utilized much less frequently by equestrians than suggested by the commenter.

With regard to safety issues related to interactions between horses and other user groups such as cyclists, as shown in the Project plans, the proposed bike path component of the Project would terminate at the western end of the alignment, and the turnaround location for that portion of the path would be fully secured by robust fencing, gates, operable locks for emergency and maintenance access, and signage to preclude non-equestrian users from proceeding beyond the Project Site to the equestrian- and pedestrian-only path to the west (refer to **Master Response No. 1: Separation of Path-Trail User Types**). It should be noted that the western terminus of the Project alignment is located approximately 800 feet to the east of the Mariposa Bridge, which represents a substantial spatial separation between the western terminus of the Project and the most frequently traveled equestrian route between Griffith Park and uses to the north of the River channel.

As relates to the proposed width of the equestrian trail, the Project Site is physically constrained by the presence of the River channel and the 134 Freeway to the immediate north and south, respectively. While every effort was made to accommodate the widest possible trail width for equestrian users, there is simply not enough ROW area to provide any greater than a 10-foot minimum width while still providing a bike path that meets the necessary design requirements for safety. The equestrian path was designed consistent with the Los Angeles River Master Plan Design Guidelines (Appendix I of the Los Angeles River Master Plan prepared by the Los Angeles County Department of Public Works) for multiuse trails along the Los Angeles River. As shown on page 63 of the Design Guidelines, the compacted earth equestrian trail components of multiuse trails with a combined bicycle/pedestrian path (such as the Project) should be a minimum of 4 feet in width and separated from the bicycle/pedestrian facility with a buffer area or physical divider; for River segments where maximum ROW width exists (i.e., for the widest multiuse trail projects), the Design Guidelines require a minimum 8-foot width for equestrian components of multiuse trails. Given the space constraints along the Project ROW there is not adequate space for a buffer between the equestrian and bicycle/pedestrian components, and thus the Project incorporates a physical barrier in the form of an 8-foot-tall continuous fence. It should be noted that the initial design of the Project included only an 8-foot minimum width for the equestrian trail, but the trail component was widened to be a minimum of 10 feet wide in direct response to input received from the equestrian community that the minimum acceptable width is 10 feet. This widening required encroachment into Caltrans ROW, and thus resulted in the need for additional coordination, but the City has done so in order to provide the optimal design of the proposed facilities given the physical constraints affecting the Project Site.

In summary, there is no additional space within the Project alignment to accommodate a wider ROW for the equestrian path without removing the bicycle/pedestrian component from the Project; however, because one of the main objectives of the Project is to provide an additional segment of bike path along the larger LA River Bikeway, there is no means to widen the equestrian path beyond the proposed 10-foot minimum width (and thus also widening to a 20-foot width) while still achieving the Project objectives. Nonetheless, the 10-foot width is consistent with, and exceeds minimum recommended widths of, applicable equestrian trail

design standards in the Los Angeles River Master Plan. Furthermore, other equestrian trail features in the immediate area that are heavily utilized by equestrians, including the Mariposa Bridge and Tunnels 6 and 7 are well below 10 feet in width, and are also enclosed on all sides, similar to the Project's equestrian trail component, yet these features do not appear to present safety risks to equestrian users as the commenter claims would result from the Project due to the limited trail width. As such, the Project is not expected to result in any safety risks to equestrian trail users due to the Project's design and proposed trail width.

*Response A3-4*

The commenter suggests that the Draft IS/MND did not consider equestrian trail user counts in the analysis of impacts, and also provides additional information about the nature of equestrian trail users in the area. As noted in **Master Response No. 2: Project Site Existing Ownership and Authorized Uses**, existing trail user count data were gathered to help the City understand the existing trail usage levels and overall activity in the Project area. The data were not relied upon for any quantitative analysis, as the Project is intended to accommodate additional user types (bicycles) within the Project alignment while maintaining access for equestrians, but is not anticipated to result in a substantial increase in ridership and trail use in the area. As shown by the data, and as noted previously, the vast majority of equestrian users do not currently utilize the Project Site for primary access to and from Griffith Park under the 134 Freeway, but rather head west from the Mariposa Bridge to Tunnel 7. The data demonstrate that the Project would not have a meaningful effect on equestrian travel between the LA Equestrian Center and uses to the north of the River channel and Griffith Park. With regard to the variety of equestrian users, their demographics, riding experience, perceived attitudes and conflicts with other path and trail users (including cyclists accessing Griffith Park equestrian trails illegally), while a consideration for decision-makers, are not germane to the range of analyses presented in the Draft IS/MND. The commenter's assertion that the Project will substantially contribute to conflicts between user groups is speculative and not supported by evidence. Incidental conflicts between users may occur regardless of whether or not the Project is implemented. However, the Project is designed to maintain physical separation of users to preclude the potential for physical interactions or confrontations between users types (also see **Master Response No. 1: Separation of Path-Trail User Types**).

*Response A3-5*

See **Master Response No. 2: Project Site Existing Ownership and Authorized Uses**; as noted therein, the existing ownership and jurisdiction discussion has been modified as needed, as shown in **Clarifications and Modifications** of this Final IS/MND. The text revisions do not change the analysis or conclusions presented in the Draft IS/MND; no further response is warranted.

*Response A3-6*

The commenter notes the projected cost of the Project and suggests consideration of improving existing bike lanes within Griffith Park in lieu of the Project's proposed bike path component. While the decision-makers will consider all public comments submitted regarding the Project, this comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

*Response A3-7*

The commenter provides a concluding statement regarding the comments provided above but does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

*Response A3-8*

The bike path noted by the commenter is the Forest Lawn Drive bike lane, which is a different facility that runs within Griffith Park and will connect to the LA River Bike Path. Nonetheless, other proposed bike path facilities in the area are not relevant to the Project, as the Project is intended to extend the LA River Bikeway within the Project Site adjacent to the River channel. While other bicycle facilities may currently exist or be planned in the area, the Project would still be necessary to provide a continuous multiuse facility immediately adjacent to the River from its headwaters to the Pacific Ocean. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

*Response A3-9*

See **Master Response No. 1: Separation of Path-Trail User Types**. Signage would be provided to clearly illustrate user types and access restrictions for both the bicycle/pedestrian path and equestrian trail components of the Project. Furthermore, user types would be physically separated to preclude the potential for interactions or conflicts with different user types. Lastly, it is speculative to assume that extending the existing LA River Bikeway within the Project Site would contribute to a notable increase in conflicts between user groups and/or perceived "aggression" by cyclists, such that the Project could result in safety risks. This assertion is not supported by evidence, and thus no further response is necessary.

*Response A3-10*

The commenter suggests that the Draft IS/MND include an analysis of the impacts from LAMC 63.44 related to historic bridle paths and equine animals; however, it is not clear what portion of the code section is being referenced. LAMC Section 63.44 prescribes allowable activities and prohibitions for all City parks, including Griffith Park and other City park facilities in the Project area. The Project would be operated by LADOT as part of the LA River Bikeway system, and would not be considered a City park that is subject to the requirements of LAMC Section 63.44, including requirements related to hours of operation, as the LA River Bikeway is considered a 24-hour accessible transportation facility rather than a park facility. Design features such as gates and locks to restrict access to Griffith Park from the Project Site during non-operating Park hours would be coordinated between LADOT and RAP as part of the MOU to be executed for the Project regarding long-term operations and maintenance of the Project (see **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**).

With regard to historic bridle trails, the code does not require anything of relevance specific to the Project Site. The Project Site is part of Griffith Park, LAHCM No. 942. Impacts to the trail network of the historic district Griffith Park are covered in Page 49-51 of the Cultural Resources Assessment (Appendix D of the Draft IS/MND).

As noted therein, the Project involves altering the existing service road to construct a new multi-use trail segment along the south side of the River from the existing western terminus of the Los Angeles River Bikeway. The trail segment would include a new paved path on the northern side of the proposed trail alignment for use by pedestrians and cyclists, an equestrian-only unpaved trail on the south side of the alignment, and associated retaining walls, concrete fencing, street lighting path lighting, and limited utility relocations. The Area of Direct Impact includes the actual paths to be altered or newly installed, including their associated amenities such as lighting and retaining walls, and all construction staging areas.

Although the network of trails in Griffith Park contributes to the setting of the District, this location has already been disturbed with the construction of the existing pavement within the Project Site. Additionally, Griffith Park is an urban park that has been modernized, altered, and expanded with additional amenities for nearly a century. Ultimately, only a small portion (roughly 4,600 feet) of Griffith Park will be altered as a result of the Project, a change that will have minimal effect on the setting of the District. All other aspects of the resource's integrity will be maintained completely.

The Project alignment will provide additional access for bike, pedestrian, and equestrian activities, and the changes associated with the Project would mainly be at the ground level of an existing service road. The current view of an informal path and various plantings will now be a view of paved pedestrian, equestrian, and bike trails with accompanying lighting, retaining wall, and associated landscaping. The Project represents a minor change to the overall setting of Griffith Park and the Equestrian Center that will not impact the resources' significance or integrity.

The Project will not substantially change the overall aesthetic of Griffith Park, the existing trails and bridges, or their surrounding areas. The Project would not cause any listed, eligible or potentially eligible resources to be ineligible for national, state, or local listing. As such, the Project would not have indirect impacts to any historical resources.

*Response A3-11*

See **Response A3-8** above. The existence of other bicycle-accessible facilities in the area is not germane to the analysis presented in the Draft IS/MND as the intent of the document is to analyze the potential environmental effects of the Project, and not to argue or justify the merits of the Project. Additionally, the commenter's assertion that the Project would provide a substandard facility for equestrians is not supported by evidence, and further, as noted above and discussed in detail in **Master Response No. 2: Project Site Existing Ownership and Authorized Uses**, the vast majority of equestrian users currently do not utilize the Project Site for access between Griffith Park and the LA Equestrian Center; as such, the commenter's statement that equestrians have "no other means of access to the park" is erroneous. No further response is warranted.

*Response A3-12*

See **Response A3-10** above. The proposed bike path would not be located within a City park and thus is not subject to LAMC Section 63.44; nonetheless, the proposed bike path would be designed and designated for cycling purposes, consistent with LAMC Section 63.44(B)(16),

which states, “No person shall drive or ride any cycle or vehicle, whether powered by a motor or human power, except on paths, roads or drives designed and provided for such purposes.” No further response is necessary.

*Response A3-13*

The commenter suggests that previous projects to convert existing equestrian trails to multi use trails has resulted in “frequent and major injuries from user conflict and resulting in disenfranchisement of equestrians.” However, this statement is not supported by any evidence, and this comment does not articulate specifically how the conversion of trails to serve multiple user groups results in additional risks. As noted in **Master Response No. 1: Separation of Path-Trail User Types**, the Project would be designed to fully separate user types along the entirety of the Project alignment, and thus there would be no potential for physical interactions between user groups that could contribute to safety risks to equestrians or other user types.

*Response A3-14*

The commenter requests “documentation that transfers jurisdiction for the deed-recorded LA COUNTY Bridle Trail easement to the City of Los Angeles.” However, the documentation of deed transfer is currently not available, but LADOT will be working with appropriate agencies to obtain the easements of the Project area. While these records are not presented in the Draft IS/MND, the commenter does not provide any information as to how this information would affect the analysis of impacts presented in the Draft IS/MND. The commenter fails to identify any issues or analysis discussed in the Draft IS/MND that would be materially affected by the requested documents or the information they provide, as the Project is being directly coordinated with all relevant agencies and City departments that have ownership, jurisdiction, or discretionary authority over one or more aspects of the Project. Accordingly, the inclusion of additional information regarding easements and jurisdictional boundaries do not meaningfully affect the analysis or conclusions presented in the Draft IS/MND. No further response is warranted.

*Response A3-15*

The commenter suggests that documentation must be provided to show that the City of Burbank would allow access for cyclists to utilize the Mariposa Bridge. No such documentation exists, as the Project would not require or contribute to the use of the Mariposa Bridge by cyclists, as all bicycle and pedestrian users along the Project’s proposed bicycle path would be required to turn back and head east toward Riverside Drive, and would not have the ability to continue west past the turnaround barrier to Mariposa Bridge and other facilities that currently, and would continue to, prohibit use by cyclists. No further response is warranted.

*Response A3-16*

The commenter inquires, “When was the conversion of a dedicated bridle trail to multi-use allowing bicycles approved by the County of Los Angeles?” No such conversion was approved, as the Project does not involve any physical improvements beyond the Project Site boundaries, including the Mariposa Bridge. No further comments is necessary.

*Response A3-17*

Refer to **Response B4-5** regarding trail count data and typical trail use activity in the Project area. With regard to preparation of an additional traffic study, no traffic study is required to be prepared for multiuse recreational trails, based on feedback provided by LADOT, as these facilities are not subject to the same kind of analysis as a traditional land use development project because they do not generate additional vehicle miles traveled (VMT). As such, no traffic analysis was prepared for the Project, but the Project is designed to safely accommodate the various user types on the respective trail and path facilities at or greater than existing user volumes.

*Response A3-18*

Emergency access for police, fire, and emergency medical services vehicles is currently provided via gates at Forest Lawn Drive on the west and the ramp leading from Riverside Drive on the east. Access would continue to be provided at the same location on the west, providing unobstructed access to the equestrian trail from the Forest Lawn Drive gate, while the existing bike path gate on the east would be removed and a new gate/barrier would be constructed at the western terminus of the Project Site, thereby providing unobstructed access to the full length of the bicycle/pedestrian component of the Project from Riverside Drive.

*Response A3-19*

Forest Lawn Drive is outside of the scope of work for the Project and would be analyzed in Caltrans' planning grant study. No further response is warranted.

*Response A3-20*

See **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**. The Project would be maintained by LADOT or its designee through a MOU with BOE, which would ensure that the Project operates as proposed.

*Response A3-21*

As noted in **Master Response No. 1: Separation of Path-Trail User Types**, the Project would include signage to clearly indicate that bicycles are prohibited on all Griffith Park bridle trails.

*Response A3-22*

The City has no plans to convert any equestrian tunnels to multiuse facilities. In fact, the Project is designed to ensure that the equestrian trail component has dedicated access to Tunnel 6 to prevent access by cyclists from unauthorized access from the proposed bike path component.

*Response A3-23*

While the mapped bridle trails are not explicitly called out as contributing elements in the Los Angeles Historic-Cultural Monument (HCM) nomination form for Griffith Park, they were

assumed as such for purposes of this Project. The HCM nomination form for Griffith Park prepared in 2008 describes the following:

> *Circulation through Griffith Park is achieved through 53 miles of hiking and bridle trails, in addition to various automobile roads which integrate and correspond to the natural terrain of the Park. The majority of the built amenities in the Park are located off of the auto roads, which themselves are primarily located at the lower lying perimeter areas of the Park (ICF Jones and Stokes, 2008).*

While the nomination form describes the various features and amenities of Griffith Park including the bridle trails, it was unclear which specific trails were significant, retained integrity and were contributing features to the overall Historic District. After consultation with the Los Angeles City Planning's Office of Historic Resources (OHR), ESA considered the trails and tunnels as contributing resources to LAHCM No. 942 for purposes of the Project, and analyzed the impacts of the Project as follows:

> *The trail network intersects the Project Area and runs parallel to the 134 Freeway north of Travel Town and the L.A. Live Steamers resources. The 2008 supplemental nomination describes the area north of the 134 Freeway including that there are "two concrete water drainage tunnels running below the highway" (ICF Jones & Stokes, 2008). ESA observed the tunnels during the site visit, noting the numbers 6 and 7 and that the tunnels provide access to Griffith Park trails to the south. While these were likely constructed as infrastructure to allow for water runoff from Griffith Park into the LAR Channel, the tunnels serve as a connection to the south end of Griffith Park and should be considered features of the District for the purposes of this report. They do not currently connect with the existing bike path nor the extension proposed by this Project.*
>
> *Although the network of trails in Griffith Park contributes to the setting of the District, this location has already been disturbed with the construction of the existing pavement in the Project Site. Additionally, Griffith Park is an urban park that has been modernized, altered, and expanded with additional amenities for nearly a century. Ultimately, only a small portion (roughly 4,600 feet) of Griffith Park will be altered as a result of the Project, a change that will have minimal effect on the setting of the District. All other aspects of the resource's integrity will be maintained completely.*
>
> *The Project alignment will provide additional access for bike, pedestrian, and equestrian activities, and the changes associated with the Project would mainly be at the ground level of an existing service road. The current view of an informal path and various plantings will now be a view of paved pedestrian, equestrian, and bike trails with accompanying lighting, retaining wall, and associated landscaping. The Project represents a minor change to the overall setting of Griffith Park and the Equestrian Center that will not impact the resources' significance or integrity.*
>
> *The Project will not substantially change the overall aesthetic of Griffith Park, the existing trails and bridges, or their surrounding areas. The Project would not cause any listed, eligible or potentially eligible resources to be ineligible for national, state,*

*or local listing. As such, the Project would not have indirect impacts to any historical resources.*

Although this comment inquires about the nature of historic resources in the Project area, it does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A3-24*

The commenter requests analysis of the footing used on the Mariposa Bridge and its suitability for bicycles; however, as noted above, the Mariposa Bridge is not a part of the Project and the Project would not direct cyclists to, or otherwise increase the likelihood of cyclists illegally using, the Mariposa Bridge. As noted in **Master Response No. 1: Separation of Path-Trail User Types**, the Project would not allow cyclists to proceed west from the western terminus of the Project's bike path component. As such, consideration of physical effects on the Mariposa Bridge structure, whether direct or indirect, is not necessary.

*Response A3-25*

The commenter questions if "the conversion of a dedicated bridle trail to multi-use approved by the County of Los Angeles Department of Parks and Recreation?" The Project, which involves converting the existing trail/road to a multiuse facility consistent with the Los Angeles River Master Plan, is owned by RAP and under the land use jurisdiction of the City. No further response is necessary.

*Response A3-26*

See **Master Response No. 4: Tree Replacement and Monitoring** regarding Project-related tree removals along the Project ROW.

*Response A3-27*

The commenter requests analysis of the impact of bicycle traffic and its proximity to Martinez Arena, but does not specify the nature of the analysis or what specific impacts are of concern. Bicycles currently utilize numerous bike paths and other facilities in the Project area, but can also legally operate within public street ROWs irrespective of the presence of striped bike lanes or other bicycle facilities.

*Response A3-28*

The commenter asks what design standards were followed regarding the equestrian trail component of the Project. The City followed the USFS Equestrian Design Guidebook cited by the commenter, as well as the City of Los Angeles' Complete Streets Design Guide for trail design guidance. Additionally, as discussed in **Response A3-3** above, the Project's multiuse facility design is consistent with the applicable design guidelines in the Los Angeles River Master Plan.

*Response A3-29*

The commenter asks what training Bureau of Engineering staff have undergone for the design of recreational trails. To clarify, the Project was designed by the City's Bureau of Street Services staff, who include licensed civil engineers qualified to design transportation facilities including recreational trails. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A3-30*

The commenter asks if City staff ever attended the annual State of California Trails and Greenways Conference. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A3-31*

The commenter asks what the proposed surface is for the reduced-width bridle trail. The tread surface would consist of decomposed granite/crushed rock with fines. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A3-32*

The commenter asks, "Has there been any study on the increased risk of injury to equestrians, or to their horses for horses passing in opposite directions?" No such study was performed for the Project, as the Project has been designed to be consistent with other similar multiuse trails involving an equestrian trail component. The commenter makes repeated statements regarding acute hazards associated with horses using trail under existing conditions, including with regard to interactions with cyclists noted by many commenters, but there is (1) no practical way to study these incidental occurrences or (2) established method by which to meaningfully assess potential impacts on the environment. The commenter fails to identify how the discussion of a specific analysis or impact would benefit or be clarified from such a study, were it possible to conduct. However, as discussed in **Master Response No. 1: Separation of Path-Trail User Types**, the Project's equestrian trail design was reviewed by iAssist Equestrians in April 2025 (see Appendix L of this Final IS/MND) to assess the safety and function of the proposed facilities; overall, based on its review of the Project, iAssist Equestrians concluded that the Project, if implemented as planned, will not adversely impact users of the existing equestrian trail, and is adequate to preserve the existing equestrian usages of the trail within the Project Site. No further response is necessary.

*Response A3-33*

The commenter asks for the standard width of historic bridle trails in Griffith Park. The historic bridle trail width in Griffith Park is not relevant to the Project, as the Project has been designed to accommodate the necessary user group facilities within a constrained ROW; while it is acknowledged, as noted in other public comments received, that the trail widths in Griffith Park are 20 feet minimum, such widths are not physically feasible for the Project. Regardless, this comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A3-34*

The commenter asks if the City of Los Angeles has retained any consultant or firm specializing in equestrian trail design. The City has not retained any such consultant or firm, as the City's internal Bureau of Street Services (BSS) staff designed the Project. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A3-35*

The commenter asks if LADOT would agree to include detailed planning for equestrian trails in their next Mobility transportation plan. The Mobility Plan was prepared by the Department of City Planning, and not LADOT. Nonetheless, this comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A3-36*

The commenter asks if the Bureau of Engineering has considered including other deed recorded Equestrian trail easements in NavigateLA. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

# LETTER A4

From: **thagans equinela** <thagansequinela@gmail.com>
Date: Thu, Mar 27, 2025 at 12:09 PM
Subject: LA River Phase IV Bike Path_CF 23-0722
To: <Christopher.adams@lacity.org>

Hi Christopher,

While I support the expansion of active transportation infrastructure across Los Angeles, the proposed Phase IV Bike Path represents a redundant and fiscally questionable investment, particularly given the forthcoming protected bike lanes and connectivity improvements planned just blocks away on Zoo Drive. The Phase IV alignment offers minimal added value while duplicating services and consuming over $9 million in public funds—at a time of serious fiscal constraint. These resources would have far greater impact if invested in communities that currently lack safe cycling infrastructure. A4-1

In addition, the proposed design raises significant trail safety concerns for equestrian users. The equestrian trail is confined to a narrow corridor in certain segments (as narrow as 8 feet) and is directly bordered by fencing and built infrastructure.
This raises concerns about inadequate shy distance- the lateral space horses instinctively need to sidestep or "shy" away from perceived threats. According to the U.S. Forest Service's Equestrian Design Guidebook, horses often shy 2 to 4 feet away from vertical objects, and trail design must accommodate this behavior for rider safety (USFS, 2007). Without sufficient lateral clearance from fencing and barriers, horses may have no safe space to react, increasing the risk of accidents, especially in constrained segments with limited passing room. A4-2

Moreover, the project's use of visual screening on fencing further compromises equestrian safety. As stated in the same guidebook:
"*Horses feel more comfortable when they can see what is around them. Obstructions such as high walls, dense vegetation, or fencing can increase anxiety and the likelihood of spooking-especially when sounds or movement come from behind or beside the barrier.*"
By obstructing views of approaching pedestrians, cyclists, or wildlife, the design increases the unpredictability of the trail environment, making it more likely that horses will startle or react defensively. This not only compromises rider safety but could lead to avoidable conflicts between trail users. A4-3

Furthermore, the project would remove mature trees along the proposed alignment-trees that are integral to Griffith Park's ecology, identity, and climate resilience. These trees provide cooling shade, habitat, air purification, and carbon sequestration-services that take decades to restore. Replanting cannot fully mitigate these losses. When assessed cumulatively with other nearby projects (e.g., Zoo Drive), these impacts should be considered significant under CEQA. A4-4

Given the design deficiencies, environmental consequences, and redundant alignment, the use of a Mitigated Negative Declaration is insufficient. A full Environmental Impact Report is warranted to assess the project's cumulative, ecological, and user-safety impacts. A4-5

Thank you for the opportunity to comment. I respectfully urge the city to reconsider advancing this project without a comprehensive environmental review that fully addresses its equity, design, and ecological implications. A4-6

T. Hagans

**Letter A4**
T. Hagans
Los Angeles Equine Advisory Committee
**City of Los Angeles**
March 27, 2025

*Response A4-1*

See **Response A3-6** above. This comment does not raise a substantive issue regarding the Draft IS/MND or the analysis presented therein. No further response is warranted.

*Response A4-2*

The commenter indicates that the proposed minimum 8-foot width of the equestrian trail component of the Project is too narrow and cites USFS trail design guidance and offers insights into horse behavior, suggesting that the proposed design would result in significant safety risks. As noted in **Master Response No. 1: Separation of Path-Trail User Types**, however, the Project would provide continuous separation between bicycles/pedestrians and equestrian users and the equestrian trail component has been designed consistent with the trail design guidelines contained in the Los Angeles River Master Plan. The commenter's assertion that there is not sufficient lateral distance to allow for horses to adequately react is not supported by evidence and does not relate to any specific environmental impacts. No further response is warranted.

*Response A4-3*

The commenter suggests that visual obstructions, including fencing between the proposed bicycle and equestrian facilities, would limit the horses' ability to see what is around them and therefore could lead to increased risk of startling the animals and creating a safety impact to this user group. However, comments received by other stakeholders in the equestrian community have suggested the contrary, stating that horses should not be able to see what is approaching so as not to startle the animals. Based on the conflicting input received in regard to this issue, there appears to be a difference of opinion regarding the appropriateness of visual screening along the proposed 8-foot chain link fence separating the two components. Given the physical constraints along the ROW, there is not adequate space to provide a buffer area such that the proposed fence separating the facilities could be removed from the design (and in doing so remove any visual obstructions). Nonetheless, the City is committed to working with the equestrian community to determine the most appropriate design for the separation fence to maximize safety for all user groups, including adding a visual screening element if preferred.

*Response A4-4*

The commenter suggests that the removal of mature trees along the Project ROW cannot be mitigated and that the Project-related removals would also contribute to significant cumulative effects. However, as discussed in **Master Response No. 4: Tree Replacement and Monitoring**, impacts to urban trees (including protected and native trees) are evaluated based on the Project's compliance with existing laws and regulations regarding tree removals, such as consistency with the City's Protected Tree Ordinance. As such, compliance with the requirements of the ordinance would preclude the potential for significant environmental effects.

Likewise, other projects in the City of Los Angeles or other nearby jurisdictions would also be required to comply with the local tree ordinances in effect, such that they would not result in significant adverse effects that could contribute to a cumulative impact. As noted in Section 4.4, *Biological Resources*, of the Draft IS/MND, impacts to trees would be less than significant with mitigation. No further response is necessary.

*Response A4-5*

The commenter cites design deficiencies (trail width and separation barrier fence), environmental consequences, and redundant alignments in the area as the basis to assert that preparation of an EIR is necessary. However, the Project design meets applicable standards for equestrian trails and is not inherently deficient despite the statements made by the commenter. Furthermore, all impacts were determined to be less than significant (either with or without mitigation measures) in the Draft IS/MND, which is supported by a number of Project-specific technical studies and other supporting analysis, and thus preparation of an EIR is not required under CEQA. And lastly, the presence of other bicycle routes in the Project area is not germane to the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A4-6*

The commenter provides a concluding statement that does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

# LETTER A5

From: **Alex Crow** <alexander.wittan.crow@gmail.com>
Date: Mon, Mar 31, 2025, 11:05 AM
Subject: Griffith Park Advisory Board, Letter Regarding LA River Phase IV
To: <ladot@lacity.org>
Cc: <christopher.adams@lacity.org>, Mehmet Berker <mehmet.berker@lacity.org>

Hello, LADOT team. I am writing on behalf of the Griffith Park Advisory Board. Please find our letter regarding the LA River Phase IV attached. A5-1

Thank you for your time.

--
Alex Crow
Chair, Griffith Park Advisory Board

**Griffith Park Advisory Board**
*Community Stewards of LA's Largest Park & Great Urban Wilderness*
Department of Recreation and Parks, City of Los Angeles
www.laparks.org/griffithpark/advisory

March 31, 2025

Christopher Adams
City of Los Angeles
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

Re: L.A. River Phase IV Bike Path Project Draft IS/MND Comments

Dear Mr. Adams,

The Los Angeles River is a wonderful, and often underutilized resource which our board takes a keen interest in given its proximity to much of Griffith Park. Griffith Park Advisory Board (GPAB) was fortunate enough to receive a presentation from LADOT three years ago that detailed initial plans for this proposed phase (IV) of the LA River Bike Path. We are encouraged to see how this project has evolved through the valuable community feedback from various stakeholders since then. Our board, guided by the Vision for Griffith Park, are large proponents of active transport and have worked hard to shepherd initiatives that hope to expand active transport in and around the park. A5-2

As we have continued to monitor the development of this phase of the river project, and listened to feedback from various park user groups, we have some concerns about the CEQA Initial Study's conclusion that this meets a Mitigated Negative Declaration, and think that more analysis needs to be done. A5-3

- We have heard feedback from other notable stakeholder groups and organizations that they feel the 30-day comment period for the IS/MND has been too short. Extending the comment period would provide these organizations more time to adequately evaluate these documents and provide more detailed feedback. A5-4

- One of the largest areas of concern is regarding necessary tree removal and the ability to adequately mitigate this. The project will require the removal of existing and mature trees on both public ROW (owned by the Department of Recreation and Parks) and CalTrans ROW. Of the combined 77 trees being removed, a total of 26 are protected trees. While we understand there are mitigation measures available, the removal of this A5-5

many, particularly protected, trees is excessive. Three restoration sites are identified - “on-site where available”, Bette Davis Picnic Area, and “Pump 7”.

    - We have yet to see the RAP Forestry Division’s reviews of the matter and are very sensitive to any projects which potentially add undue stress or workload to RAP’s already thinly-stretched department. In short, we are not convinced that this issue can be effectively mitigated to a less than significant impact, particularly as much of the mitigation efforts will fall upon RAP.

    - We are also concerned about who will ultimately be responsible for maintaining this stretch of the bike path. The draft IS/MND states that LADOT has committed to maintaining the entirety of phase IV - can we confirm that this is indeed that case for perpetuity? As stated, RAP’s resources are thinly stretched; so, the prospect of adding yet another area that requires their attention and maintenance would provide undue stress.

A5-5 (cont.)

- At our most recent board meeting we were fortunate enough to receive some updates from representatives from Council District 4. During this presentation we learned that CalTrans has won a grant to study numerous Freeway and Bicycle interactions, which will hopefully be completed later this year. As the project in question constitutes a closed loop for cyclists - where they must dismount, turn around, and return east when they reach the terminus of Phase IV - it brings into question whether this phase should proceed until it is clear what it will ultimately connect to.

A5-6

- Similarly, as we consider the overall goal of the LA River Master Plan to have a unified connection for active transport along the entirety of the LA River, within the constraints of existing infrastructure challenges, it is not clear that this particular phase is best placed on the river itself until and unless we know what it will connect to. Does this create duplicative connectivity that is better served by bolstering active transport lanes within Griffith Park itself?

A5-7

- While there has been some valuable engagement with the Equestrian Community, and they have been proactive in providing feedback, their uneasiness about the safety and effectiveness of this project are a major cause for concern

    - There isn’t a clear consensus about what the most safe and effective design of the fencing should be. The community seems to be pretty split about whether the fencing should obstruct the view of oncoming traffic or not. Without consensus in design features, the project risks ending up a built feature that just isn’t used - much like the North Atwater Bridge.

A5-8

    - The project isn’t clear about minimum widths for the equestrian trail. The virtual public meeting from March 12, 2025 suggests that the minimum width for the entire length is 10 feet; however, the Draft IS/MND says that there is one location where the width drops to 8 feet due to ROW constraints. The community’s feedback has been absolutely consistent about minimum safe passing distance.

A5-9

We appreciate your taking the time to listen to and address our concerns about the project as it currently stands. The goal of increasing active transport connectivity along the LA River is an excellent undertaking and one that we are generally in support of; however, we do question whether more analysis needs to be done before approving a final IS/MND.

A5-10

Thank you and we look forward to seeing your responses to our questions and concerns,

Alex Crow
Chair, Griffith Park Advisory Board

*BOARD MEMBERS: Chair – Alex Crow; Vice Chair – Alex Phillips; Secretary – Jane Carlson;*
*Aaron Chung; Jason Greenwald; Billy Griffin; Amy Gustinic, T. Hagans; Cristian Hamilton; Chris Laib; Sarah Lann*

**Letter A5**
Alex Crow
Chair, Griffith Park Advisory Board
**City of Los Angeles**
March 31, 2025

*Response A5-1*

The commenter notes that the attached letter is submitted on behalf of the Griffith Park Advisory Board. However, this comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. Responses to the comments included in this letter are provided in **Responses A5-2 through A5-10** below.

*Response A5-2*

The commenter expresses support for the Project and notes how the design has evolved based on input from community stakeholders. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A5-3*

The commenter indicates that the Griffith Park Advisory Board does not feel that the Project would qualify for a Mitigated Negative Declaration, and that further analysis is required. However, the commenter fails to note specific impacts or issues that they believe would be significant or what additional analyses are required. No further response is warranted.

*Response A5-4*

The commenter conveys input from stakeholders that the required 30-day public review period for the Draft IS/MND is not adequate and that more time is requested. The City has complied with CEQA requirements by circulating the Draft IS/MND for a 30-day public review and comment period and duly noticing the public review of the document and public meeting to solicit public comment. All comments received during the public comment period have been included in this Final IS/MND and written responses are provided in this section. No further response is necessary.

*Response A5-5*

Refer to **Response A4-4**, above. Tree impacts would be fully mitigated by implementation of Mitigation Measure MM-BIO-1 (see **Clarifications and Modifications** of this Final IS/MND). Also see **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** regarding maintenance of the proposed facilities including tree monitoring. No further response is warranted.

*Response A5-6*

The commenter suggests that the Project should be delayed until a separate study being undertaken by Caltrans regarding future bicycle facilities in the Project area is completed. However, notwithstanding the findings of that unrelated study, the Project is intended to meet its

stated objectives, including most notably the provision of a bike path segment along the Project alignment to extend the LA River Bikeway. Speculation regarding the future connections to other off-site facilities is not appropriate or relevant to the analysis presented in the Draft IS/MND, as the Project is intended to operate as a discrete segment of bike path and equestrian trail irrespective of future plans for new connections to facilities further to the west of the Project Site. Additionally, funding is available for the Project at this time. Such future connections would be the subject of additional planning studies and environmental review in coordination with Caltrans, as appropriate, once a design concept has been developed, but these are beyond the scope of the Project and the analysis presented in the Draft IS/MND.

*Response A5-7*

The commenter questions the need for and merits of the Project given there could be other potential alignments in the Project area that could accommodate a new bike path. There are a number of other transportation projects as well as the DWP Headworks bike path that could occur in the area. However, RAP would have discretion as to what projects are needed within Griffith Park. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A5-8*

Refer to **Response A4-3** above regarding the difference of opinion among equestrian stakeholders regarding the design and transparency of the proposed separation fence between proposed equestrian trail and bike path components. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A5-9*

The commenter notes that the stated minimum width noted in the Draft IS/MND is not consistent with information provided by the City at the Public Meeting on March 12, 2025, and is indicated in the Draft IS/MND as being 10 feet wide except for one location where the width narrows to 8 feet given a ROW constraint. However, the design provides a continuous 10-foot width along the entire alignment, and thus the text in the Draft IS/MND has been updated to reflect the current design as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response A5-10*

The commenter provides a concluding statement that does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

**LETTER A6**

Chris Adams
Environmental Management Group | Environmental Specialist III
Bureau of Engineering | Department of Public Works
1149 S. Broadway, Suite 600
Los Angeles, CA 90015
Cell: 818.233.9026 (preferred) Office: 213.485.5910

---------- Forwarded message ---------
From: **Elena Maggioni** <elena.maggioni@lacity.org>
Date: Mon, Mar 31, 2025, 12:14 PM
Subject: LA River Phase IV Bike Path
To: Christopher Adams <christopher.adams@lacity.org>

Please see here attached RAP's comments to the IS/MND.

A6-1

Thank you for your consideration

Elena Maggioni, Ph.D.
Environmental Supervisor
DEPARTMENT OF RECREATION AND PARKS
Phone (213)482-6980
Cell (213) 332-7938
e-mail elena maggioni@lacity org
221 N. Figueroa St., Room 400 MS 682
Los Angeles, CA 90012

DEPARTMENT OF RECREATION AND PARKS

BOARD OF COMMISSIONERS

RENATA SIMRIL
PRESIDENT

LUIS SANCHEZ
VICE PRESIDENT

FIONA HUTTON
MARIE LLOYD
BENNY TRAN

TAKISHA SARDIN
BOARD SECRETARY
(213) 202-2640

City of Los Angeles
California

KAREN BASS
MAYOR

JIMMY KIM
GENERAL MANAGER

MATTHEW RUDNICK
EXECUTIVE OFFICER

CATHIE SANTO DOMINGO
ASSISTANT GENERAL MANAGER

BRENDA AGUIRRE
ASSISTANT GENERAL MANAGER

CHINYERE STONEHAM
ASSISTANT GENERAL MANAGER
(213) 202-2633

March 31, 2025

**Bureau of Engineering**
**Environmental Management Group,**
**Attention: Christopher Adams**
**1149 S. Broadway, 6th Floor**
**Los Angeles, CA 90015.**

**RE: DRAFT Initial Study/Mitigated Negative Declaration Los Angeles River Phase IV Bike Path Draft IS/MND Comments - City of Los Angeles Department of Recreation and Parks**

The Department of Recreation and Parks (RAP) staff completed its review of the DRAFT Initial Study/Mitigated Negative Declaration Los Angeles River Phase IV Bike Path and found that some areas of the study need to be revised. A6-2

**Comments on Project Description.**

The Project Description fails to mention that part of the property is owned in fee by the City of Los Angeles Department of Recreation and Parks (RAP) and that the Flood Control District has an easement over such portion. It would also be appropriate to specify the percentage of the project site owned by RAP and the percentage of the project site owned by Caltrans. A6-3

The Project Description highlights that the staging areas will be installed at Betty Davis Park and in a parking lot adjacent to RAP's yard on Zoo Dr.. If this is the case, right of entry permits to install staging areas should be included in the list of permits to be acquired to complete the proposed Project. A6-4

The Project Description addresses the operational issues of the bike lane only partially. The Operation and Maintenance section mentions the Department of Transportation (LADOT) commitment to maintain the Project. It should be noted in the IS/MND that LADOT would be required to sign a Memorandum of Understanding (MOU) with RAP where they will assume all the maintenance obligations related to the Project. The IS/MND also mentions the fact that the Project "would be open to the public 24 hours a day, seven days a week". Since the proposed Project is on RAP's property, the proposed Project is subject to parks' restrictions pursuant to Los Angeles Municipal Code 63.44.14(a), which states that no person should enter or stay in any park between 10:30 pm and 5:00 am of the following day. A change to the Los Angeles Municipal Code would be required in order to permit the Project to operate as described, and the IS/MND contains no discussion of this requirement. A6-5

The IS/MND should consider this operational fact and note that the MOU should also include details about hours of operation, emergency response and law enforcement. A6-5 (cont.)

**Comments on Environmental Analysis.**

**The description of the number of trees in the project area should be improved.**

The sentence "Of the 291 trees, 131 are located within the Project Site and 160 trees are located within the Caltrans ROW. Of the 131 trees located within the Project Site 46 trees protected by the City Ordinance, 18 special habitat value trees, 41 common park trees, and the remaining 26 are undesirable non-native invasive species. Of the 160 trees located within the Caltrans ROW, 31 trees are protected by the City Ordinance and 129 are unprotected trees." (p.69) Should be changed to read as follows: A6-6

*Of the 291 trees, 131 are located within RAP's property and 160 trees are located within the Caltrans ROW. Of the 131 trees located within RAP's property 46 trees protected by the City Ordinance, 18 special habitat value trees, 41 common park trees, and the remaining 26 are undesirable non-native invasive species. Of the 160 trees located within the Caltrans ROW, 31 trees are protected by the City Ordinance and 129 are unprotected trees."*

The sentence "Similarly, a total of 25 trees located within the Project Site would require removal in order to accommodate the proposed construction activities. In the Caltrans ROW, a total of 15 trees would be encroached and 52 would require removal." (p. 70). A6-7

Should be changed to read as follows:

*Similarly, a total of 25 trees located within RAP's property would require removal in order to accommodate the proposed construction activities. In the Caltrans ROW, a total of 15 trees would be encroached and 52 would require removal.*

It would also be advisable that MM-BIO-1 reported the DBH of the trees that need to be removed and replaced and the number of protected trees (Ordinance trees) that will replace the protected trees that will be removed. A6-8

Finally, it would also be necessary to clarify Caltrans' tree replacement policy. It is important to clarify whether the City expects that RAP find space to plant the replacement of Caltrans' trees and maintain them in the future or whether Caltrans would want to replant the trees on their property or implement different mitigation measures. The planting of replacement trees for Caltrans' tree would require the approval of the Board of Recreation and Park Commissioners (Board) as such a requirement would require modification of park property as well as identification of additional RAP staff and resources for the long-term maintenance of the trees. A6-9

**The proposed language of BMP-WQ-4 should be modified.**

The sentence "LADOT will develop and enter into one or more use agreements with the U.S. Army Corps of Engineers, Los Angeles County Department of Public Works, and other agencies, as appropriate, to maintain all improvements built as part of the Project. Such use agreement(s) would be in place prior to the proposed bike path and equestrian trail being open to the public for use." (p. 19) A6-10

Should be changed to read as follows:

*"LADOT shall develop and enter into one or more use agreements with the Department of Recreation and Parks, U.S. Army Corps of Engineers, Los Angeles County Department of Public Works, and other agencies, as appropriate, to maintain all improvements built as part of the Project. Such use agreement(s) would be in place prior to the start of construction of the bike path and equestrian trail."*

A6-10 (cont.)

**Table 2 "Required Permits and Approvals" should be modified**

As the Project is located on RAP's property Los Angeles Department of Recreation and Parks the approval of the Project design requires approval of Board of Recreation and Park Commissioners (Board).

A6-11

**Figures 6A and 6B "Project Detail Plan" should be modified**

Figures 6A and 6B incorrectly label RAP property as "Los Angeles Flood Control"

A6-12

Thank you for giving RAP the opportunity to comment. For any further questions regarding this, please contact Elena Maggioni, of my staff, at (213) 482-6980.

A6-13

Sincerely,

JIMMY KIM
General Manager

For DARRYL FORD
Planning and Construction Superintendent

JK/DF/EM:ar
cc: Darryl Ford, Superintendent, Dept. of RAP

**Letter A6**
Elena Maggioni, Ph.D.
Environmental Supervisor
Department of Recreation and Parks
**City of Los Angeles**
March 31, 2025

*Response A6-1*

The commenter notes the agency's official comment letter is attached to the email submittal. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A6-2*

The commenter provides an introduction to the comments provided in the comment letter. Responses to the comments included in this letter are provided in **Responses A6-3 through A6-13** below.

*Response A6-3*

The commenter suggests clarifications be made to the Draft IS/MND; refer to **Clarifications and Modifications** of this Final IS/MND. With regard to the current ownership of the Project Site, RAP owns approximately 97 percent of the property and Caltrans owns approximately 3 percent of the property within the Project boundaries.

*Response A6-4*

The commenter notes that right of entry permits to install staging areas should be included in the list of permits to be acquired to complete the Project. Thus, the text in the Draft IS/MND has been updated to reflect this change as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response A6-5*

Refer to **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** regarding ongoing maintenance responsibilities for the proposed facilities and the MOU between BOE and LADOT to ensure the Project operates and is maintained as intended.

*Response A6-6*

The commenter suggests that text regarding the number of existing trees be refined. Thus, the text in the Draft IS/MND has been updated to reflect this change as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response A6-7*

The commenter suggests that text regarding tree removals be modified. The text in the Draft IS/MND has been updated to reflect this change as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response A6-8*

The commenter suggests that text of Mitigation Measure MM-BIO-1 be refined. As such, the text in the Draft IS/MND has been updated to reflect this change as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response A6-9*

See **Master Response No. 4: Tree Replacement and Monitoring** regarding tree removals and replacement within Caltrans' jurisdiction. The commenter indicates that coordination with Caltrans regarding its tree replacement requirements and tree planting locations for trees within its jurisdiction need to be understood and described in the IS/MND. Subsequent discussions with Caltrans staff indicate that the tree replacement requirements are less intensive than those of the RAP Policy, and thus the estimation of replacement trees in the Draft IS/MND is considered conservative. Caltrans has further indicated that it intends to plant replacement trees that are removed as part of the Project within the Caltrans ROW adjacent to the Project Site (where available space exists) as a first preferred option, as well as two other nearby Caltrans properties in the area.

*Response A6-10*

The commenter suggests that the text of BMP-WQ-4 should be refined. Therefore, the text in the Draft IS/MND has been updated to reflect this change as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response A6-11*

The commenter suggests that the text in Table 2 "Required Permits and Approvals" should be modified. Thus, the text in the Draft IS/MND has been updated to reflect this change as shown in Clarifications and Modifications of this Final IS/MND.

*Response A6-12*

The commenter suggests that the labeling in Figures 6a and 6b, Project Detail Plan, should be modified. Thus, these figures in the Draft IS/MND have been updated to reflect this change as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response A6-13*

The commenter provides a concluding statement that does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

# LETTER A7

**From:** Christopher Adams
**To:** Jan Green Rebstock; David Crook; Tamseel Mir; Rachel McPherson; Monique Alcala
**Subject:** Fwd: LA River Phase IV Bike Path
**Date:** Monday, March 31, 2025 5:09:58 PM
**Attachments:** Griffith Park Advisory Board - LA River Phase IV Letter.pdf

---

Chris Adams
Environmental Management Group | Environmental Specialist III
Bureau of Engineering | Department of Public Works
1149 S. Broadway, Suite 600
Los Angeles, CA 90015
Cell: 818.233.9026 (preferred) Office: 213.485.5910

---------- Forwarded message ---------
From: **Alex Crow** <alexander.wittan.crow@gmail.com>
Date: Mon, Mar 31, 2025, 1:17 PM
Subject: LA River Phase IV Bike Path
To: <christopher.adams@lacity.org>

Hello, Chris. Please find the Griffith Park Advisory Board's letter of comment regarding the LA River Phase IV Bike Path attached. Thank you.

A7-1

--
Alex Crow
Chair, Griffith Park Advisory Board

**Griffith Park Advisory Board**
*Community Stewards of LA's Largest Park & Great Urban Wilderness*
Department of Recreation and Parks, City of Los Angeles
www.laparks.org/griffithpark/advisory

March 31, 2025

Christopher Adams
City of Los Angeles
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

Re: L.A. River Phase IV Bike Path Project Draft IS/MND Comments

Dear Mr. Adams,

The Los Angeles River is a wonderful, and often underutilized resource which our board takes a keen interest in given its proximity to much of Griffith Park. Griffith Park Advisory Board (GPAB) was fortunate enough to receive a presentation from LADOT three years ago that detailed initial plans for this proposed phase (IV) of the LA River Bike Path. We are encouraged to see how this project has evolved through the valuable community feedback from various stakeholders since then. Our board, guided by the Vision for Griffith Park, are large proponents of active transport and have worked hard to shepherd initiatives that hope to expand active transport in and around the park. A7-2

As we have continued to monitor the development of this phase of the river project, and listened to feedback from various park user groups, we have some concerns about the CEQA Initial Study's conclusion that this meets a Mitigated Negative Declaration, and think that more analysis needs to be done. A7-3

- We have heard feedback from other notable stakeholder groups and organizations that they feel the 30-day comment period for the IS/MND has been too short. Extending the comment period would provide these organizations more time to adequately evaluate these documents and provide more detailed feedback. A7-4

- One of the largest areas of concern is regarding necessary tree removal and the ability to adequately mitigate this. The project will require the removal of existing and mature trees on both public ROW (owned by the Department of Recreation and Parks) and CalTrans ROW. Of the combined 77 trees being removed, a total of 26 are protected trees. While we understand there are mitigation measures available, the removal of this A7-5

many, particularly protected, trees is excessive. Three restoration sites are identified - “on-site where available”, Bette Davis Picnic Area, and “Pump 7”.

    - We have yet to see the RAP Forestry Division’s reviews of the matter and are very sensitive to any projects which potentially add undue stress or workload to RAP’s already thinly-stretched department. In short, we are not convinced that this issue can be effectively mitigated to a less than significant impact, particularly as much of the mitigation efforts will fall upon RAP.

    - We are also concerned about who will ultimately be responsible for maintaining this stretch of the bike path. The draft IS/MND states that LADOT has committed to maintaining the entirety of phase IV - can we confirm that this is indeed that case for perpetuity? As stated, RAP’s resources are thinly stretched; so, the prospect of adding yet another area that requires their attention and maintenance would provide undue stress.

A7-5 (cont.)

- At our most recent board meeting we were fortunate enough to receive some updates from representatives from Council District 4. During this presentation we learned that CalTrans has won a grant to study numerous Freeway and Bicycle interactions, which will hopefully be completed later this year. As the project in question constitutes a closed loop for cyclists - where they must dismount, turn around, and return east when they reach the terminus of Phase IV - it brings into question whether this phase should proceed until it is clear what it will ultimately connect to.

A7-6

- Similarly, as we consider the overall goal of the LA River Master Plan to have a unified connection for active transport along the entirety of the LA River, within the constraints of existing infrastructure challenges, it is not clear that this particular phase is best placed on the river itself until and unless we know what it will connect to. Does this create duplicative connectivity that is better served by bolstering active transport lanes within Griffith Park itself?

A7-7

- While there has been some valuable engagement with the Equestrian Community, and they have been proactive in providing feedback, their uneasiness about the safety and effectiveness of this project are a major cause for concern

    - There isn’t a clear consensus about what the most safe and effective design of the fencing should be. The community seems to be pretty split about whether the fencing should obstruct the view of oncoming traffic or not. Without consensus in design features, the project risks ending up a built feature that just isn’t used - much like the North Atwater Bridge.

A7-8

    - The project isn’t clear about minimum widths for the equestrian trail. The virtual public meeting from March 12, 2025 suggests that the minimum width for the entire length is 10 feet; however, the Draft IS/MND says that there is one location where the width drops to 8 feet due to ROW constraints. The community’s feedback has been absolutely consistent about minimum safe passing distance.

A7-9

We appreciate your taking the time to listen to and address our concerns about the project as it currently stands. The goal of increasing active transport connectivity along the LA River is an excellent undertaking and one that we are generally in support of; however, we do question whether more analysis needs to be done before approving a final IS/MND.

A7-10

Thank you and we look forward to seeing your responses to our questions and concerns,

Alex Crow
Chair, Griffith Park Advisory Board

*BOARD MEMBERS: Chair – Alex Crow; Vice Chair – Alex Phillips; Secretary – Jane Carlson;*
*Aaron Chung; Jason Greenwald; Billy Griffin; Amy Gustinic, T. Hagans; Cristian Hamilton; Chris Laib; Sarah Lann*

**Letter A7**
Alex Crow
Chair, Griffith Park Advisory Board
**City of Los Angeles**
March 31, 2025

*Response A7-1*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-1**.

*Response A7-2*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-2**.

*Response A7-3*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-3**.

*Response A7-4*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-4**.

*Response A7-5*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-5**.

*Response A7-6*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-6**.

*Response A7-7*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-7**.

*Response A7-8*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-8**.

*Response A7-9*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-9**.

*Response A7-10*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-10**.

*Response A7-11*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-11**.

*Response A7-12*

This comment is a repeat of a prior comment from Letter A5. Refer to **Response A5-12**.

## LETTER A8

From: **Oloresisimo, Jaden@DOT** <Jaden.Oloresisimo@dot.ca.gov>
Date: Tue, Apr 1, 2025, 1:30 PM
Subject: SCH # 2025021226 LA River Phase IV Bike Path
To: christopher.adams@lacity.org <christopher.adams@lacity.org>
Cc: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>

Good afternoon Christopher,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this MND (SCH # 2025021226). Attached is Caltrans' response letter. A8-1

If you have any questions, please feel free to contact me and refer to GTS # 07-LA-2025-04759.

Thank you,

**Jaden Oloresisimo**
Transportation Planner
Caltrans D7|Local Development Review
P: (213) 266-3562

**DEPARTMENT OF TRANSPORTATION**
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

*Making Conservation a California Way of Life*

April 1, 2025

Christopher Adams
City of Los Angeles Public Works,
Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

RE: Los Angeles River Phase IV Bike Path Project - MND
Vic. LA-134/3.829
SCH # 2025021226
GTS # 07-LA-2025-04759

Dear Christopher Adams:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed Project would upgrade an existing maintenance road into a new section of the Los Angeles River Bikeway. The Project would construct an asphalt concrete pavement Class I bicycle and pedestrian path along the south bank access road of the Los Angeles River, and a partially separated equestrian trail. The Project would extend the Los Angeles River Bikeway by approximately one mile from its current western terminus near Riverside Drive and would provide new equestrian trail facilities near the Los Angeles Equestrian Center. The proposed Project would connect to the active transportation network throughout the region and provide new pedestrian, bicycle, and equestrian access and connectivity to transit, residential homes, schools, jobs, parks, and other community-serving amenities for the surrounding communities. The proposed Project would add to the region's livability by expanding active transportation options and providing new access to public transit, homes, schools, work, parks, and other community-serving amenities. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA). A8-2

The nearest state facility is the SR-134. After reviewing the MND, Caltrans has the following comments:

Caltrans is in support of this project's pedestrian-oriented plans that help achieve state planning priorities contained in state law and meet state policy goals on transportation, VMT reduction, GHG emissions reduction, and/or betterment of the environment and human health. To achieve the goal of zero traffic-related fatalities and serious injuries by 2050, Caltrans emphasizes the importance of enhancing pedestrian and bicyclist amenities in community destinations. A8-3

Any project work occurring within, or abutting Caltrans ROW will require an encroachment permit, this includes any grading, topography, or equipment work that will change the pattern or direction of water runoff in a way that will impact State facilities or ROW. Please see Appendix A for Caltrans ROW map F2198 and an Assessor's map. A8-4

Additionally, final design requirements for any proposed changes to infrastructure within or along Caltrans Right-of-way will be determined by the Office of Permits. At the time of permit application there will be rounds of review and corrections to ensure all design, Right-of-way, access management, water runoff, environmental, and statutory requirements are being addressed. A8-5

**Caltrans District 7 Office of Permits contact information:**
Mailing Address: 100 S Main Street, Ste 100 Los Angeles, CA 90012
Office Hours: 8:00 a.m. to 5:00 p.m. Monday-Friday
Phone: 213-897-3631 | Fax: 213-897-0420 | E-mail: D7.Permits@dot.ca.gov

Caltrans also recommends limiting large truck travel and construction traffic to off-peak commute hours. A permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing potential impacts for Caltrans for review. A8-6

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2025-04759. A8-7

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

# Appendix A:

ROW Map: F2198

Assessor's Map

RBANK

Part of Block 68

RIVERSIDE DRIVE

BEACHWOOD DRIVE

GRIFFITH PARK DRIVE

MARIPOSA

TRACT No. 9767 M.B. 140-41

TRACT No. 10116 M.B. 143-98/99

TRACT

RANCHO SAN

PAT. 3-222

Part of Block 69

SUBDIVISION OF PROVIDENCIA — SCOTT TRACT

M.R. 43-47/59

Burbank City Limits

Los Angeles City Limits

Glendale City Limits

RANCHO

BURBANK

WASH

TRACT No. 9213

TRACT No. 9766

TRACT No. 9767

TRACT No. 10116

OF BURBANK

OF PROVIDENCIA PARK TRACT

OF LOS

FREEWAY R=2000 Δ=27°44'42" L=968.48

FREEWAY R=2917 Δ=26°59'43" L=1374.36

FLOOD CONTROL BASIN

VALLEY SETTLING BASIN SITE

ORDINANCE NO. 102824

NOT TO SCALE

O.R. 23878-184

COUNTY FLOOD CONTROL BASIN

LAWN

FOREST LAWN MEMORIAL PARK

VENTURA

RIVERSIDE

CRYSTAL SPRINGS

MT. HOLLYWOOD DR.

INTERVALE

DRIVE

ROAD

AVE.

STREET

Note: Permission for the opening, establishment and maintenance of this roadway granted by Resolution No. 909 of the Board of Park Commissioners, recorded in Book 26, Page 20 of Miscellaneous Deeds and Data.

Griffith Park Boundary Line as per F.M. 12525

Walt Disney Prod. et al Par. 48-721615

Walt Disney Prod. et al Par. 1K-721615

City of L.A. et al Par. 2A-724302

City of L.A. et al Par. 2E-724302

City of L.A. et al Par. 1A-643921

City of L.A. et al Par. 2F-724302

City of L.A. et al Par. 2A-724302

City of L.A. et al Par. 2A-724302

N 77°44'28" E 436.40

N 77°44'28" E 1403.77

N 77°44'28" E 2189.22

N 72°29'48" W 1575.44

S 72°29'48" E 1359.72

N 77°44'54" E 540.96

N 77°44'54" E 540.96

R=2822.29 L=1016.96

Δ=20°26'43" L=1007.10

R=3012.29' L=1074.89'

Δ=20°26'43"

Point "2"

Point "1"

DETAIL "A" Scale: 1"=50'

RANCHO Vacated Burbank Res. No. 4516

LOT 2

M.R. 43-47/59

Par. 1A, 1C, 2A 2C 28-22-132

City of L.A. et al Case No. Cont. 5-21-58 D.R. 12625-371

City of L.A. et al Case No. Cont. 4-3-62 D.R. 13425-480 Termination 7-1-66

5593 | 2

SCALE 1" = 1500'

2019

8-26-65
1-14-66
661104
930401

2-3-66
4-5-66
5-17-6
700225

2005032306004001-22
2008080603-22
2019031573-22

CITY OF L.A.

POR. SEC. 29

POR. SEC. 32

POR. SEC. 5

POR. SEC. 6

POR. SEC. 19

POR. SEC. 30

POR. SEC. 31

POR. SEC. 24

POR. SEC. 25

SEC. 36

POR. SEC. 1

T.1N.,R.13W.

T.1S.,R.13W.

T.1N.,R.14W.

T.1S.,R.14W.

GRIFFITH PARK

F.M. 12325
R.F. 543

RIVERSIDE DR.

FRWY.

RIVER

GOLDEN STATE FRWY.

LOS ANGELES

VICTORY BLVD.

RIVERSIDE DR.

SAN FERNANDO

GLENDALE

Most S. Cor. Lot 2 Tr. No. 15255

See Detail C.

MARIA SEPULVEDA DE SANCHEZ 212 3/100 ACRES

S'ly In. PELANCONI TRACT M. B. 135-62-64

S'ly In. SUBDIVISION OF RANCHO PROVIDENCIA AND SCOTT TRACT M. R. 43-47-59

S'ly In. M.R. 43-47-59

See Detail A

See Detail B

See Detail C

DETAIL A
SCALE 1"=80'

DETAIL B
NO SCALE

DETAIL C
NO SCALE

Most N. Cor. Tr. No. 9050

S.E. cor. Sec. 32 T.1N, R.13W.

N.W. cor. Sec. 5, T.1S, R.13W.

SW Cor. M.R. 42-75

E'ly In. Rd. to Los Felis per F.M. 12325

Ranch Line adopted by the County Engineer 4-7-61 C.S.B. 2735-1

4-7-61 C.S.C. 2735-2

Boundary Line City of Glendale
Boundary Line City of Los Angeles

RANCHO LOS FELIS
SEC., TWP. & RGE. AS PER P. 1-164 & R.F. 543

RANCHO SAN RAFAEL
D.C.C. 1621
C.F. 61

CODE
13
11689

FOR PREV. ASSM'T. SEE:
5593-2

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CALIF

**Letter A8**
Jaden Oloresisimo
Transportation Planner
Caltrans D7|Local Development Review
**California Department of Transportation**
April 1, 2025

*Response A8-1*

The commenter notes the agency's official comment letter is attached to the email submittal. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A8-2*

The commenter provides a brief summary of the Project and notes that the City of Los Angeles is the Lead Agency under CEQA. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A8-3*

The commenter expresses support for the Project and the enhancement of bicycle and pedestrian facilities in the area. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response A8-4*

The commenter indicates that work within the Caltrans ROW will require issuance of an encroachment permit. The City will coordinate with Caltrans for the issuance of an encroachment permit for all Project-related construction activities within Caltrans' jurisdiction. No further response is warranted.

*Response A8-5*

The commenter indicates that Caltrans will determine any final design requirements relevant to their facilities and jurisdiction. The City will coordinate with Caltrans, as appropriate, to ensure that all design, right-of-way, access management, water runoff, environmental, and statutory requirements are being adequately addressed. No further response is warranted.

*Response A8-6*

The commenter recommends limiting large truck travel and construction traffic to off-peak commute hours and notes that a permit is required for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. If construction traffic is expected to cause issues on any State facilities, the City will submit a construction traffic control plan detailing potential impacts for Caltrans for review. No further response is warranted.

*Response A8-7*

The commenter provides a concluding statement that does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

# LETTER A9

---------- Forwarded message ---------
From: **Chan, Michelle@DOT** <Michelle.S.Chan@dot.ca.gov>
Date: Tue, Mar 25, 2025 at 10:20 AM
Subject: RE: LA River Phase IV - Draft IS/MND Review Meeting
To: Monique Alcala <monique.alcala@lacity.org>, Enwedo, Michael C@DOT <michael.enwedo@dot.ca.gov>
Cc: Christopher Adams <christopher.adams@lacity.org>, Edward Giron <edward.giron@lacity.org>, Kyle Flake <kyle.flake@lacity.org>, Rachel McPherson <rachel.mcpherson@lacity.org>, David Crook <dcrook@esassoc.com>, Tamseel Mir <TMir@esassoc.com>, Jan Green Rebstock <Jan.Green.Rebstock@lacity.org>, Thomas Sarkisyan <thomas.sarkisyan@lacity.org>, Ricardo Acosta <ricardo.acosta@lacity.org>

Good Morning Monique,

Our Hazardous Waste Specialist has completed his review of the Draft IS. The following is his comment:

*For Section 4.9 Hazards and Hazardous Materials, subparts a and b, based on the proximity of the bike path to State Route 134, there should be a short discussion about aerially deposited lead (ADL) and why or why not it's significant. As previously commented on the referenced Initial Site Assessment, an in-house Caltrans library search discovered that ADL was detected in shallow soils near the bike path at concentrations up to 1,600 milligrams per kilogram. Even minor disturbance of this soil should be conducted with staff that has lead awareness training, and if any excess soil is generated, it should be tested for soluble lead to properly determine which class of landfill to transport the spoils.*

A9-1

*Please let me know if you have any questions or require further clarification.*
*Thank you,*

*Michelle Chan*
*Environmental Scientist*
*Local Assistance Branch*
*Division of Environmental Planning Caltrans, District 7 (Los Angeles)*
*100 S Main Street Los Angeles, CA 90012*
*Cell phone: (213) 326-2365*

**Letter A9**
Michelle Chan
Environmental Scientist
Local Assistance Branch
Division of Environmental Planning Caltrans, District 7 (Los Angeles)
100 S Main Street Los Angeles, CA 90012
**California Department of Transportation**
April 1, 2025

*Response A9-1*

The commenter notes that the Draft IS/MND should include a discussion of aerially deposited lead (ADL) in soils within and adjacent to the Project Site given the presence of the 134 Freeway. As such, additional language has been added to Section 4.9, *Hazards and Hazardous Materials*, of the Draft IS/MND, as shown in **Clarifications and Modifications** of this Final IS/MND. The proposed text changes provide additional details regarding standard practices regarding testing, handling, and disposal of surficial soils containing ADL residues, but these revisions do not change the analysis and conclusions presented in the Draft IS/MND regarding impacts to hazards and hazardous materials resulting from the Project. Impacts would remain less than significant and no mitigation measures are necessary.

**LETTER A10**

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*


MARK PESTRELLA, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460


April 14, 2025

IN REPLY PLEASE
REFER TO FILE: LD-4

Mr. Christopher Adams
Environmental Specialist
City of Los Angeles
1149 South Broadway, Suite 600
Los Angeles, CA 90015

Dear Mr. Adams:

**ENVIRONMENTAL PLAN (RPPL2025000883)**
**DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**
**LOS ANGELES RIVER PHASE IV BIKE PATH PROJECT**

As requested, Public Works reviewed the proposed upgrade of an existing maintenance road into a new section of the Los Angeles River Bikeway. The project would construct an asphalt concrete pavement Class I bicycle and pedestrian path along the south bank access road of the Los Angeles River and a partially separated equestrian trail. A10-1

We offer the following comment for your consideration:

1. **General Comment**

1.1. The project site is currently mapped by FEMA in a Zone X (outside the 0.2 percent annal chance flood area) in the City of Los Angeles. However, the United States Army Corps of Engineers (USACE) 2016 Hydraulic Study shows the project to be within a 1 percent annual chance flood area so the proposed bike path may be subject to flooding in large storm events. The City of Los Angeles' National Flood Insurance Administration Program administrator (located in the City's Bureau of Engineering) should be contacted to determine if there are any National Flood Insurance Program compliance requirements for the proposed project. A10-2

1.2. Based on the Los Angeles River Comprehensive Hydrology Study, the 50-year flow rates for this portion of the channel at the project site are 65,950 and 84,650 cfs. Additionally, per the 1999 USACE Operation and Maintenance Manual, the design flow rate for this portion of the channel is 40,000 cfs. Therefore, the channel at the project site does not meet the Los Angeles County Flood Control District (LACFCD) capacity standards. A10-3

1.3. The Initial Study/Mitigated Negative Declaration discusses impact on migratory birds only from the construction of the project. Impacts from bicycle traffic is not discussed. Considering the intent to increase recreational traffic along the Los Angeles River and the potential large population of potential recreational bicyclists, the Initial Study/Mitigated Negative Declaration should include discussion of these impacts, especially considering any habitat creation proposed by the City's Ecosystem Restoration Project for this reach of the Los Angeles River. A10-4

1.4. It is recommended that the project follow the Los Angeles River Master Plan Design guidelines. A10-5

1.5. It is recommended that the project seeks out collaborative opportunities with projects in the headworks area. A10-6

1.6. It is recommended inputs from Los Angeles County Fire/Los Angeles City regarding swift water rescue be included. A10-7

For questions regarding comments 1.1 to 1.6, please contact Diana Ibarra of Public Works, Stormwater Engineering Division, at (626) 458-6132 or dibarra@pw.lacounty.gov.

2. **Flood Permit Requirements**

2.1. Access within channel limits will require a five-day clear forecast from the National Weather Service. Permittee must provide a schedule of activities, including duration, to avoid any potential conflicts with Public Works maintenance activities in the area.

2.2. Permittee shall notify Public Works, Stormwater Planning Division (Operations Section), at (626) 458-6177, 72 hours prior to channel access.

2.3. Permittee shall notify Public Works, Dispatch office, at (626) 458-4357 in the event of an emergency related to LACFCD facilities. A10-8

2.4. Permittee shall be responsible for the resolution of any complaints deriving from construction activities (i.e., smell, noise, etc.).

2.5. Permittee must take measures in the project design to discourage People Experiencing Homelessness encampments and accept responsibility for addressing all People Experiencing Homelessness encampments because of this development.

2.6. An agreement shall be in place between the City of Los Angeles and the LACFCD concerning the maintenance of all improvements, including how to handle People Experiencing Homelessness encampments, affecting the LACFCD's right of way prior to the issuance of the permit.

2.7. Permittee shall repair any damage to LACFCD facilities caused by the construction activities. Existing LACFCD facilities and appurtenant structures shall be protected in place during construction.

2.8. Ingress/egress access by LACFCD maintenance vehicles, along the LACFCD right of way, shall be preserved at all times.

2.9. Please note that the work is located over an active Flood Control channel. If there will be equipment in the channel, surface water diversion systems must be implemented to maintain design capacity of channels as follows:

- April 16 to May 31: 33 percent of channel design capacity.
- June 1 to August 31: 5 percent of channel design capacity.
- September 1 to October 14: 33 percent of channel design capacity.
- October 15 to April 15: 100 percent of channel design capacity (no work will take place in the channel).

For questions regarding comments 2.1 through 2.9, please contact Ms. Ibarra of Public Works, Stormwater Engineering Division, at (626) 458-6132 or dibarra@pw.lacounty.gov.

A10-8 (cont.)

If you have any questions or require additional information, please contact Toan Duong of Public Works, Land Development Division, at (626) 458-4921 or tduong@pw.lacounty.gov.

A10-9

Very truly yours,

MARK PESTRELLA, PE
Director of Public Works

CIARA BARNETT, PE
Assistant Deputy Director
Land Development Division

DK:la
P:\ldpub\SUBPCHECK\Plan Checking Files\Projects submitted by Other Agencies\RPPL2025000883 - Los Angeles River Phase IV Bike Path Project\2025-03-25 Submittal\DPW_Cleared_2025-04-08_RPPL2025000883.docx

**Letter A10**
Ciara Barnett, P.E.
Assistant Deputy Director
Land Development Division
**County of Los Angeles Department of Public Works**
April 14, 2025

*Response A10-1*

The commenter makes an introductory statement regarding the comments provided in the letter, and provides a brief summary of the Project as presented in the Draft IS/MND. This comment does not raise a substantive issue regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response A10-2*

The commenter notes that the Project Site is currently mapped by FEMA in a Zone X (outside the 0.2 percent annal chance flood area) in the City of Los Angeles, but that the USACE 2016 Hydraulic Study shows the project to be within a 1 percent annual chance flood area so the proposed bike path may be subject to flooding in large storm events. The commenter also notes that the City of Los Angeles' National Flood Insurance Administration Program administrator (located in the City's Bureau of Engineering) should be contacted to determine if there are any National Flood Insurance Program compliance requirements for the proposed project. However, this comment does not raise a substantive issue regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response A10-3*

The commenter notes that the River channel at the Project Site does not meet the Los Angeles County Flood Control District (LACFCD) capacity standards. However, the Project would have no effect on the channel or its flood conveyance capacity. This comment does not raise a substantive issue regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response A10-4*

The commenter notes that the Project does not evaluate operational impacts of the Project relative to effects on migratory birds from the introduction of bicycles into this segment of the LA River channel. The commenter also notes the importance of this issue given the Project's context within the Los Angeles River Ecosystem Restoration Project being undertaken by the USACE. However, the analysis contained in the Draft IS/MND and in Appendix C-1, *Biological Technical Letter Report*, did address operational impacts including those related to migratory species. As noted therein, the Project Site currently is improved with a paved equestrian trail/service road that is utilized regularly by equestrians and pedestrians as authorized users, and also by cyclists who access the alignment via damaged fences. As such, the Project would not introduce human activity into an area of the River that is currently undisturbed, but rather would formalize recreational access for an additional user group (i.e., cyclists). In addition, the Project Site contains numerous continuous fences between the 134 Freeway and the existing trail/road and

between the trail/road and the River channel, which are existing linear features/barriers currently limiting wildlife movement under existing conditions, and thus the Project's new fencing would not notably change this condition. Furthermore, the Project Site is located immediately adjacent to the 134 Freeway, which is not only a large physical barrier to wildlife movement from the south, but also is a major source of noise, air pollution, and overall human activity in the immediate area, which currently discourages use of the Project Site for wildlife movement and/or nesting activities. Nonetheless, the Project would comply with the requirements of the Migratory Bird Treaty Act (MBTA) to preclude the potential for adverse effects to migratory and nesting birds. Lastly, see **Response B3-19** below regarding the Project's coordination with the USACE regarding Project-related tree plantings and consistency with the USACE's planned restoration activities at the Project Site. No further response is necessary.

*Response A10-5*

The commenter notes that the Project should be consistent with the Los Angeles River Master Plan Design Guidelines. As noted in **Response A3-3**, above, the Project design is consistent with this guidance.

*Response A10-6*

The commenter recommends that the Project seek collaborative opportunities with projects in the headworks area, which is noted. However, this comment does not raise a substantive issue regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response A10-7*

The commenter recommends that inputs from Los Angeles County Fire/Los Angeles City regarding swift water rescue be included, which is noted. However, this comment does not raise a substantive issue regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response A10-8*

The commenter lists a number of permit conditions associated with issuance of the permits required by Los Angeles County for the Project. The City would comply with all permit conditions prescribed by the County. This comment does not raise a substantive issue regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response A10-9*

The commenter provides a concluding statement regarding the comments provided in the comment letter. No further response is necessary.

# LETTER B1

Hello,

Thanks for reaching out.

There is a recording of the presentation at the following link.

https://engineering.lacity.gov/about-us/divisions/environmental-management/projects/los-angeles-river-phase-iv-bike-path

B1-1

Thank you,

Chris Adams
Environmental Management Division | Environmental Specialist III
Bureau of Engineering | Department of Public Works
1149 S. Broadway, Suite 600
Los Angeles, CA 90015
Cell: 818.233.9026 (preferred) Office: 213.485.5910

On Thu, Mar 13, 2025 at 10:31 AM Kesper Wang <kesper@streetsareforeveryone.org> wrote:

Hello Christopher,

Hope you are well! I am wondering if you had any slides, recording, or presentation from last night's public meeting for those who were unable to make it. We're very interested in this project and some other cyclists were asking about it.

B1-2

I had wanted to be at the meeting, but unfortunately there was a scheduling conflict, so just making sure I have the latest updates :)

Thank you!
Kesper

Kesper Wang (he/ him, they/ them)
Bicycle and Pedestrian Advocacy Coordinator
Streets Are For Everyone

**Letter B1**
Kesper Wang
Streets Are For Everyone
March 13, 2025

*Response B1-1*

This comment is a response from City staff to the commenter's inquiry. This comment does not raise a substantive issue regarding the Project or the issues raised in the Draft IS/MND. As such, no further response is warranted.

*Response B1-2*

The commenter requests a recorded version and related materials from the virtual public meeting held on March 12, 2025. This comment does not raise a substantive issue regarding the Project or the issues raised in the Draft IS/MND. As such, no further response is warranted.

# LETTER B2

From: **Gerry Hans** <gerry@friendsofgriffithpark.org>
Date: Sun, Mar 30, 2025, 8:41 AM
Subject: LA River Phase IV Bike Path
To: <Christopher.adams@lacity.org>
Cc: Mehmet Berker <mehmet.berker@lacity.org>, Jennifer Hull <jennifer.hull@lacity.org>, Stefanie Smith <stefanie.smith@lacity.org>, Tracy James <tracy.james@lacity.org>, GPAB <rap-gpab@lacity.org>

Please see the attached letter. B2-1

Thank you,

Gerry Hans
President
https://www.friendsofgriffithpark.org/

**Friends of Griffith Park**
P.O. Box 27573
Los Angeles, CA 90027-0573
friendsofgriffithpark.org

March 29, 2025

Christopher Adams
City of Los Angeles
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

Re: Extension of comment period – L.A. River Phase IV Bike Path Project (Project)

Dear Mr. Adams:

Friends of Griffith Park (FoGP) requests an extension of the comment period of the L.A. River Phase IV Bike Path Project so that we are given proper time to meet and consider our position on the adequacy of the Initial Study & Mitigated Negative Declaration for the Project. B2-2

We dispute that the comment period terminates on March 31, 2025 since FoGP, a longstanding Griffith Park stakeholder with an extensive and deeply committed constituency, has yet to receive official notification per CEQA requirements. In fact, on August 8, 2024, consultant ESA contacted us seeking advice on Park historic resources *without an accurate description of the proposed Project.* We responded by email and provided a mailing address in that communication. FoGP is in EOS and City records as an entity deserving official notification. B2-3

In addition to ourselves, we request that all pertinent Trustee Agencies, such as Mountains, Recreation and Conservation Authority (MRCA) are notified when the 45-day comment period begins. B2-4

FoGP needs proper time to evaluate these and other areas of concerns: B2-5

- The extent of adverse impacts of removing trees, especially since the public has not had the opportunity to see RAP Forestry Division's review of the matter, which FoGP values greatly.

- We question the desire to create nearly one mile of new bike path considering the difficult connection to the next biking section – presumably Forest Lawn Drive – has not yet been studied. We want to understand if a safe connection is possible and at an affordable price. Constructing a one-mile section becomes an argument itself for the next project, rather than considering projects (Phase IV Project and the continuation of the Bike Path) collectively for the best overall outcome. B2-6

- We want to investigate, through discussions with bicyclists, any preference of biking near a concrete section of the LA River versus through Park environs, such as biking on Zoo Drive. We wonder if Zoo Drive can be considered as an Environmentally Superior Alternative, especially if the Los Angeles River Bike Path's next section is, in fact, Forest Lawn Drive. B2-7

We kindly request an all-encompassing notification effort after which a 45-day comment period is provided. B2-8

Sincerely,

Gerry Hans, President

*<u>About Friends of Griffith Park</u>: Friends of Griffith Park is a non-profit 501(c)(3) charitable group that promotes the enlightened stewardship of Griffith Park so it can survive and thrive well beyond the 21st century. FoGP is committed to ensuring that Griffith Park, a public park and Los Angeles' largest Historic-Cultural Monument, remain open, natural, and free to all citizens of Los Angeles.*

**Letter B2**
Gerry Hans, President
**Friends of Griffith Park**
March 29, 2025

*Response B2-1*

The commenter notes that the attached letter is submitted on behalf of the Friends of Griffith Park. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. Responses to the comments included in this letter are provided in **Responses B2-2 through B2-8** below.

*Response B2-2*

Refer to **Response A5-4** above. The Draft IS/MND was circulated for the required minimum 30-day comment period and the City has complied with the requirements of CEQA.

*Response B2-3*

The commenter argues that the public comment period does not end on March 31, 2025; however, as clearly stated on the Notice of Intent to Adopt a Mitigated Negative Declaration (NOI), the public comment period for the Draft IS/MND began on February 28, 2025 and ended on March 31, 2025, which exceeds the minimum 30-day review requirement. The City distributed the NOI via email utilizing contact information provided by attendees of Project-related community meetings, at which various stakeholders, including numerous individuals identifying themselves as affiliated with the Friends of Griffith Park. As such, several representatives from Friends of Griffith Park were provided with the NOI. In addition, in accordance with CEQA, the NOI was directly mailed to numerous public agencies, published in the Los Angeles Times, posted with the Los Angeles County Clerk, filed with the State Clearinghouse, and posted on the City Bureau of Engineering's website.

Additionally, with regard to the August 2024 correspondence from ESA, the letter noted by the commenter was seeking input from local organizations regarding historic resources in the Project area as part of the consultation process associated with compliance with National Historic Preservation Act of 1966 (NHPA) Section 106. The Section 106 process is still ongoing as part of a separate environmental review pursuant to the National Environmental Policy Act of 1969 (NEPA), for which Caltrans is the NEPA lead agency. The commenter conflates the two public notification/outreach efforts, but the Section 106 consultation process is ongoing. The commenter's statements about the Section 106 consultation correspondence containing an inaccurate project description is not germane to the analysis and conclusions presented in the Draft IS/MND, and thus no further response is warranted.

*Response B2-4*

The City notified all relevant Responsible and Trustee Agencies either directly through mail delivery or via the State Clearinghouse. No comments on the Draft IS/MND were received from such agencies other than Caltrans (see **Comment Letters A8 and A9**). The required 30-day public comment period concluded on March 31, 2025 in accordance with CEQA requirements. No 45-day public comment period is being provided.

*Response B2-5*

Refer to **Response A4-4** above. Impacts to trees would be less than significant with mitigation.

*Response B2-6*

Refer to **Response A5-6** above. The commenter questions the need for and merits of the Project given the future connections to the west have not yet been studied. However, this comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response B2-7*

The commenter speculates that cyclists would prefer to cycle through park environs (ostensibly Griffith Park) rather than along a concrete-lined River channel such as the Project Site. However, as noted in **Master Response No. 7: Alternative Routes for Cyclists and Equestrians**, one key objective of the Project is to extend the Los Angeles River Bikeway within the Project Site alignment, consistent with the LA River Master Plan. Nonetheless, this comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response B2-8*

Refer to **Response B2-4** above. The commenter again requests a new 45-day public comment period for the Draft IS/MND. No further response is warranted.

# LETTER B3

From: **Jamie Hall** <jamie.hall@channellawgroup.com>
Date: Mon, Mar 31, 2025, 4:42 PM
Subject: Comments on the Mitigated Negative Declaration for the LA River Phase IV Bike Path
To: <Christopher.adams@lacity.org>
Cc: <friendsofeqbridge@gmail.com>, <gerry@friendsofgriffithpark.org>, <meberts@glendale.edu>

Dear Mr. Adams:

This firm represents Emily Gabel-Luddy, FASLA and the Mariposa Basin Environmental Alliance on a pro-bono basis. As documented in the attached comment letter, an Environmental Impact Report (EIR) is required for the L.A. River Phase IV Bike Path (Project) due to the potential for significant impacts not addressed in the Mitigated Negative Declaration (MND) for the Project. In addition, the City has engaged in improper piecemealing of a larger project resulting in an underestimate of impacts. Given the federal funding that will be used for the proposed Project, the City of Los Angeles (City) should have prepared a joint California Environmental Quality Act (CEQA) / National Environmental Policy Act (NEPA) document for the proposed Project. B3-1

**Jamie T. Hall**
Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211
Main Number: (310) 347-0050
Direct: (310) 982-1760
Fax: (323) 723-3960
Email:jamie.hall@channellawgroup.com
Website: www.channellawgroup.com

****NOTICE****

I receive many e-mails on a daily basis and am unable to respond to all of them despite my best efforts. If you have sent me an e-mail that requires my attention and I have not responded, it may have been overlooked. I ask that you call me at 310-982-1760.

****CONFIDENTIAL & PRIVILEGED TRANSMISSION****

The information contained within this e-mail and any attached document(s) is confidential and/or privileged. It is intended solely for the use of the addressee(s) named above. Unauthorized disclosure, photocopying, distribution or use of the information contained herein is prohibited. If you believe that you have received this e-mail in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

*Please consider the environment before printing this email*

# Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com


March 31, 2025

**VIA EMAIL**

Christopher Adams
City of Los Angeles
Public Works, Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213
Christopher.adams@lacity.org

**RE: Comments on the Mitigated Negative Declaration for the LA River Phase IV Bike Path**

Dear Mr. Adams:

This firm represents Emily Gabel-Luddy, FASLA and the Mariposa Basin Environmental Alliance on a pro-bono basis. As documented in this comment letter, an Environmental Impact Report (EIR) is required for the L.A. River Phase IV Bike Path (Project) due to the potential for significant impacts not addressed in the Mitigated Negative Declaration (MND) for the Project. In addition, the City has engaged in improper piecemealing of a larger project resulting in an underestimate of impacts. Given the federal funding that will be used for the proposed Project, the City of Los Angeles (City) should have prepared a joint California Environmental Quality Act (CEQA) / National Environmental Policy Act (NEPA) document for the proposed Project. B3-2

## I. The Proposed Project As Described in the MND

As described in the MND for the Project, the proposed Project consists of upgrading:

> an existing maintenance road into a new section of the Los Angeles River Bikeway. The Project would construct an asphalt concrete pavement Class I bicycle and pedestrian path along the south bank access road of the Los Angeles River, and a partially separated equestrian trail. The Project would extend the Los Angeles River Bikeway by approximately one mile

B3-3

from its current western terminus near Riverside Drive and would provide new equestrian trail facilities near the Los Angeles Equestrian Center.[1]

The Project would upgrade an existing maintenance road, which is currently under the jurisdiction of the USACE, **into a new section of the Los Angeles River Bikeway**. The Project would construct an asphalt concrete (AC) pavement Class I bicycle and pedestrian path (Bike Path) along the south bank access road of the River (see MND Figure 3). The path would contain two 4-foot-wide bike lanes with 2-foot-wide shoulders on each side, as well as a partially separated equestrian trail (Equestrian Trail) with an over 10-foot width (with one isolated location having a width of 8 feet due to ROW constraints). The Bike Path and Equestrian Trail would be separated by an 8.5-foot- tall chain link fence with visual screening material for the entirety of the Equestrian Trail length, starting from the western terminus and continuing until the Equestrian Trail turns southward at its eastern terminus to connect to Tunnel 6 and the Griffith Park Main Trail on the south site of the 134 Freeway.[2]

The proposed facilities, once constructed, would operate passively and would be open to the public 24 hours a day, seven days a week, and would only be closed during large rain events in order to minimize safety risks associated with peak stormwater flows in the adjacent LA River channel. ShelterCLEAN Services (ShelterCLEAN), through a contract with the City, would have primary responsibility for closing the bike path at any access point during these events, though City staff would also have direct access via the City's gate locks at the access points.[3]

B3-3
(cont.)

According to the MND, "**construction** of the proposed Project **would** begin in approximately Winter 2026 and **last for approximately 2.5 years** (i.e., until approximately Winter 2029). Project construction activities would include clearing and grubbing, rough grading, fine grading; and installation of an AC-paved path, lighting, railing, traffic striping and signs, retaining walls, and minor landscaping improvements."[4]

**Figure 1** shows the location of the proposed Project. It is from Figure 2 in the MND with the location of equestrian Tunnel 7 added. As shown in the **Figure 1**, the one-mile segment is located between the Los Angeles River and the 134 Freeway.

[1] MND Cover Page. The MND is available at: https://engineering.lacity.gov/about-us/divisions/environmental-management/projects/los-angeles-river-phase-iv-bike-path

[2] MND Section 2.6.

[3] MND Section 2.6.

[4] MND page 12.

**Figure 2**
Project Vicinity

**FIGURE 1 – Project Vicinity Map**
(Source: MND Figure 2 with Tunnel 7 location added)

B3-3 (cont.)

## II. Inadequacies in the Project Description and Setting Information

The proposed Project would dead end at its western terminus, as shown in **Figure 2**. As a result, bicyclists would need to either turn around and go back the way they came, or attempt to access Burbank on the north side of the Los Angeles River via the Mariposa Equestrian Bridge or the greater Griffith Park area via equestrian Tunnel 6 or 7.

B3-4

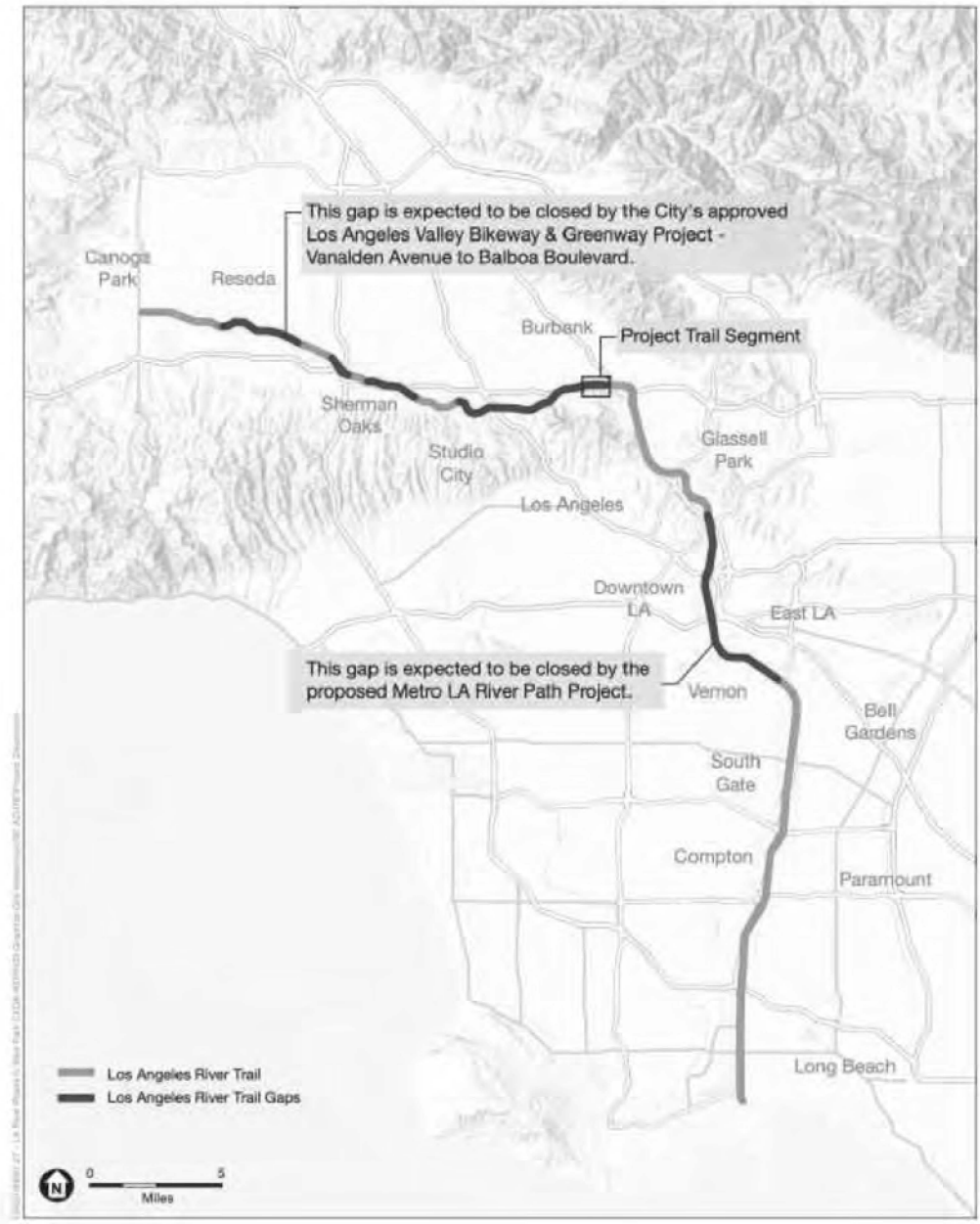



**FIGURE 2 – Los Angeles River Bikeway Map**
(Source: MND Figure 5)

B3-4
(cont.)

The Project site is currently used by equestrians, as shown in **Figure 3**. The Project site and vicinity are subject to a number of equestrian easements, which are not adequately described in the MND (see **Attachment 1**). Easement information for the Project site and vicinity needs to

be fully described the environmental document for the proposed Project. The environmental document must include a map showing the extent of the Caltrans right-of-way to be acquired and a parcel list. Please provide this information in response to comments. Failure to provide information on existing easements and the way they would be affected by the Project has led to an underestimate of impacts to equestrians, horses, and equestrian facilities which would resulting from the proposed introduction of newly sanctioned bicycle use in the Project area and the potential misuse of equestrian/pedestrian facilities where bicycles are prohibited, such as Tunnels 6 and 7 and the Mariposa Bridge. A video showing the number of horses crossing over the existing Mariposa Bridge on a representative day in May of 2023 shows 167 horses making use of the bridge in a little over a three-hour period.[5] Any introduction of bicycles onto this 7 foot-wide bridge, however inadvertent, as a result of the proposed Project would have serious safety impacts.

B3-4
(cont.)

**FIGURE 3 – Equestrian Using the Project Parcel.**

[5] A video in which the time period has been condensed to 8 minutes is available at: https://www.youtube.com/watch?v=o-pQ7HJraQ

### A. Failure to Make Clear That Bicycles Are Prohibited From Using Mariposa Bridge and Tunnels 6 and 7

The MND incorrectly states in multiple places that the existing one-mile maintenance/service road, that would be converted for bike, pedestrian and equestrian use under the proposed Project, is "owned by the Los Angeles County Flood Control District and under the jurisdiction of the U.S. Army Corps of Engineers (USACE) and **is currently accessible** only **to** pedestrians, **cyclists,** and equestrian users **via an existing pedestrian/equestrian bridge to the west of the alignment and a tunnel beneath the 134 Freeway that connects to Griffith Park/Zoo Drive to the south**."[6] This is incorrect and such. Cyclists are prohibited from using the Mariposa Equestrian Bridge by Burbank Municipal Code Section 6-1-2802[7] and Tunnels 6 and 7 by the existing Caltrans easement for those tunnels (see **Attachment 1**). This must be corrected throughout the environmental document and the potential misuse of these facilities and resulting impacts to equestrian safety and equestrian facilities analyzed in the environmental document for the proposed Project. B3-5

### B. Failure to Identify That the Project Would Introduce A New, Currently Unpermitted Use Along the Project Alignment, Cycling

The environmental document must state in the Project Description that the proposed Project would introduce a new, currently prohibited use along the alignment. As shown in the Assessor's parcel information included in **Attachment 1**, the Project site parcel is owned by Los Angeles Parks.[8] It is within the boundaries of Griffith Park. Pursuant to Los Angeles Municipal Code Section 63.44 – Regulations Affecting Park and Recreation Areas, Subsection B.16: B3-6

> B. Within the limits of any park or other City-owned Harbor Department designated and controlled property within the City of Los Angeles: (Amended by Ord. No. 174,737, Eff. 9/9/02.)

---

[6] See for example MND page 4.

[7] **Burbank Municipal Code Section 6-1-2802 - SPECIAL RULES APPLICABLE TO THE USE OF THE MARIPOSA STREET BRIDGE** states:
In addition to the Rules of the Road, as set forth in 6-1-2801 A-E, and K, which are incorporated herein by this reference, the following special rules for the Mariposa Street Bridge (Bridge) are as follows:
A. Every equestrian rider shall proceed over the Bridge in a safe, slow manner, and shall cause the horse to be in a walking gait while on the Bridge.
**B. No person shall ride, walk or carry a bicycle on the Bridge.**
C. Pedestrians are allowed to use the Bridge.
D. The Public Works Director is authorized to place and maintain adequate signage, and/or markings to inform equestrians, cyclists and pedestrians of these rules. [Added by Ord. No. 16-3,875, eff. 3/25/16.]

[8] See also:
https://maps.assessor.lacounty.gov/GeoCortex/Essentials/PAIS/REST/sites/PAIS/VirtualDirectory/AssessorMaps/ViewMap.html?val=5581-001

> 16. No person shall drive or ride any cycle or vehicle, whether powered by a motor or human power, except on paths, roads or drives designed and provided for such purposes.

The Project site is not currently designed for bicycling purposes and use by bicyclists is currently a prohibited use. The environmental document must analyze the potential impacts of introducing cyclists in areas where they are not currently allowed and provide mitigation to ensure that cyclists will not use designated pedestrian/equestrian facilities, including the Mariposa Bridge and Tunnels 6 and 7. In addition, the environmental document for the proposed Project must analyze the cumulative impact of additional bicycle use in the area, resulting from the planned connection of the Project segment of the bikeway to segments both north and south, on equestrian safety and equestrian facilities. The cumulative impact analysis in the MND is currently inadequate and fails to identify potentially significant project and cumulative impacts resulting from the increase in bicycle use in close proximity to horses, equestrians and equestrian facilities that would result from the proposed Project. These potentially significant cumulative impacts necessitate the preparation of an EIR.

B3-6 (cont.)

## III. Primary Concerns Which Have Not Been Adequate Addressed In The MND

Our client's primary concerns, which are impact-based, that have not been adequately addressed in the MND include horse/rider safety impacts and impacts to the existing horse trail system, including: the historic Mariposa Bridge[9] used by pedestrians and horses; and, the existing horse and pedestrian tunnels (Tunnels 6 and 7). These facilities connect pedestrians and equestrians on the north side of the Los Angeles River, including those in the Burbank Rancho and Los Angeles Equestrian Center areas, with trails in Griffith Park.

B3-7

- The proposed Project will introduce bicyclists into an area with pedestrian and horse trails creating the potential for horse-bike inter-action and the potential for horseback riders and horses, which can be spooked by bicycles, to be injured as a result. In fact, a rider testified at LADOT's presentation on the Project to the Equine Advisory Committee on July 22, 2024 that feel off of his horse three times as a result of his horse being spooked by bicycles in the Project vicinity.[10] The potential for significant safety impacts has not been adequately analyzed in the MND.

[9] National Register Nomination for Mariposa Bridge is available at: https://ohp.parks.ca.gov/pages/1067/files/CA_Los%20Angeles_Mariposa%20St%20Bridge_DRAFT.pdf
The bridge was approved for designation at the February 2, 2024 meeting of the California State Historical Resources Commission: https://www.parks.ca.gov/NewsRelease/1239
For more information about the bridge see also: https://friendsofgriffithpark.org/mariposa-street-bridge-a-unique-historic-place/

[10] LA/DOT presentation to Equine Advisory Cmte. 7/22/24 -- Rider describes horse scared by bicycles at 23:13 https://www.youtube.com/watch?v=sLHLgxvObB4

- The proposed Project creates the potential for misuse of the Mariposa Bridge by bicyclists seeking to cross the Los Angeles River to get to locations in Burbank, something not allowed by the Burbank Municipal Code Section 6-1-2802. The proposed Project similarly creates the potential for misuse of equestrian Tunnels 6 and 7 by bicyclists seeking to access other areas of Griffith Park. Tunnels 6 and Tunnel 7 are similarly restricted by a Caltrans equestrian easement. Both of these limitations are directly tied to safety. The MND provides inadequate mitigation to ensure that bike use of Mariposa Bridge and Tunnels 6 and 7 will not occur, and fails to identify and mitigate the potential for significant impacts to horse-related recreational facilities and use in the area. An EIR is therefore required for the proposed Project. B3-8

- The proposed Project does not provide a horse trail of adequate width, given proximity to bicycle use. B3-9

- The proposed Project does not provide adequate fencing and screening between horse and bicycle uses. The proposed chain-link fence is inadequate, as it can be easily cut. (See **Attachment 2**, which shows existing damage to chain-link fences in the area.) B3-10

- The MND fails to identify the design changes made at the request of the equestrian community, or to list the design changes that were found to be infeasible and the reason for their infeasibility. This information needs to be provided in response to comments. As explained on pages 7-8 of the MND: B3-11

> The most recent community meeting was held at the Forest Lawn Drive Safety and Mobility Project open house, hosted by Council District 4 on December 4, 2024. This event showcased several proposed projects along Forest Lawn Drive, including the proposed Project, which had its own station with a board, sign-up sheets, and comment cards for stakeholder feedback. **Members of the equestrian community attended the event and raised concerns about the width of the trail, the fence design, and safety implications of shared paths for equestrians and cyclists.** Some equestrians, however, did express some support for the revised fence design, noting its improved safety in cases where riders might be thrown from their horses.
>
> Since the initial round of outreach meetings, LADOT and StreetsLA have made significant progress in addressing stakeholder concerns in the Project design. Due to the Project's complexity and limited right-of-way, LADOT has focused the majority of the design improvements on the equestrian trail and the feedback received from the equestrian community. Many requested changes require approval from regulatory agencies, including the USACE, Caltrans, LA County Public Works, LA County Flood Control, and the LA River Ecosystem Restoration team, **and thus some of the requested design changes may not be feasible**. Despite this, LADOT has studied other equestrian trails in Griffith Park, such as the

> Main trail that is located to the south of the SR-134 freeway, to incorporate best practices and enhance safety features for the proposed Project. This trail is similar to that of the proposed Project in terms of a bridle trail traveling alongside, and in close proximity to, the freeway while being separated by a chain link fence.

The MND alleges that LADOT and StreetsLA have made significant progress in addressing stakeholder concerns in the Project design. What is the nature of that significant progress? What specific design changes have been made in response to community concerns?

B3-11 (cont.)

The MND indicates that "some of the requested design changes may not be feasible." Which design changes are not feasible and why? Does the Project as proposed include any potentially infeasible design features?

It should be noted that the Main Trail studied by the City does not include an adjacent bike path or place horses between a bike path and a freeway. This key difference between the Main Trail and the proposed Project should be identified in the discussion on pages 7-8 of the MND, as to two trails are not comparable.

- The Project as currently proposed dead ends, providing only a one-mile extension of the southern portion of the existing bikeway. Users will either have to turn around and go back the way they came or seek other outlets. This will further encourage users to enter areas intended for horses. These potentially significant impacts have not been adequately addressed in the MND.

B3-12

- The MND fails to require proper maintenance of fences and Project facilities and to ensure proper separation between bike and horse uses. The MND in Section 2.8 described the needed operation and maintenance requirements, by these are not included as mitigation measures or made mandatory through some legally enforceable mechanism.

  Section 2.8 maintenance assumptions are not credible, based upon evidence in the record. LADOT does not currently maintain the existing bike path facilities: signs are spray painted and destroyed; fences are consistently cut and destroyed; graffiti is neither removed nor painted over.). The gate at Forest Lawn Drive famously has 4-6 locks, but the fencing next to it is cut and destroyed. (See **Attachment 2**) The fencing illustrated for the Project in the MND is landscape fencing. MND Photos 7a and 7b convey just how flimsy the fencing is. This fencing is not sufficient to avoid impacts. In addition, 12 agencies possess easements or fee simple ownership over this area. The MND fails to identify maintenance responsibilities by agency. The environmental document needs to include legally enforceable maintenance requirements, or identify the impacts of improper maintenance of Project facilities as a significant Project and cumulative impact.

  B3-13

  In the absence of a legally enforceable mechanism, the potential for significant maintenance-related impacts remains. The measures included in MND Section 2.8 and

2.8.1 must be made mitigation measures and the timing, frequency, and responsibility for the specified actions included in the mitigation measures. B3-13 (cont.)

## IV. Failure to Prepare a Joint CEQA/NEPA document

The proposed Project is subject to the National Environmental Policy Act ("NEPA"). As shown in **Attachment 3,** the proposed Project is funded in part by federal dollars. What percentage of the Project funding is state, local and federal?

NEPA "applies to projects which are carried out, financed, or approved in whole or in part by federal agencies."[11] CEQA encourages the preparation of joint CEQA/NEPA documents. Preparation of a joint document is important so that neither the CEQA or NEPA lead agency is put in the position of approving a project prior to the preparation of an environmental document by the other level of government, leading to improper post-hoc rationalization for a decision already made, something discouraged by both CEQA and NEPA. The CEQA Guidelines § 15226 explains the need for a joint document in the context of preparation of an EIR, but the same is true for Negative Declarations:

**15226. JOINT ACTIVITIES** B3-14

State and local agencies should cooperate with federal agencies to the fullest extent possible to reduce duplication between the California Environmental Quality Act and the National Environmental Policy Act. Such cooperation should, to the fullest extent possible, include:

1. (a) Joint planning processes,
2. (b) Joint environmental research and studies,
3. (c) Joint public hearings,
4. (d) Joint environmental documents.

Under NEPA there are three levels of environmental review documents: a Categorical Exclusion ("CATEX"), an Environmental Assessment ("EA") which lead to a Finding of No Significant Impact ("FONSI") and an Environmental Impact Statement ("EIS"). CEQA Guidelines §15222 specifies that for projects also subject to NEPA:

**15222. PREPARATION OF JOINT DOCUMENTS**

If a Lead Agency finds that an EIS or Finding of No Significant Impact for a project would not be prepared by the federal agency by the time when the Lead Agency will need to consider an EIR or Negative Declaration, the Lead Agency should try to prepare a combined EIR-EIS or Negative Declaration-Finding of No Significant Impact. To avoid the need for the federal agency to prepare a separate document for the same project, the Lead Agency must involve the federal agency in the preparation of the

[11] CEQA Guidelines Section 15220.

> joint document. The Lead Agency may also enter into a Memorandum of Understanding with the federal agency to ensure that both federal and state requirements are met. This involvement is necessary because federal law generally prohibits a federal agency from using an EIR prepared by a state agency unless the federal agency was involved in the preparation of the document.

B3-14 (cont.)

The City should be preparing a joint CEQA/NEPA document. This is particularly true, given that CEQA Guidelines §15003(h) state that the "lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect. (*Citizens Assoc. For Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151)."

## V. Improper Piecemealing

The City is engaging in improper piecemealing of the environmental review for the L.A. River **Phase IV** Bike Path. "CEQA forbids 'piecemeal' review of the significant environmental impacts of a project." *Berkeley Jets, supra,* 91 Cal.App.4th at p. 1358, 111 Cal.Rptr.2d 598. Agencies cannot allow "environmental considerations [to] become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences." *Bozung, supra,* 13 Cal.3d at pp. 283–284, 118 Cal.Rptr. 249, 529 P.2d 1017.

As explained by the Association of Environmental Professionals:[12]

> Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less- than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies.
>
> In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. When future phases of a project are possible, but too

B3-15

[12] AEP CEQA Portal Topic Paper, Project Description, available at: https://ceqaportal.org/tp/CEQA%20Project%20Description%202020%20Update.pdf

> speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.

The California Supreme Court set forth a piecemealing test in *Laurel Heights* . "We hold that an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." *Laurel Heights, supra,* 47 Cal.3d at p. 396, 253 Cal.Rptr. 426, 764 P.2d 278.

Courts have found "improper piecemealing 'when the reviewed project legally compels or practically presumes completion of another action.'" (Quoting *Banning Ranch Conservancy v. City of Newport* (2012) 211 Cal.App.4th 1209, 1224. There may be improper piecemealing if a proposed project is "a crucial functional element" of a larger project that could not proceed without it, or if its purpose "is to be the first step or to provide a catalyst for future development." (Citing *id.* at 1223.) However, piecemealing may not be found where two projects "have different proponents, serve different purposes, or can be implemented independently." (Citing *id.* at 1223.)

B3-15
(cont.)

In name, and in reality, the L.A. River **Phase IV** Bike Path Project, is part of a larger bike path project. The MND for the Project is not tiered off an EIR the L.A. River Bike Path Project, as no such EIR appears to exist. As shown in **Figure 2**, the proposed Project is clearly a crucial functional element of the larger project, the Los Angeles River Bikeway. The viability of the one-mile Project practically presumes completion of other gaps in the River Path (or Bikeway) which are reasonably foreseeable, including the recent Los Angeles Valley Bikeway & Gateway Project – Vanalden Avenue to Balboa Boulevard.[13] The City has failed to analyze the whole of the environmental action as required by CEQA Guidelines Section 15003(h) and thus has not proceeded in the manner required by law. The MND thus fails to adequately address significant cumulative impacts and to identify significant cumulative impacts of the Project.

Completion of other segments of the Los Angeles River Bikeway will result in future expansion in the use of the Project segment and will increase the environmental effects thereof. Given the limited, one-mile, length of the proposed Project, it clearly lacks utility without connection to northern and southern segments of the larger bikeway and trail system. An EIR is therefore required for the larger River Bike Path project and the current MND for this segment clearly underestimates the impacts of this segment and the Los Angeles River Bike Path as a whole. The MND is thus clearly inadequate and an EIR is required for the proposed Project.

[13] https://ceqanet.opr.ca.gov/2021100118/3
The MND for this segment is available at: https://ceqanet.opr.ca.gov/2021100118
Notice of Determination dated 12/14/23 available at: https://ceqanet.opr.ca.gov/2021100118/3

## VI. Improper Reliance on "Best Management Practice" Which Should Be Treated As Mitigation Measures

Sections 2.7.1, 2.8, 2.8.1 contain "Best Management Practices" and assumed actions which the City will take, many of which are in fact measures intended to reduce impacts. In *Lotus v. Department of Transportation* (2014) 223 Cal. App. 4th 645 ("*Lotus*"), Caltrans was found to have certified an insufficient EIR based on its failure to properly evaluate the potential impacts of a highway project. The *Lotus* court found that Caltrans erred by:

> . . . incorporating the proposed mitigation measures into its description of the project and then concluding that any potential impacts from the project will be less than significant. As the trial court held, the "avoidance, minimization and/or mitigation measures," as they are characterized in the EIR, are not "part of the project." They are mitigation measures designed to reduce or eliminate the damage to the redwoods anticipated from disturbing the structural root zone of the trees by excavation and placement of impermeable materials over the root zones. ***By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA***.

B3-16

(*Id.* at 655–656, emph. added.) The court ordered Caltrans' certification of the EIR be set aside, finding:

> . . . this shortcutting of CEQA requirements subverts the purposes of CEQA by omitting material necessary to informed decisionmaking and informed public participation. It precludes both identification of potential environmental consequences arising from the project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences. The deficiency cannot be considered harmless.

The same holds true when mitigation measures are called Best Management Practices (BMPs) in an MND or assumed maintenance actions are described but not mandated. In calling mitigation measure BMPs or simply listing assumed maintenance activities, so as to avoid the identification of actually project impacts, the MND fails to comply with a requirement of CEQA. The environmental document for the Project must be revised to identify the impacts these specified practices are intended to mitigate, to reclassify these practices as mitigation measures, and the environmental document must be recirculated to allow the public to assess the adequacy of these measures in mitigating the pre-mitigation impacts that the environmental document must disclose.

## VII. An EIR is Required for the Project - CEQA Standard for Use of an MND

B3-17

CEQA Guidelines Section 15064(f)(1) specifically mandates that:[14]

[14] See also 15002(f)(1) and Public Resources Code Section 21082.2(d).

> (1) If the lead agency determines there is substantial evidence in the record that the project **may** have a significant effect on the environment, the lead agency **shall** prepare an EIR (*Friends of B Street v. City of Hayward* (1980) 106 Cal.App.3d 988). Said another way, **if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR** even though it may also be presented with other substantial evidence that the project will not have a significant effect (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68). (Emphasis added)

This is further clarified in CEQA Guidelines Section 15002(f)(1) which states: B3-17 (cont.)

> (f) Environmental Impact Reports and Negative Declarations. An Environmental Impact Report (EIR) is the public document used by the governmental agency to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid the possible environmental damage.
>
> (1) An EIR is prepared when the public agency finds substantial evidence that the project **may** have a significant effect on the environment. (See: Section 15064(a)(1).)
>
> (2) When the agency finds that there is **no substantial evidence** that a project may have a significant environmental effect, the agency will prepare a "Negative Declaration" instead of an EIR. (See: Section 15070.) (Emphasis added).

This comment letter provides substantial evidence that the Project may have a significant environmental effect. An EIR is therefore required.

## VIII. An Understanding Horses and Horse Behavior Is Important to and Understanding of Potential Project Impacts

An understanding of horse behavior is important to an understanding of the potential safety, noise and air quality impacts resulting from the proposed Project. It is also important to an understanding of the design issues with the Project and this unique segment of the larger bikeway project. As clearly explained in Chapter 1- Understanding Horses and Mules - of the US Forest Service's Equestrian Design Guidebook:[15] B3-18

> **Chapter 1—Understanding Horses and Mules**
>
> In addition to the usual planning considerations, equestrian recreation trails and facilities require attention to the behavior and physical characteristics of

[15] Available at: https://www.fs.usda.gov/t-d/pubs/htmlpubs/htm07232816/toc.htm

horses and mules. The success of horse trails and recreation sites depends on how well planners and designers understand these animals.

## An Evolutionary Perspective

Essentially, horses and their kin are prey animals. They developed behavior patterns and physical characteristics over millions of years spent in wide open spaces. Flight is their primary defense. They use their strength, stamina, agility, and speed to escape predators, notably large cats—such as cougars—and wild dogs—such as dingos. Horses and mules constantly monitor their surroundings and are always aware of available escape routes. They may become nervous when routes are narrow or blocked. Horses and mules also prefer to see what they hear or smell. . .

## The Startle Factor

What frightens horses and mules is not always obvious. Anything that moves suddenly or makes an unexpected noise can rouse an animal's survival instincts and prime it to bolt. This natural reaction—often referred to as a startle reflex—is the result of remarkably acute senses.

B3-18
(cont.)

**Lingo Lasso**

Startling News

A horse or mule can be said to *startle*, to *shy*, to *spook*, or to be *skittish*. The terms have similar meanings—a horse is instinctively on alert, assessing the situation for danger. Horses and mules have much faster reflexes than humans and other domesticated animals (Miller 1999). When a horse or mule startles, its response varies according to the stimulus and the animal's personality.

*Startle* is a generic description for any aroused behavior. *Shy* and *spook* are often used interchangeably with startle, but they are not exactly the same. An animal that shies moves swiftly away from the disturbance—sometimes quickly enough to unseat the rider. *Spook* is a colloquial term for frighten.
A *skittish* horse is one that is nervous or easily alarmed.

Horses and mules have excellent vision, hearing, and tactile senses. They are even capable of feeling vibrations through their hoofs, which often alert them to others long before the rider becomes aware. Horses and mules need a comfortable operating space. When they can see something suspicious from afar, they can more easily evaluate the danger and react accordingly. There is a fine line between what is comfortable for horses and mules and what seems dangerous.

In addition to confined spaces and predators, things that can startle a horse or mule include:

- Loud or unexpected noises—Buzzing model airplanes, exploding firecrackers, batting practice, or a falling tree
- Quick or unexpected movements—Fast-moving bicycles, inquisitive children, running animals, or birds rustling in the underbrush
- Things in unusual combinations—Hikers with large backpacks or vehicles with strange loads

- Highly contrasting or reflective surfaces—A light colored tread near dark soil, freshly cut logs, black or white rocks, or a manmade object in a natural setting
- Unfamiliar situations—Activity at a golf driving range or a train nearby
- Wild or unfamiliar domestic animals—Mountain lions, moose, emus, pigs, or llamas (figure 1–3) Narrow or constricted spaces—Bridges, gates, or tight passages
- Unexpected trail obstacles—Litter, fallen trees, or boulders

**Figure 1–3—Anything that appears suddenly, makes an unexpected noise, or is unfamiliar engages a horse's survival instincts. On the trail, horses and mules are particularly wary of llamas, hikers with bulky backpacks, and bicycles.**

B3-18
(cont.)

**Trail Talk**

Equine View

Designing Shared-use Trails to Include Equestrians (O'Dell 2004) offers the following interpretations of scary things from a trail animal's perspective:

- Fishing rods look suspiciously like buggy whips.
- The ticking of bicycle gears sounds like an electric fence charger.
- Boisterous dogs look like wolves.
- People carrying canoes overhead may be horse-eating monsters

So, what happens when horses and mules are startled? They have a range of responses, from remaining calm to becoming severely frightened. The more conditioned the animal is to uncomfortable situations, the more likely its response will be subdued. When something makes it nervous, an animal may dance around, inadvertently step on things, or balk. Horses or mules that are severely unnerved may run, jump, spin, or do a creative combination of all these things. When horses and mules feel the need to protect themselves,

they may kick, bite, or strike. Experienced riders can hold a well-trained animal in check under most circumstances. There is a point, though, where a ~~stimulus becomes so great that even the~~ best conditioning will not override the animal's innate fight-or-flight instincts.

**Trail Talk**

Trail Manners

Trail etiquette varies in different parts of the country and in different situations. According to IMBA, the International Mountain Bicycling Association (2007), "All animals are startled by unannounced approach, a sudden movement, or loud noise. This can be dangerous for you, others, and the animals. Give animals extra room and time to adjust to you. When passing horses always use special care and follow directions from the horseback riders (ask if uncertain). Running cattle and disturbing wildlife is a serious offense. Leave gates as you found them, or as marked."

Horses and mules are often uncomfortable around moving bicycles and may startle if they spot a bicyclist nearby. It is a good idea for bicyclists to make sure the stock have seen them from a distance. Hiding is not a good strategy, as the animal will probably sense the presence of something unknown and become agitated.

Trail stock—especially mules—have highly developed memories for pleasure, pain, fear, people, and places. Many trail animals recognize a previously visited location or trail route (figure 1–4). Once a horse or mule has had a particularly unpleasant or painful experience, the animal will try to avoid that location, condition, or object forever. Recreationists in many areas minimize potential conflicts by practicing trail etiquette that favors needs of horses and mules. Chapter 12— Providing Signs and Public Information lists ways to communicate a trail animal's needs to other trail users.

B3-18
(cont.)

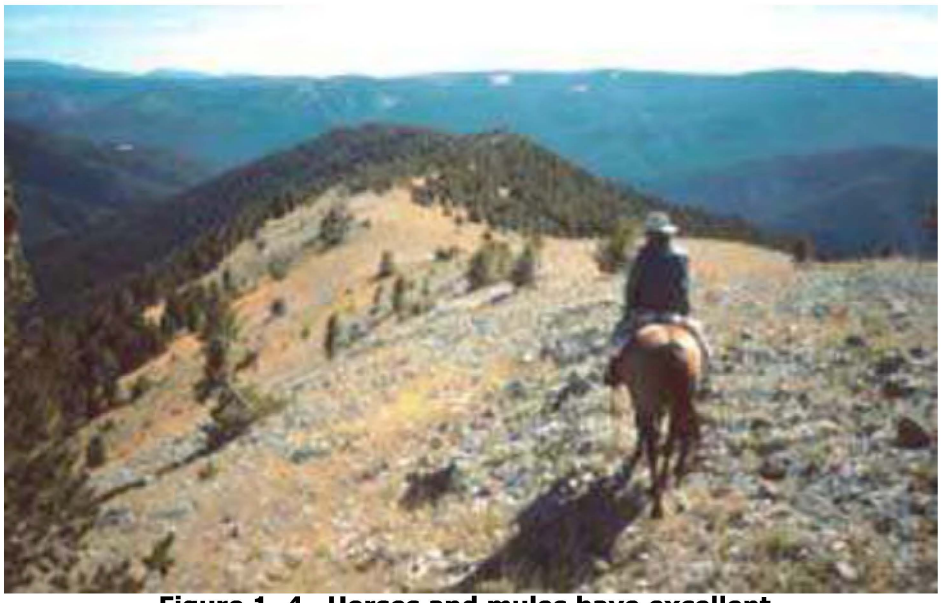


**Figure 1–4—Horses and mules have excellent memories and can easily retrace routes they have traveled in the past. They avoid areas they associate with unpleasant experiences.**

## Physical Characteristics

On nonmotorized recreation trails, the heaviest, widest, and tallest recreationists are riders on their mounts. Not only do designers need to take the dimensions of mounts and their riders into consideration, they have to provide for the needs, abilities, and heightened sensitivities of horses and mules.

### Size and Strength

Horses and mules come in all different sizes. For example, quarterhorses, used extensively in the American West, are generally shorter than thoroughbreds, commonly used in other areas. A horse or mule's height is measured in *hands*—or 4-inch (102-millimeter) increments. Measurements start at the bottom of the front hoof and end at the *withers*—the highest point on an animal's shoulder near its mane. The saddle rests just behind the withers, in a slight depression on the animal's back.

The size of horses and mules depends on their breed and age. Miniature breeds are about the size of a large dog. Small horses, such as ponies, are frequently about 14 and one-half hands—also referred to as 14.2 hands—or about 58 inches (1,473 millimeters) tall. Draft horses are often about 19 hands—76 inches (1,930 millimeters) tall. Many trail stock are about 15 to 16 hands—60 to 64 inches (1,524 to 1,626 millimeters) tall.
Trail stock usually weigh between 800 to 1,500 pounds (454 to 680 kilograms). They have exceptionally strong muscles that help them maintain their balance and allow them to carry heavy loads for long distances. The rule of thumb is that healthy, well-conditioned horses and mules can carry as much as 20 percent of their body weight.

B3-18
(cont.)

**Horse Sense**

Horses by Design

Design measurements give recreation designers some guidance when they are designing and constructing recreation facilities and amenities. The American Institute of Architects (2000) considers a design horse as 16 hands—64 inches (1,626 millimeters) at the withers (figure 1–5), 92 inches (2,337 millimeters) from tail to nose, and 81 inches (2,057 millimeters) at the top of the ears. When a rider is seated in the saddle, the top of the rider's head is about 93 inches (2,362 millimeters) above the ground. Viewed from behind, the rider and horse span about 4 feet (1.2 meters) at the widest point. These measurements don't include maneuvering space.

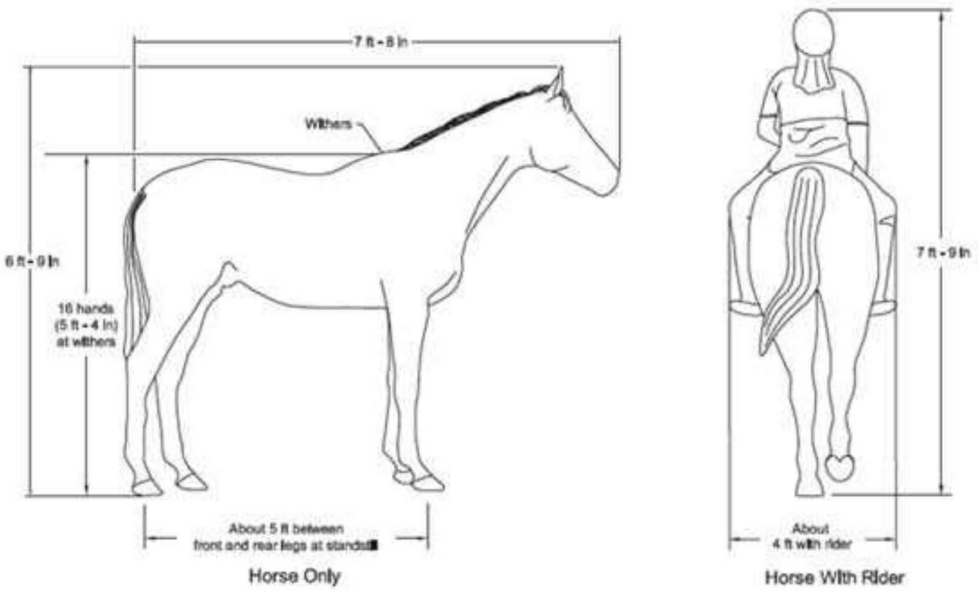



**Figure 1–5—Industry standard design dimensions for a horse and rider from *Architectural Graphics Standards*. Standard design dimensions are representative dimensions for planning purposes.**
***—Courtesy of Wiley Publishing. The original figure was edited for clarity.***

**Hoofs**

With their well-adapted hoofs, horses and mules are sure-footed in many environments. Hoofs have a hard material outside—the *hoof wall*—and a triangular-shaped area of living tissue on the underside (figure 1–6). This tissue—the *frog*—is susceptible to injury from sharp objects, such as broken glass or sharp crushed gravel, and by very hot surfaces, such as melted asphalt. Horses and mules can bruise their hoofs with repeated exposure to hard surfaces. Mule hoofs are generally more elongated than those of horses. Both horses and mules are particularly careful where they place their hoofs. Many stock avoid stepping on slippery shale, smooth boulders, mud puddles, boggy areas, railroad crossings, bridge decks, or other unfamiliar surfaces, until they become more confident with their footing. They sometimes are reluctant to use human-sized steps on trails or in urban environments. Many riders also are uncomfortable negotiating steps while on horseback.

B3-18
(cont.)

Because an animal's hoof wall can crack, chip, or break, horseshoes are used to enhance the hoof wall's strength. Special nails are tapped through the hoof wall and clinched over to hold the horseshoes in place. Horseshoes are made in different sizes and styles (figure 1–7). Some are smooth on the bottom, some have grooves, and others have raised heels and toes for better wear and traction. A hoof that is protected by a horseshoe withstands rugged terrain and extended periods of use better than the natural hoof alone. However, horseshoes can be loosened or pulled off when they catch in wire, between boulders, in underground holes, under roots and waterbars, and in cattle guards. If this happens, stock may trip or suffer pain or injury.

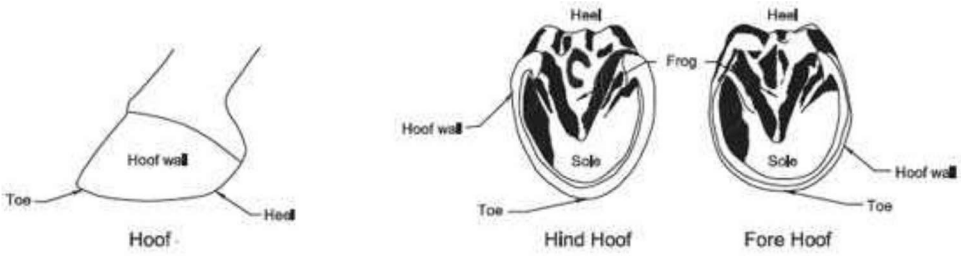



**Figure 1–6—A horse hoof.**

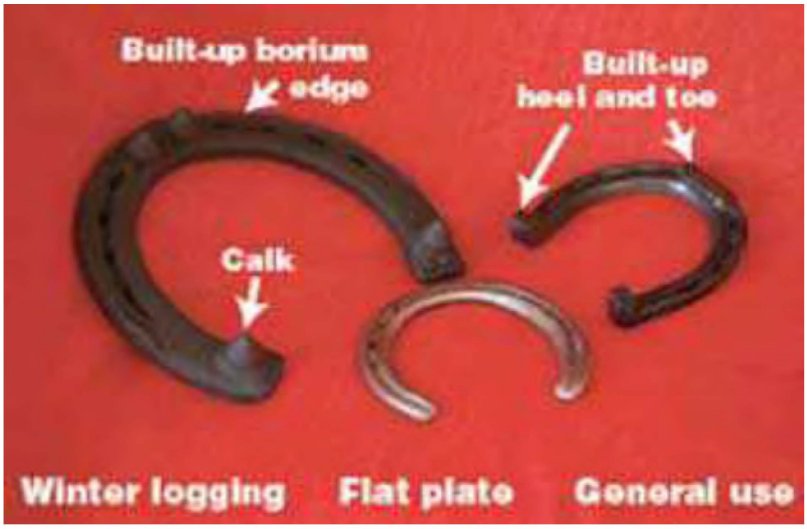



**Figure 1–7—As far as horses and mules are concerned, one horseshoe doesn't fit all. A draft horse wears the large, specialized horseshoe during winter logging operations. Its sizeable calks and built-up borium edges improve footing on ice. Saddle horses commonly use flat-plate horseshoes. The general use shoe has built-up heels and toes for added traction.**

B3-18
(cont.)

Paved or hard surfaces—asphalt, concrete, metal, and stone—offer little or no traction and are quite dangerous for stock. The smooth face of horseshoes exacerbates the danger of slipping. While there are some horseshoe styles that increase traction in certain circumstances, they are not appropriate for all surfaces. Slick surfaces that compromise an animal's footing include shale, submerged rocks, wet wood surfaces, moist vegetation, and ice. Snow-packed hoofs, especially shod hoofs, also limit an animal's mobility.
Hard surfaces become much more dangerous on a slope. Once an animal has started to slip or skid, it has difficulty regaining its balance. In most cases, both animal and rider fall to the ground. Hard surfaces with slopes steeper than 5 percent need to be treated to increase traction. Consult Chapter 6—Choosing Horse-Friendly Surface Materials for more information regarding suggested surface treatments.

**Mouth and Teeth**

Horses and mules use their flexible lips and strong teeth much like people use their hands. They can untie a rope or release a pressure snap on a gate. Mules

are especially adept escape artists. Even experienced riders have been surprised to return to a mount they thought was securely tied, only to find it wandering loose. Horses and mules also can lift or pull heavy objects by using their teeth and their body weight.

**Basic Needs**

Horses and mules have the same basic needs as most living beings—healthy air, water, and food. They also have some specific and unique requirements. Healthy horses and mules have excellent lung capacity and a high level of endurance. Smoke, dust, toxic fumes, and pollutants affect their ability to breathe. Many people are surprised to learn that horses and mules breathe air only through their nostrils. Some stock even hold their breath when they are listening intently or greatly stressed or alarmed. When this happens, they can become dizzy or faint from lack of oxygen. Horses and mules also hold their breath for short periods while eating underwater vegetation. They must be able to keep their nostrils above water when swimming. If *tack*—or riding equipment— restricts movement and forces a horse's nostrils underwater, the horse may drown. Horses and mules with canvas feedbags on their heads can drown if the bag fills with water when they try to drink. . . .

At feeding time, horses and mules frequently become very nervous, aggressive, and display dominating behavior toward other horses. The horses in figure 1–9 display typical aggressive body language as they keep an eye on their neighbors and show their impatience for food. If facilities don't have adequate space to allow horses and mules to get away from a dominant animal, stock can injure themselves, their stablemates, people, and property. In such cases, stock may need to be separated from one other.

B3-18
(cont.)

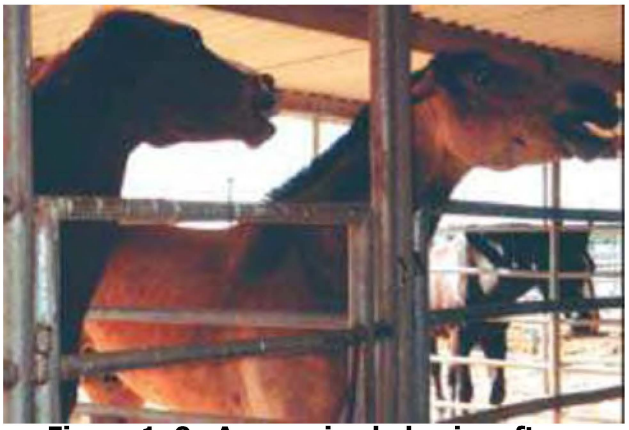


**Figure 1–9—Aggressive behavior often emerges during feeding time. These horses are extremely wary of each other.**

## Senses and Behavior

A key to understanding the instinctive behavior of horses and mules is to know how they see, hear, smell, and feel things. As prey animals, horses and mules are very perceptive—they had to be to survive in the wild. However, along with that acuity comes some limitations.

**Vision**

Horses and mules move their eyes independently, allowing them to see objects in two different directions at once. Their eyes protrude slightly from the sides of the head, allowing panoramic vision with a visual field that measures about 350 degrees. This visual field is predominantly *monocular*—or seen with one eye at a time. The monocular portion of the field measures about 285 degrees. Monocular vision is relatively flat and is used for detecting distant motion. Horses and mules also have a *binocular* visual field—an area of about 65 degrees that is seen with both eyes at once. In contrast, the human field of vision, which measures less than 180 degrees, is mostly binocular. Binocular vision is three dimensional and contributes to depth perception. Because their eyes are on the sides of their heads, horses and mules have blind spots in their binocular vision (figure 1–10). They cannot see the tips of their own noses or anything directly beneath their heads, limiting the ability to see anything directly in front. They cannot see objects closer than 4 feet (1.2 meters) with binocular vision. They also don't automatically see something behind that is narrower than their body. Horses and mules can't see forward and sideways at the same time.

In order to focus their vision, horses and mules must move their heads, and they can do so with amazing speed. They can focus their vision more quickly than can humans. Usually when stock lift their heads, they are looking at something in the distance. They lower their heads to focus on low, close objects. This visual arrangement allows horses and mules to graze and watch for danger at the same time, but may affect their depth perception. Occasionally stock run into, fall over, or step on low-lying objects that they did not see or recognize as a hazard, such as posts, wires, holes, signs, rocks, and waterbars. Stepping into an animal's burrow can cause a horse or mule to trip, fall down, or break a leg. Common burrow dwellers include ground squirrels, badgers, and prairie dogs (figure 1–11).

B3-18
(cont.)

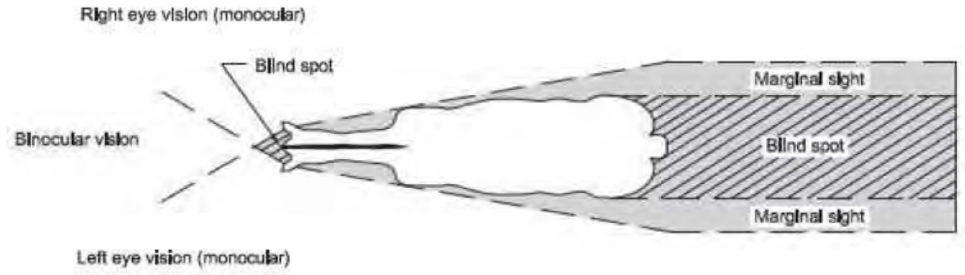



**Figure 1–10—A horse's fields of vision.**
***—Courtesy of American Youth Horse Council. The original figure was edited for clarity.***

**Figure 1–11—The burrows of ground animals, such as prairie dogs, present tripping hazards for horses and mules.**

Unfamiliar objects in the distance are suspect to horses and mules. For instance, a trail animal sometimes has trouble identifying a hiker with a bulky backpack (figures 1–12 and 1–13) as a person, unless the hiker speaks. The animal will be on alert until satisfied that a threat is not imminent. Because they are prey animals, horses and mules can become disoriented and nervous when they hear something, but are unable to see it. Hidden sources of activity—such as those behind solid walls or fences—cause some stock to become fearful. Horses and mules frequently rely on their wide peripheral vision to navigate in tightly restricted spaces and to pass through narrow areas, such as gates, trails, or bridges. In these situations, some stock feel trapped. In response, they may bolt quickly through the offending space, creating a potential safety hazard to themselves, riders, and others. . . . Research by J. Carroll and others (2001) suggests horses—mules were not studied—have *dichromatic* vision—they distinguish two main colors—while humans have *trichromatic* vision—they distinguish three main colors. Many of the colors horses do see are *desaturated*—or less intense. Colors that contrast with more subtle natural hues attract the animal's attention. Examples include a large white rock against a dark background, a red shirt, or dappled shadows. Many experienced stock stop to make certain such objects are not potential hazards or predators. Similarly, when horses or mules see a surface change, such as shadows or roadway markings painted on asphalt, they hesitate or stop. Reflective materials may confuse stock, especially if the material is used on signs that move in the wind or if lights ripple across reflective backgrounds. Any lighting that distorts natural colors, including some night lighting, affects an animal's comfort, vision, and ability to function well.

B3-18
(cont.)

Horses and mules see very well at night, probably a survival mechanism to escape nocturnal predators. Their large eyes admit substantial light, which is amplified by internal reflectors. The low-light vision of horses and mules is better than that of humans. However, their eyes adjust more slowly to light changes than human eyes. Lighting contrasts when entering or leaving enclosures, such as tunnels or horse trailers, can cause horses and mules to hesitate until their eyes can adjust to conditions.

**Hearing**

Riding animals have excellent hearing, better than that of humans. Horse and mule ears rotate 180 degrees and generally face the direction the animal is looking. They can focus one eye and ear on the rider and one eye and ear on something else. When they hear something, horses and mules want to see the cause. Noise created by traffic, wind, and other distractions can greatly interfere with hearing, and cause many stock to become skittish. Stock ridden in more developed environments become accustomed to unsettling noises after repeated exposure to them. Vehicles backfiring, sonic booms, gunfire, firecrackers, sirens, helicopters, public address systems, hot air balloons, trains, marching bands, mechanical equipment, echoes, and bridge or tunnel sounds are tolerated by stock that are accustomed to them. Horses and mules that spend time in rural areas get used to noises there, such as the sounds of farm animals or forest activities. However, all these sounds and many others can startle stock unfamiliar with them, making it difficult for riders to maintain control. . . .

**Touch**

Horses and mules are so sensitive to touch that they can feel a fly land on a single hair. Slight pressure from a rider's legs can guide a horse or mule forward and anything touching its whiskers or body hair can alert the animal to trouble. If an animal brushes up against a narrow passage and feels trapped, its survival instincts kick in.

B3-18
(cont.)

Sharp objects, such as barbed wire, easily cut or damage the relatively tender skin of a horse or mule. Painful or sharp impacts trigger the animal's instinct to run away from the offending object or lunge through it, potentially injuring itself or others. A frightened animal also can damage things nearby.
Horses and mules enjoy rubbing against protruding objects because they are handy scratching devices. Given the sensitivity of their skin, stock can easily injure themselves while scratching. Remove or flatten any sharp corners, nails, posts, curbing, or protruding objects that can catch an animal, rider, or equipment. Wire fences should be completely smooth and free from projections or barbs.

**Curiosity**

Some horses—and many mules—are exceptionally bold. Their curiosity leads them to explore anything new in their environment. They smell, push, move, pick up, or play with new objects within their reach. They may pull things into a corral with their teeth or kneel to reach underneath fences for something they want. Depending on the design of the fence or barrier and the size of the animal, horses and mules may be able to reach 6 feet (1.9 meters) beyond its edge.

**The Herding Instinct**

Horses and mules prefer being around others of their kind, where they find comfort and safety. In the wild, horses survived by staying with the herd. This innate herding instinct strongly affects domesticated horses and mules today. If one animal becomes startled, many nearby animals also will become alarmed. When one horse runs, the others want to run as well. . . .
Kicking and biting are natural defense mechanisms for horses and mules. Their kick is amazingly quick, powerful, and potentially life threatening. An average animal can kick 6 feet (1.8 meters) backward without moving its front feet.

> They also strike and stomp with their front legs and can aim sideways. Mules in particular are adept at kicking forward with their hind feet, a practice sometimes described as a *cow kick.* Stock confined in relatively small enclosures often repeatedly kick the offending barriers. Horses and mules also may bite people, animals, vegetation, or other objects within range.

B3-18 (cont.)

The environmental document for the proposed Project needs to include an explanation of horse-related behavior and address the potential for Project safety impacts, noise and air quality impacts given these behavioral characteristics and the specifics of the Project design. The width of the horse trail component of the Project and its location between a freeway and a bike path clearly has the potential to result in safety impacts which have not been adequately addressed, identified or mitigated in the MND. In addition, given the characteristics and sensitivities of horses, the proposed Project has the potential to result in significant construction noise and emission impacts which have not been adequately addressed in the MND.

## IX. Failure to Identify Significant Impacts

### a. Aesthetics

The finding on MND Page 52, under c) is inadequate because the draft MND project fails to accurately describe the relevant Reaches of the LA River Ecosystem Restoration Project.[16] The MND identifies Reach 3, but completely omits Reach 1. As shown in **Figure 4**, Reach 1 is the single most relevant Reach to this Project and contains specific reference to habitat restoration on the overbanks of both sides of the LA River in Reach 1. The MND fails to analyze consistency with Reach 1 plans and the aesthetic impacts of the Project on Reach 1. The potential for impacts remains.[17]

B3-19

[16] **US Army Corps of Engineers, Los Angeles River Ecosystem Restoration Feasibility Project, adopted by City of Los Angeles, June 2016**

**Volume 1** https://usace.contentdm.oclc.org/digital/collection/p16021coll7/id/2339

REACH 1 is found on Plates 11 and 12, Volume 1

**Volume 3** https://usace.contentdm.oclc.org/digital/collection/p16021coll7/id/2341
REACH 1, Habitat Corridors/Riparian Planting is found on Appendix G, Figure 4-17, Page 4-79 Alternative 20 (Adopted Alternative), Volume 3.

[17] See also: **LARiver Master Plan, Los Angeles County, adopted June 2022,** which is not adequately addressed in the MND.

https://pw.lacounty.gov/uploads/swp/LARiverMasterPlan-FINAL-DIGITAL-COMPRESSED.pdf

https://pw.lacounty.gov/uploads/swp/LARiverMasterPlan-AppendixVolumeI-DesignGuidelines-FINAL-DIGITAL-COMPRESSED.pdf

**Figure 4 – Location of the Project in Relation to Reach 1 of the Los Angeles River Ecosystem Restoration Study**

B3-19 (cont.)

### b. Agriculture

The finding on MND Page 54 under a) is inadequate because the MND fails to identify that the Project is within an Urban Agriculture Incentive Zone.[18] (See **Attachment 4**). The Urban Agriculture Incentive Zone (UAIZ) is a state program (AB 551) adopted by the California State

B3-20

[18] See: https://zimas.lacity.org/ search under APN 5581001906

Legislature in 2013. This program aims to encourage urban agriculture in urbanized areas by offering reduced property taxes in exchange for converting vacant or unimproved property to an agricultural use through a contract agreement, starting with a 5-year period. B3-20 (cont.)

**c. Biological Resources**

The MND fails to assess the impacts of the proposed Project on Reach 1 of the Los Angeles River Ecosystem Restoration Project,[19] which begins west of the project and ends midpoint of Bette Davis Park as shown in **Figure 4**. B3-21

The finding on Page 68 under d) is inadequate because is based on the supposition that the Project area is heavily trafficked by vehicles. It is not. It is isolated area, currently used by horses and pedestrians and where local and regional (seasonal) wildlife freely move, including egrets, blue herons, and raptors. The biological assessment must be corrected accordingly. The potential for wildlife movement impacts remains. B3-22

Mitigation Measure MM-BIO-1 is inadequate because LADOT staff have no expertise in irrigation, soil science, weeding or managing trees and there has been no showing that LADOT has complied with mitigation requirements in the Project area in the past. B3-23

The finding under f) is inadequate because the nightime lighting is not time-limited. Night lights are well known to disturb habitat. The description of the area fails to acknowledge the natural-bottomed tunnels which function as ecological corridors for wildlife under the 134 freeway. In addition, the impact of the Project on Reach 1 of the LA River Ecosystem Restoration Project.[20]was not analyzed. REACH 1 is identified for Habitat Corridors/Riparian Planting on the overbanks of the LA River that lie within the project area. The potential for significant biological resource impacts remains. B3-24

[19] US Army Corps of Engineers, Los Angeles River Ecosystem Restoration Feasibility Project, adopted by City of Los Angeles, June 2016
Volume 1 https://usace.contentdm.oclc.org/digital/collection/p16021coll7/id/2339
Volume 3 https://usace.contentdm.oclc.org/digital/collection/p16021coll7/id/2341

[20] **US Army Corps of Engineers, Los Angeles River Ecosystem Restoration Feasibility Project, adopted by City of Los Angeles, June 2016**

**Volume 1** https://usace.contentdm.oclc.org/digital/collection/p16021coll7/id/2339

REACH 1 is found on Plates 11 and 12, Volume 1

**Volume 3** https://usace.contentdm.oclc.org/digital/collection/p16021coll7/id/2341

REACH 1, Habitat Corridors/Riparian Planting is found on Appendix G, Figure 4-17, Page 4-79 Alternative 20 (Adopted Alternative), Volume 3.

**d. Cultural Resources**

The finding on Page 73 under a) is inadequate because the Mariposa Bridge is listed on the National Register[21] because, among other factors, the "Bridge retains integrity of setting." Despite its location within a dense urban environment, the setting of the Mariposa Street Bridge continues to be pastoral."[22] The integrity of the Bridge setting would be impacted by the Project which would introduce a new use, bicycles, in the vicinity of the Bridge, and the MND fails to address the fact that the lack of bike trail connectivity and proximity to the Bridge will encourage bicyclists to attempt to use the Bridge to access the Burbank and the north side of the river. The MND fails to adequately mitigate the historic resource and operational impacts to the Mariposa Bridge. B3-25

The MND preparer in prior communications with the Consulting Party for the Mariposa Bridge sought to minimize these public's concerns.[23] The MND preparers failed to engage with the designated Consulting Party about the Mariposa Bridge. After efforts to communicate, the consultant dismissed concerns about the project description, legally allowable uses, and the Bridge as follows: "Please note that there will be no change in use and/or no physical or material alterations of the bridge as a result of the Project, and its eligibility and listing will not be impacted in any manner." (See **Attachment 5**). Nearly identical language is used in the MND on page 74. B3-26

**e. Hazards and Hazardous Material**

The MND and proposed Project fail to mitigate the impact of the project design and construction (including inadequate security fencing and trail widths) and address the startle factor of horses with respect to bicycles, construction activity, and/or the heavily trafficked freeway.[24] The horse trail will be next to the Caltrans right of way. The startle factor is recognized in Caltrans Highway Design Manuel, by the City of Los Angeles Complete Streets Plan[25] as well as the US Forest Service (see **Section VIII** of this letter). The potential for significant unmitigated safety hazards to horses and equestrians remains. B3-27

The finding on Page 98 under d) is inadequate because the MND fails to discuss that the project is located within the boundaries of the Glendale/Crystal Springs Operating Unit, San B3-28

[21] National Register Nomination for Mariposa Bridge is available at: https://ohp.parks.ca.gov/pages/1067/files/CA_Los%20Angeles_Mariposa%20St%20Bridge_DRAFT.pdf
The bridge was approved for designation at the February 2, 2024 meeting of the California State Historical Resources Commission: https://www.parks.ca.gov/NewsRelease/1239
For more information about the bridge see also: https://friendsofgriffithpark.org/mariposa-street-bridge-a-unique-historic-place/

[22] Ibid, Section 7, page 6.

[23] See: https://www.codepublishing.com/CA/Burbank/#!/Burbank06/Burbank0601.html#6-1-2802

[24] See: MND, Appendix I, Table 1 - Geometric Hazards Review.

[25] See Section 4.18 of https://planning.lacity.gov/odocument/c9596-0f3a-4ada-93aa-e70bbde68b0b/Complete_Street_Street_Design_Guide. pdf

Fernando Valley Superfund Site, EPA Region 9.[26] The EPA conducted a remedial investigation/feasibility study (2023).[27] There is no discussion of the effects of this project on the underground contamination plume in the MND. B3-28 (cont.)

Cited Appendix H is the Technical Study for NOISE, not hazards. This citation should be corrected. B3-29

**f. Land Use**

The MND fails adequately mitigate impacts of the project on land use because it misinterprets the ownerships and easements, which is a foundational error. (See **Attachment 1**). B3-30

The MND (see Page 104) fails to consider the impact of the project given its location in the following sensitive areas (see Attachment X):

Very High Fire Severity Zone - YES

Santa Monica Mountains Zone - YES

Mountain Lion Potential HIGH

Biological Resource Potential - HIGH

Special Grading Area (BOE Basic Grid Map A13372)— YES
The potential for impacts to these sensitive areas and resources remains. B3-31

The finding under a) is inadequate because the Project Description itself mischaracterizes the location and circumstances of existing conditions: the "service road" is within an equestrian trail easement. The easement is further identified as the River Trail. LCFCD owns an easement on the Los Angeles River and on its overbanks for flood control purposes, but it is not the fee owner of the land. That owner is the City of Los Angeles Recreation and Parks (RAP). According to Assessor records (see **Attachment 1**), the property is used for horse stables and trails. The record of use is unmistakable: for decades the uses have been equestrian and pedestrian uses only, supported by the accommodation in the design of significant public infrastructure (horse ramps by the Army Corps of Engineers, Equestrian Bridge permitted by the Los Angeles County Flood Control District, equestrian easements under the 134 Freeway in the form of several tunnels) and the concurrent development and preservation of significant Los Angeles, Burbank and Glendale communities as horse keeping areas through zoning, land use and municipal code ordinances. The proposed Project has the potential to disrupt equestrian use in the area and thus to divide communities. This is a potentially significant impact. B3-32

[26] See for example: https://semspub.epa.gov/work/09/100010776.pdf

[27] https://storymaps.arcgis.com/collections/6ca5bd6f91474df3acb8d07ef76f0aab?item=1

On March 24, 2025 CAL Fire released Fire Maps which the Very High Fire Severity Zone (VHFSZ) as covering the location of the proposed Project and extending to the north of it.[28] The MND fails to analyze the impacts of introducing new bicycle use in a VHFSZ and the potential for significant fire-related impacts. B3-33

The discussion under b) is inadequate. The MND omits the most relevant Reach identified in the LA River Ecosystem Restoration Project for this proposed Project. It fails to assess conflicts with the proposals for habitat restoration of the over banks. It also fails to consider the 2022 adopted Los Angeles County LA River Master Plan[29] which described the very location for the proposed project as: B3-34

> Adjacent to Griffith Park from approximately river mile 32 to 34.5 along the right bank. Significant Design Considerations for this Frame:
>
> - Projects in this frame have the opportunity to enhance native habitat and connect to other important habitat corridors in the region, especially the riparian to upland connection along the right bank with Griffith Park.
> - Significant equestrian community in this area would utilize an expanded network of equestrian trails.[30]

**g. Noise**

The findings on Page 110 under a) are inadequate because the construction noise and construction noise limitations apply only to receptors within the City of Los Angeles. Sensitive receptors, including horses and wildlife, will be within 500 feet of construction activities at Reach 1 and 2 LA River Ecosystem Restoration Project. The MND omits an assessment of Reach 1 and the finding is therefore inadequate**.** B3-35

The MND does not adequately assess the impact of vibrations on sensitive receptors. B3-36

MM - NOI- 1 is inadequate because noise blankets do not work based upon direct experience of equestrians (Pickwick Construction), and a reduction of 6dBA does not address sudden noises which startle horses. Saturday construction work will impact the primary B3-37

[28] See: https://calfire.app.box.com/file/1810974627871

[29] **Los Angeles River Revitalization Master Plan, April 2007:** https://lariver.lacity.gov/

Segment 9, description - "Partial capital funding attached"
https://www.google.com/maps/d/viewer?mid=16sTEZXoOofqmY0qooN-Cszgeh0I&femb=1&ll=34.15423733559887%2C-118.31684196334493&z=16

Findings and Statement of Overriding Considerations
https://clkrep.lacity.org/onlinedocs/2006/06-0186_rpt_misc_4-23-07.pdf

[30] Page 384, Implementation, LA County LA River Master Plan, 2022.

horseback riding day and further damage businesses that rely on providing the weekend horseback riding experience to young, old, beginners, and disabled. Saturday is when people ride out of the rent barns; and take their children for a ride. The potential for significant noise impacts on horses and equestrian activities remains. B3-37 (cont.)

The Equestrian Trail along the northside of the LA River in Reach 1 is approximately 130 feet from construction of the proposed Project and it is at the same elevation. Noise impacts were not studied for sudden sounds commonly associated with dropping asphalt into trucks or suddenly starting construction equipment. These types of sounds have the potential to result in significant impacts to horses and equestrian safety. B3-38

**h. Public Services and Utilities**

The proposed MND fails to adequately address impact of the Project on vehicle access of heavy duty DWP equipment. This equipment is used to power wash the towers. B3-39

**i. Recreation**

The findings on Page 123 under a) are inadequate because the type of fencing recommendation is landscape fencing, prone to cutting and vandalism. There are no proposals for the Caltrans fencing where horses will be closest to the freeway and subject to startle. Based on evidence in the record, fencing material is inadequate. B3-40

The project will terminate on its western end without adding any bike path or trails connections. It will become an unmaintained dead-end. This will result in the inadvertent encouragement of bicyclists to use equestrian/pedestrian only facilities including the Mariposa Bridge and Tunnels 6 and 7 to connect to the Burbank or greater Griffith Park areas. This will result in a significant impact on equestrian/pedestrian recreation in the area by introducing bicycle conflicts. B3-41

**j. Transportation**

The finding on Page 126 under c) is inadequate. The geometric review inadequate because, pursuant to Caltrans Highway Design Manual:[31]

> When a corridor includes equestrian paths and Class I bikeways, the widest possible lateral separation should be provided between the two. A physical obstacle, such as an open rail fence, adjacent to the equestrian trail may be beneficial to induce horses to shy away from the bikeway, as long as the obstacle does not block visibility between the equestrian trail and bicycle path. B3-42

[31] California Department of Transportation (Caltrans) Highway Design Manual (HDM), Chapter 1000 – Bicycle Transportation Design, Topic
1003 – Bikeway Design Criteria, Section 1003.1 (Class I Bikeways)

Given the Project design, a horse that shies away from the bicyclist will have insufficient space for its rider to collect and calm it. The horse and rider will be adjacent to the Caltrans right-of-way. They will be closest to freeway noise and traffic. The potential for impacts remains.

B3-42 (cont.)

The LA Complete Streets Design Guide, Section 4.18 states:[32]

> A minimum height of 4 feet is recommended for all fences and barriers along trails. A greater height may be permitted for trails adjacent to high-speed roads where traffic may startle horses. Height should be tapered down as trail approaches intersections or end, to maximize horse/rider view.

The proposed chain link fence on the Caltrans Right of way is now cut all of the time (see **Attachment 2**). The project detail plans do not include a vandal cut-proof fence; nor are the detailed plans, which were provided to Emily Gable-Luddy on March 28, 2025, indicative of critical requirements: fencing type, final equestrian trail width, etc. The detail drawings, appear to remain in progress and there is a lack assurances that the acquisition of Caltrans ROW will be secured to maintain minimum equestrian tail width. The Project detail plans were not made available to the public to review before the comment deadline. In the absence of a vandal cut-proof fence and a demonstration that provision of an adequate equestrian trail width, the potential for significant safety impacts remains.

B3-43

According to MND Appendix I, several accommodations are being prepared by the City of LA Design Team that will permit deviations from the Caltrans Highway Design Manual. According to MND Appendix I, the geometry of the proposed bike path is being designed for low volume pedestrians and bicyclists. There are several notations in Appendix I referring to detail project plans, which have not been included in the Appendix. The MND fails to address whether any such design modifications will result in additional safety impacts.

B3-44

## X. Failure to Analyze Alternatives to the Proposed Project Design, Due to Failure to Prepare and EIR

As detailed herein, the proposed Project design has the potential to result in horse/bicycle conflict, resulting in the potential for impacts to equestrians and their horses. In addition, the location of the alignment in proximity to the two equestrian/pedestrian tunnels and the Mariposa Bridge has the potential to inadvertently encourage bicyclists to make use of these equestrian facilities to access either Griffith Park or the Burbank area, further resulting in the potential for equestrian bicycle conflicts. One of the reasons that an EIR would be appropriate is so that alignment alternatives for bike use which avoid equestrian areas can be analyzed. Two potential alternatives that should be included in the required EIR would be: (1) routing bicyclist via Forest Lawn Drive and (2) routing bicyclists via Riverside Drive in this area, with connectivity to bike path segments to the north and south.

B3-45

[32] City of Los Angeles Complete Streets Design Guide, Section 4.18: Sidewalk Equestrian Trails, as cited in the MND Transportation appendix.

## XI. Errors, Corrections and Questions

Page 2: Page 2 of the MND states:

> After the close of the public review period, the Board of Public Works considers the ND or MND, together with any comments received during the public review process and makes a recommendation to the City Council on whether or not to approve the Project. One or more Council committees may then review the proposal and documents and make its own recommendation to the full City Council. The City Council is the decision-making body and also considers the ND or MND, together with any comments received during the public review process, in the final decision to approve or disapprove the project.

B3-46

However, at the March 12, 2025 virtual meeting on the Project, a slide labeled "Next Steps" stated the following:

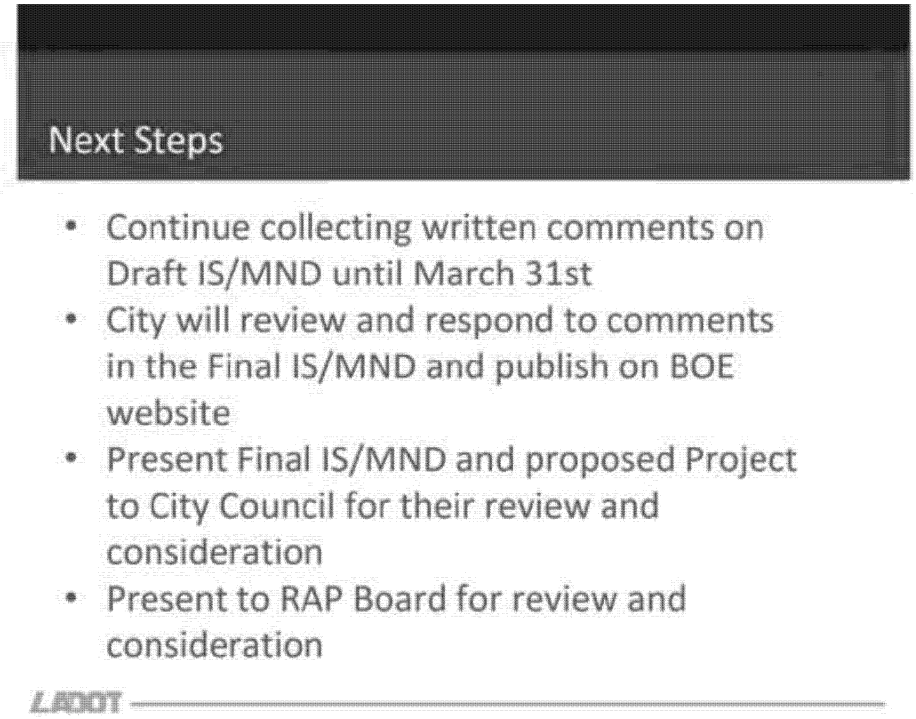


**FIGURE 6 – LADOT Description of Review Process Provided in the at the March 12, 2025 Virtual Meeting**

B3-46 (cont.)

This difference in the process description between the MND and the Virtual Meeting Presentation has created confusion among members of the public. Members of the public are unclear regarding the point of possible participation in the process.

Page 3-4: The project location is described as an "…alignment along an existing paved service road with an existing, variable 8- to 10-foot right-of-way (ROW) width. The existing service road is owned by the Los Angeles County Flood Control District and under the jurisdiction of the U.S. Army Corps of Engineers (USACE) is currently accessible only to pedestrians, cyclists, and equestrian users via an existing pedestrian/equestrian bridge to the west of the alignment and a tunnel beneath the 134 Freeway that connects to Griffith Park/Zoo Drive to the south."

B3-47

The description in substantial error because the proposed project is proposed across an existing easement for equestrian purposes granted by the LA County Flood Control District to the Los Angele City Department of Recreation and Parks (RAP) decades ago and acknowledged in Park Maps as the River Trail. The LCFCD owns an access easement for flood control purposes, but the underlying fee ownership is (RAP) It is and always has been an equestrian trail that was paved possibly in the 1980's. But it has never been a bike path, a dedicated service road nor has the property been owned by the LCFCD. It is an easement granted to the RAP for a bridle path. (See **Attachment 1**)

Page 46: The closest educational facility is the LILA School, not McKinley Elementary School. The Mariposa Equestrian Bridge and its historic nature needs to be discussed. The Project is adjacent to the Griffith Park Historic Cultural Monument.

B3-48

Figure 4b: The photo is deceptive because it carefully avoids the prominent sign vandalism on signs posted trail side near Tunnel 6. A careful examination of photo shows sign vandalism which should be noted in the caption.

B3-49

Figure 4c: Photo 5 is deceptive because it fails to include the vandalized signs at the edge of trail.

B3-50

Figure 4e: What is the relevance of Photo 10. The connection to the LA Equestrian Center (LAEC) is to the west. The equestrian trail, labeled "main trail," that is cited an example of trail design is nowhere near the proposed Project. The "Main Trail" is also known as Oak Canyon. The graffiti that is painted out I believe is done by a group of volunteers. This needs to be confirmed so there is no confusion.

B3-51

Figure 4f: Photo 11 requires measurements to understand the relationship of the horse trail and the bike path, their side-by-side widths and the location of the Caltrans chain link fence. Photo 12 is mislabeled. It is the view looking westbound, east of the terminus. B3-52

## XII. Conclusion

The Project Description erroneously identifies the Project site as an "access road" and the Project as providing "new" pedestrian and equestrian access when the "access road" is, in reality, a decades-old equestrian trail easement that accommodates pedestrians and equestrians, and connects directly to the Los Angeles Equestrian Center. The Proposed Project will not provide "new access to public transit, homes, school, work" etc., because it will dead-end.[33] There is no access to this bike path for pedestrians and cyclists from the west. Bicycles and disabled persons **will become stranded**, must turnaround and head back south/east the way they came. B3-53

Frustrated cyclists now cut fences and vandalize signs along the existing easement. There is good reason to believe, on the basis of LADOT's failed maintenance of the existing east bike path dead-end, that they will continue to do so in the future, putting horseback riders at significant risk and compromising the setting and integrity of the historic Mariposa Bridge listed on the National Register in March of 2024. B3-54

The valuable history of the area, known as the Mariposa Basin, has been simply ignored in the MND. It is a long-standing natural and equestrian use area with significant public infrastructure constructed to accommodate pedestrians and equestrians. The infrastructure includes tunnels, a bridge and horse/hiking trails identified in the record as equestrian easements and utilized for decades as such. The introduction of cyclists will conflict with these uses. B3-55

The LA River bike path is a county-city vision that looks great from a 30,000-foot bird's eye view. However, from a 100-foot view, the facts on the ground are quite different. This is a sensitive area of longstanding established uses that directly support the current trail system for horseback riders from Los Angeles, Burbank and Glendale. Introducing NEW uses, and encouraging bicycle use in this area, would result in impacts inadequately studied in the MND. B3-56

While not the principal subject of this comment letter, it is extraordinary that the Phase IV Project costs have ballooned to $9 million[34] from $2.3 million in 2019, and the project was intended to be completed by January 1, 2024.[35] Based on the currently projected cost, it will cost

[33] See MND, Figure 2 and Sheet 6a.

[34] Public Meeting 7.22.24

[35] Metro-Los Angeles Phase IV Letter of Agreement 2019 included in Attachment 3.

approximately $20,000 per every 10-feet of trail. The wisdom of the Project as currently conceived is thus questionable.

As detailed in this comment letter, the MND for the proposed Project contains significant defects. These must be corrected and an EIR prepared pursuant to CEQA Guidelines Sections 15002 and 15064.

Please keep this office on the list of interested persons to receive timely advance notice of all hearings, votes and determinations related to the Project, its DEIR and requested entitlements. Pursuant to Public Resources Code Section 21167(f), please provide us with a copy of each and every Notice of Determination issued in connection with the Project. B3-56 (cont.)

As previously noted, we adopt and incorporate by reference all Project comments and objections raised by all others during the environmental review and land use entitlement processes for the Project. Pursuant to PRC Section 21167.6(e) and *Consolidated Irrig. Dist. v.. Superior Court*, 205 Cal.App.4th 697 (2012), please include all of the hyperlinked references cited in each of the comment letters submitted during the administrative process in the administrative record.

Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

Jamie T. Hall

Attachments:

1. APN and Parcel Easements
2. Photos of Cut Fences and Maintenance Issues
3. Letter Agreement for Federal Projects Programmed Through the LACMTA Call for Projects dated July 1, 2019 showing the use of federal funds for the Project.
4. City of Los Angeles ZIMAS Report for the Project Parcel
5. Mariposa Bridge Consulting Parties Emails

Cc:

Friends of the Equestrian Bridge
friendsofeqbridge@gmail.com

Friends of Griffith Park
gerry@friendsofgriffithpark.org

# Attachment 1
# APN and Parcel Easements

## Subject Property Location

[redacted]

| | | | |
|---|---|---|---|
| **Property Address** | | | |
| **City, State & Zip** | LOS ANGELES, CA 90068 | | |
| **County** | LOS ANGELES COUNTY | **Property Use** | Riding Stable, Trails |
| **Mailing Address** | 111 E 1ST ST STE 201, LOS ANGELES, CA 90012-4113 | **Parcel Number** | 5581-001-906 |
| **Census Tract** | 9800.09 | **Latitude** | 34.155844 |
| **Thomas Bros Pg-Grid** | | **Longitude** | -118.310547 |

**Legal Description Details** Brief Description: M R 43-47-59 FOR DESC SEE ASSESSOR'S MAPS POR OF SD RO

## Current Ownership Information **Source of Ownership data: Assessment Data*

| | |
|---|---|
| **Primary Owner Name(s)** | L A CITY PARK |
| **Vesting** | |

## Latest Full Sale Information

Details beyond coverage limitations

**Financing Details at Time of Purchase**

No financing details available

## Property Characteristics

| | | | | | | |
|---|---|---|---|---|---|---|
| | **Bedrooms** | | **Year Built** | | **Living Area (SF)** | 0 |
| | **Bathrooms/Partial** | | **Garage/No. of Cars** | | **Price ($/SF)** | |
| | **Total Rooms** | | **Stories/Floors** | | **Lot Size (SF/AC)** | 6,930/.16 |
| | **Construction Type** | | **No. of Units** | | **Fireplace** | |
| | **Exterior Walls** | | **No. of Buildings** | | **Pool** | |
| | **Roof Material/Type** | | **Basement Type/Area** | | **Heat Type** | |
| | **Foundation Type** | | **Style** | | **A/C** | |
| | **Property Type** | Recreational | **View** | | **Elevator** | |
| | **Land Use** | Riding Stable, Trails | | | **Zoning** | LAOS |

## Assessment & Taxes

| | | | | | | |
|---|---|---|---|---|---|---|
| | **Assessment Year** | 2024 | **Tax Year** | | **Tax Exemption** | |
| | **Total Assessed Value** | | **Tax Amount** | $.00 | **Tax Rate Area** | 0-013 |
| | **Land Value** | | **Tax Account ID** | | | |
| | **Improvement Value** | | **Tax Status** | | | |
| | **Improvement Ratio** | | **Delinquent Tax Year** | | | |
| | Total Value | | | Market Improvement Value | | |
| | Market Land Value | | | Market Value Year | | |

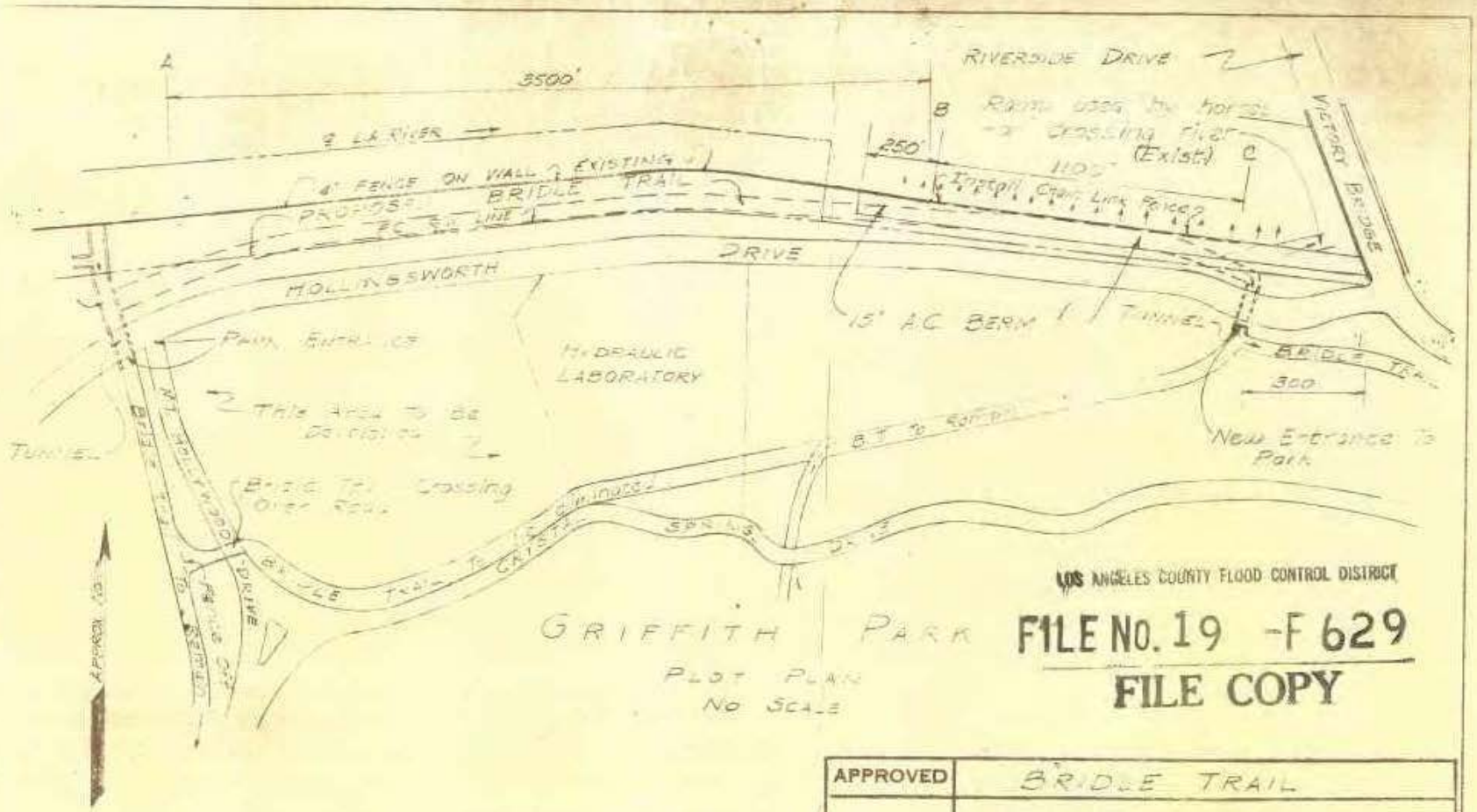
## Lien History

| Trans. ID | Recording Date | Lender | Amount | Purchase Money |
|---|---|---|---|---|

No details available

## Loan Officer Insights

No details available




LOS ANGELES COUNTY FLOOD CONTROL DISTRICT

FILE NO. 19 -F 629

FILE COPY

| APPROVED | BRIDLE TRAIL |
|---|---|
| | GRIFFITH PARK |
| | LOS ANGELES CALIF. |
| | DEPT. OF PARKS AND PLAYGROUNDS GEO. HJELTE |
| | DATE 7-18-50 DESIGN PLAN |
| | DRAWN E.L.S. |
| | CH'K'D SHEET |

LOS ANGELES COUNTY FLOOD CONTROL DISTRICT

FILE No. 19 -F 629

FILE COPY

FILE COPY

FILE No. 19 -F 629

LOS ANGELES COUNTY FLOOD CONTROL DISTRICT

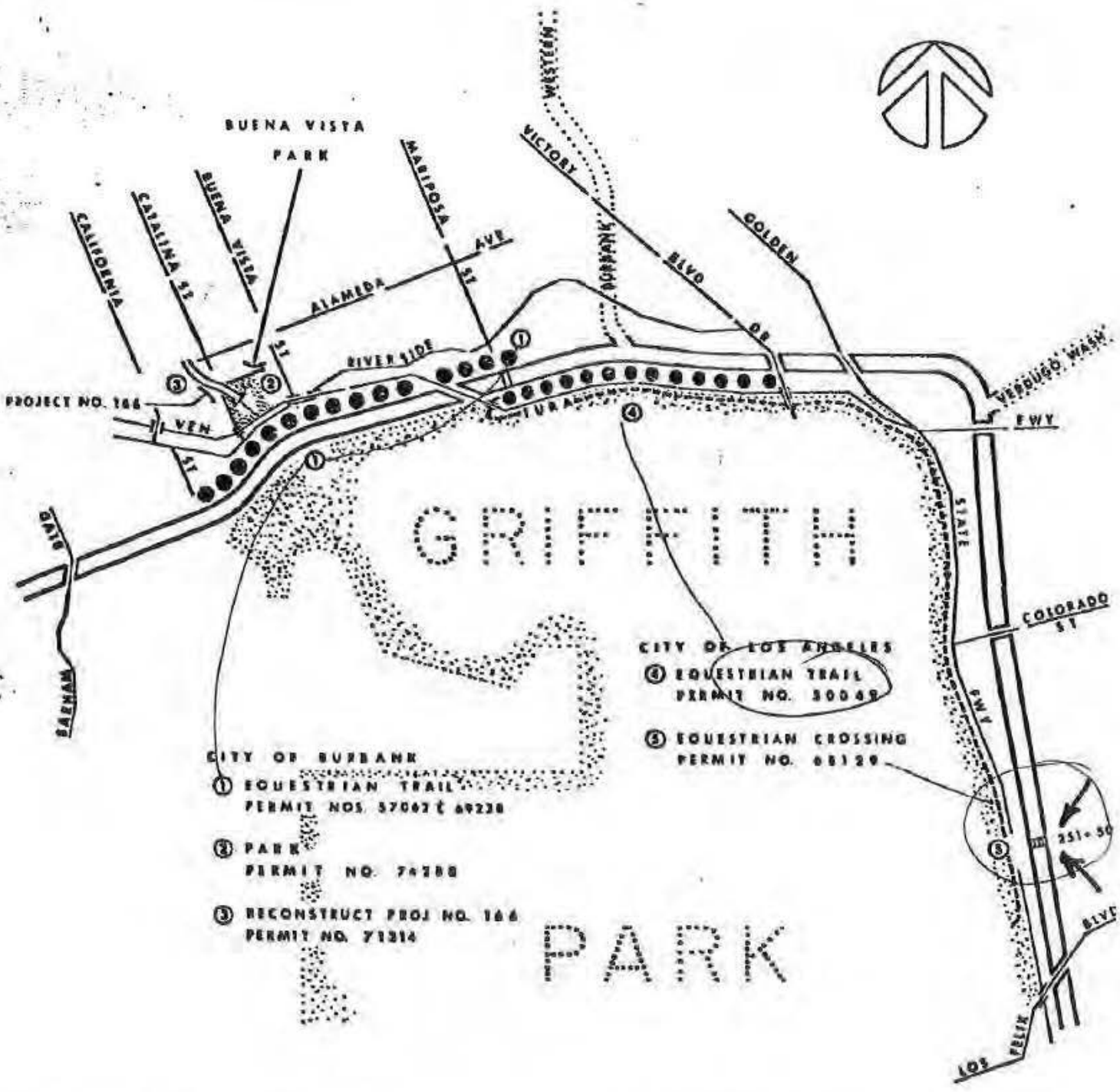
Letter No. 175 4-69 Letter No. 2578

LOS ANGELES COUNTY FLOOD CONTROL DISTRICT

FILE No. 19 -F 629

FILE COPY

| Permittee | Project | Authorization | Purpose |
|---|---|---|---|
| Los Angeles City Department of Recreation and Parks | Lower Ballona Crk | Pt No. 721011 | Beach Parking Areas |
| | Limekiln Debris Basin | Pt No. 73788 | Equ Trail; 93-F 106.1 & 106.2 |
| | Upper L. A. River | Pt No. 50049 | Equ Trail, Riverside W. Mariposa; 19-F 629 |
| | | Pt No. 68129 | Equ Trail Crossing, ½ mi U/S Los Felix Blvd |
| | Tujunga Wash | Pt No. 76389 | Mural, U/S Burbank Blvd |
| | | Pt No. 77010 | Bicycle Trail Bridge at Canterbury Ave; 11-F 512.1 thru 512.5 |
| | | Pt No. 77011 | Bicycle Trail, Oxnard N. to Canterbury; 11-F 513.1 thru 513.7 |
| | | Pt No. 77044 | O & M Hik & Bike Trls, Chandler N. to Oxnard; 11-F 505.1 through 505.2 |
| Los Angeles Co. Dept of Parks and Recreation | Cheseboro Cyn Ch | Pt No. 73458 | Equ trl; 422-F 9 |
| | Eaton Wash | Pt No. 64296 | Equ Bridge at Rio Hondo; 24-F 296.1 through 296.3 |
| | Flint Canyon Channel | Pt No. 56409 | Equ Trl; 65-F 56 |
| | | Pt No. 64569 | Reloc gate at Paradise Cyn Ch confluence |
| | Gould Canyon Ch & Debris Basin | Pt No. 51020 | Equestrial Trail; 65-F 56 |
| | Las Flores Cyn Channel & Debris Basin | Pt No. 51023 | Equ Trl; 65-F 56 |
| | | Pt No. 56270 | Trail access at Mount Curve Ave |
| | Lincoln Debris Basin | Pt No. 60503 | Equestrial Trail; 37-F 24, 65-F 56 |
| | | Pt No. 74727 | Relocate portion of trail; 37-F 29 |
| | Lower Los Angeles River | Agmt No. 11866 supersedes Pt No. 47264 | Equ trl, Willow St N. to Rio Hondo; 19-F 2064 |



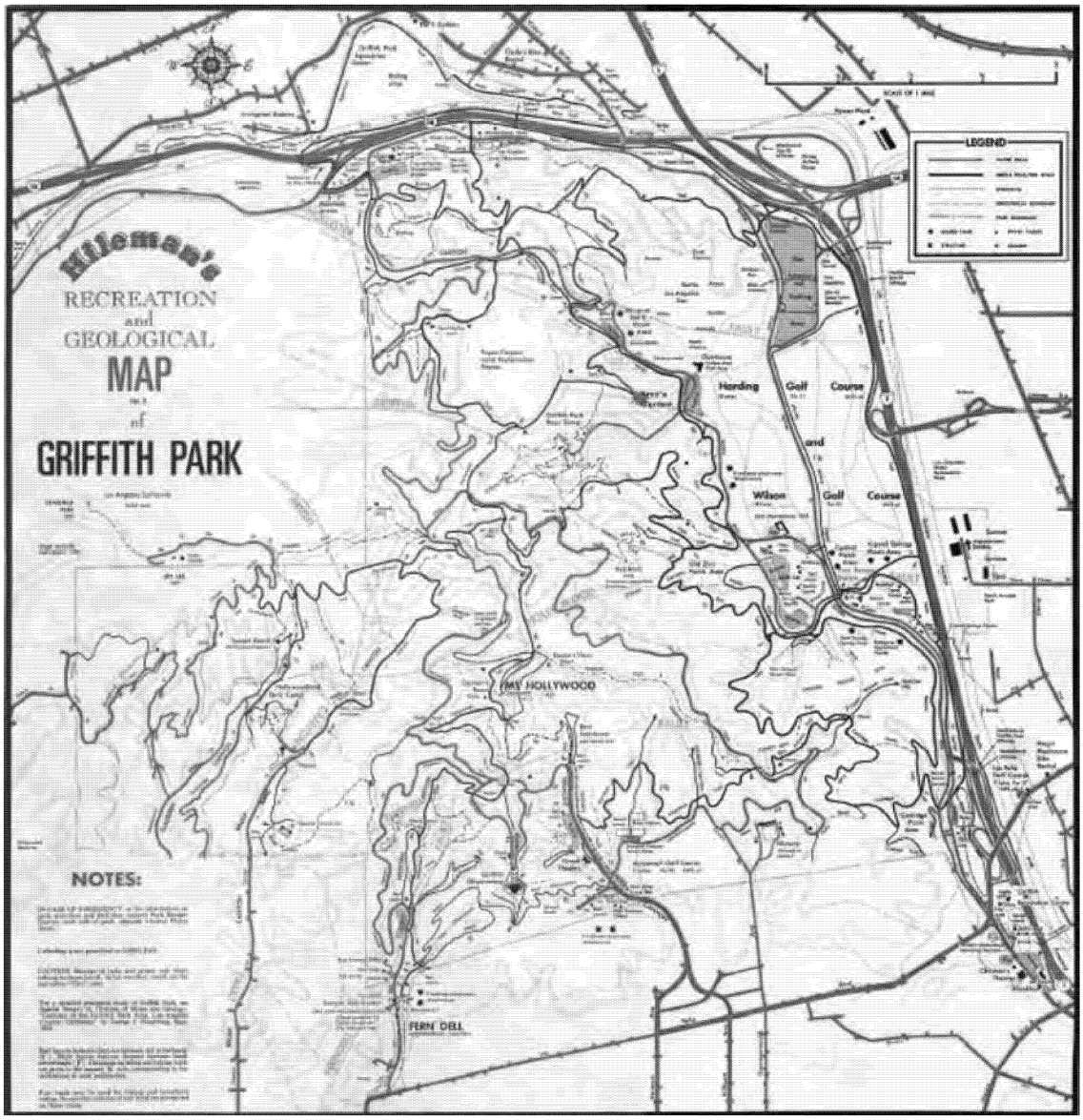

THIS REACH OF THE L.A. RIVER IS MAINTAINED BY THE U.S. ARMY CORPS OF ENGINEERS

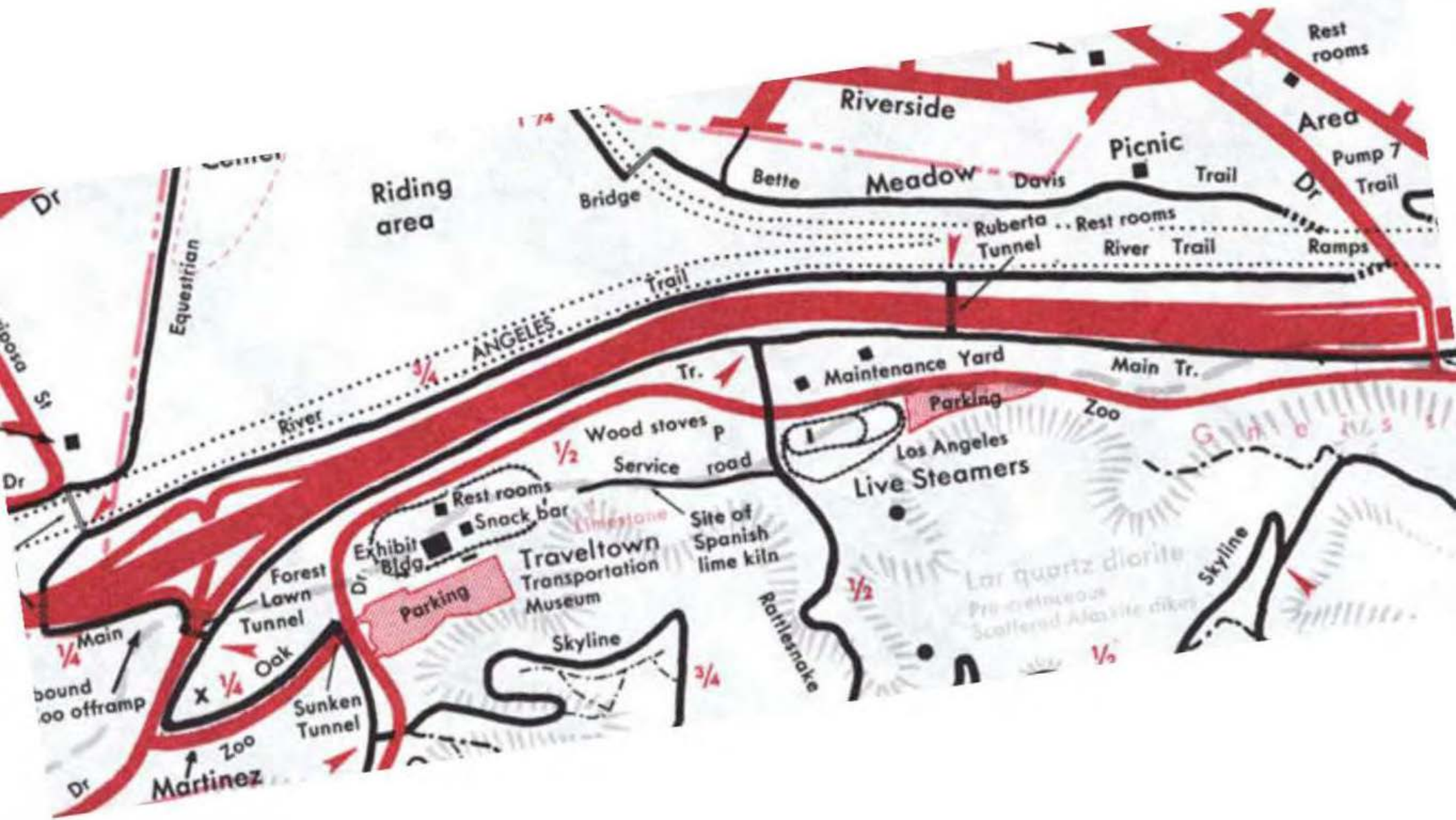
● EQUESTRIAN TRAIL ON LACFCD R/W

▬ TRAIL OUTSIDE LACFCD R/W

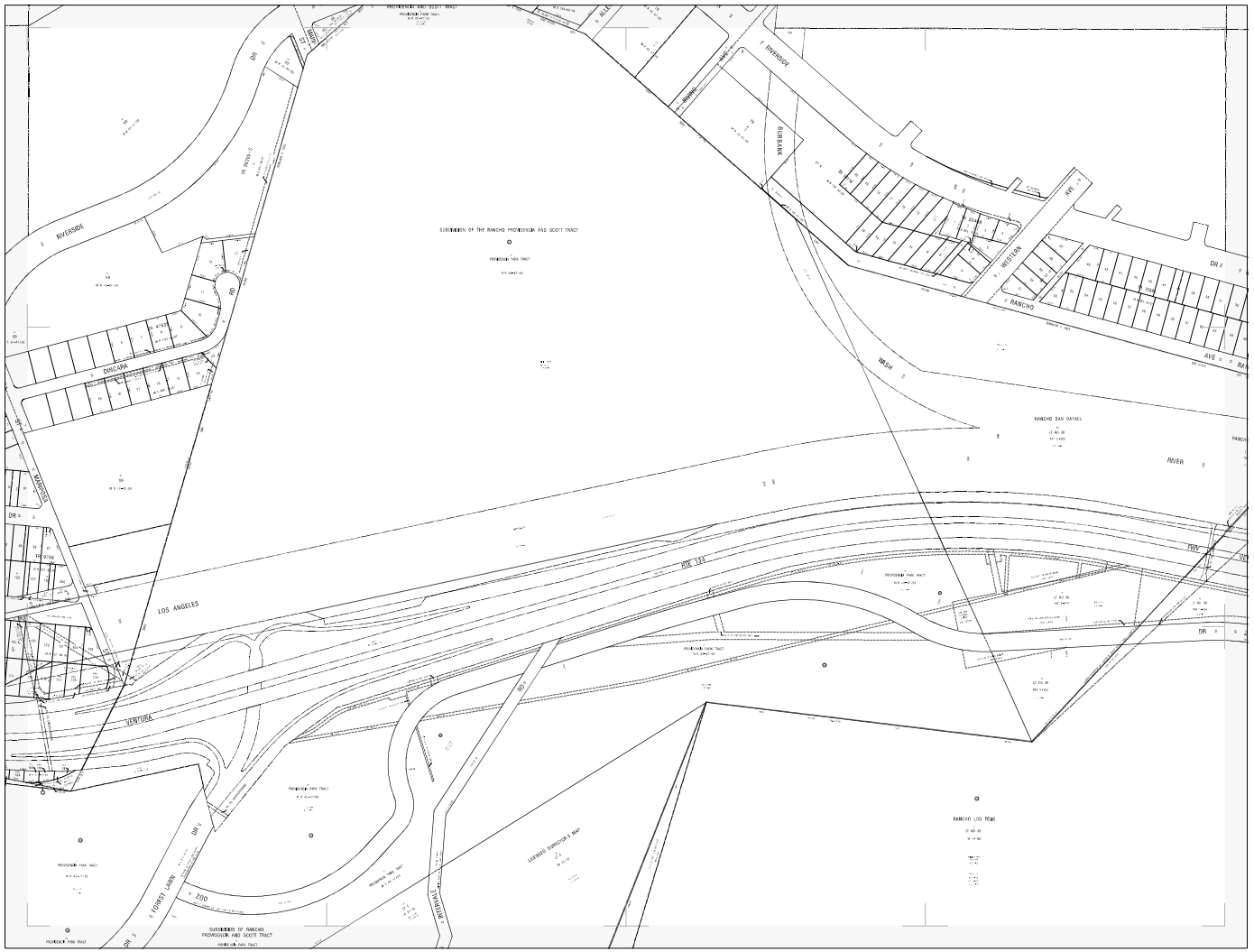
TH BRO 24

# LOS ANGELES RIVER


Hillman's
RECREATION
and
GEOLOGICAL
MAP
of
GRIFFITH PARK
NOTES:
LEGEND
Harding
Golf
Course
Wilson
Golf
Course
MT. HOLLYWOOD
FERN DELL


Riverside
Area
Rest rooms
Picnic
Trail
Pump 7
Dr
Trail
Bette
Meadow
Davis
Bridge
Riding area
Ruberta Tunnel
Rest rooms
River Trail
Ramps
Equestrian
Trail
ANGELES
River
Tr.
Maintenance Yard
Main Tr.
Parking
Zoo
Wood stoves
P
Service road
Los Angeles Live Steamers
Rest rooms
Snack bar
Exhibit Bldg.
Traveltown Transportation Museum
Site of Spanish lime kiln
Parking
Forest Lawn Tunnel
Main
Oak
Sunken Tunnel
Zoo
Martinez
Skyline
Rattlesnake
Skyline
Dr
St
1/4
1/2
3/4

# 168B193




PLOT AS OF 2/23/2023

KEY MAP
168 B 193

CITY OF LOS ANGELES

| | |
|---|---|
| TED ALLEN, P.E. | CITY ENGINEER |
| BUREAU OF ENGINEERING | GIS DIVISION |
| ESSAM AWARRACY | DIVISION MANAGER |
| RAUL VIRGEN | GIS CHIEF |

168B193

# Attachment 2
# Photos of Cut Fences and Maintenance Issues

**PHOTOS SHOWING DAMAGE TO EXISTING FENCING IN PROJECT VICINITY**

**Cut Fence Near Forest Law Off Ramp**

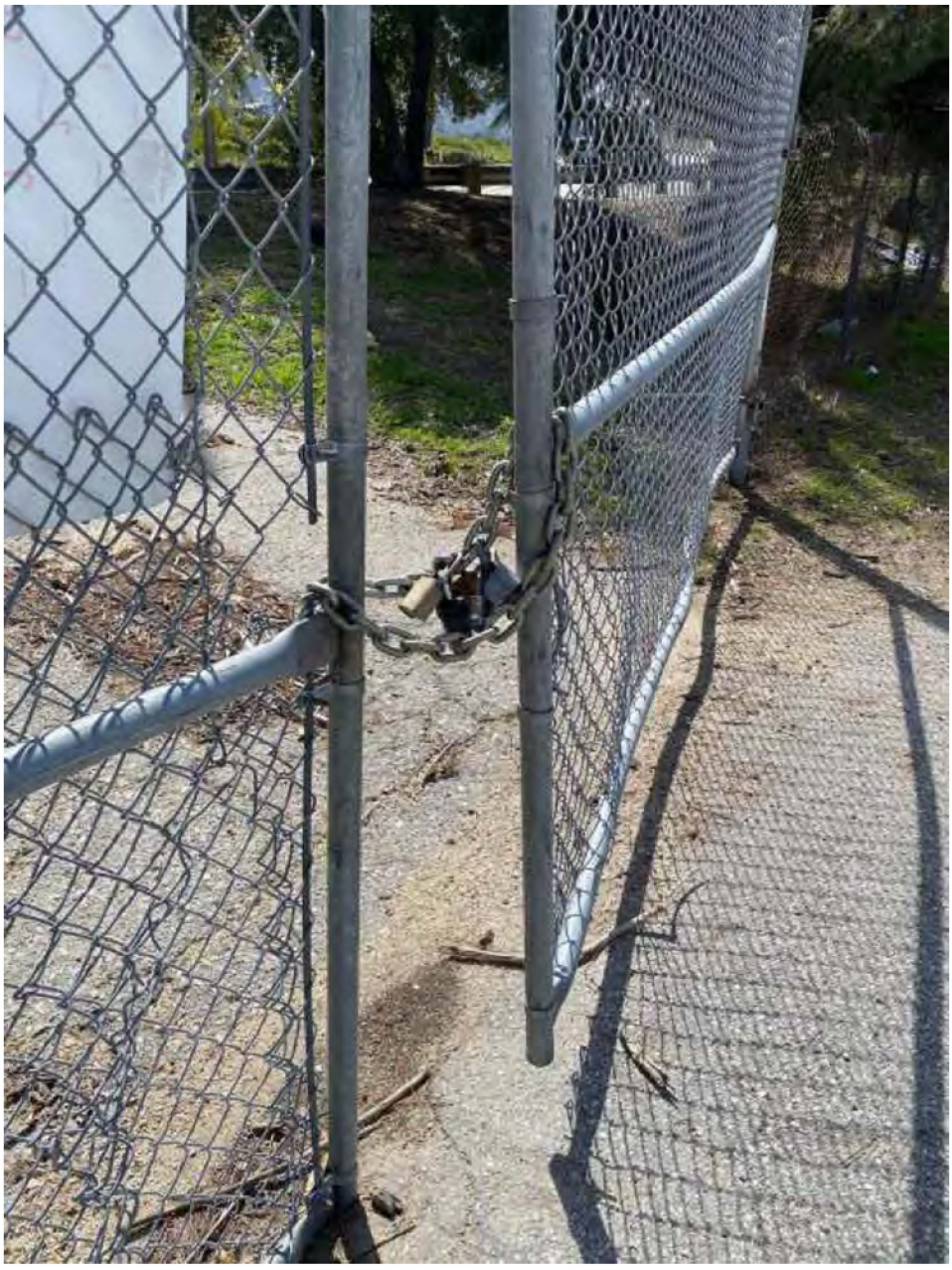


**Photo showing that padlocks do not keep people out in Project vicinity.**

**Fence Vandalized at Forest Lawn On/Off Ramps**

**Signs Near Horse Tunnel 6 Vandalized**

**Caltrans Fence Cut in Project Vicinity**

# Attachment 3
# Letter Agreement for Federal Projects Programmed Through the LACMTA Call for Projects dated July 1, 2019 showing the use of federal funds for the Project

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

FTIP# LAF3516

CFP# F3516
LOA.P00F3516

July 1, 2019

CITY OF LOS ANGELES
DEPARTMENT OF TRANSPORTATION
100 S. Main Street, 10th Floor
Los Angeles, CA 90012
Attn: Seleta Reynolds

RE: LETTER OF AGREEMENT FOR FEDERAL PROJECTS PROGRAMMED THROUGH THE LACMTA CALL FOR PROJECTS

Dear Sir/Madam:

As part of the Los Angeles County Metropolitan Transportation Authority ("LACMTA") 2009 Call for Projects, the LACMTA Board of Directors, at its meeting on September 24, 2009, authorized the programming of funds to the City of Los Angeles ("Project Sponsor") for the Los Angeles River Bike Path Phase IV Construction – LACMTA Call for Projects ID# F3516, FTIP# LAF3516, (the "Project") subject to the terms and conditions contained in this Letter of Agreement ("LOA").

The terms and conditions of this LOA consist of the following and each is incorporated by reference herein as if fully set forth herein: Specific Terms of the LOA, General Terms of the LOA; Attachment A - the Project Funding, Attachment B - the Scope of Work, Attachment C - the Reporting Guidelines, Attachment D - Federal Transportation Improvement Program (FTIP), Attachment E - Caltrans Document List, Attachment F - Special Conditions by the Board, and Attachment G - Project Readiness Certification and any other attachments or documents referenced therein.

In the event of a conflict, the Special Conditions for the Project, if any, shall prevail over the Specific Terms of the LOA and the Specific Terms of the LOA shall prevail over the General Terms of the LOA.

Please acknowledge your acceptance and agreement to the terms and conditions of this LOA by signing below.

Very truly yours,

Phillip A. Washington
Chief Executive Officer

Project Sponsor has read and understands the terms and conditions of this LOA, including all the attachments, and by signing below Project Sponsor hereby accepts and agrees to the terms of this LOA.

CITY OF LOS ANGELES
DEPARTMENT OF TRANSPORTATION

By: _____ Date: 9-10-19

for Seleta J. Reynolds
General Manager

APPROVED AS TO FORM:

By: _____ Date: 8/13/19

Mike Feuer
City Attorney

In the event of a conflict, the Special Conditions for the Project, if any, shall prevail over the Specific Terms of the LOA and the Specific Terms of the LOA shall prevail over the General Terms of the LOA.

Please acknowledge your acceptance and agreement to the terms and conditions of this LOA by signing below.

Very truly yours,

Phillip A. Washington
Chief Executive Officer

Project Sponsor has read and understands the terms and conditions of this LOA, including all the attachments, and by signing below Project Sponsor hereby accepts and agrees to the terms of this LOA.

CITY OF LOS ANGELES
DEPARTMENT OF TRANSPORTATION

By: _____ Date: 9-10-19
for Seleta J. Reynolds
General Manager

APPROVED AS TO FORM:

By: _____ Date: 8/13/19
Mike Feuer
City Attorney

In the event of a conflict, the Special Conditions for the Project, if any, shall prevail over the Specific Terms of the LOA and the Specific Terms of the LOA shall prevail over the General Terms of the LOA.

Please acknowledge your acceptance and agreement to the terms and conditions of this LOA by signing below.

Very truly yours,

Phillip A. Washington
Chief Executive Officer

Project Sponsor has read and understands the terms and conditions of this LOA, including all the attachments, and by signing below Project Sponsor hereby accepts and agrees to the terms of this LOA.

CITY OF LOS ANGELES
DEPARTMENT OF TRANSPORTATION

By: _____ Date: 9-10-19

for Seleta J. Reynolds
General Manager

APPROVED AS TO FORM:

By: _____ Date: 8/13/19

Mike Feuer
City Attorney

CALL FOR PROJECTS
LETTER OF AGREEMENT

PART I
SPECIFIC TERMS OF THE LOA

1. Title of the Project (the "Project"): Los Angeles River Bike Path Phase IV Construction - LACMTA Call for Projects ID# F3516, FTIP# LAF3516.

2. Amount of Funds Programmed (the "Funds"): LACMTA Board of Directors' action of September 24, 2009, originally programmed $1,826,537 (the "Funds") over one year, Fiscal Year (FY) 2013-14. The Project Sponsor was later required to apply for the State Active Transportation Program, but was not awarded funds. LACMTA Board of Directors' action on June 25, 2015 reprogrammed the Funds over one year, FY 2018-19. LACMTA Board of Directors' action recertified the Funds for FY 2018-19 only in the amount of $1,826,537.

3. The Funding Agency for this Project (the "Agency") is CALTRANS.
The Programming Agency for this Project is LACMTA.

4. The "Project Funding" documents all sources of funds programmed for the Project as approved by LACMTA and is attached as Attachment A. The Project Funding includes the total programmed budget for the Project, including the Funds programmed by LACMTA and the Project Sponsor Funding Commitment (local match). The Project Funding also includes the fiscal years in which all the funds for the Project are programmed.

5. Project Sponsor shall complete the Project as described in the Scope of Work. The "Scope of Work" for the Project is attached to this LOA as Attachment B. The Scope of Work includes a general description of the Project and a detailed description of the work to be completed. The Scope of Work also includes a set schedule including Project milestones consistent with the lapsing policy described in Part II below. Work shall be delivered in accordance with that schedule unless otherwise agreed to by the parties in writing.

6. Attachment C - the Reporting Guidelines; Project Sponsor shall complete the "Quarterly Progress Report." The Quarterly Progress Report is attached to this LOA as Attachment C1 in accordance with Attachment C - Reporting Guidelines.

7. The "FTIP PROJECT SHEET" is attached as Attachment D and is required to ensure that the Project is programmed correctly in the most up-to-date FTIP document. The FTIP PROJECT SHEET can be found in ProgamMetro FTIP database under the reports section at https://program.metro.net. All projects that receive funding through the LACMTA Call for Projects must be programmed into the FTIP which includes locally funded regionally significant projects for information and air quality modeling

purposes. Project Sponsor shall review the Project in ProgramMetro each year and update or correct the Project as necessary during a scheduled FTIP amendment or adoption. Project Sponsor will be notified of amendments and adoptions to the FTIP via e-mail. Changes to the FTIP through ProgramMetro should be made as soon as possible after Project Sponsor is aware of any changes to the Project, but no later than October 1 of the year the change or update is effective. Should Project Sponsor fail to meet this date, it may affect Project Sponsor's ability to access funding, delay the Project and may ultimately result in the Funds being lapsed.

8. Attachment E - Caltrans Document List, are attached to this LOA as Attachment E for reference purposes only and however a more current listing may be found on http://www.dot.ca.gov/hq/LocalPrograms/ or http://www.dot.ca.gov/hq/LocalPrograms/public.htm

9. Special Grant Conditions imposed by the LACMTA is attached as Attachment F. Project Sponsor shall comply with the Special Grant Conditions as set forth in Attachment F.

10. An executed "Project Readiness Certification" is attached as Attachment G, which is evidence that Project Sponsor can appropriately fund and staff the Project so that the Project can be completed in a timely manner.

11. Prior to the obligation of the Funds, no material changes to the Project Funding or the Scope of Work shall be funded or allowed without prior written approval of LACMTA and Project Sponsor. Such prior approval shall be evidenced by an amendment to this LOA, approved and signed by the LACMTA Chief Executive Officer or his designee and Project Sponsor. After the Funds have been obligated, no material changes will be allowed.

12. LACMTA's Address:
    Los Angeles County Metropolitan Transportation Authority
    One Gateway Plaza
    Los Angeles, CA 90012
    Attention: Michael Richmai
    Mail Stop: 99-22-6
    Phone: 213-922-2558; Email: RichmaiM@metro.net

13. Project Sponsor's Address:
    City of Los Angeles, Department of Transportation
    100 S. Main Street, 10th Floor,
    Los Angeles, CA 90012
    Attention: Paul Konkirati
    Phone: 213-972-8632; Email: Paul.Konkirati@lacity.org

## PART II
## GENERAL TERMS OF THE LOA

1. PAYMENT OF FUNDS: Project Sponsor understands and agrees that LACMTA provides no Funds under this LOA and LACMTA shall have no responsibility or obligation to provide any Funds for the Project. Project Sponsor shall receive the Funds directly from the Agency pursuant to a separate agreement with the Agency. Project Sponsor shall submit to the Agency the appropriate invoices in the form, manner, and schedule specified by the applicable requirements of the Agency. Project Sponsor cannot be reimbursed for any cost incurred without prior authorization from the Agency. Project Sponsor shall be subject to, and comply with, all applicable requirements of the Agency and of LACMTA as required by LACMTA to fulfill its responsibilities as the programming agency. The allowability of expenditures, the cost reimbursement schedule, eligibility issues, resolution of disputes, and all other issues relating to this LOA shall be subject to the rules, regulations, and requirements of the Agency and LACMTA as the programming agency.

2. TERM:

2.1 The term of this LOA shall commence upon the date of this LOA, and shall terminate upon completion of the Scope of Work and LACMTA's receipt of Caltrans' final voucher paid for the Project.

2.2 Prior to the obligation of the Funds, should LACMTA determine there are insufficient Funds available for the Project, LACMTA may terminate this LOA by giving written notice to Project Sponsor at least thirty (30) days in advance of the effective date of such termination.

3. USE OF FUNDS:

3.1 Project Sponsor shall utilize the Funds to complete the Project as described in the Scope of Work and as approved by LACMTA and in accordance with the applicable requirements of the Agency.

3.2 The Funds, as programmed under this LOA, can only be used towards the completion of the Scope of Work originally adopted by LACMTA unless modified by an amendment to this LOA. Project Sponsor shall also be subject to and comply with all applicable requirements of the Agency administering this Project.

4. REPORTING AND AUDIT REQUIREMENTS:

4.1 Project Sponsor shall be subject to and comply with all applicable requirements of the Agency regarding Project reporting and audit requirements. *Project Sponsor shall use the Federal Transportation Improvement Program ("FTIP") No., Expenditure Authorization ("EA") No., and LACMTA Call for Projects Project ID# on all correspondence.*

4.2 Since the Project is funded exclusively with Federal funds and contains no LACMTA local funding, LACMTA has no audit responsibilities for this Project. Project Sponsor shall comply with all Agency compliance, pre-award and performance audit requirements as deemed necessary to assure that funding expenditures conform to all applicable Project funding guidelines, laws and regulations. LACMTA, as the programming agency, shall have the right, at its sole discretion, to audit the Project for compliance with the terms of this LOA and to assure that funding expenditures conform to the terms of this LOA. LACMTA shall have the same audit rights as the Agency to audit the Project.

4.3 Project Sponsor shall submit the Quarterly Progress Report within 60 days after the close of each quarter on the last day of the months November, February, May and August. Annually with the 4th quarter Progress Report, Project Sponsor also shall submit photos of key components and milestones demonstrating Project progress or completion.

5. EXPENDITURE AND DISPOSITION OF FUNDS:

5.1 The expenditure and disposition of the Funds by Project Sponsor shall be subject to and in accordance with the terms and conditions of this LOA and the applicable requirements of the Agency. Project Sponsor shall not utilize the Funds in any other way or on any project other than that specified in this LOA and the applicable requirements of the Agency.

5.2 Project Sponsor shall be responsible for any and all cost overruns for the Project.

5.3 Project Sponsor shall be eligible for the Funds up to the programmed amount specified in Part I, Section 2 of this LOA subject to the terms and conditions contained herein and in all applicable requirements of the Agency.

5.4 Subject to the requirements and regulations of the Agency, and to the extent allowed by the Agency, any underruns to the funds shown in Attachment A shall be apportioned between LACMTA and Project Sponsor in the same proportion as the Sources of Funds from each party to this LOA as specified in Attachment A to this LOA. Upon completion of the Project described in the Scope of Work and subject to the requirements and regulations of the Agency, and to the extent allowed by the Agency, any unused obligation of the Funds shall revert back to LACMTA for future programming at LACMTA's discretion.

5.5 The programming of the Funds does not imply nor obligate any future funding commitment on the part of LACMTA or the Agency.

6. TIMELY USE OF FUNDS / REPROGRAMMING OF FUNDS:

6.1 Project Sponsor must demonstrate timely use of the Funds by:

(i) executing this LOA within ninety (90) days of receiving formal transmittal of the LOA from LACMTA, or by December 31 of the first Fiscal Year in which the Funds are programmed, whichever date is later; and

(ii) obligating the Funds programmed under this LOA for allowable costs within 36 months from July 1 of the first Fiscal Year in which the Funds are programmed. All Funds programmed for FY 2018-19 are subject to lapse on June 30, 2021.

If Project Sponsor fails to meet any of the above conditions, the Project shall be considered lapsed and will be submitted to the LACMTA Board of Directors for deobligation.

6.2 Project Sponsor must demonstrate evidence of timely use and obligation of Funds programmed for the Project within the time period described in Part II, Section 6.1 of this LOA. Evidence of timely obligation will be either an executed "Authorization To Proceed" document (Caltrans Version E-76).

6.3 In the event this LOA is not executed and/or evidence of timely obligation of Funds is not provided as described in Part II, Sections 6.1 and 6.2 of this LOA, the Project will be reevaluated by LACMTA as part of the annual Call for Projects Recertification/Deobligation process and the Funds may be deobligated and reprogrammed to another project by the LACMTA Board of Directors. If Project Sponsor does not complete one element of the Project, as described in the FTIP Sheet, due to all or a portion of the Funds lapsing, the entire Project may be subject to deobligation at LACMTA's sole discretion. In the event the Funds are reprogrammed, this LOA shall automatically terminate without further action by either party.

7. SOURCES AND DISPOSITION OF FUNDS:

7.1 The obligation for LACMTA to program the Funds for the Project is subject to sufficient Funds being made available for the Project by the LACMTA Board of Directors, the United States Government or the State of California, as applicable. If such Funds are not made available for the Project, this LOA shall be void and have no further force and effect, and LACMTA shall have no obligation to program the Funds for the Project, unless otherwise agreed to in writing by LACMTA.

7.2 Project Sponsor shall fully fund and contribute the Project Sponsor Funding Commitment, as identified in the Project Funding (Attachment A), towards the

cost of the Project. If the Funds identified in Attachment A are insufficient to complete the Project, Project Sponsor agrees to secure and provide such additional non-LACMTA programmed funds necessary to complete the Project.

8. COMMUNICATIONS:

8.1 Project Sponsor shall ensure that all Communication Materials contain recognition of LACMTA's contribution to the Project as more particularly set forth in "Funding Agreement Communications Materials Guidelines" available on line or from the LACMTA Project Manager. Please check with the LACMTA Project Manager for the web address. The Funding Agreement Communications Materials Guidelines may be changed from time to time during the course of this Agreement. Project Sponsor shall be responsible for complying with the latest Funding Agreement Communications Materials Guidelines during the term of this Agreement, unless otherwise specifically authorized in writing by the LACMTA Chief Communications Officer.

8.2 For purposes of this Agreement, "Communications Materials" include, but are not limited to, press events, public and external newsletters, printed materials, advertising, websites radio and public service announcements, electronic media, and construction site signage. A more detailed definition of "Communications Materials" is found in the Funding Agreement Communications Materials Guidelines.

8.3 The Metro logo is a trademarked item that shall be reproduced and displayed in accordance with specific graphic guidelines. These guidelines and logo files including scalable vector files will be available through the LACMTA Project Manager.

8.4 Project Sponsor shall ensure that any subcontractor, including, but not limited to, public relations, public affairs, and/or marketing firms hired to produce Project Communications Materials for public and external purposes will comply with the requirements contained in this Section.

8.5 The LACMTA Project Manager shall be responsible for monitoring Project Sponsor compliance with the terms and conditions of this Section. Project Sponsor failure to comply with the terms of this Section shall be deemed a default hereunder and LACMTA shall have all rights and remedies set forth herein.

9. OTHER TERMS AND CONDITIONS:

9.1 This LOA, along with the applicable requirements of the Agency, constitutes the entire understanding between the parties, with respect to the subject matter herein. The LOA shall not be amended, nor any provisions or breach hereof waived, except in writing signed by the parties who agreed to the original LOA or the same level of authority.

9.2 In the event that there is any legal court (e.g. Superior Court of the State of California, County of Los Angeles, or the U.S. District Court for the Central District of California) proceeding between the parties to enforce or interpret this LOA, or the applicable

requirements of the Agency, to protect or establish any rights or remedies hereunder, the prevailing party shall be entitled to its costs and expenses, including reasonable attorneys' fees.

9.3 Neither LACMTA nor any officer or employee thereof shall be responsible for any damage or liability occurring by reason of anything done or committed to be done by Project Sponsor under or in connection with any work performed by and or service provided by Project Sponsor, its officers, agents, employees, contractors and subcontractors under this LOA. Project Sponsor shall fully indemnify, defend and hold LACMTA, and its subsidiaries and their respective officers, agents and employees harmless from and against any liability and expenses, including without limitation, defense costs, any costs or liability on account of bodily injury, death or personal injury of any person or for damage to or loss of risk of property, any environmental obligation, any legal fees and any claims for damages of any nature whatsoever arising out of the Project, including, without limitation: (i) use of the Funds by Project Sponsor, or its officers, agents, employees, contractors or subcontractors; (ii) breach of Project Sponsor's obligations under this LOA; or (iii) any act or omission of Project Sponsor, or its officers, agents, employees, contractors or subcontractors in the performance of the work or the provision of the services in connection with the Project, including, without limitation, the Scope of Work, described in this LOA.

9.4 Neither party hereto shall be considered in default in the performance of its obligations hereunder to the extent that the performance of any such obligation is prevented or delayed by unforeseen causes including acts of God, acts of a public enemy, and government acts beyond the control and without fault or negligence of the affected party. Each party hereto shall give notice promptly to the other of the nature and extent of any such circumstances claimed to delay, hinder, or prevent performance of any obligations under this LOA.

9.5 Project Sponsor shall comply with and insure that work performed under this LOA is done in compliance with Federal Agency Regulations (FAR), Generally Accepted Accounting Principles (GAAP), all applicable provisions of federal, state, and local laws, statutes, ordinances, rules, regulations, and procedural requirements and the applicable requirements and regulations of the Agency and LACMTA.

9.6 Project Sponsor shall not assign this LOA, or any part thereof, without written consent and prior approval of the LACMTA Chief Executive Officer or his designee, and any assignment without said consent shall be void and unenforceable.

9.7 This LOA shall be governed by California law. If any provision of this LOA is held by a court of competent jurisdiction to be invalid, void, or unenforceable, the remaining provisions shall nevertheless continue in full force without being impaired or invalidated in any way.

9.8 The terms of this LOA shall inure to the benefit of, and shall be binding upon, each of the parties and their respective successors and assigns.

9.9 If any software/Intelligent Transportation Systems ("ITS") is developed

with the Funds and if Project Sponsor ceases to use the software/ITS for public purposes or Project Sponsor sells, conveys, licenses or otherwise transfers the software/ITS, LACMTA shall be entitled to a refund or credit, at LACMTA's sole option, equivalent to the amount of the Funds spent developing the software/ITS. Such refund or credit shall not be required, subject to LACMTA approval of the intended use, if Project Sponsor reinvests the proceeds of such sale, conveyance, license or transfer into the Project to offset operating or systems management costs.

9.10 If applicable, implementation of any ITS project shall be consistent with the Regional ITS Architecture. ITS projects must comply with LACMTA's Countywide ITS Policy and Procedures adopted by the LACMTA Board of Directors including the submittal of a completed, signed self-certification form, in the form of Attachment F-1.

9.11 If any parking facilities are designed and/or constructed using the Funds, Project Sponsor shall coordinate with LACMTA parking program staff in the planning, design and management of the facility and shall ensure that its implementation is consistent with LACMTA-adopted parking policy.

9.12 Project Sponsor agrees that the disposal of property purchased with the Funds shall be disposed of in accordance with the Agency's guidelines.

9.13 Notice will be given to the parties at the address specified in Part I, unless otherwise notified in writing of change of address.

9.14 Project Sponsor in the performance of the work required by this LOA is not a contractor nor an agent or employee of LACMTA. Project Sponsor attests to no organizational or personal conflicts of interest and agrees to notify LACMTA immediately in the event that a conflict, or the appearance thereof, arises. Project Sponsor shall not represent itself as an agent or employee of LACMTA and shall have no powers to bind LACMTA in contract or otherwise.

9.15 Project Sponsor shall notify LACMTA in advance of any key Project staffing changes.

# LOA ATTACHMENT A - PROGRAMMED FUNDS

## FEDERAL GRANT AGREEMENT
## CFP# F3516 PROJECT TITLE: LOS ANGELES RIVER BIKE PATH PHASE IV - CONSTRUCTION
## LETTER OF AGREEMENT NO: LOA.P00F3516

($ in Actual Dollars)

(LACMTA Programmed Funding and Sponsors Match Only)

| PROGRAMMED FUNDS | FY 2015-16 | FY 2016-17 | FY 2017-18 | FY 2018-19 | FY 2019-20 | FY 2020-21 | BUDGET | % |
|---|---|---|---|---|---|---|---|---|
| LACMTA PROGRAMMED FUNDING: | | | | | | | | |
| Federal | | | | | | | | |
| (RSTP) Regional Surface Transportation Program | | | | | | | | |
| (CMAQ)Congestion Mitigation and Air Quality Program | | | | 1,826,537 | | | 1,826,537 | 80.0% |
| | | | | | | | | |
| | | | | | | | | |
| Other: | | | | | | | | |
| -PA & ED | | | | | | | | |
| -PS&E | | | | | | | | |
| -R/W | | | | | | | | |
| -Construction | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | LACMTA SUBTOTAL | | | | | | 1,826,537 | 80.0% |
| GRANTEE/SPONSOR MATCH: | | | | | | | | |
| Grantee Funding Commitment (specify type) | | | | | | | | |
| City Local Transportation Funds | | | | 456,635 | | | 456,635 | 20.0% |
| Prop A or C Local Return | | | | | | | | |
| Block Grant | | | | | | | | |
| Other | | | | | | | | |
| -PA & ED | | | | | | | | |
| -PS&E | | | | | | | | |
| -R/W | | | | | | | | |
| -Construction | | | | | | | | |
| Note:You can not match Federal with Federal | | | | | | | | |
| | PROJECT SPONSOR MATCH SUBTOTAL | | | | | | 456,635 | 20.0% |
| TOTAL PROJECT FUNDING | | | | $2,283,172 | | | $2,283,172 | 100.0% |

ATTACHMENT B

# SCOPE OF WORK

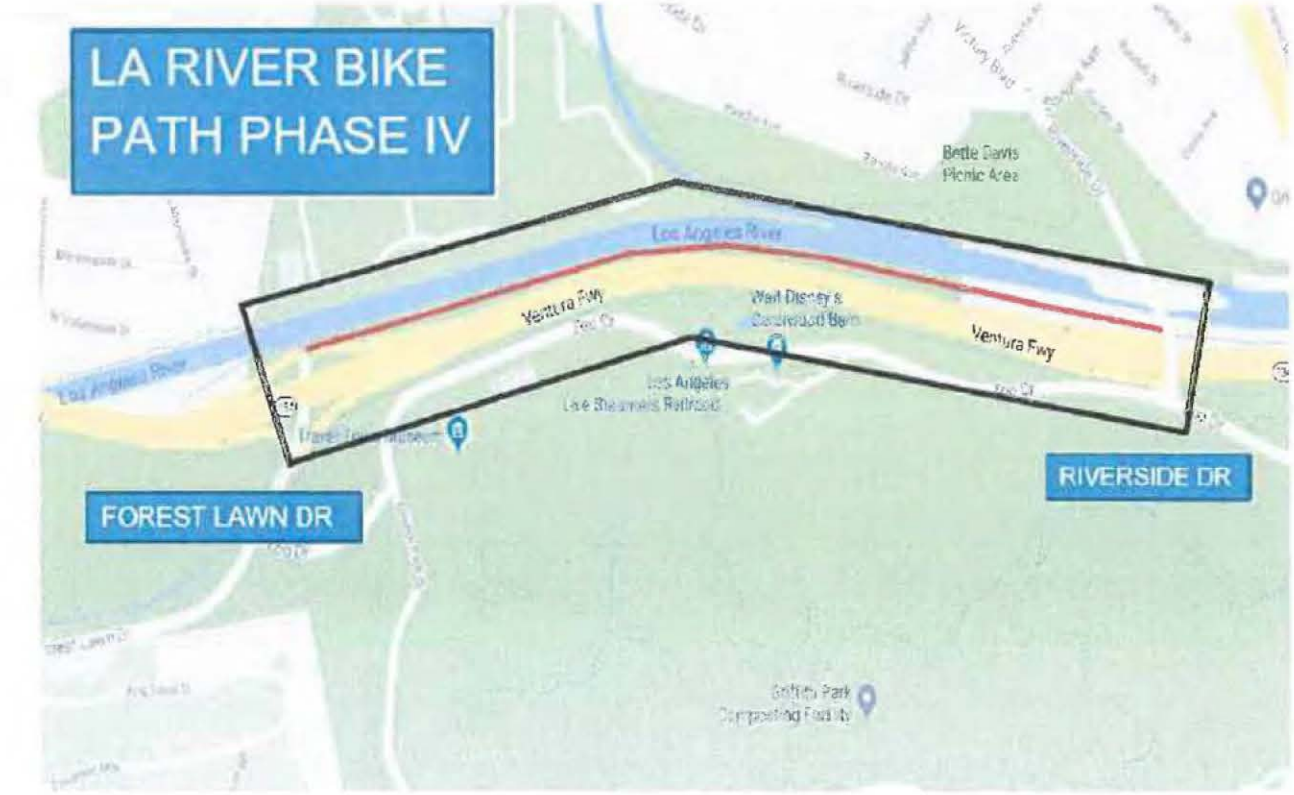
PROJECT ID: F3516

PROJECT TITLE: LOS ANGELES RIVER BIKE PATH PHASE IV CONSTRUCTION

PROJECT LIMITS: The project is located in the City of Los Angeles along the south bank of the Los Angeles River channel from Riverside Dr. to Forest Lawn Dr.

PROJECT DESCRIPTION: The project will extend the Class I Los Angeles River Bike Path for approximately one mile from Riverside Dr. to Forest Lawn Dr. The Project will implement Metro's bicycle transportation strategic planning policy recommendation to close the gaps and extend the existing bikeway network. The project will serve to connect the existing bike path termination at Riverside Dr. and extend another one mile westward to Forest Lawn Dr. The project's bike path is 12-feet wide and will be built along the south bank of the LA River on an existing service road. The bike path will include fencing, striping, pavement marking, lighting, and signage. There is a portion where the bike path will be split by a 4-feet concrete fence to accommodate the bike path and an equestrian path.

PROJECT MAP:



PROJECT FUNDING:

| PROJECT ITEM | METRO | CITY | TOTAL |
|---|---|---|---|
| Construction | $1,826,537 | $456,635 | $2,283,172 |
| Total Budget Cost | $1,826,537 | $456,635 | $2,283,172 |

ESTIMATED PROJECT COSTS:

| Street improvements | Qty | Unit | Unit Cost | Total Cost |
|---|---|---|---|---|
| Crushed Miscellaneous Base (CMB) | 72,000 | SF | $1.50 | $108,732 |
| Asphalt Concrete Pavement | 60,000 | SF | $5.00 | $315,405 |
| Pervious Pavers with Underdrain and Wall Outlets | 9,000 | SF | $14.00 | $131,698 |
| Concrete Curb | 271 | LF | $24.00 | $6,504 |
| Pipe Handrail | 1,262 | LF | $60.00 | $75,720 |
| Reinforced Concrete Split Rail Fence | 2,300 | LF | $100.00 | $236,400 |
| Chain Link Fence | 4,700 | LF | $55.00 | $260,535 |
| Reinforced Concrete Retaining Wall | 1,320 | LF | $320.00 | $423,360 |
| Asphalt Concrete Removal | 51,402 | SF | $4.40 | $227,649 |
| Tree Removal | 72 | EA | $1,500.00 | $108,732 |
| Cut | 2,800 | CY | $36.00 | $101,916 |
| Fill | 622 | CY | $36.00 | $22,392 |
| LED Lights | 52 | EA | $5,744.00 | $298,690 |
| **TOTAL** | | | | **$2,283,172** |

PROJECT MILESTONES:

| Activity | Begin | End |
|---|---|---|
| Execute FA (LOA) | 3/1/19 | 6/1/19 |
| Plan Specification and Estimate | 7/1/19 | 6/1/21 |
| Submit Caltrans forms Request to Proceed to Construction, Caltrans issues Notice to Proceed/ Agreement E76 for Construction | 12/1/20 | 6/1/21 |
| Advertise Bid & Award Construction | 6/1/21 | 9/1/21 |
| Construction | 9/1/21 | 9/1/23 |
| Report of Completion/Project Close out | 9/1/23 | 1/1/24 |

# LOA ATTACHMENT C
# REPORTING GUIDELINES FOR FEDERAL FUNDS

## REPORTING PROCEDURES

- The Quarterly Progress Report (Attachment C1) is required for all projects. The Project Sponsors shall be subject to and comply with all applicable requirements of the funding agency regarding project-reporting requirements. In addition, Project Sponsor will submit a quarterly report to the LACMTA PROJECT MANAGER. Please note that letters or other forms of documentation may **not** be substituted for this form.

- The Quarterly Progress Report covers all activities related to the project and lists all costs incurred. It is essential that Project Sponsors provide complete and adequate response to all the questions. The expenses listed must be supported by appropriate documentation with a clear explanation of the purpose and relevance of each expense to the project. Expenses must reflect the proportionate share of local match, including in-kind, charged to the grant.

- In cases where there are no activities to report, or problems causing delays, clear explanation, including actions to remedy the situation, must be provided.

- Project Sponsors are required to track and report on the project schedule. LACMTA will monitor the timely use of funds and delivery of projects. Project delay, if any, must be reported each quarter. Projects not delivered in a timely manner will be reevaluated by LACMTA as part of the annual Call for Projects Recertification process and the Funds may be deobligated and reprogrammed by the LACMTA Board.

- The Quarterly Progress Report is due to the LACMTA as soon as possible after the close of each quarter, but no later than the following dates for each fiscal year:

| *Quarter* | *Report Due Date* |
|---|---|
| July –September | November 30 |
| October - December | February 28 |
| January - March | May 31 |
| April - June | August 31 |

Upon completion of the Project a Final Report that includes project's final evaluation must be submitted.

| Project Sponsor to Complete |
|---|
| LOA# |
| Quarterly Report # |

# LACMTA LOA ATTACHMENT C1

## QUARTERLY PROGRESS REPORT

**Project Sponsors are requested to mail this report to the LACMTA PROJECT MANAGER. Please submit Quarterly Progress Report with 60 days after the close of each quarter. No later than November 30, February 28, May 31, and August 31.**

## SECTION 1: GENERAL INFORMATION

**PROJECT TITLE:** _____

**LOA#:** _____

**QUARTERLY REPORT SUBMITTED FOR:**

***Fiscal Year :***

☐ 2018-2019 ☐ 2019-2020 ☐ 2020-2021

☐ 2021-2022 ☐ 2022-2023 ☐ 2023-2024

***Quarter :***

☐ Q1: Jul - Sep ☐ Q2: Oct - Dec

☐ Q3: Jan - Mar ☐ Q4: Apr - Jun

**(Attach photos of key components & milestones)**

**DATE SUBMITTED:** _____

**LACMTA MODAL CATEGORY:**

☐ RSTI ☐ Pedestrian ☐ Signal Synchronization

☐ TDM ☐ Bicycle ☐ Goods Movement

☐ Transit ☐ TEA

| | | |
|---|---|---|
| **LACMTA Project Mgr.** | Name: | |
| | Project Mgr: | |
| | Mailing Address: | |
| | Phone Number: | |
| | e-mail: | |

| | | |
|---|---|---|
| **Project Sponsor Contact / Project Manager** | Contact Name: | |
| | Job Title: | |
| | Department: | |
| | City / Agency: | |
| | Mailing Address: | |
| | Phone Number: | |
| | e-mail: | |

## SECTION 2: Quarterly PROGRESS REPORT

### 1. Project-to-Date Expenditure

| | |
|---|---|
| **% of Project Budget Expended to Date** | |
| **% of Project Completion** | |

### 2. DELIVERABLES & MILESTONES

*duration.* ***DO NOT CHANGE THE ORIGINAL LOA MILESTONE START AND END DATES SHOWN IN THE 2ND AND 3RD COLUMNS BELOW.***

Project sponsors must make every effort to accurately portray milestone dates in the original LOA Scope of Work, since this will provide the basis for calculating any project delay. If milestone start and/or end dates change from those stated in the Original LOA Scope of Work, indicate the new dates under Actual Schedule below and re-calculate the project duration. However, this does not change the original milestones in your LOA. *PER YOUR LOA AGREEMENT, ANY CHANGES TO THE PROJECT SCHEDULE MUST BE*

| | **Original LOA Schedule in Scope of Work** | | **Actual Schedule** | |
|---|---|---|---|---|
| **LOA Milestones** | **Start Date** | **End Date** | **Start Date** | **End Date** |
| Environmental Clearance | | | | |
| Design Bid & Award | | | | |
| Design | | | | |
| Right-of-Way Acquisition | | | | |
| Construction Bid & Award | | | | |
| Ground Breaking Event | | | | |
| Construction | | | | |
| Ribbon Cutting Event | | | | |
| **Total Project Duration (Months)** | | | | |

### 3. PROJECT COMPLETION

A. Based on the comparison of the original and actual project milestone schedules above, project is (select only one) :

☐ On schedule per original LOA schedule

☐ Less than 12 months behind original sc

☐ Between 12-24 months behind original schedule

☐ More than 24 months behind original sc

B. Was the project design started within 6 months of the date originally stated in the LOA?

☐ Yes ☐ No ☐ Not Applicable

C. Was a construction contract or capital purchase executed within 9 months after completion of design / specifications?

☐ Yes ☐ No ☐ Not Applicable

## 4. TASKS / MILESTONES ACCOMPLISHED

**List tasks or milestones accomplished and progress made this quarter.**

## 5. PROJECT DELAY

**If project is delayed, describe reasons for delay (this quarter). Pay particular attention to schedule delays. If delay is for the same reason as mentioned in previous quarters, please indicate by writing "Same as Previous Quarter."**

## 6. ACTION ITEMS TO RESOLVE DELAY

**If the project is delayed (as described in #4), include action items that have been, or will be, undertaken to resolve the delay.**

I certify that I am the responsible Project Manager or fiscal officer and representative of _____ and that to the best of my knowledge and belief the infoı stated in this report is true and correct.

_____ _____

*Signature* *Date*

_____ _____

*Name* *Title*

# Attachment D

CFP# F3516
LOA.P00F3516

## Los Angeles Metropolitan Transportation Authority

### 2019 Federal Transportation Improvement Program ($000)

**TIP ID LAF3516** | Implementing Agency: **Los Angeles A, City of**

Project Description: Los Angeles River Bike Path Phase IV - Construction: Construct Class I bikeway on the south bank of the Los Angeles River Flood Control Channel from Riverside Drive to Forest Lawn Drive on/off ramps, a distance of under one mile

SCAG RTP Project # 1AL04
Study N/A Is Model NO Model #
PM Paul Meshkin - (213) 972-4959
Email paul meshkin@lacity org
LS N LS GROUP#
Conformity Category
NON REPORTABLE TCM COMMITED

System: Local Hwy Route: Postmile: Distance: Phase: Engineering/Plans, Specifications and Estimates (PS&E) Completion Date: 01/01/2022

Lane # Extd: Lane # Prop: Imprv Desc: Air Basin: SCAB Envir Doc: CATEGORICALLY EXEMPT - 01/01/2018

Toll Rate: Toll Calc Loc: Toll Method: Hov acs eg loc: Uza: Los Angeles-Long Beach-Santa Ana Sub-Area: Central Area Sub-Region: Central Area Area Team

CTIPS ID: EA #: PPNO: 4301

Program Code: NCN26 - BICYCLE FACILITY-NEW Stop Loc:

| | PHASE | PRIOR | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 | BEYOND | PROG TOTAL |
|---|---|---|---|---|---|---|---|---|---|---|
| | PE | | | | | | | | | |
| | RW | | | | | | | | | |
| | CON | | | | | | | | | |
| | SUBTOTAL | | | | | | | | | |
| CITY - City Funds | PE | | $0 | | | | | | | $0 |
| | RW | | $0 | | | | | | | $0 |
| | CON | | $457 | | | | | | | $457 |
| | SUBTOTAL | | $457 | | | | | | | $457 |
| CMAQ - Congestion Mitigation Air Quality | PE | | $0 | | | | | | | $0 |
| | RW | | $0 | | | | | | | $0 |
| | CON | | $1,827 | | | | | | | $1,827 |
| | SUBTOTAL | | $1,827 | | | | | | | $1,827 |
| | TOTAL | | $2,284 | | | | | | | $2,284 |

**TOTAL PE: $0** **TOTAL RW: $0** **TOTAL CON: $2,284**

- **General Comment:** Carry over into 2019 FTIP
- **Mdeling Comment:**
- **TCM Comment:**
- **Narrative:** PROJECT CHANGES (FROM PREVIOUS VERSION):

*Total project cost stays the same $2,284*

**Last Revised Adoption 19-00 - APPROVED** | Change reason:Carry Over, Schedule Funding Sc | Total Cost: $2,284

# ATTACHMENT E
# LIST OF DOCUMENTS TO BE SUBMITTED TO CALTRANS
# (FOR FEDERAL FUNDED PROJECTS)

NOTE: Refer to the Local Assistance Procedure Manual (LAPM) for the Exhibits.

## Request for Authorization for Preliminary Engineering (PE)

1. Copy of approved FTIP sheet.
2. Copy of LOA with LACMTA (only if RSTP, CMAQ, or Federal STIP funds are involved).
3. Field Review Form – Exhibit 7-B.
4. Preliminary Environmental Study Form (PES) – Exhibit 6-A.
5. A field review should be conducted at this stage and then the remaining documents could be submitted. During the field review all issues of the project such as Environmental & Right-of-Way (R/W) should be identified and addressed.
6. Request for Authorization to Proceed with PE – Exhibit 3-A.
7. Request for Authorization – Data Sheets – Exhibit 3-G.
8. Local Programs Agreement – Exhibit 4-A (only if the agency plans to begin invoicing for PE Phase prior to contract award).

NOTE: The portion of PE work done prior to authorization is ineligible for federal participation. The Master Agreement (if needed), Supplemental Agreement and PR2 will be initiated upon receiving Exhibit 4-A. Invoices will be accepted only after execution of all of these agreements. Caltrans Encroachment permit must be obtained before the Request to Proceed with Construction Phase if Caltrans R/W is involved.

## Request for Authorization for Utility Relocation

1. Request for Authorization to Proceed with Utility Relocation – Exhibit 3-L.
2. Completed Project Prefix Checklist – Exhibit 3-E (if previously not submitted).
3. Finance Letter – Exhibit 3-F.
4. Request for Authorization – Data Sheets – Exhibit 3-G.
5. Local Programs Agreement Checklist – Exhibit 4-A (if not submitted previously).
6. Approved Environmental Document. (After the authorization, the following documents should be submitted).
7. Request for Specific Authorization: See Exhibit 14-A. (Utility relocation work can commence only after the approval of Specific Authorization).
8. Fully executed Utility Agreement.

## Request for Authorization for R/W Phase

1. Request for Authorization to Proceed with R/W – Exhibit 3-B.
2. Completed Project Prefix Checklist – Exhibit 3-E (if previously not submitted).
3. Finance Letter – Exhibit 3-F.
4. Request for Authorization – Data Sheets – Exhibit 3-G.
5. Local Programs Agreement Checklist – Exhibit 4-A (if not submitted previously).
6. Approved Environmental Document (if not submitted previously.

## Request for Authorization for Construction

1. Environmental Clearance Document.
2. R/W Certification – LAPM, Chapter 13.
3. PS&E Certification – Exhibit 12-C.
4. PS&E Checklist – Exhibit 12-D.
5. Request for Authorization to Proceed with Construction – Exhibit 3-C.
6. Project Prefix Checklist – Exhibit 3-E (if not previously submitted).
7. Preliminary Estimate.
8. Finance Letter – Exhibit 3-F.
9. Request for Authorization – Data Sheets – Exhibit 3-G.
10. Local Programs Agreement – Exhibit 4-A.

NOTE: The Local Agency shall not advertise the project until they receive the authorization to proceed with construction. Every local agency must also have Quality Assurance Program (QAP) – LAPM, Chapter 16.14, before advancing to Construction Phase. After a Program Supplemental Agreement, Exhibit 4-A, which includes all the phases of the project, will be mailed to the Local Agency.

# ATTACHMENT F
# SPECIAL GRANT CONDITIONS

The 2009 COUNTYWIDE CALL FOR PROJECTS Board Report No. 9 dated September 16, 2009 included various projects' specific conditions imposed by the LACMTA.

Project Sponsor should refer to the following guidelines and standards when designing bike projects: Pedestrian and Bicycle Facilities in California July 2005, including mid-block crossings where required; California Highway Design Manual Chapter 1000; the California Supplement of the Manual of Uniform Traffic Control Devices; and Americans with Disabilities Act.

The project must comply with the following conditions: At the conclusion of the project, prepare a Project Completion Report to be provided to the MTA Bike Program Manager. The report must include a brief description of "lessons learned," a user survey and "before and after" bicycle counts taken on a mid-week day and weekend, excluding winter months. The "after" counts should not be taken until six (6) months after the completion of the project.

# CITY OF LOS ANGELES
CALIFORNIA

**Seleta J. Reynolds**
GENERAL MANAGER

**ERIC GARCETTI**
MAYOR

**DEPARTMENT OF TRANSPORTATION**
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410


## LOA Attachment G
## PROJECT READINESS CERTIFICATION

As part of the 2007 Call for Projects, the LACMTA Board of Directors, authorized a grant to Project Sponsor for the Imperial Highway Bike Lanes (the "Project").

Prior to execution of Letter of Agreement for the Project, Project Sponsor must assure LACMTA that Project Sponsor has taken the necessary steps to ensure that the Project will be appropriately staffed, that the Project will be appropriately funded, and that the Project will be completed in a timely manner.

The undersigned, duly qualified and serving as Transportation Engineer for the City of Los Angles, certifies that the below Project Readiness actions have been duly authorized and approved by its Governing Authority. The undersigned further certifies that the information submitted herein is true and accurate to the best of his/her knowledge.

per SJR — 9-10-19

Signature — Date

1) Project Sponsor has incorporated the Project into the adopted Capital Improvement Program (CIP). The date the adopted CIP included the Project is set forth below and attached to this Certification is the CIP cover page and the date showing the Project.

| Date of Adoption |
|---|
| September 10, 2018 |

# CITY OF LOS ANGELES
CALIFORNIA

Seleta Reynolds
GENERAL MANAGER

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410

ERIC GARCETTI
MAYOR


2) Project Sponsor hereby commits to provide its Local Match amount accepted by the LACMTA Board as follows:

| Metro Grant Amount | Local Match Amount | Total Project Cost |
|---|---|---|
| $1,826,537 | $456,635 | $2,283,172 |

3) Project Sponsor hereby commits to the following Staffing Plan for the Project:

| Staff Name | Job Title | % Project Responsibility |
|---|---|---|
| Paul Konkirati | Transportation Engr Associate II | 16% |
| Garland Seto | Transportation Engr Associate III | 15% |
| Abbass Vajar | Transportation Engr | 15% |
| Kyle Chan | Civil Engr Assoc III | 18% |
| Victor Cortes | Civil Engr | 18% |
| Oscar Ramirez | St Lighting Engr Assoc III | 18% |

4) Project Sponsor hereby commits to deliver the Project by the Project Lapse Date.

Project Lapse Date: June 30, 2022

5) Project Sponsor has submitted all of the foregoing to the Governing Authority of Project Sponsor for approval in the date set forth below.

| Date of Governing Authority Approval |
|---|
| 9/10/18 |

**(Submit Governing Authority Clerk stamped agenda/minutes)**

# CITY OF LOS ANGELES
## INTER-DEPARTMENTAL CORRESPONDENCE

Date: September 10, 2018

To: The Honorable City Council, City of Los Angeles
c/o City Clerk, Room 395
Attention: Honorable Mike Bonin, Chair, Transportation Committee

From: Seleta J. Reynolds, General Manager
Department of Transportation

Subject: **AUTHORITY TO ENTER INTO FUNDING AGREEMENTS WITH THE LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**


SUMMARY

The Los Angeles County Metropolitan Transportation Authority (Metro) requires local agencies that have received grant funding through Metro's biennial Call for Projects program reiterate a formal commitment to dedicate the necessary resources for the timely delivery of projects, prior to the execution of funding agreements.


**RECOMMENDATIONS**

That the City Council, subject to the approval of the Mayor:

1. AFFIRM the list of projects (Attachment 1), which were awarded grant funds in previous Metro Call for Projects cycles, as a City resource priority, a commitment to the timely completion of the projects and that all projects meet Metro's Project Readiness criteria; and

2. AUTHORIZE the General Managers/Directors of each respective lead City department to execute any necessary funding and contractual documents, including the Project Readiness Certification, to accept the grant funds and implement the projects, subject to the approval of the City Attorney as to form and legality; and

3. DIRECT the General Managers/Directors of the lead department or agency for each project to submit to the Los Angeles Department of Transportation, for inclusion in the Transportation Grant Fund Report, resource needs (including match and front funding, staff, and overtime funding) for the implementation of the projects.

**BACKGROUND**

The Call for Projects is a process by which Metro awards federal, state, and regional transportation funds on a competitive basis throughout the County. Attachment 1 lists the projects approved for funding from the 2007 through the 2015 Metro Calls for Projects (Council File numbers 06-1080-S2, 09-0099, 10-2277, 12-1866 and 14-1680) that have their first year of funding programmed in Fiscal Year 2018-19.

## DISCUSSION

Metro's Board of Directors recently adopted a Project Readiness Certification requirement to be included in each funding agreement. The certification contains the following:

1. Project Sponsor commitment of its local match
2. Project Sponsor commitment to provide necessary staffing
3. Project Sponsor commitment to deliver projects by their Project Lapse Date

The Los Angeles Department of Transportation, on behalf of the City's grant recipients, is requesting authority to affirm resource commitments for the delivery of the proposed projects in Attachment 1. These projects were already approved by City Council. The aforementioned recommendations satisfy Metro's new requirements and subsequently authorize the successful grant recipients to execute the necessary funding agreement and initiation of their respective projects.

## FISCAL IMPACT

There is no impact to the City's general fund. Metro-awarded grant funds are available via reimbursement basis only. Local Proposition C funds are expected to front-fund the project expenditures and provide the necessary local match.

Attachment

c: Daniel Rodman, Office of the Mayor
Maria Souza-Rountree, CLA
Roy Cervantes, CAO

**ATTACHMENT 1 - CITY OF LOS ANGELES METRO CALL FOR PROJECTS LISTING WITH FIRST YEAR OF FUNDING PROGRAMMED IN FY 2018-19 (METRO BOARD APPROVED)**

| | Project # | Agency | Council District | Project Title | Funding Source | Phases Funded | Grant Amount Programmed and Fiscal Years | | | | | City Committed Local Match | Project Lapse Date | City Support Departments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | FY 2018-19 | FY 2019-20 | FY 2020-21 | FY 2021-22 | Total | | | |
| 1 | F1520 | LA CITY (DOT) | 11 | Imperial Highway Bike Lanes | CMAQ | Construction | $1,506,000 | | $ - | $ | $1,506,000 | $ 377,000 | 6/30/2021 | BSS, BSL |
| 2 | F3516 | LA CITY (DOT) | 4 | Los Angeles River Bike Path Phase IV - Construction | CMAQ | Construction | $1,827,000 | | $ - | $ - | $1,827,000 | $ 457,000 | 6/30/2021 | BSS, BSL |
| 3 | F7423 | LA CITY (DOT) | Citywide | Downtown Bus Maintenance Facility | CMAQ | Construction | $4,636,000 | $ - | $ - | $ | $4,636,000 | $ 1,159,000 | 6/30/2021 | BOE, CON ADMIN |
| 4 | F7622 | LA CITY (DOT) | 8 | LANI - West Boulevard Community Linkages Project | CMAQ | Preliminary Eng. & Construction | $ 276,000 | $ - | $1,103,000 | $ | $1,379,000 | $ 345,000 | 6/30/2023 | BSS, BSL, BOE |
| 5 | F9422 | LA CITY (DOT) | Citywide | Dash Clean Fuel Vehicles - Headway Reduction | CMAQ | Purchase buses | $1,000,000 | $1,729,000 | $ - | $ - | $2,729,000 | $ 683,000 | 6/30/2022 | DOT |
| 6 | F9308 | LA CITY (DOT) | Citywide | ATSAC ATCS/TPS/LRT/HRI/CMS System Reliability and Eff. | PC25 | Preliminary Eng. & Construction | $ 853,000 | $1,307,000 | $ - | $ - | $2,160,000 | $ 540,000 | 6/30/2022 | DOT,CON ADMIN,BOE |
| 7 | F5207 | LA CITY (BOE) | 14 | Alameda Street Downtown La: Goods Movement, Phase I | RSTP | Construction | $3,767,000 | $ - | $ - | $ - | $3,767,000 | $ 3,359,000 | 6/30/2021 | DOT, BOE, BSL, CON ADMIN |
| 8 | F9207 | LA CITY (BOE) | 14 | Alameda St Widening - North Olympic Blvd to I-10 Freeway | CMAQ | Preliminary Eng. & Construction | $ 988,000 | $ 171,000 | $8,466,000 | $ | $9,625,000 | $ 2,407,000 | 6/30/2023 | DOT, BOE, BSL, CON ADMIN |
| 9 | F9621 | LA CITY (BSS) | 5 | Melrose Avenue -Fairfax Avenue To Highland Avenue Pedestrian Improvements | PC25 | Preliminary Eng. & Construction | $ 416,000 | $ - | $2,545,000 | $ - | $2,961,000 | $ 946,000 | 6/30/2023 | DOT, BSL, DWP, BOE (survey) |
| 10 | F9123 | LA CITY (BSS) | 14 | Complete Streets Project for Colorado Blvd. In Eagle Rock | PC25 | Preliminary Eng. & Construction | $ 347,000 | $ - | $1,407,000 | $ | $1,754,000 | $ 439,000 | 6/30/2023 | DOT, BSL, BOE (survey) |

# Attachment 4
# City of Los Angeles ZIMAS Report for the Project Parcel

# City of Los Angeles
# Department of City Planning

## 3/31/2025
## PARCEL PROFILE REPORT

**PROPERTY ADDRESSES**
None

**ZIP CODES**
None

**RECENT ACTIVITY**
None

**CASE NUMBERS**
CPC-9708
CPC-2016-1450-CPU
CPC-2008-4683-CA
CPC-2008-3125-CA
CPC-2007-3036-RIO
CPC-2006-48-ICO
CPC-1995-148-GPC
CPC-1986-831-GPC
ORD-183145
ORD-183144
ORD-181128
ORD-171178-SA10E
ORD-171039-SA10
ORD-164713
ORD-129279
CHC-2008-2724-HCM
ENV-2016-1451-EIR
ENV-2008-4684-ND
ENV-2008-3103-CE
ENV-2007-3037-ND
ENV-2006-49-CE

| Address/Legal Information | |
|---|---|
| PIN Number | 165B185 28 |
| Lot/Parcel Area (Calculated) | 93,120.6 (sq ft) |
| Thomas Brothers Grid | PAGE 563 - GRID F4 |
| Assessor Parcel No. (APN) | 5581001906 |
| Tract | SUBDIVISION OF RANCHO PROVIDENCIA AND SCOTT TRACT |
| Map Reference | M R 43-47/59 |
| Block | None |
| Lot | PT PROVIDENCIA PARK TRACT |
| Arb (Lot Cut Reference) | 35 |
| Map Sheet | 165B185 |
| | 165B189 |
| **Jurisdictional Information** | |
| Community Plan Area | Hollywood |
| Area Planning Commission | Central APC |
| Neighborhood Council | Atwater Village |
| | Hollywood Hills West |
| | Hollywood United |
| | Los Feliz |
| Council District | CD 4 - Nithya Raman |
| Census Tract # | 9800.09000000 |
| LADBS District Office | Los Angeles Metro |
| **Permitting and Zoning Compliance Information** | |
| Administrative Review | None |
| **Planning and Zoning Information** | |
| Special Notes | None |
| Zoning | OS-1XL-H-RIO |
| Zoning Information (ZI) | ZI-2452 Transit Priority Area in the City of Los Angeles |
| | ZI-2358 River Implementation Overlay DIstrict (RIO) |
| | ZI-2427 Freeway Adjacent Advisory Notice for Sensitive Uses |
| General Plan Land Use | Open Space |
| General Plan Note(s) | Yes |
| Minimum Density Requirement | No |
| Hillside Area (Zoning Code) | Yes |
| Specific Plan Area | None |
| Subarea | None |
| Special Land Use / Zoning | None |
| Historic Preservation Review | Yes |
| HistoricPlacesLA | No |
| Historic Preservation Overlay Zone | None |
| Other Historic Designations | Yes |
| Mills Act Contract | None |
| CDO: Community Design Overlay | None |
| CPIO: Community Plan Imp. Overlay | None |
| Subarea | None |
| CPIO Historic Preservation Review | No |
| CUGU: Clean Up-Green Up | None |

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

| | |
|---|---|
| HCR: Hillside Construction Regulation | No |
| NSO: Neighborhood Stabilization Overlay | No |
| POD: Pedestrian Oriented Districts | None |
| RBP: Restaurant Beverage Program Eligible Area | None |
| ASP: Alcohol Sales Program | No |
| RFA: Residential Floor Area District | None |
| RIO: River Implementation Overlay | Yes |
| SN: Sign District | No |
| AB 2334: Low Vehicle Travel Area | Yes |
| AB 2097: Within a half mile of a Major Transit Stop | Yes |
| Streetscape | No |
| Adaptive Reuse Incentive Area | None |
| Affordable Housing Linkage Fee | |
| Residential Market Area | Medium-High |
| Non-Residential Market Area | High |
| Inclusionary Housing | No |
| Local Affordable Housing Incentive | No |
| Targeted Planting | No |
| Special Lot Line | No |
| Transit Oriented Communities (TOC) | Tier 3 |
| Mixed Income Incentive Programs | |
| Transit Oriented Incentive Area (TOIA) | Not Eligible |
| Opportunity Corridors Incentive Area | Not Eligible |
| Corridor Transition Incentive Area | Not Eligible |
| TCAC Opportunity Area | Moderate |
| High Quality Transit Corridor (within 1/2 mile) | Yes |
| ED 1 Eligibility | Not Eligible |
| RPA: Redevelopment Project Area | None |
| Central City Parking | No |
| Downtown Parking | No |
| Building Line | None |
| 500 Ft School Zone | None |
| 500 Ft Park Zone | Active: Griffith Park |
| **Assessor Information** | |
| Assessor Parcel No. (APN) | 5581001906 |
| APN Area (Co. Public Works)* | 272.440 (ac) |
| Use Code | 8846 - Miscellaneous - Government Owned Property - Recreation - Horse Stable |
| Assessed Land Val. | $0 |
| Assessed Improvement Val. | $0 |
| Last Owner Change | 02/45/1967 |
| Last Sale Amount | $0 |
| Tax Rate Area | 13 |
| Deed Ref No. (City Clerk) | 985 |
| | 9-280 |
| Building 1 | No data for building 1 |
| Building 2 | No data for building 2 |
| Building 3 | No data for building 3 |
| Building 4 | No data for building 4 |
| Building 5 | No data for building 5 |
| Rent Stabilization Ordinance (RSO) | No [APN: 5581001906] |
| **Additional Information** | |
| Airport Hazard | None |
| Coastal Zone | None |

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

| | |
|---|---|
| Farmland | Area Not Mapped |
| Urban Agriculture Incentive Zone | YES |
| Very High Fire Hazard Severity Zone | Yes |
| Fire District No. 1 | No |
| Flood Zone | 100 Yr - Zone A |
| Watercourse | Yes |
| Methane Hazard Site | Methane Zone |
| High Wind Velocity Areas | No |
| Special Grading Area (BOE Basic Grid Map A-13372) | Yes |
| Wells | None |
| Sea Level Rise Area | No |
| Oil Well Adjacency | No |
| **Environmental** | |
| Santa Monica Mountains Zone | Yes |
| Biological Resource Potential | High |
| Mountain Lion Potential | High |
| Monarch Butterfly Potential | No |
| **Seismic Hazards** | |
| Active Fault Near-Source Zone | |
| Nearest Fault (Distance in km) | 0.87130128 |
| Nearest Fault (Name) | Hollywood Fault |
| Region | Transverse Ranges and Los Angeles Basin |
| Fault Type | B |
| Slip Rate (mm/year) | 1.00000000 |
| Slip Geometry | Left Lateral - Reverse - Oblique |
| Slip Type | Poorly Constrained |
| Down Dip Width (km) | 14.00000000 |
| Rupture Top | 0.00000000 |
| Rupture Bottom | 13.00000000 |
| Dip Angle (degrees) | 70.00000000 |
| Maximum Magnitude | 6.40000000 |
| Alquist-Priolo Fault Zone | No |
| Landslide | No |
| Liquefaction | Yes |
| Preliminary Fault Rupture Study Area | None |
| Tsunami Hazard Area | No |
| **Economic Development Areas** | |
| Business Improvement District | None |
| Hubzone | None |
| Jobs and Economic Development Incentive Zone (JEDI) | None |
| Opportunity Zone | No |
| Promise Zone | None |
| State Enterprise Zone | None |
| **Housing** | |
| Direct all Inquiries to | Los Angeles Housing Department |
| Telephone | (866) 557-7368 |
| Website | https://housing.lacity.org |
| Rent Stabilization Ordinance (RSO) | No [APN: 5581001906] |
| Ellis Act Property | No |
| AB 1482: Tenant Protection Act | No |
| Housing Crisis Act Replacement Review | No |
| Housing Element Sites | |
| HE Replacement Required | N/A |

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

| | |
|---|---|
| SB 166 Units | N/A |
| Housing Use within Prior 5 Years | No |
| **Public Safety** | |
| Police Information | |
| Bureau | Valley |
| Division / Station | North Hollywood |
| Reporting District | 1589 |
| Bureau | Central |
| Division / Station | Northeast |
| Reporting District | 1101 |
| Fire Information | |
| Bureau | West |
| Battallion | 5 |
| District / Fire Station | 76 |
| Red Flag Restricted Parking | No |

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

## CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

| | |
|---|---|
| Case Number: | CPC-2016-1450-CPU |
| Required Action(s): | CPU-COMMUNITY PLAN UPDATE |
| Project Descriptions(s): | UPDATE TO THE HOLLYWOOD COMMUNITY PLAN |
| Case Number: | CPC-2008-4683-CA |
| Required Action(s): | CA-CODE AMENDMENT |
| Project Descriptions(s): | A CODE AMENDMENT TO REVISE THE CURRENT HILLSIDE AREA DEFINITION AND ESTABLISH A NEW DEPARTMENT OF CITY PLANNING HILLSIDE AREA MAP. |
| Case Number: | CPC-2008-3125-CA |
| Required Action(s): | CA-CODE AMENDMENT |
| Project Descriptions(s): | THE ADDITION OF A RIVER IMPROVEMENT OVERLAY (RIO) DISTRICT AS SECTION 13.12 OF THE L.A.M.C. IN RESPONSE TO THE LOS ANGELES RIVER REVITALIZATION MASTER PLAN (LARRMP) THAT WAS ADOPTED IN MAY 2007. THIS SUPPLEMENTAL USE DISTRICT WOULD ESTABLISH STANDARDS FOR NEW DEVELOPMENT ALONG WATERWAYS |
| Case Number: | CPC-2007-3036-RIO |
| Required Action(s): | RIO-RIVER IMPROVEMENT OVERLAY DISTRICT |
| Project Descriptions(s): | THE ESTABLISHMENT OF AN ORDINANCE THAT FACILITATES DEVELOPMENT WITHIN THE LA-RIO BOUNDARIES TO ENHANCE THE WATERSHED, URBAN DESIGN AND MOBILITY OF THE AREA. THESE BOUNDARIES ARE ADJACENT TO, NOT INSIDE, THE LOS ANGELES RIVER ON LAND ALREADY ZONED FOR DEVELOPMENT. |
| Case Number: | CPC-2006-48-ICO |
| Required Action(s): | ICO-INTERIM CONTROL ORDINANCE |
| Project Descriptions(s): | AN INTERIM CONTROL ORDINANCE REQUIRING A PROJECT PERMIT IN ORDER TO ISSUE A BUILDING PERMIT FOR PROPERTIES ALONG THE LOS ANGELES RIVER, IN THREE SECTIONS WITH WIDTHS OF 300 FEET, 500 FEET AND 1,000 FEET. |
| Case Number: | CPC-1995-148-GPC |
| Required Action(s): | GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) |
| Project Descriptions(s): | GENERAL PLAN/ZONE CONSISTENCY PROGRAM PLAN AMENDMENTS AND ZONECHANGES (PUBLIC FACILITIES, OPEN SPACE II AND CLEAN UP |
| Case Number: | CPC-1986-831-GPC |
| Required Action(s): | GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) |
| Project Descriptions(s): | HOLLYWOOD COMMUNITY PLAN REVISION/GENERAL PLAN CONSISTENCY PLAN AMENDMENT, ZONE CHANGES AND HEIGHT DISTRICT CHANGES |
| Case Number: | CHC-2008-2724-HCM |
| Required Action(s): | HCM-HISTORIC CULTURAL MONUMENT |
| Project Descriptions(s): | DESIGNATION AS A HISTORIC-CULTURAL MONUMENT. |
| Case Number: | ENV-2016-1451-EIR |
| Required Action(s): | EIR-ENVIRONMENTAL IMPACT REPORT |
| Project Descriptions(s): | UPDATE TO THE HOLLYWOOD COMMUNITY PLAN |
| Case Number: | ENV-2008-4684-ND |
| Required Action(s): | ND-NEGATIVE DECLARATION |
| Project Descriptions(s): | A CODE AMENDMENT TO REVISE THE CURRENT HILLSIDE AREA DEFINITION AND ESTABLISH A NEW DEPARTMENT OF CITY PLANNING HILLSIDE AREA MAP. |
| Case Number: | ENV-2008-3103-CE |
| Required Action(s): | CE-CATEGORICAL EXEMPTION |
| Project Descriptions(s): | THE ADDITION OF A RIVER IMPROVEMENT OVERLAY (RIO) DISTRICT AS SECTION 13.12 OF THE L.A.M.C. IN RESPONSE TO THE LOS ANGELES RIVER REVITALIZATION MASTER PLAN (LARRMP) THAT WAS ADOPTED IN MAY 2007. THIS SUPPLEMENTAL USE DISTRICT WOULD ESTABLISH STANDARDS FOR NEW DEVELOPMENT ALONG WATERWAYS |
| Case Number: | ENV-2007-3037-ND |
| Required Action(s): | ND-NEGATIVE DECLARATION |
| Project Descriptions(s): | THE ESTABLISHMENT OF AN ORDINANCE THAT FACILITATES DEVELOPMENT WITHIN THE LA-RIO BOUNDARIES TO ENHANCE THE WATERSHED, URBAN DESIGN AND MOBILITY OF THE AREA. THESE BOUNDARIES ARE ADJACENT TO, NOT INSIDE, THE LOS ANGELES RIVER ON LAND ALREADY ZONED FOR DEVELOPMENT. |
| Case Number: | ENV-2006-49-CE |
| Required Action(s): | CE-CATEGORICAL EXEMPTION |
| Project Descriptions(s): | AN INTERIM CONTROL ORDINANCE REQUIRING A PROJECT PERMIT IN ORDER TO ISSUE A BUILDING PERMIT FOR PROPERTIES ALONG THE LOS ANGELES RIVER, IN THREE SECTIONS WITH WIDTHS OF 300 FEET, 500 FEET AND 1,000 FEET. |

## DATA NOT AVAILABLE

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

CPC-9708

ORD-183145

ORD-183144

ORD-181128

ORD-171178-SA10E

ORD-171039-SA10

ORD-164713

ORD-129279

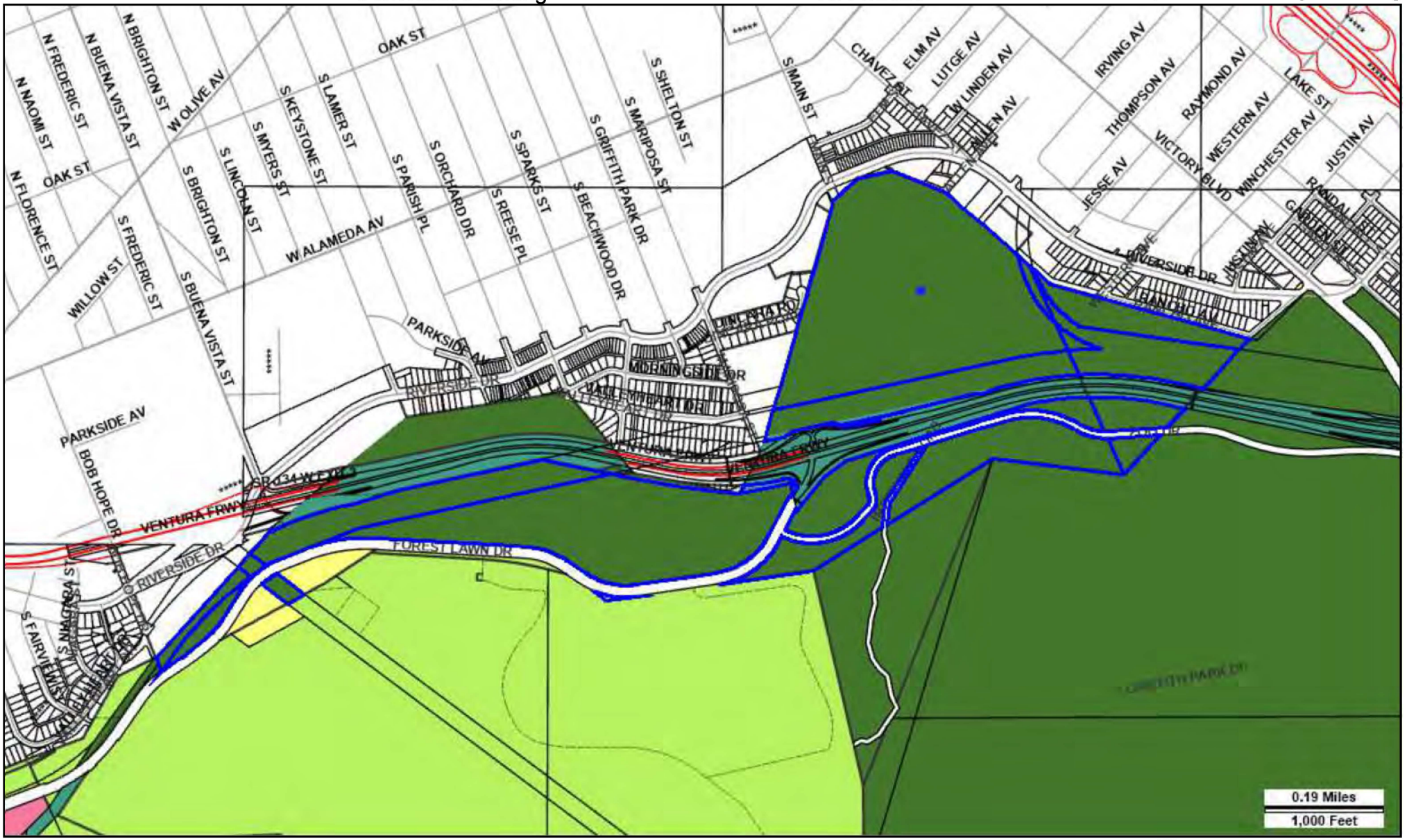
This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

# ZIMAS PUBLIC

Generalized Zoning

03/31/2025

City of Los Angeles
Department of City Planning




Address: undefined

APN: 5581001906

PIN #: 165B185 28

Tract: SUBDIVISION OF RANCHO PROVIDENCIA AND SCOTT TRACT

Block: None

Lot: PT PROVIDENCIA PARK TRACT

Arb: 35

Zoning: OS-1XL-H-RIO

General Plan: Open Space

N W E S

CITY OF LOS ANGELES FOUNDED 1781

# LEGEND

## GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

## GENERAL PLAN LAND USE

### LAND USE

#### RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

#### COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

#### INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

#### PARKING

- Parking Buffer

#### PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

#### LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

#### OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

### FRAMEWORK

#### COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

#### INDUSTRIAL

- Limited Industrial
- Light Industrial

# CHAPTER 1A LEGEND

## General Plan Designation

- Transit Core
- Traditional Core
- Regional Center
- High Residential
- Community Center
- Village
- Neighborhood Center
- Medium Neighborhood Residential
- Medium Residential
- Low Neighborhood Residential
- Low Medium Residential
- Low Residential
- Compact Residential
- Very Low Residential
- Minimum Residential
- Agriculture
- Hybrid Industrial
- Markets
- Light Industrial
- Production
- Industrial
- Open Space
- Public Facilities
- Public Facilities - Freeways

## Zone Use Districts

- Open Space
- Agricultural
- Residential Single Family
- Residential Multiple Family
- Residential-Mixed
- Commercial
- Commercial-Mixed
- Industrial
- Industrial-Mixed
- Public
- Freeway

# CIRCULATION

## STREET

- Arterial Mountain Road
- Collector Scenic Street
- Collector Street
- Collector Street (Hillside)
- Collector Street (Modified)
- Collector Street (Proposed)
- Country Road
- Divided Major Highway II
- Divided Secondary Scenic Highway
- Local Scenic Road
- Local Street
- Major Highway (Modified)
- Major Highway I
- Major Highway II
- Major Highway II (Modified)
- Major Scenic Highway
- Major Scenic Highway (Modified)
- Major Scenic Highway II
- Mountain Collector Street
- Park Road
- Parkway
- Principal Major Highway
- Private Street
- Scenic Divided Major Highway II
- Scenic Park
- Scenic Parkway
- Secondary Highway
- Secondary Highway (Modified)
- Secondary Scenic Highway
- Special Collector Street
- Super Major Highway

## FREEWAYS

- Freeway
- Interchange
- On-Ramp / Off- Ramp
- Railroad
- Scenic Freeway Highway

# MISC. LINES

- Airport Boundary
- Bus Line
- Coastal Zone Boundary
- Coastline Boundary
- Collector Scenic Street (Proposed)
- Commercial Areas
- Commercial Center
- Community Redevelopment Project Area
- Country Road
- DWP Power Lines
- Desirable Open Space
- Detached Single Family House
- Endangered Ridgeline
- Equestrian and/or Hiking Trail
- Hiking Trail
- Historical Preservation
- Horsekeeping Area
- Local Street
- MSA Desirable Open Space
- Major Scenic Controls
- Multi-Purpose Trail
- Natural Resource Reserve
- Park Road
- Park Road (Proposed)
- Quasi-Public
- Rapid Transit Line
- Residential Planned Development
- Scenic Highway (Obsolete)
- Secondary Scenic Controls
- Secondary Scenic Highway (Proposed)
- Site Boundary
- Southern California Edison Power
- Special Study Area
- Specific Plan Area
- Stagecoach Line
- Wildlife Corridor

## POINTS OF INTEREST

- Alternative Youth Hostel (Proposed)
- Animal Shelter
- Area Library
- Area Library (Proposed)
- Bridge
- Campground
- Campground (Proposed)
- Cemetery
- HW Church
- City Hall
- Community Center
- Community Library
- Community Library (Proposed Expansion)
- Community Library (Proposed)
- Community Park
- Community Park (Proposed Expansion)
- Community Park (Proposed)
- Community Transit Center
- Convalescent Hospital
- Correctional Facility
- Cultural / Historic Site (Proposed)
- Cultural / Historical Site
- Cultural Arts Center
- DMV DMV Office
- DWP DWP
- DWP Pumping Station
- Equestrian Center
- HQ Fire Department Headquarters
- Fire Station
- Fire Station (Proposed Expansion)
- Fire Station (Proposed)
- Fire Supply & Maintenance
- Fire Training Site
- Fireboat Station
- Health Center / Medical Facility
- Helistop
- Historic Monument
- Historical / Cultural Monument
- Horsekeeping Area
- Horsekeeping Area (Proposed)
- Horticultural Center
- Hospital
- Hospital (Proposed)
- HW House of Worship
- e Important Ecological Area
- e Important Ecological Area (Proposed)
- Interpretive Center (Proposed)
- JC Junior College
- M MTA / Metrolink Station
- M MTA Station
- MTA Stop
- MWD MWD Headquarters
- Maintenance Yard
- Municipal Office Building
- P Municipal Parking lot
- Neighborhood Park
- Neighborhood Park (Proposed Expansion)
- Neighborhood Park (Proposed)
- Oil Collection Center
- P Parking Enforcement
- HQ Police Headquarters
- Police Station
- Police Station (Proposed Expansion)
- Police Station (Proposed)
- Police Training site
- PO Post Office
- Power Distribution Station
- Power Distribution Station (Proposed)
- Power Receiving Station
- Power Receiving Station (Proposed)
- C Private College
- E Private Elementary School
- Private Golf Course
- Private Golf Course (Proposed)
- JH Private Junior High School
- PS Private Pre-School
- Private Recreation & Cultural Facility
- SH Private Senior High School
- SF Private Special School
- E Public Elementary (Proposed Expansion)
- E Public Elementary School
- E Public Elementary School (Proposed)
- Public Golf Course
- Public Golf Course (Proposed)
- Public Housing
- Public Housing (Proposed Expansion)
- JH Public Junior High School
- JH Public Junior High School (Proposed)
- MS Public Middle School
- SH Public Senior High School
- SH Public Senior High School (Proposed)
- Pumping Station
- Pumping Station (Proposed)
- Refuse Collection Center
- Regional Library
- Regional Library (Proposed Expansion)
- Regional Library (Proposed)
- Regional Park
- Regional Park (Proposed)
- RPD Residential Plan Development
- Scenic View Site
- Scenic View Site (Proposed)
- ADM School District Headquarters
- SC School Unspecified Loc/Type (Proposed)
- Skill Center
- SS Social Services
- ★ Special Feature
- Special Recreation (a)
- SF Special School Facility
- SF Special School Facility (Proposed)
- Steam Plant
- SM Surface Mining
- Trail & Assembly Area
- Trail & Assembly Area (Proposed)
- UTL Utility Yard
- Water Tank Reservoir
- Wildlife Migration Corridor
- Wildlife Preserve Gate

## SCHOOLS/PARKS WITH 500 FT. BUFFER

- Existing School/Park Site
- Planned School/Park Site
- Inside 500 Ft. Buffer

- Aquatic Facilities
- Beaches
- Child Care Centers
- Dog Parks
- Golf Course
- Historic Sites
- Horticulture/Gardens
- Skate Parks
- Other Facilities
- Park / Recreation Centers
- Parks
- Performing / Visual Arts Centers
- Recreation Centers
- Senior Citizen Centers
- Opportunity School
- Charter School
- Elementary School
- Span School
- Special Education School
- High School
- Middle School
- Early Education Center

## COASTAL ZONE

- Coastal Commission Permit Area
- Dual Permit Jurisdiction Area
- Single Permit Jurisdiction Area
- Not in Coastal Zone

## TRANSIT ORIENTED COMMUNITIES (TOC)

- Tier 1
- Tier 2
- Tier 3
- Tier 4

**Note:** TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

## WAIVER OF DEDICATION OR IMPROVEMENT

- Public Work Approval (PWA)
- Waiver of Dedication or Improvement (WDI)

## OTHER SYMBOLS

- Lot Line
- Tract Line
- Lot Cut
- Easement
- Zone Boundary
- Building Line
- Lot Split
- Community Driveway
- Building Outlines 2020
- Building Outlines 2017
- Airport Hazard Zone
- Census Tract
- Coastal Zone
- Council District
- LADBS District Office
- Downtown Parking
- Fault Zone
- Fire District No. 1
- Tract Map
- Parcel Map
- Flood Zone
- Hazardous Waste
- High Wind Zone
- Hillside Grading
- Historic Preservation Overlay Zone
- Specific Plan Area
- Very High Fire Hazard Severity Zone
- Wells - Acitive
- Wells - Inactive

# Attachment 5
# Mariposa Bridge Consulting Parties Emails

# Consulting Party Status for the LA River Bike Path Phase IV Project

From: Harbert, Claudia A@DOT (claudia.harbert@dot.ca.gov)

To: [redacted]

Date: Monday, September 30, 2024 at 03:08 PM PDT

Hello Ms. Gabel-Luddy and Ms. Walla,

Thank you for your interest in the LA River Bike Path Phase IV Project, particularly the potential effects to the historic Mariposa Street Bridge.

As the Caltrans District 7 Heritage Resource Coordinator, I would like to grant you Consulting Party status under Section 106 of the National Historic Preservation Act.

We will be in touch soon to continue consultation regarding the project.

Thank you.

Claudia Harbert
Senior Environmental Scientist (Supervisory)
Heritage Resource Coordinator
Cultural Resources Unit
Division of Environmental Planning
Caltrans District 7
213.335.0124

[redacted]

**Subject:** Second Request to be Consulting Party Pursuant to Section 106 -- LA River Bike Path Phase IV

**EXTERNAL EMAIL.** Links/attachments may not be safe.

Hi Ms. Papin and Smith,
Please see our attached letter regarding our second request. In addition, by this letter we are requesting notification of any and all environmental assessments pursuant to NEPA or CEQA be sent to us as well as habitat and historic organizations impacted by the Phase IV Bike Path. Their contact information is listed in our attached letter.
Thank you,

Emily
Emily Gabel-Luddy, FASLA

Papin&Smith_9.25.24.pdf
1.4MB

*Emily Gabel-Luddy and Nori Walla*
[redacted]

VIA EMAIL

August 16, 2024

ESA
633 West 5th Street
Suite 830
Los Angeles, CA 90071
ATTN: Shannon Papin, M.A.
spapin@esassoc.com

**RE: Section 106 of the National Historic Preservation Act of 1966, Los Angeles Phase IV Bike Path Project located in Griffith Park.**

Dear Ms. Papin,

We recently became aware of your outreach in support of compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA) related to the Los Angeles Phase IV Bike Path Project located in Griffith Park.

The Mariposa Street Bridge, identified on your Project Maps, was listed on the National Register of Historic Places on March 25, 2024. Due to our concern over this vital link to the equestrian trails, we nominated the Mariposa Street Bridge and secured its listing on the National Register. As the Nominating Party, we would like to be a Consulting Party on this Project pursuant to Section 106.

Among our concerns at the outset are several notable inaccuracies in the Project Description (attached). While you may not have been responsible for its preparation, this Project Description requires correction prior to moving forward.

Furthermore, based upon the Project Description, there appears to be a potential for significant adverse effects to the integrity of the Mariposa Street Bridge that we would like to discuss.

We look forward to meeting with you (and those who prepared the Project Description) at your earliest convenience.

It is best to contact us at our emails: [redacted]

Sincerely,

Emily Gabel-Luddy

Nori Walla

cc: Julianne Polanco, California State Historic Preservation Officer
Friends of Griffith Park
Friends of the Equestrian Bridge

# Request for Funding Source

From: [redacted]

To: vsmith@esassoc.com

Cc: [redacted]

Date: Friday, August 23, 2024 at 10:42 AM PDT

Hi Ms. Smith,
The reason I am emailing you is because it is challenging to reach you by phone! I tried all the phone numbers associated with ESA. As well as your listed mobile.

These are my questions: what is the Federal funding source  for the Los Angeles Phase IV Bike Path Project Section 106 Compliance? What is the number/name of the grant for which these funds will be utilized?

Thank you,
Emily

Emily Gabel-Luddy, FASLA
[redacted]

*Emily Gabel-Luddy and Nori Walla*
*c*[redacted]

VIA EMAIL
September 25, 2024

ESA
633 West 5th Street
Suite 830
Los Angeles, CA 90071
ATTN: Shannon Papin, M.A. spapin@esassoc.com and
Valerie Smith, Architectural Historian, vsmith@esassoc.com

**RE: Second Request to be Consulting Party, Corrections to Project Description and Maps**

**Section 106 of the National Historic Preservation Act of 1966, Los Angeles Phase IV Bike Path Project located in Griffith Park**

Dear Ms. Papin and Ms. Smith,

In a letter dated August 21, 2024, my colleague Nori Walla and I requested information about the above-cited Project. On August 23, Ms. Smith confirmed she had received my call and had forwarded our requests to Ms. Papin. As of today, there has been no response to our original request and questions.

We nominated the Mariposa Street Bridge, secured its listing on the National Register and as the Nominating Party, we want to be a Consulting Party on this Project pursuant to Section 106. We also brought to your attention the presence of notable inaccuracies in the Project Description (and also maps) and requested a meeting with you — and whomever may have been responsible for the Project Description — in order to correct it before the Project moved forward. An NOI should not be issued until the description is accurate.

In addition to our specific request to become a Consulting Party under Section 106, I formally request the organizations listed below be notified of any and all agency notifications related to environmental assessments/studies for notices of intent (NOI), notices of preparation (NOP), drafts, etc. pursuant to NEPA review; and any CEQA review of the Project. They are listed below.

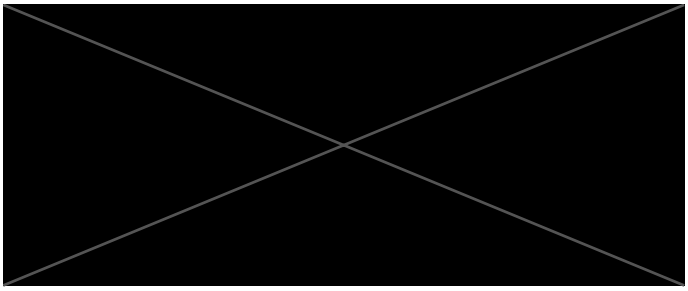
**Second Request to be Consulting Party, Correct Project Description/Maps/2**

Notices should be sent to:

Friends of the Equestrian Bridge:

Friends of Griffith Park:

Griffith J. Griffith Trust:



We look forward to hearing from you. Please do not hesitate to contact either Nori or me.

Thank you,

Nori Walla

cc: Julianne Polanco, State Historic Preservation Officer (SHPO)
Natalie Lindquist, Local Govt/Environmental Compliance (SHPO)
Jeff Carr, Caltrans HQ, Cultural Studies Office
Joshua Knutson, Caltrans, District 7

Attachment: August 21, 2024 letter/Project Description

*Emily Gabel-Luddy and Nori Walla*
[redacted]

VIA EMAIL
August 21, 2024

ESA
633 West 5th Street
Suite 830
Los Angeles, CA 90071
ATTN:
Valerie Smith, Architectural Historian, vsmith@esassoc.com
Shannon Papin, M.A. spapin@esassoc.com

**RE: Section 106 of the National Historic Preservation Act of 1966, Los Angeles Phase IV Bike Path Project located in Griffith Park**

Dear Ms. Smith and Ms. Papin,

This updates our prior August 16, 2024 letter sent by email to Ms. Papin. Please discard that letter.

We recently became aware of your outreach in support of compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA) related to the Los Angeles Phase IV Bike Path Project located in Griffith Park.

The Mariposa Street Bridge, identified on your Project Maps, was listed on the National Register of Historic Places on March 25, 2024. Due to our concern over this vital link to the equestrian trails, we nominated the Mariposa Street Bridge and secured its listing on the National Register. As the Nominating Party, we would like to be a Consulting Party on this Project pursuant to Section 106.

Among our concerns at the outset are several notable inaccuracies in the Project Description (attached). While you may not have been responsible for its preparation, this Project Description requires corrections prior to moving forward.

Furthermore, based upon the Project Description, there appears to be a potential for significant adverse effects to the integrity of the Mariposa Street Bridge that we would like to discuss.

We look forward to meeting with you (and those who prepared the Project Description) at your earliest convenience.

It is best to contact us at our emails [redacted]

Sincerely,

Emily Gabel-Luddy

Nori Walla

Attachment: "Attachment A," Project Description, LA Phase IV Bike Path Project, Section 106 Compliance

cc: Julianne Polanco, California State Historic Preservation Office
Friends of Griffith Park
Friends of the Equestrian Bridge
Griffith J. Griffith Trust

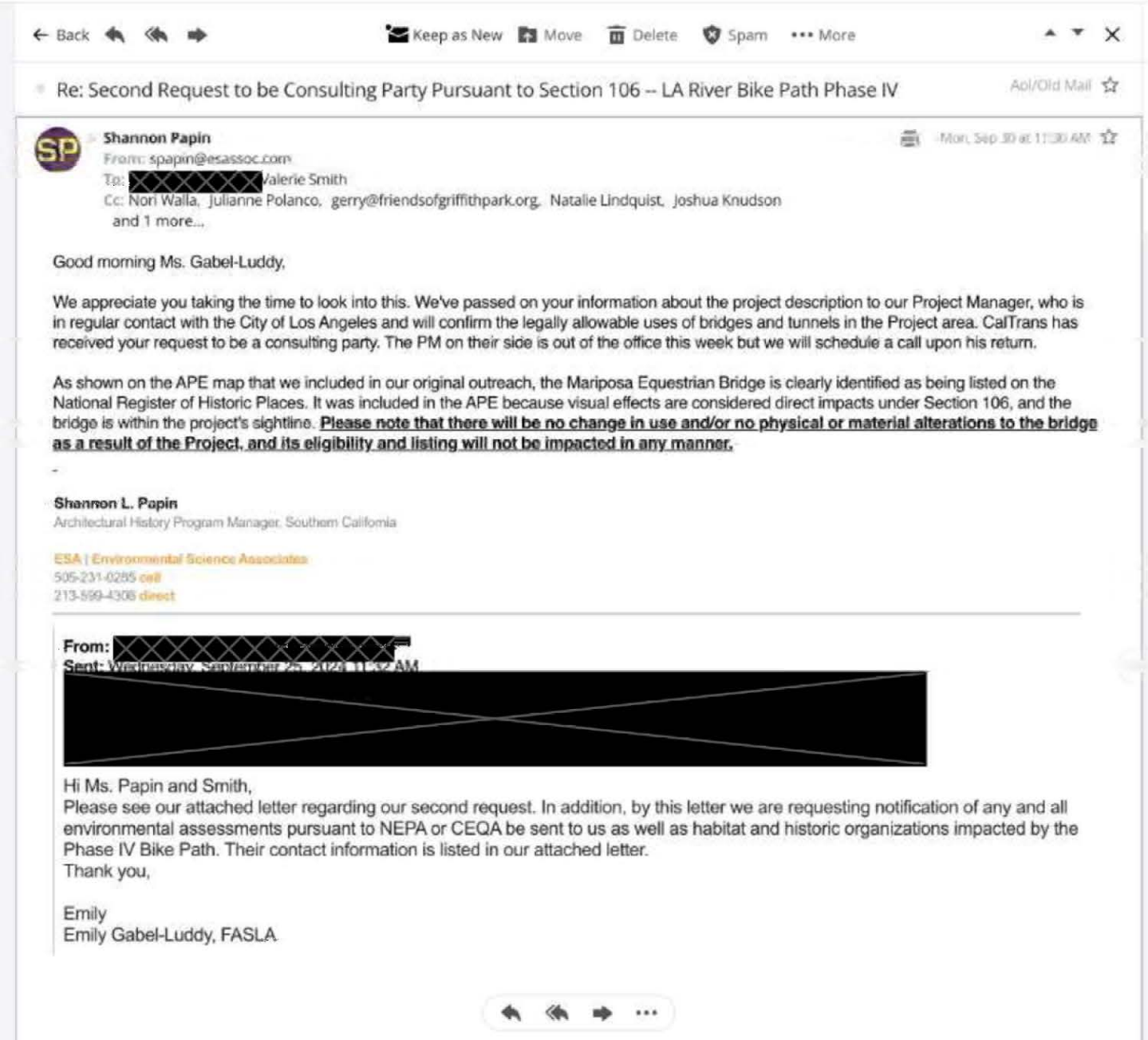
# Los Angeles Phase IV Bike Path Project – Project Description

The Project location is in the Hollywood Community Plan area within the central portion of the City of Los Angeles in Los Angeles County, within the Hollywood Community Plan area. It is bordered by the River, Los Angeles Equestrian Center, Bette Davis Picnic Area and City of Burbank to the north; Riverside Drive and the City of Glendale to the east; State Route 134 (134 Freeway) and Griffith Park to the south; and Forest Lawn Drive and the City of Burbank to the west. The Project area is an approximately one-mile alignment along an existing paved service road owned by the Los Angeles County Flood Control District and under the jurisdiction of the U.S. Army Corps of Engineers (USACE). The road is currently accessible only to pedestrians, cyclists, and equestrian users via an existing pedestrian/equestrian bridge to the west of the alignment and a tunnel beneath the 134 Freeway that connects to Griffith Park/Zoo Drive to the south. The eastern terminus of the alignment includes a locked gate which is also the western terminus of the existing Los Angeles River Bikeway segment to the east of the Project area. The western terminus of the Project alignment is located approximately 200 feet east of the northern terminus of Forest Lawn Drive.

The City of Los Angeles Department of Public Works, Bureau of Engineering (BOE) as lead agency under CEQA, and the Los Angeles Department of Transportation (LADOT) as project proponent, proposes to implement the Los Angeles River Phase IV Bike Path Project (Project), which would construct a new multi-use trail segment along the south side of the Los Angeles River (River) from the existing western terminus of the Los Angeles River Bikeway located just to the west of Riverside Drive westward to approximately 200 feet east of Forest Lawn Drive in the Hollywood Community Plan area of the City of Los Angeles. The total length of the Project is just under one mile (approximately 4,600 feet). The trail segment would include a new paved path on the northern side of the proposed trail alignment for use by pedestrians and cyclists, an equestrian-only unpaved trail on the south side of the alignment, and associated retaining walls, concrete fencing, street lighting path lighting, and limited utility relocations.

The purpose of the Project is to provide recreational opportunities and bicyclist connectivity in the Hollywood Community Planning Area. The proposed Project would connect the existing Los Angeles River Bikeway and close existing bikeway gaps along the River. The proposed Project would provide connections to the active transportation network throughout the region and provide new pedestrian, bicycle, and equestrian access and connectivity to transit, residential homes, schools, jobs, parks and recreational facilities, and other community-serving amenities for the surrounding communities. The Project is a key component of the City's effort to revitalize the River with increased access, amenities, recreational opportunities, and stormwater management. The City of Los Angeles Department of Transportation (LADOT) is working with partner agencies towards creating a continuous, paved bikeway along the entire length of the River, from the headwaters in West San Fernando Valley to the Long Beach Harbor. Currently, access to the LA River and its bikeways and trails is highly variable along the 51-mile stretch of the Los Angeles River. In the proposed Project area, multi-use trails and Class I bikeways are located to the east in the Narrows Riverwalk area.

The Los Angeles Equestrian Center is located on the north side of the river and provides a 75-acre complex featuring areas for equestrian events, over 500 boarding stalls, along with access to the Griffith Park equestrian trails. In addition to the Los Angeles Equestrian Center, various private stables provide equestrian trail riding access. These stables are adjacent to the river and the trails that cross the river and provide access to the wide network of trails throughout Griffith Park.


Back
Keep as New
Move
Delete
Spam
More
Re: Second Request to be Consulting Party Pursuant to Section 106 -- LA River Bike Path Phase IV
Aol/Old Mail
Shannon Papin
From: spapin@esassoc.com
To: [redacted] Valerie Smith
Cc: Nori Walla, Julianne Polanco, gerry@friendsofgriffithpark.org, Natalie Lindquist, Joshua Knudson
and 1 more...
Mon, Sep 30 at 11:30 AM
Good morning Ms. Gabel-Luddy,
We appreciate you taking the time to look into this. We've passed on your information about the project description to our Project Manager, who is in regular contact with the City of Los Angeles and will confirm the legally allowable uses of bridges and tunnels in the Project area. CalTrans has received your request to be a consulting party. The PM on their side is out of the office this week but we will schedule a call upon his return.
As shown on the APE map that we included in our original outreach, the Mariposa Equestrian Bridge is clearly identified as being listed on the National Register of Historic Places. It was included in the APE because visual effects are considered direct impacts under Section 106, and the bridge is within the project's sightline. Please note that there will be no change in use and/or no physical or material alterations to the bridge as a result of the Project, and its eligibility and listing will not be impacted in any manner.
-
Shannon L. Papin
Architectural History Program Manager, Southern California
ESA | Environmental Science Associates
505-231-0285 cell
213-599-4308 direct
From: [redacted]
Sent: Wednesday, September 25, 2024 11:02 AM
[redacted]
Hi Ms. Papin and Smith,
Please see our attached letter regarding our second request. In addition, by this letter we are requesting notification of any and all environmental assessments pursuant to NEPA or CEQA be sent to us as well as habitat and historic organizations impacted by the Phase IV Bike Path. Their contact information is listed in our attached letter.
Thank you,
Emily
Emily Gabel-Luddy, FASLA
Reply, Reply All or Forward

**Letter B3**
Jamie T. Hall
**Mariposa Basin Environmental Alliance**
March 31, 2025

*Response B3-1*

The commenter provides an introduction to, and overall summary of, the comments provided in the comment letter. Responses to the comments included in this letter are provided in **Responses B3-2 through B3-56** below.

*Response B3-2*

This comment is a repeat of Comment B3-1; refer to **Response B3-1**, above.

*Response B3-3*

The commenter provides a summary of the Project Description as presented in Section 2.0, *Project Description*, of the Draft IS/MND. This comment does not raise a substantive issue regarding the analysis or conclusions contained in the Draft IS/MND. Further, the City points to the **Clarifications and Modifications** section of this Final IS/MND to the extent they clarify and/or modify matters stated by the commenter. As such, no further response is warranted.

*Response B3-4*

The commenter suggests that cyclists utilizing the proposed bike path component of the Project "would need to either turn around and go back the way they came, or attempt to access Burbank on the north side of the Los Angeles River via the Mariposa Equestrian Bridge or the greater Griffith Park area via equestrian Tunnel 6 or 7." To clarify, as noted in **Master Response No. 1: Separation of Path-Trail User Types** regarding the design and function of the bike path turnaround at the western Project terminus, the Project would require that cyclists and pedestrians turn back and head east toward Riverside Drive and would not allow users to "attempt to access Burbank" as stated by the commenter.

Refer to **Master Response No. 2: Project Site Existing Ownership and Authorized Uses** regarding existing jurisdiction and easements applicable to the Project Site. While text has been added to **Clarifications and Modifications** of this Final IS/MND to clarify the ownership, easements, and allowable uses and activities within the Project Site, as well as supporting figures to illustrate applicable boundaries, this information is not used as a basis to determine the extent of physical impacts on the environment in the Draft IS/MND. That is, irrespective of how the specific jurisdictional limits apply to the Project Site, the lack of detailed descriptions of these conditions do not translate to potential adverse impacts on the environment that are associated with the implementation of the Project as proposed. The mere fact that easements are in place at the Project Site does not preclude the City, who owns and has land use jurisdiction over the property, from developing a multiuse trail on the Project Site to provide bicycle access along the River channel while also maintaining equestrian access between Tunnel 6 and the Project's western terminus. Furthermore, there is no logical nexus between the description of easements in effect on the Project Site and "an underestimate of impacts to equestrians, horses, and equestrian facilities which would resulting from the proposed introduction of newly

sanctioned bicycle use in the Project area and the potential misuse of equestrian/pedestrian facilities where bicycles are prohibited, such as Tunnels 6 and 7 and the Mariposa Bridge," as stated by the commenter. The easements and allowable uses under existing conditions at the Project Site would have no effect on the evaluation of physical impacts on the environment associated with Project implementation. **Clarifications and Modifications** of this Final IS/MND includes clarifying language regarding the existing easements and jurisdictional limits at or near the Project Site, but these changes have no effect on the analysis and conclusions presented in the Draft IS/MND.

As noted above, the commenter's claim that the Project would lead to "potential misuse of equestrian/pedestrian facilities" such as Tunnels 6 and 7 and the Mariposa Bridge by non-equestrian users is not supported by evidence, as the Project would physically preclude access beyond the Project's western terminus. Further, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses. (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further response is warranted.

*Response B3-5*

The commenter suggests that the cyclist prohibitions for Tunnels 6 and 7 and the Mariposa Bridge need to be more accurately described in the Draft IS/MND. As such, the text in the Draft IS/MND has been revised, where appropriate, to affirmatively state that cyclists are not permitted to use these facilities, as shown in **Clarifications and Modifications** of this Final IS/MND. With regard to the notion that the Project will lead to misuse of equestrian facilities by unauthorized users, see **Response B3-4** above; as noted therein, the Project would preclude access by non-equestrian users by construction and maintenance of physical barriers and signage, which would prevent physical interactions between user groups. No further response is warranted.

*Response B3-6*

The commenter asserts that the Draft IS/MND mischaracterizes the existing allowable activities at the Project Site, and thus the introduction of bicycles into this segment of trail that does not currently allow bicycle access would result in adverse impacts. However, to clarify, the Draft IS/MND characterized the Project Site as an existing service road that is utilized by pedestrians, equestrians, and bicycles, but did not distinguish between which users utilizing the ROW are authorized users along the alignment. This is because the existing activities occurring on-site, whether legal or illegal, would not have any effect on the physical environmental effects associated with the construction and operation of an improved multiuse facility that is designed to completely segregate equestrian and non-equestrian users throughout the entire length of the Project. It is acknowledged that cyclists are not currently authorized to access the Project Site. However, this existing condition does not change the fact that the Project-related improvements and barriers would physically prevent unauthorized access beyond the western terminus, and the Project would also be subject to ongoing monitoring and maintenance to prevent damage to Project barriers that could allow for unauthorized access. Refer to **Master Response No. 1: Separation of Path-Trail User Types** regarding the Project's physical barriers and signage to prevent unauthorized access.

With regard to cumulative impacts, the commenter suggests that the Project would result in larger cumulative impacts associated with increased bicycle activity in the area; however, the commenter fails to articulate how the extension of the LA River Bikeway by a less than one-mile segment with a turnaround feature would substantially increase overall bicycle activity in the area. To the contrary, there is already bicycle activity throughout the Griffith Park area and along the existing LA River Bikeway segments to the east, as noted by numerous public comments from the cycling community. As such, the construction and operation of the Project's bike path component is not expected to generate substantial new bicycle trips or bicycle activity in the area such that significant environmental effects would result. Further, the commenter does not indicate which specific issues or cumulative impacts would result from the asserted increase in bicycle activity. The commenter fails to cite which significant impacts would occur that would necessitate the preparation of an EIR. No further response is necessary.

*Response B3-7*

The commenter suggests that their main concerns involve safety issues related to equestrian-pedestrian-bicyclist interactions, as well as impacts to historic features such as the Mariposa Bridge and Tunnels 6 and 7 resulting from increased bicycle traffic outside of the limits of the Project. The commenter also states, "The proposed Project will introduce bicyclists into an area with pedestrian and horse trails creating the potential for horse-bike interaction and the potential for horseback riders and horses, which can be spooked by bicycles, to be injured as a result." The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, as noted previously, the Project would not introduce bicycles into off-site areas including the Mariposa Bridge and Tunnels 6 and 7. The Project would not result in an increase in such interactions, but rather, would serve to reduce and even preclude such events. This is due to the fact that under existing conditions there are no barriers in place to limit access for all user groups to Mariposa Bridge, the Project Site, and Tunnels 6 and 7. The Project would provide new barriers and fully contain the equestrian connection between Tunnel 6 and the entire length of the Project ROW, allowing access further westward to Mariposa Bridge and Tunnel 7 only from the equestrian trail component of the Project (see **Master Response No. 1: Separation of Path-Trail User Types**). The bike path component would be fully separated along the entire length of the Project, and at no point along the alignment would access to the equestrian facilities be provided. The Project would serve to limit overall access to the area from the east by constructing continuous barriers separating user groups along the entirety of the Project Site. The Project would not increase the potential for safety hazards associated with interactions between user groups, and impacts would remain less than significant. Further, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses. (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further response is warranted.

*Response B3-8*

See **Response B3-7**, above. The commenter claims that the Project will "create the potential for misuse of the Mariposa Bridge" by increasing or encouraging bicycle activity in the area. However, to the contrary, the Project does not address the larger Griffith Park trail system or

otherwise attempt to control or enforce access limitations beyond the Project Site itself. The Project would construct and operate a segment of multiuse trail along the River that would separate user groups along the entire length and control access to areas west of the Project Site through various physical barriers. Interactions between user groups outside of the Project Site are beyond the scope of the Project, and thus the analysis presented in the Draft IS/MND. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further response is warranted.

*Response B3-9*

Refer to **Response A3-3** above. The commenter states that the width of the equestrian trail is not adequate given that it is adjacent to a bicycle path. However, the equestrian trail component has been designed consistent with Los Angeles River Master Plan Design Guidelines (Appendix I of the Los Angeles River Master Plan prepared by the Los Angeles County Department of Public Works) for multiuse trails along the Los Angeles River. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further comment is warranted.

*Response B3-10*

The commenter suggests that the proposed fencing and barriers for the Project are inadequate, and points to the existing damaged fences at the Project Site as an example. As noted in **Master Response No. 1: Separation of Path-Trail User Types** and **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**, the Project would include fencing and other types of barriers, as appropriate, to prevent unauthorized access, and such fencing and separation features would be subject to regular inspection, maintenance, and repair as part of the Project's Operations and Maintenance MOU between LADOT and BOE; as such, the Project's fencing and barriers are considered adequate. Further, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further response is necessary.

*Response B3-11*

The commenter asserts that "[t]he MND fails to identify the design changes made at the request of the equestrian community, or to list the design changes that were found to be infeasible and the reason for their infeasibility." However, as cited by the commenter, the Draft IS/MND does, in fact, discuss the design features suggested by the community in public workshops in summary form, highlighting the major concerns including trail width and barrier/fence material and height. The Draft IS/MND, contrary to the commenter's statements, need not articulate each and every

design suggestion for the Project offered in the context of public meetings, nor include an itemized discussion regarding the feasibility of each suggestion. However, for example, suggested design features such as a minimum 5-foot physical setback/separation between the equestrian trail and bike path components of the Project are simply not physically possible given the restricted space available within the Project Site (see **Master Response No. 1: Separation of Path-Trail User Types** for further discussion). The City, as stated on pages 7 and 8 of the Draft IS/MND, revised the design a number of times directly in response to feedback received at the public meetings, attempting in good faith in coordination with the equestrian and cycling communities, to put forth the best possible Project design that meets the needs of all intended user groups. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further response is warranted.

*Response B3-12*

See **Responses B3-7 and B3-8** above. As noted therein, bike path users would be required to turn back and head east toward Riverside Drive; the commenter's suggestion that users would "or seek other outlets" is speculative and not supported by evidence. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further response is warranted.

*Response B3-13*

Refer to **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** regarding ongoing trail maintenance. The commenter points to existing conditions of damage to fences and other existing facilities in the Project area, and argues that the Project would incur similar damage and thus access cannot be controlled and impacts would be significant. However, as noted in Master Response No. 3, LADOT would sign a MOU with BOE in coordination with RAP to ensure that LADOT (or its designee such as the River Rangers) maintains and repairs the proposed facilities in perpetuity to ensure that the Project operates as intended. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). Impacts would remain less than significant and preparation of an EIR is not required. No further response is necessary.

*Response B3-14*

The commenter asserts that the Project requires preparation of a joint CEQA/NEPA document due to the involvement of federal funding. While the Project would require environmental review pursuant to NEPA, as stated by the commenter, there is no requirement that such review be conducted concurrent with CEQA environmental review, or within a joint CEQA/NEPA document. The Project will be subject to environmental review pursuant to NEPA with Caltrans serving as the NEPA Lead Agency. No further response is warranted.

*Response B3-15*

The commenter argues that because the Project is contributing a segment of bike path and equestrian trail to the overall LA River Bikeway system, the City is "piecemealing" the environmental analysis of the Project and that it should be evaluated as part of a larger environmental analysis of the entirety of the LA River Bikeway. However, while the Project would represent a small portion of the overall LA River Bikeway, as envisioned in the Los Angeles River Master Plan, the Draft IS/MND need not explore the larger context of the impacts of the LA River Bikeway since the impacts of the Master Plan's implementation were previously evaluated in the Los Angeles River Master Plan Final Program Environmental Impact Report (PEIR). On June 14, 2022, the County of Los Angeles Board of Supervisors approved the LA River Master Plan and certified the PEIR on behalf of the County and the Los Angeles County Flood Control District. Given the numerous jurisdictions and interests involved along the 51-mile stretch of River, it was necessary to evaluate the impacts of the Master Plan at a program level, with the expectation that smaller individual projects (i.e., "implementing projects") would be designed consistent with the Master Plan and also would be subject to future project-specific environmental review under CEQA. As such, the Project was evaluated in the Draft IS/MND in order to provide the Project-specific detail that was not possible to evaluate in the PEIR, and the Draft IS/MND functions as a stand-alone CEQA document to comprehensively evaluate the potential environmental effects of the Project at hand, and not attempt to analyze the overall impacts of the larger bikeway system. As such, an IS/MND is the appropriate type of CEQA document for the Project. No further response is necessary.

*Response B3-16*

The commenter suggests that the incorporation of Best Management Practices (BMPs) in the Draft IS/MND is improper and that these requirements should have been included as mitigation measures (MMs) to ensure their implementation and enforcement. Despite these assertions, the Draft IS/MND incorporates BMPs and MMs, both of which are provided where appropriate to address impacts of the Project. However, BMPs that are provided in the Draft IS/MND need not be prescribed as MMs because their implementation is required by existing ordinances, policies, permits, or regulations such that they are standard conditions of Project approval, or would be required through forthcoming agreements with other agencies with jurisdiction. As such, they need not be included as MMs in the Draft IS/MND to ensure their enforceability. As discussed in **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**, the ongoing activities for Project operations listed in Section 2.8.1 would be implemented by LADOT or its designee on an ongoing basis pursuant to a MOU between LADOT and BOE. Furthermore, every one of these BMPs are also included in the Project's Mitigation Monitoring and Reporting Program (MMRP), which would further ensure their implementation. Implementation of these

BMPs would preclude the need for additional mitigation measures to adequately address impacts, and thus no further response is necessary.

*Response B3-17*

The commenter argues that an EIR must be prepared for the Project in accordance with CEQA. However, this assertion is based on the assumption that the Project would result in a potentially significant adverse impact on the environment. The comments provided by the commenter have stated repeatedly that the Project would result in significant impacts, but the comments fail to point to specific analysis or cite sections of the Draft IS/MND for which significant impacts are likely to occur, or offer a reasonable argument as to how the Project would create or substantially contribute to such adverse effects, other than erroneously claiming that the Project would introduce cyclists into the equestrian- and pedestrian-only portions of nearby off-site trails and other facilities resulting in potential user conflicts and safety impacts. The Draft IS/MND addressed all of the 20 CEQA Appendix G Checklist thresholds and provided substantial evidence to support the conclusions reached in the document; the Draft IS/MND included MMs to address potentially significant impacts as required by CEQA. All impacts were determined to be less than significant, either with or without mitigation, and thus preparation of an EIR is not required. No further response is necessary.

*Response B3-18*

The commenter states that an understanding horses and horse behavior is necessary to understand potential Project impacts, and also provides extensive, detailed information about horse behavior and sensitivities, and other related information. The Project has been designed consistent with applicable design standards to safely accommodate all user groups by providing the widest possible equestrian trail ROW possible given the Project Site constraints, while still achieving the key Project objective to provide a properly designed and fully separated bike path facility within the same overall alignment. The Project's equestrian trail design has incorporated input received at numerous community meetings with members of the equestrian community, and every attempt has been made to accommodate the suggestions received. The information provided by the commenter, while relevant, does not raise a substantive issue regarding the analysis presented in the Draft IS/MND. Further, the commenter asserts that this information will necessarily change the analysis of "safety impacts, noise and air quality impacts given these behavioral characteristics and the specifics of the Project design", but fails to point to any specific analysis presented in the Draft IS/MND or how understanding horse behavior would result in material changes to air quality or noise impacts, or impacts related to safety hazards, all of which are demonstrated to be less than significant. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further response is necessary.

*Response B3-19*

The commenter states that the analysis is deficient because the Draft IS/MND identifies Reach 3 of the LA River Ecosystem Restoration Project as applicable to the Project and not Reach 1.

However, page 52 of the Draft IS/MND notes that the Project is located within Reach 2 of the LA River Ecosystem Restoration Project and accurately describes the Project's consistency with its Reach-specific requirements in the area. Additional text has been added to the Draft IS/MND, as shown in **Clarifications and Modifications** of this Final IS/MND, to also address Reach 1 conditions and restoration efforts in this segment. The additional information does not change the analysis and conclusions reached regarding aesthetics impacts, since the proposed restoration efforts for Reach 1 are consistent with those of Reach 2, and the Project's design is consistent with both. Furthermore, the Project is being coordinated with the United States Army Corps of Engineers (USACE), and thus the ultimate Project design would be consistent with the restoration activities contemplated by USACE for Reaches 1 and 2. No further comment is warranted.

*Response B3-20*

The commenter states that the finding on page 54 of the Draft IS/MND under threshold a) is inadequate because it fails to identify that the Project is within an Urban Agriculture Incentive Zone. However, the threshold question specifically relates to the location of the Project Site relative to designated Farmland as defined by the California Department of Conservation, which is adequately addressed in the response provided. No further response is warranted.

*Response B3-21*

See **Response B3-19** above. The Project would not conflict with the LA River Ecosystem Restoration Project, and the Project is being coordinated with the USACE to ensure consistency with the Project's habitat restoration goals. No further response is necessary.

*Response B3-22*

The area surrounding the Project Site is heavily trafficked by motor vehicles from use of the 134 Freeway immediately adjacent to the proposed alignment. While motorized vehicles are less frequent within the boundaries of the Project Site (i.e., limited to City, County, or USACE official vehicles or other authorized vehicles), motorized vehicle use does occur, including trucks that access the River channel for maintenance purposes. Additionally, heavy use of the Project Site by pedestrians, cyclists and equestrians during the day similarly deters wildlife from use of the area. The Project does not incorporate obstructions to the free movement of wildlife mammal species or the mentioned avian wildlife species (egrets, blue herons, and raptors), as these avian species are flight capable, and higher-value habitat for these species is available within the River basin and in parks to the north and south of the Project Site. In addition, it should be noted that the City met with CDFW staff prior to the release of the Draft IS/MND to ensure that all of CDFW's concerns were addressed in the analysis. Based on the feedback received during meetings with CDFW, it was determined that no regulatory permits from CDFW would be required to implement the Project. Further, CDFW did not submit any written comments regarding the Draft IS/MND. Impacts would remain less than significant and no further response is necessary.

*Response B3-23*

It is the responsibility of the City and LADOT to source capable and qualified staff or contractors to successfully implement MM-BIO-1. See **Master Response No. 4: Tree Replacement and**

**Monitoring** for tree mitigation specifications. Also see **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**, regarding ongoing maintenance responsibilities for the Project. No further response is necessary.

*Response B3-24*

As noted on page 11 of the Draft IS/MND, light poles would be located approximately every 70 feet, would be 10 feet in height, and equipped with modular, solar-powered LED lights oriented downward and properly shielded to prevent unintentional or off-site lighting effects, as light would be focused solely on the proposed bike path and equestrian trail directly beneath the light fixtures. Since the corridor between the 134 Freeway and the River channel is currently exposed to traffic-related light from vehicles traveling along the freeway corridor, the addition of nighttime lighting is unlikely to impact the use of the area by wildlife undeterred by heavy traffic and lack of suitable habitat. Furthermore, the Project would not significantly change the existing habitat connectivity or wildlife corridors within the Project boundaries. With regard to analysis of impacts related to Reach 1 of the LA River Ecosystem Restoration Project, see **Response B3-19** above. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further response is warranted.

*Response B3-25*

The excerpts from ESA's technical report cited by the commenter were taken directly from the Mariposa Bridge National Register nomination and were used to provide context for the bridge's status as a historical resource. ESA's analysis of the Project's direct and indirect impacts was detailed in the following discussion in the Cultural Resources Assessment Report (Appendix D of the Draft IS/MND):

> *The Mariposa Equestrian Bridge is situated northwest of the Project Area and is listed in the National Register. It will not be altered in any manner because of the project. The equestrian trails it connects will be expanded and upgraded, but there will be no change in use or material changes to the bridge itself as a result of the Project. The bridge will remain intact in its current location and will not be physically impacted or materially impaired by the Project. It will retain all aspects of its integrity and will not lose any ability to convey its significance. [pages 49–50]*
>
> *Although there are direct and indirect views from all of these resources, the Project will minimally alter these views. The Project alignment will provide additional access for bike, pedestrian, and equestrian activities, and the changes associated with the Project would mainly be at the ground level of an existing service road. The current view of an informal path and various plantings will now be a view of paved pedestrian, equestrian, and bike trails with accompanying lighting, retaining wall, and associated landscaping. The Project represents a minor change to the overall setting of Griffith Park and the Equestrian Center that will not impact the*

*resources' significance or integrity. This change will have no material impact on the Equestrian Center nor any effect on its significance or integrity. [page 50]*

It was also addressed in the Section 106 analysis on pages 51-52 of the report:

*The Project will not substantially change the overall aesthetic of Griffith Park, the existing trails and bridges, or their surrounding areas. The Project would not cause any listed, eligible or potentially eligible resources to be ineligible for national, state, or local listing. As such, the Project would not have indirect impacts to any historical resources.*

*The National Register-listed Mariposa Bridge will not be subject to any material alterations, just an alteration to its view, which will change from a dirt service road to a landscaped and asphalted bike path. This alteration will not impact its eligibility in any manner.*

*While the extension of a bike path will slightly alter the setting of the historic resources, the setting was already altered in a highly significant manner when Zoo Drive and the 134 Freeway were built. Resources including the LAR Channel, Mariposa Equestrian Bridge, River/Zoo Drive Bridge, and all features of Griffith Park will retain all aspects of integrity and will not lose any ability to convey historical significance.*

*Although the network of trails in Griffith Park contribute to the setting of the District, they have already been disturbed with the construction of the existing pavement in the Project Site. The formalization and/or extension of an existing trail within the Park does not impact its character-defining features in any manner. Ultimately, only a small portion (roughly 4,600 feet) of Griffith Park will be altered as a result of the Project, a change that will have minimal effect on the setting of the District.*

The Project does not include features that would facilitate the introduction of bike traffic onto the Mariposa Bridge, and there would be steel barriers, fences, and other obstacles and nearly 800 feet between the end of the bike path component and the Mariposa Bridge. The introduction of bike traffic into the “vicinity” of this listed resource does not impact its significance, integrity or eligibility in any negative manner.

*Response B3-26*

See **Response B2-3** above. ESA was contacted by the commenter who requested to be added as a consulting party. As the commenter noted, they are now a consulting party to that process. Since this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

*Response B3-27*

The commenter suggests that the Project design has inadequate security fencing and trail widths; refer to **Response A3-3** above. The commenter then argues that the location of the Project adjacent to the 134 Freeway would result in impacts related to startling horses from the

noise and activity nearby. However, numerous comments have noted that equestrians regularly travel along the existing ROW that currently is exposed to the same level of freeway-related noise and activity that the commenter asserts results in adverse effects. The Project would not increase these freeway-related effects or introduce substantial new sources of noise once operational. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). Nonetheless, this comment does not raise a specific substantive issue regarding the analysis presented in the Draft IS/MND and thus no further comment is warranted.

*Response B3-28*

The commenter claims that the Draft IS/MND did not evaluate the potential effects associated with a listed Superfund Site in the area. However, to the contrary, page 11 of the Phase I Initial Site Assessment (ISA) included in Appendix G of the Draft IS/MND, includes a discussion of this site and concludes "[t]his listing is not considered a REC, HREC, or CREC because investigation determined this site did not affect the subject property." As such, no impacts would occur in relation to this listed site, and no further comment is necessary.

*Response B3-29*

The typo noted by the commenter has been corrected to correctly indicate Appendix G of the Draft IS/MND, as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response B3-30*

See **Response B3-4** above. Revised text regarding the existing ownership and jurisdiction of the Project Site has been added to the Draft IS/MND as shown in **Clarifications and Modifications** of this Final IS/MND. The additional clarifying text does not change the analysis of the potential for the Project to result in significant physical adverse effects on the environment; impacts remain less than significant and no further response is necessary.

*Response B3-31*

The commenter asserts that the Draft IS/MND fails to analyze impacts with regard to the listed "sensitive areas"; however, the comment fails to point to a specific analysis, issue, or impact presented in the Draft IS/MND that is deficient. Impacts related to wildfire hazards are addressed in Section 4.9, *Hazards and Hazardous Materials*, and Section 4.20, *Wildfire*, of the Draft IS/MND, while impacts to biological resources including wildlife species are addressed in Section 4.4, *Biological Resources*. No further response is warranted.

*Response B3-32*

The commenter argues that due to the historic use of the Project Site for equestrian recreation, the Project would physically divide an established community through the disruption of the equestrian community by constructing and operating a multiuse trail along the existing Project ROW. However, the Project would not physically divide any communities or populations, as it

would simply redesign the existing service road/trail into a multiuse trail as envisioned in the Los Angeles River Master Plan, which would maintain equestrian connectivity between the Mariposa Bridge and Tunnel 6 and safely separate it from other user groups, where currently there is a lack of enforcement and physical barriers to prevent user group interactions along the existing ROW. The perception that the Project would disrupt the equestrian community in the area does not translate to physical division of a community, which is the focus of the CEQA threshold for the issue at hand. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND). No further response is warranted.

*Response B3-33*

The commenter erroneously states that the Draft IS/MND fails to analyze the impacts of introducing new bicycle use in a Very High Fire Hazard Severity Zone (VHFSZ) and the potential for significant fire-related impacts. However, as indicated previously, Impacts related to wildfire hazards are addressed in Section 4.9, *Hazards and Hazardous Materials*, and Section 4.20, *Wildfire*, of the Draft IS/MND. The comment does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND, and therefore no further response is necessary.

*Response B3-34*

See **Response B3-19** above. The Project would not conflict with the LA River Ecosystem Restoration Project, and the Project is being coordinated with the USACE to ensure consistency with the Project's habitat restoration goals. Furthermore, the Project is intended to contribute to the overall implementation of the Los Angeles River Master Plan, and additionally, it would help facilitate upland habitat restoration efforts and contribute to the equestrian trail network in the area, both of which are cited by the commenter as design considerations for this location. Furthermore, the Project's design is consistent with the Los Angeles River Master Plan Design Guidelines for multiuse trails along the River. The comment does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND, and therefore no further response is necessary.

*Response B3-35*

The analysis of construction noise impacts on pages 110 through 116 of the Draft IS/MND are adequate. Contrary to the commenter's assertion that construction noise and construction noise limitations apply only to receptors within the City of Los Angeles, the noise analysis in the Draft IS/MND considers construction noise and construction noise limitations to receptors within the City of Los Angeles, City of Burbank, and City of Glendale as shown in Table 13 on page 115 of the Draft IS/MND.

Furthermore, the Draft IS/MND recognizes sensitive uses such as the nearby parks, residences, and equestrian-related land uses in the area as sensitive receptors and such uses have been adequately assessed for noise impacts in the Draft IS/MND. Refinements to Mitigation Measure

MM-NOI-1 have been made to more specifically address potential effects on horses, as shown in **Clarifications and Modifications** of this Final IS/MND. The Project is required to implement stringent mitigation including the use of noise barriers, construction equipment vibration dampers or similar controls, mufflers, and rubber mats to reduce the generation of loud and instantaneous noise.

The commenter states that the analysis is deficient because the Draft IS/MND omits an assessment of Reach 1. Page 52 of the Draft IS/MND notes that the Project is located within Reach 2 of the LA River Ecosystem Restoration Project and accurately describes the Project's consistency with its Reach-specific requirements in the area. Additional text has been added to the Draft IS/MND, as shown in **Clarifications and Modifications** of this Final IS/MND, to also address Reach 1 conditions and restoration efforts in this segment. The additional information does not change the analysis and conclusions, since the proposed restoration efforts for Reach 1 are consistent with those of Reach 2, and the Project's design is consistent with both. Furthermore, the Project is being coordinated with the United States Army Corps of Engineers (USACE), and thus the ultimate Project design would be consistent with the restoration activities contemplated by USACE for Reaches 1 and 2. See also **Response B3-19** for information regarding Reach 1. No further response is warranted.

*Response B3-36*

The analysis of construction vibration impacts on pages 116 through 118 of the Draft IS/MND are adequate. The comment does not point to any specific issue, analysis, or conclusion regarding the impact of vibrations on sensitive receptors. Nonetheless, to be responsive to the commenter, it is noted that the Project is required to implement stringent mitigation including the use of noise barriers, construction equipment vibration dampers or similar controls, mufflers, and rubber mats to reduce the generation of loud and instantaneous noise. As shown in **Clarifications and Modifications** of this Final IS/MND, the text of Mitigation Measure MM-NOI-1 has been clarified to include further specifications for the protection of the equestrian-related facilities to ensure that reductions in instantaneous, sudden, and on-going noise and vibrations are realized at the nearby equestrian uses. No further response is warranted.

*Response B3-37*

As shown in **Clarifications and Modifications** of this Final IS/MND, the text of Mitigation Measure MM-NOI-1 has been clarified to include further specifications for the protection of the equestrian-related facilities to ensure the noise and vibration reductions are realized at the nearby equestrian uses. Mitigation Measure MM-NOI-1 does not only require the use of noise blankets. The Project is required to implement a number of stringent mitigation requirements including the use of noise barriers, construction equipment vibration dampers or similar controls, mufflers, and rubber mats to reduce the generation of loud and instantaneous noise. Therefore, the Draft IS/MND along with the clarifications to Mitigation Measure MM-NOI-1 provided in **Clarifications and Modifications** of this Final IS/MND reduces the potential for significant noise impacts on horses and equestrian activities to less than significant. No further response is warranted.

*Response B3-38*

Refer to **Response B3-19** and **Responses B3-35 through B3-37** the noise impacts assessment in the Draft IS/MND and clarifications provided in **Clarifications and Modifications** of this Final IS/MND, which includes addressing Reach 1 conditions and restoration efforts in this segment and that Measure MM-NOI-1 includes further specifications for the protection of the equestrian-related facilities to ensure that reductions in instantaneous, sudden, and on-going noise and vibrations are realized at the nearby equestrian uses. No further response is warranted.

*Response B3-39*

The commenter states that the Draft IS/MND fails to analyze heavy duty vehicle access to the Project Site for power line tower maintenance. If such vehicles are necessary to maintain the power infrastructure owned and operated by the LADWP, they are assumed to currently access the site as needed, and thus this activity is expected to occur under existing conditions at the Project Site. The Project would provide a minimum 11' 2" ROW along the paved bike path portion of the Project alignment to allow for adequate space for service and emergency vehicles to access the entire length of the Project Site. This comment does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND, and therefore no further response is necessary.

*Response B3-40*

Refer to **Response B3-27** above regarding proximity to the 134 Freeway and potential for startling horses, as well as **Master Response No. 1: Separation of Path-Trail User Types**, regarding Project fencing and barriers and **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** regarding ongoing maintenance responsibilities for the Project including maintaining fences and barriers. The impact threshold referenced by the commenter relates to whether the Project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The comments regarding the inadequacy of the fencing to prevent vandalism is not germane to the analysis presented in the Draft IS/MND.

*Response B3-41*

See **Response B3-4** above, as well as **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** regarding ongoing maintenance responsibilities for the Project including maintaining fences and barriers. No further response is warranted.

*Response B3-42*

The commenter cites guidance from the Caltrans Highway Design Manual regarding separation of user groups and barriers; however, the Project design provides the widest possible lateral separation given the constraints of the Project Site, as noted in **Master Response No. 1: Separation of Path-Trail User Types**, and the initial Project design included a 4-foot-3-inch-tall split rail fence as a barrier between the bike path and equestrian trail components, but this was changed to the 8-foot-tall chain link fence in response to comments received from the equestrian community. As such, the Project design has considered this guidance but the design has been

modified to increase the height and material of the “obstruction” in direct response to community input. Further, it should be noted that the cited design guidance provides no direction on how to calculate sufficient space for an equestrian to collect and calm a horse. The fence height is consistent with the cited design guidance in that it is a minimum of 4 feet in height and does not block visibility between the equestrian trail and the bike path. The commenter fails to explain how any of these comments discuss potential impacts to environmental resources regulated by CEQA. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND).

*Response B3-43*

The commenter notes existing damage to fences in the Project area and that revised plans provided by the City (as a courtesy at the request of the commenter) do not resolve design questions including fencing types and trail widths. Furthermore, the commenter questions the likelihood of the City acquiring the easement to accommodate the full 10-foot ROW for the equestrian trail component of the Project. However, the City is under no obligation to provide plans, materials, or responses to commenters during the public review period since, as required by CEQA, written responses are to be provided once all comments have been received and considered by the lead agency. In addition, the Project will ultimately be subject to further minor design refinements prior to finalizing the plans for construction, which will involve review by various City departments and outside agencies with jurisdiction over the Project. As such, some details such as the specific fencing material and other variable design elements are yet to be determined, but would be subject to review and approval by the respective agencies prior to final construction drawings are prepared. Nonetheless, as discussed previously, the Project’s equestrian trail width meets applicable design guidelines and the fencing would be maintained in perpetuity as discussed in **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**, and thus the potential safety impacts related to these design elements are considered less than significant. Additionally, equestrian expert Kathy Hobstetter has reviewed the proposed Project and examined the Equestrian Trail including the Mariposa Bridge and has determined the Project is adequately designed not to adversely impact existing equestrian uses (See **Appendix L**, Equestrian Trail Design Memorandum, of this Final IS/MND).

*Response B3-44*

Refer to **Response B3-43** above regarding final detailed plans for the Project. The final design refinements that may be incorporated into the Project prior to construction cannot be determined at this stage of planning. However, the full set of the most recent version of the Project plans showing the Project design along the entire alignment has been included in **Clarifications and Modifications** of this Final IS/MND. The comment does not point to any specific analysis in the Draft IS/MND for which future minor design modifications may contribute to additional impacts. No further response is warranted.

*Response B3-45*

Refer to **Response B3-17** above regarding preparation of an EIR for the Project. If the City had determined, based on substantial evidence, that the Project could result in one or more

significant impacts on the environment that cannot be mitigated to a level less than significant, then an EIR would be required that would include evaluation of Project Alternatives to reduce or eliminate those significant impacts. However, as noted above, the Project would not result in any significant and unavoidable impacts and thus preparation of an EIR is not required.

*Response B3-46*

The commenter notes discrepancies between the CEQA process discussed in Draft IS/MND Section 1.3 and the content of the virtual public meeting held on March 12, 2025. The discussion in Draft IS/MND Section 1.3 describes the typical CEQA process for projects for which a Negative Declaration of Mitigated Negative Declaration is being prepared. The discussion is intended to provide the reader with context and a basic understanding of the process and opportunities to participate in the CEQA process by providing comments. The information presented at the March 12, 2025 virtual public meeting is intended to a brief summary of the current timeline for the Project based on this particular Project's overall schedule. The discrepancy between the discussion in Draft IS/MND Section 1.3 and the information presented at the virtual public meeting does not have any effect on the public's opportunities to participate in the CEQA process, but rather the public meeting information clarified the process and timeline for the Project so the public was provided with the most current information. No further response is necessary.

*Response B3-47*

Refer to **Response B3-4** above.

*Response B3-48*

The commenter notes the there is a school facility closer to the Project Site than the McKinley Middle School cited on page 46 of the Draft IS/MND, but fails to note the significance of this observation or relate this information to any specific analysis presented in the Draft IS/MND. No further response is necessary.

*Response B3-49*

The photographs presented in Figure 4 of the Draft IS/MND were selected to illustrate representative segments of the existing facility along its entire length; as such it is not practical to document every portion and feature of the alignment, but rather enough information to provide context and the overall setting of the Project Site. The photographs were not taken or selected to include or omit any particular features or conditions along the ROW. In fact, the damaged fences noted by commenters are clearly depicted in the first photo set in Figure 4a. No further response is necessary.

*Response B3-50*

Refer to **Response B3-49** above.

*Response B3-51*

The commenter questions the relevance of Photo 10 in Figure 4e; the view of the LA Equestrian Center is provided to show context for the location of surrounding land uses relative to the Project Site. Accordingly, Figure 3 provides the photo location of each photograph presented in Figure 4 for geographic context. No further response is necessary.

*Response B3-52*

The typo in Figure 4e noted by the commenter has been corrected to indicate the view is "westbound" and not "eastbound", as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response B3-53*

Refer to **Response B3-4** above.

*Response B3-54*

Refer to **Response B3-10** above.

*Response B3-55*

Refer to **Response B3-7** above.

*Response B3-56*

The commenter provides a concluding statement regarding the comments provided in the comment letter, and requests to be notified regarding all future Project-related hearings, votes and determinations related to the Project, its CEQA document and requested entitlements. No further response is necessary.

# LETTER B4

From: **Rancho Horses** <ranchohorses@gmail.com>
Date: Mon, Mar 31, 2025 at 11:12 PM
Subject: LA River Bikepath Phase IV, Draft MND on Council File 23-0722
To: <Christopher.Adams@lacity.org>

Please see attached PDF with photographs. Thank you!

LA River Bikepath Phase IV Draft MND on Counc...

B4-1

Christopher Adams
Department of Public Works
Bureau of Engineering
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213
Christopher.Adams@lacity.org

Re: LA River Bikepath Phase IV, Draft MND on Council File 23-0722

Dear Mr. Adams:

My name is Liz Radley, Admin of Burbank-Glendale-Griffith Park Equestrians community group of over 11,000 members, anchored in this immediate area.
I am personally a stakeholder, a frequent user of this area as both a pedestrian and equestrian.
I live directly opposite of the east end of the project, and have a clear view of it and its current users.
These comments represent discussions held with multiple members of Burbank-Glendale-Griffith Park Equestrians community group, and express just some of their concerns.

B4-2

**Missing Equestrian Usage Count**

The proposed Project contains unmitigated impacts because it does not protect the safety of the existing long standing users of the bridle trail along the Los Angeles River. The Project introduces a new use into an historic location.

The equestrian users of the location have used this equestrian trail for decades and have only one point of access to Griffith Park, via the historic Mariposa Bridge.

The project does not accurately account for the number of equestrians, where their rides originate, and what their destinations are in the park.

B4-3

**Who uses the Griffith Park equestrian trails?**

Horses who live in backyards and boarding barns in the cities of Burbank, Glendale and Los Angeles, including over 400 who reside at the Los Angeles Equestrian Center itself.
The owners of these horses live in all 3 cities, including a large contingent from the City of Los Angeles, as there is no backyard horse-keeping area in Los Angeles near Griffith Park.
Because of the excellent public trail riding in the park, horses are also brought in by owners who live further away.
Finally, the riders include old and young, tourists, novices and families with children who rent horses from the stables in the area. Indeed, even the Los Angeles Equestrian Center is involved their clients renting horses to ride in Griffith Park.

B4-4

**How many riders use the trail between the Riverside Bridge/Tunnel 6 and the Mariposa Bridge/Tunnel 7 area?**

The draft Mitigated Negative Declaration contains no information about equestrian usage. No accurate count has been taken, and usage varies with the season, weather, day of the week and access.

Apparently cameras were installed in the last 2 weeks of October 2024 to count usage. These cameras were reported as seen by multiple members of the public on October 28th. This period was not typical of usage and thus any data is incomplete, and needs to be redone.
Based on events and weather, the usage in those weeks was negatively impacted including:
1) A local public equestrian event in a nearby part of Griffith Park on Saturday October 26th that drew many equestrians away from the trail system.
2) The LAEC Perimeter Trail was closed on October 29th and partially closed on November 4th due to DWP tree trimming/palm frond removal. (The Perimeter Trail around Los Angeles Equestrian Center must be fully open for most horses to access the historic Mariposa Bridge, the only way over the LA River into Griffith Park.)
3) It rained on November 2nd, causing many riders to stay home to avoid slippery conditions.

B4-5

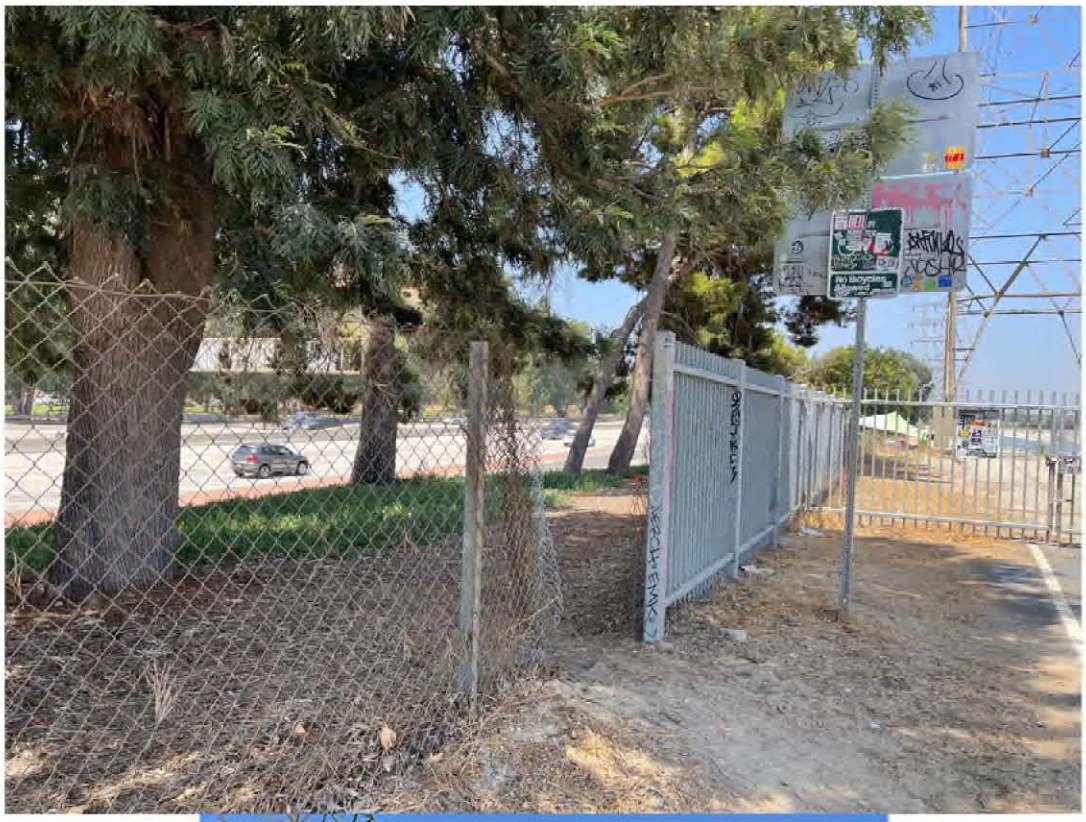
The YouTube link below shows a 3 hour time span on a random Saturday in May 2023 as a timelapse video of almost 9 minutes.
This shows the volume of equestrians travelling by and over the Mariposa Bridge, showing all types and levels of riders.
The total horse was count of 167 at a rate of over 50 per hour. That's way more than cars or bicycles on any day at that pivotal location.
https://youtu.be/o-pQ7HJyraQ

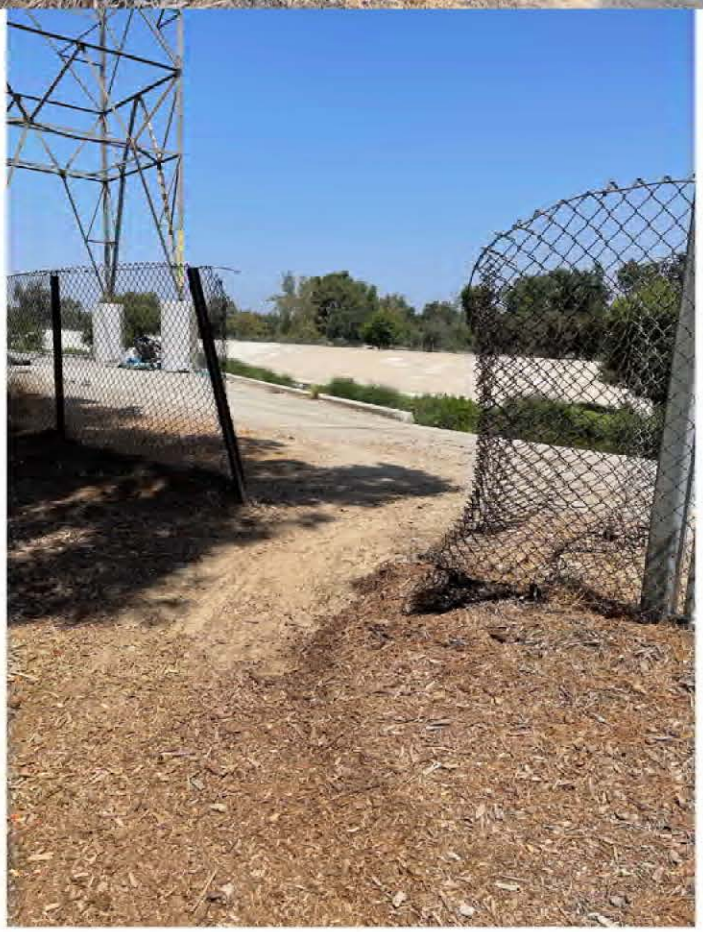
**How can LA/DOT improve public safety at the east end of the bike path at Riverside Bridge?**

Based on the maintenance observed so far, it seems that the proposed Project will NOT be maintained to normally expected public safety standards. The current east end is NOT secured or maintained in terms of public safety or signage, and I believe exposes the City of LA to possible liability claims.

B4-6

For years the east end of the current bikepath has had wide open gaps from cuts in the CalTrans chain link fencing. The secure metal DOT gates and wings at the east end offer little restriction because they do not extend far enough. They function as an island and people simply go around them. As was conveyed to DOT at previous meetings, metal security fencing needs to extend from the current east end to the bridle path at Tunnel #6 to prevent cyclists from bypassing the current gated-off location at the current terminus of the existing bikepath. (see photos)

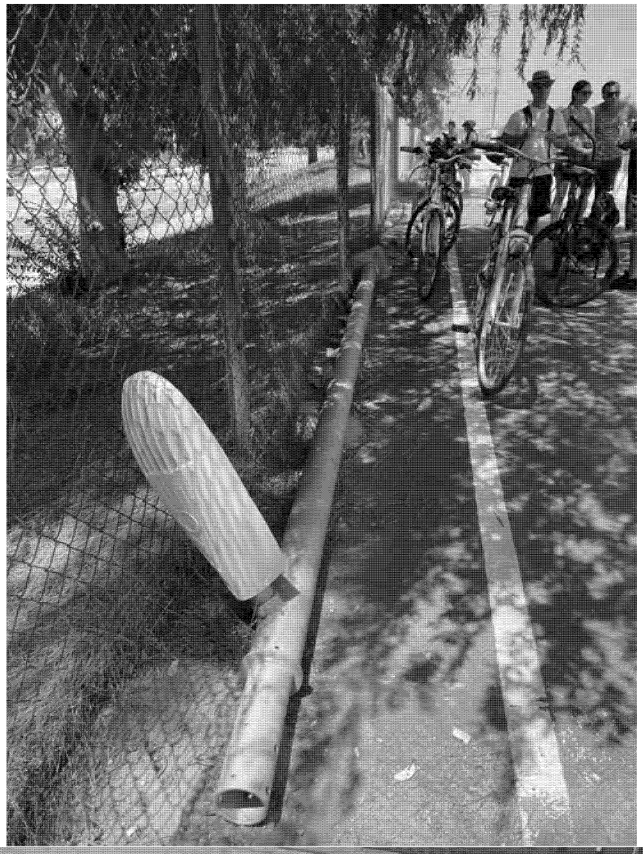

No Bicycling



Moreover, ‘no bike’ signs are painted out, graffiti’d or removed altogether. Even cyclists who wish to follow protocol do not have legible signage to inform them. This is a lack of maintenance that leads to a risk to the public.

There is so far just one recorded maintenance visit where the downed light poles and graffiti-covered signage were simply removed after being reported in 2022. No lighting has since been restored. The area lacks clear signage and is in darkness.



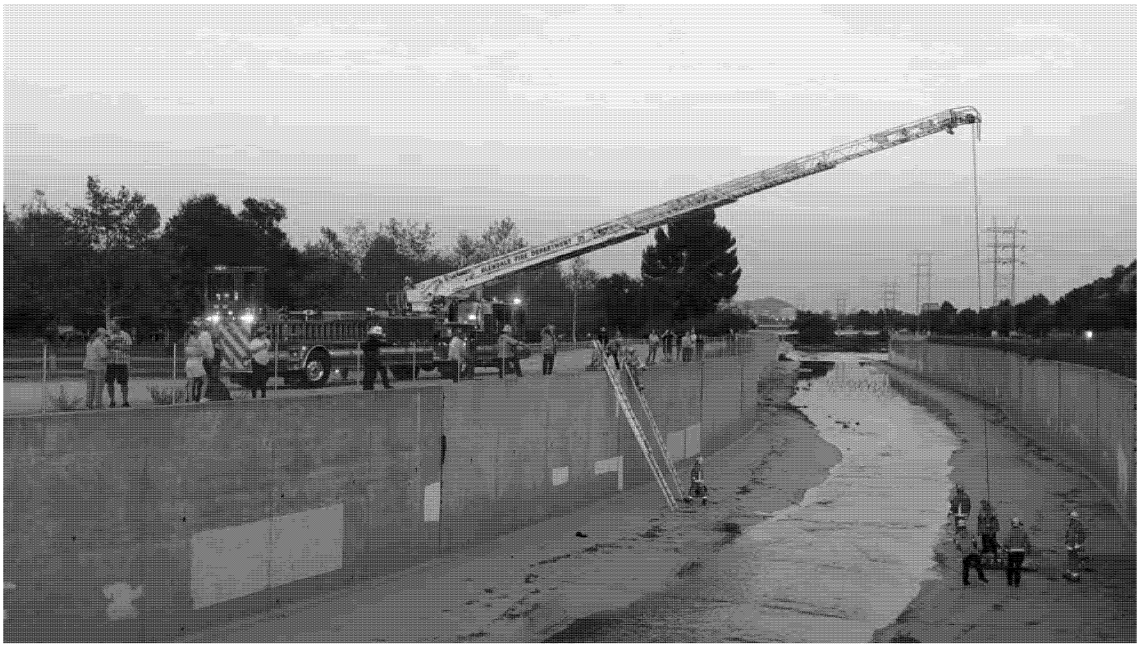


How will LA/DOT maintain and prevent the same chronic issues that currently occur at the east end, from happening at the proposed west end near the Forest Lawn freeway ramps? Given the number of agencies cited in the draft MND , there is no adequate mitigation measure for maintenance because there is no Master Agreement identified that gives LA/DOT the right to maintain all of the improvements: fences, Caltrans fence, LA River-side fence, all gates, landscaping, lighting, walls, trees? The agency complexity and the lack of maintenance shows the inadequacy of the MND. Given the enforcement complexity, the draft MND does not identify the agencies responsible for enforcement: LAPD, Park Rangers, LA/DOT, County Sheriff? The Army Corps and County Flood Control do not handle enforcement. Who do you call? B4-9

How will LA/DOT ensure physical signage at the Riverside Bridge that informs cyclists well in advance of the DEAD END and requirement to turn around and go back a mile in order to exit where they started? B4-10

How will LA/DOT ensure electronic GPS's (such as Google Maps) mark this as a DEAD END with NO outlet, so cyclists with a destination will transfer onto Zoo Drive as originally intended? As currently proposed, this has been characterized by cyclists as 'a Bike Path To Nowhere'. Until Caltrans reviews, designs, funds and builds a bridge at the Forest Lawn 134 entrance/exit, I'm told this has limited attraction to cyclists. B4-11

How will LA/DOT design the path to be striped to avoid the same misconception as currently exists at Riverside Bridge? The current striping leads cyclists onto the horse trail incorrectly believing this is in fact currently a bicycle path, and leads to hostile interactions which could end in a rider falling from their horse over the very low chainlink fence. A photo is attached of a rider being rescued, thankfully alive, from a fall face-first into the concrete-lined river as a result of a horse being startled. A cyclist could be also injured in an altercation, not realizing a horse's concern. B4-12



Additionally the current asphalt is not intended or maintained as a bike path, leading to the possibly of injury to cyclists, as described by cyclists on the recent Zoom call. B4-13

What specific law enforcement agencies will have jurisdiction? How will they coordinate? Who currently handles enforcement on the bike path east of the Riverside Bridge? B4-14

How will LA/DOT plan for law enforcement to have on/off/turnaround access on both the bike path and the horse trail? Same question for fire trucks and ambulances. And for maintenance vehicles? B4-15

Additionally, this area has an unhoused population resulting in unpredictable situations, such as this fire right beside the existing bike path just east of Riverside Bridge on July 10 2023. There have been several small fires like this - this one did ignite the main park (see photo). B4-16

Are small motorcycles and e-bikes traveling fast permitted to use the proposed bike path? They currently use the existing path sometimes at what appears to be about 25mph. Will there be a speed limit if they are permitted? B4-17

How will LA/DOT post and maintain the rules? Who will be involved in the wording to ensure clarity? B4-18

What will be the legal penalty if cyclists bring their bikes onto the horse trail? Who will enforce that? Note: LAMC 63.44 (B)(16) No person shall drive or ride any cycle or vehicle, whether powered by a motor or human power, except on paths, roads or drives designed and provided for such purposes. B4-19

Are there liability concerns for the City of LA, and Rec & Parks, for design errors that result in injury or death? Example: a horse's gruesome death at North Atwater Bridge. Link to ABC article: https://abc7.com/atwater-village-equestrian-bridge-los-angeles-river-horse-euthanized/5874329/ B4-20

What will be the horses' and cyclists' visibility of each other to prevent surprises leading to startles and falls? Clear visibility with a suitable barrier (such as a robust post-and-rail fence) is better than partial or obscured visibility to prevent people and horses being suddenly startled especially in low light. B4-21

How will these paths be managed after dark? Will the path/trail be closed at night outside the Griffith Park standard hours (10:30pm)? If so, how will that be implemented? Will gates be installed and then closed by Park Rangers? B4-22

How will LA/DOT or the City of LA prevent taxpayers money being wasted by preventing equipment being stolen? Example: stolen solar panels are now powering a encampment located at an outfall just feet from the east end gate within the LA River itself. B4-23

Nearby, multiple additional solar panels have been installed on the roof of a small RV, parked outside Tunnel 6 on Zoo Drive.

B4-23 (cont.)

Thank you for reviewing these significant concerns.

B4-24

Best regards,

Liz Radley
Admin, Burbank-Glendale-Griffith Park Equestrians,
a community group of over 11,000 members.
RanchoHorses@gmail.com

**Letter B4**
Liz Radley
**Burbank-Glendale-Griffith Park Equestrians**
March 31, 2025

*Response B4-1*

The commenter notes that their comments are contained within the attached document. This comment does not raise a substantive issue regarding the analysis presented in the Draft IS/MND. As such, no further response is warranted.

*Response B4-2*

The commenter provides an introduction to the comments provided in the comment letter. Responses to the comments included in this letter are provided below in **Responses B4-3 through B4-24**.

*Response B4-3*

The commenter states that the Project does not protect the safety of existing trail users by introducing a new bicycle path facility in an area historically used by equestrians, and that the Project "does not accurately account for the number of equestrians, where their rides originate, and what their destinations are in the park." These comments, however, do not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND; nonetheless, see **Response A3-3** above and **Master Response No. 1: Separation of Path-Trail User Types** regarding safety concerns associated with interactions between user groups and **Master Response No. 2: Project Site Existing Ownership and Authorized Uses** regarding existing equestrian activity and user access at and near the Project Site. No further response is warranted.

*Response B4-4*

The commenter provides background information regarding the equestrian users of Griffith Park and the surrounding area, including the Project Site. These comments, however, do not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response B4-5*

The commenter notes that the Draft IS/MND contained no information about equestrian usage, and claims that no accurate count has yet been taken, and usage varies with the season, weather, day of the week and access. The commenter also notes that cameras were installed near the end of October 2024 to count usage but suggests that this period was not typical of usage and thus any data is incomplete, and needs to be redone. The commenter then offers information to support the notion that the usage that was recorded by the cited usage counts were not representative of normal conditions, including the following: (1) A local public equestrian event on Saturday October 26 (2) The LAEC Perimeter Trail was closed on October 29 and partially closed on November 4; and (3) It rained on November 2. As discussed in detail in **Master Response No. 2: Project Site Existing Ownership and Authorized Uses**,

the trail count data were gathered on October 30, 2025 for weekday counts, and on November 1, 2025 for weekend counts. Neither of the days on which count data were gathered coincide with the conditions noted by the commenter. Thus, the count data are considered representative of typical usage conditions. Nonetheless, as also noted in Master Response No. 2, these data were not relied upon for any quantified analysis or evaluation of Project impact in the Draft IS/MND, as the Project is intended to provide a ride-in/ride-out extension to the existing LA River Bikeway system, but also maintain the existing equestrian trail connection between Tunnel 6 and the equestrian-only facilities including the Mariposa Bridge located to the west of the Project Site.

The commenter also cites empirical video data from a Saturday in May 2023 that shows the Mariposa Bridge total horse count was 167 over a 3-hour timeframe at a rate of over 50 per hour. For context, as shown in Master Response No. 2, the data collected at the southern end of the Mariposa Bridge on Saturday, November 1, 2025, had a total equestrian count of 698 between 7 a.m. and 7 p.m., which is a rate of over 58 per hour on average. This is comparable to the Saturday level of equestrian activity at this location as cited by the commenter. Additionally, as noted by the commenter, the level of equestrian activity at this location and Main Trail location is much higher than both pedestrian and bicycle activity. No further response is warranted.

*Response B4-6*

Refer to **Response B3-10** above.

*Response B4-7*

Refer to **Response B3-10** above.

*Response B4-8*

Refer to **Response B3-10** above.

*Response B4-9*

Refer to **Response B3-10** above. As also noted in **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**, the maintenance of the Project facilities would be coordinated between various agencies with jurisdiction, including through a MOU between LADOT and BOE. The MOU will ensure that LADOT or its designee, such as the River Rangers, maintain the Project fencing, signage, and other improvements so that the Project operates safely and as intended.

*Response B4-10*

See **Master Response No. 1: Separation of Path-Trail User Types** regarding signage for the Project.

*Response B4-11*

The commenter inquires as to how the Project will ensure that GPS devices recognize the Project's bike path "dead end" turnaround feature. However, this is beyond the scope of the

Project and Draft IS/MND, and no further response is warranted. Refer to **Response A5-6** regarding the pending Caltrans study cited by the commenter.

*Response B4-12*

See **Master Response No. 1: Separation of Path-Trail User Types** regarding full physical separation of equestrians and cyclists throughout the length of the Project alignment.

*Response B4-13*

Refer to **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**. The Project bike path and equestrian trail components would be constructed to appropriate engineering design standards to accommodate the respective intended user groups. In addition, all aspects of the Project, including paving, would be regularly inspected and repaired, as necessary, to ensure safe operation and proper function of the proposed facilities.

*Response B4-14*

Refer to **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**. The Project Site is located entirely within the City of Los Angeles, and thus is within the primary jurisdiction of the Los Angeles Police Department (LAPD) for law enforcement, but other entities such as the Los Angeles County Sheriff's Department may also offer support, and the River Rangers may also participate in law enforcement activities, as appropriate, through an MOU between LADOT and BOE.

*Response B4-15*

The Project will be subject to plan review by other City departments including the LAPD and Los Angeles Fire Department (LAFD), which may require that access gates or other features to facilitate emergency services access, be incorporated into the Project design. As noted previously, the Project's bike path component has been designed with a minimum width of 11' 2" in order to allow adequate space for maintenance vehicles along the entire length of the alignment.

*Response B4-16*

The commenter notes the presence of unhoused persons and past instances of fires occurring in the Project area. This comment does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response B4-17*

The commenter questions if e-bikes and motorcycles would be permitted to use the bike path component of the Project. Motorcycles and e-bikes are prohibited from using designated bike paths in the City per LAMC Section 63.44(B)(16). This comment does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response B4-18*

Refer to **Response B4-9** above.

*Response B4-19*

The legal penalties for violations are not germane to the analysis presented in the Draft IS/MND. However, see **Response B4-14** above regarding law enforcement services for the Project Site.

*Response B4-20*

Legal liability issues regarding the design and safety concerns associated with another trail location in the area are not relevant to the analysis presented in the Draft IS/MND. No further response is necessary.

*Response B4-21*

See **Response B3-42** above regarding the trail/path barrier design for the Project. No further response is necessary.

*Response B4-22*

Refer to **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**.

*Response B4-23*

The commenter's observations regarding perceived theft of public property in the Project area are not relevant to the analysis presented in the Draft IS/MND. No further response is necessary.

*Response B4-24*

The commenter provides a concluding statement that does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

LETTER C1

## Communication from Public

| | |
|---|---|
| **Name:** | Alyce Heath Schwartz |
| **Date Submitted:** | 02/09/2025 08:32 AM |
| **Council File No:** | 23-0722 |
| **Comments for Public Posting:** | Re: Phase IV Riverway Bike Path on LA City Council Agenda Tuesday, February 11, 2025 - 23-0722 Re: Recommendations for Council action, pursuant to Motion (Raman - Blumenfield) I have attached a pdf for y'all to read to show you why it's a bad idea to add a bike path to the 80+year old Mariposa Trail. Thank you for taking the time to make sure riders and horses are not injured or killed. PLEASE READ IT! PS: I should also point out that, based on 40+ years of dealing with bicyclists and the trails in Griffith Park, once the bicyclists gets to the "end" of the bike path next to the maintenance gates by the Forest Lawn 134 exits, they will cut through the fence, put their bikes over, under or through the fence and continue on the trail. |

C1-1

**Was previously submitted, now being submitted for the virtual Public Meeting regarding the Project and Initial Study/ Mitigated Negative Declaration will be held on March 12, 2025, at 6 p.m.**

C1-2

**Phase IV Riverway Bike Path on LA City Council Agenda Tuesday, February 11, 2025**

**Re:**
Recommendations for Council action, pursuant to Motion (Raman - Blumenfield):

1. INSTRUCT the Los Angeles Department of Transportation (LADOT), with assistance from the Bureau of Street Services and the Bureau of Engineering (BOE), to report to the Council within 45 days on implementing a design for the LA RiverWay Phase IV Project that prioritizes maximizing space and enjoyment for all uses, and forms a continuous segment with an outlet at Forest Lawn Drive or another identified bicycle/pedestrian facility. This report should include encroachments/easements or other agreements necessary with other jurisdictions in order to eliminate mixing modal uses, maintain **a minimum 10 feet equestrian-only path**, **construct fencing**, bend cycling segments to slow cyclists at trail junctions, and any other needed design elements. The report should also outline steps to protect the trail from the negative impacts of the CA-134 freeway. The report should outline anticipated costs of any needed encroachments/easements and elements to protect the trail from the negative impacts of the CA-134 freeway and methods to cover those costs.

C1-3

## WHAT Y'ALL NEED TO KNOW

C1-4

**A:** the 80+year old Mariposa Trail (Equestrian/Pedestrian Trail, Bridle Trail, Horse Trail) has a whole section that from the chain link/barbed wire fence on the wall of the Los Angeles River to the chain link fence between the trail and the 134 Freeway (that gets cut open regularly) is around **24.5 feet** wide.

C1-5

**B:** for safety's sake there should be(AT THE VERY LEAST!!!) **1.5 feet** between a horse and rider and a fence and from a horse passing by so you're looking at, FOR SAFETY'S SAKE at least **4 feet** of trail. The average horse and rider from the outside of the rider's right foot to the outside

C1-6

**C:** the width of space one horse and rider take up going East on the Mariposa Trail is around 3 feet and one horse and rider going West takes up around 3 feet so that's 6 feet. Add on the 4 feet for the least amount of safety you're looking at 10 feet for two horses to be on the trail passing each other.

However, the average **LENGTH** of a horse from the tip of its forehead to the back of its tail is **10 feet**.

## PLEASE PAY ATTENTION TO THIS NEXT PART.....

C1-7

**D:** The first instinct for a horse when it feels threatened is turn and run (and sometimes kick). And being herd bound animals when one horse says danger, run, so do the others. A crash on the freeway, a backfire, a piece of trash blowing across the trail, the horse passing by trying to bite or kick....is all it takes. So when horse and rider #1, going West on the Mariposa Trail and horse and rider #2 going East on the trail both turn at the same time you are looking at the need for (based on the LEAST amount of safety) **1.5 feet** between the freeway fence and horse #1, **10 feet** of horse #1, **1.5 feet** between horse and rider #1 and horse and rider #2, **10 feet** of horse #2 and **1.5 feet** between horse and rider #2 and the "proposed" fence between the horse trail (aka bridle path, equestrienne trail) and the proposed bike path making a total (again, least amount of safety) amount of space needed **24.5 feet**.

C1-8

## WHERE DOES THE BICYCLE PATH GO?

## OR ARE YOU GOING TO THREATEN THE LIVES OF THE HORSE AND RIDERS?

# LOOK WHAT YOU DID WITH THE FINGER BRIDGE IN ATWATER!!!!

23-0722

C1-8
(cont.)

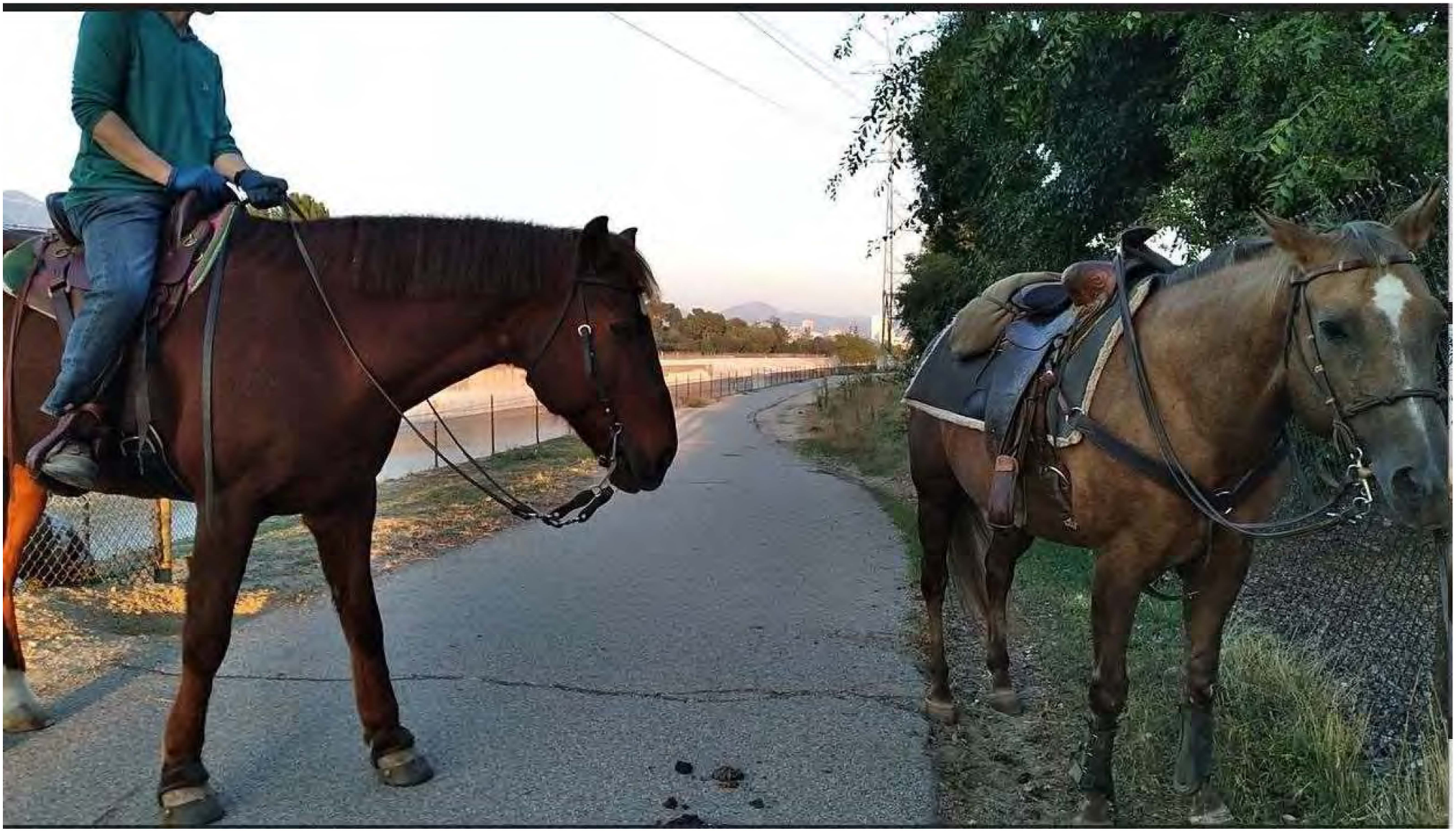
**AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**

THE TRAIL BY THE PIPE [**34.156856, -118.302896**}

btw, this 80+ year old bridle path was paved in the mid 1980s most likely to make life easier for the maintenance truck drivers who were maintaining the river crossing for horses at the Riverside Bridge - but in the mid 1990s it was decided to make the LA River "au natural" and that river crossing for horses was no longer maintained however was still usable as a way home if something happened to the 80+ year old Mariposa Bridge....BUT then it was decided to make life easier for the bicyclists and the LA River Bike Path was changed to go under the Riverside Bridge and the dirt ramp for the horses was removed so the escape route for getting home is now very dangerous.

A HORSE GOING EAST AND A HORSE GOING WEST BY THE PIPE - **NOTE:** AS CLOSE TO EACH FENCE AS POSSIBLE (not the safest way to ride). **AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**

ONE HORSE GOING EAST, ONE GOING WEST BUT TURNING AROUND BY THE PIPE (NOTE: if a horse is startled, spooked or reacting to the another horse, their first instinct it to turn and leave.) ). **AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**



ONE HORSE GOING EAST, ONE GOING WEST BUT BOTH TURNING AROUND BY THE PIPE (NOTE: horses are herd-bound animals, if one turns to leave the other will want to do the same.) ). **AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**

THE SECTION OF THE TRAIL JUST EAST OF THE PIPE AND BEFORE THE MAINTENANCE GATES BY THE FOREST LAWN EXIT/ENTRANCE FROM THE 134 FREEWAY, BOTH EAST HORSE AND WEST HORSE TURNING (NOTE: unsafely close to each fence) [34.156830, -118.303388]. AND THIS SECTION OF THE TRAIL GOES TO 34.156233, -118.307287 ABOUT A QUARTER OF A MILE). **AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**

As you can see when the safety for horses and riders is taken into account (and that includes the psyche and physics of equines) there's no place for bicycles to "share" this trail.

***OR*** if measurements are easier to understand: the trail at this section goes from around 25' to 22'. A horse with a rider going East (safely with no "issues") takes up around 5'. A horse with a rider going West (safely with no "issues") takes up around 5' a horse going West. That equals 10'. ***BUT*** if the horse going East is startled,

spooked or reacting to the horse going West, the first instinct it to turn and leave. The length of a horse from the tip of its nose to the back of its tail averages 8' so if the East horse turns that's 8' plus 5" which equals 13'. ***BUT*** horses are herd-bound animals and if one turns to leave the other will want to do the same. Now you're looking at the East horse (8') turning at the same time as the West horse (8'). That equals 16'. You also need to take into account, there'll be space between the horses because they're not going to want to hit each other so add 2 more feet to the total and now you have 18' for two horses to somewhat safely pass each other on this trail. That brings up the question:

C1-8 (cont.)

## WHERE DO THE BICYCLES GO?

**Would you consider coming to the trail and see for yourself the actual size of a horse? It was done some years ago by an earlier commitee and everyone on the committee could actually see the issue.**

C1-9

**Alyce Heath Schwartz**

**hwoodstar@gmail.com**

**818-681-9715**

**Letter C1**
Alyce Heath Schwartz
February 9, 2025

*Response C1-1*

The commenter provides an introduction to the comments contained in the comment letter, and expresses objections to the Project based on concerns over cyclists causing safety issues for existing equestrian users. Responses to the comments raised in this letter are provided below in **Responses C1-2 through C1-9**.

*Response C1-2*

The commenter notes that the comments in the letter were previously submitted to the City Council in February 2025, but are now being submitted for consideration related to the March 12, 2025 virtual public meeting being held during the 30-day public comment period for the Draft IS/MND. No further response is necessary.

*Response C1-3*

The commenter cites language from a City Council motion related to the Project, highlighting the 10-foot width proposed for the equestrian trail component of the Project. This comment, however, does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response C1-4*

The commenter states that a segment of the existing trail/service road is “around 24.5 feet wide”. This comment, however, does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response C1-5*

The commenter offers observations regarding equestrian trail width design considerations, but does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response C1-6*

The commenter offers observations regarding equestrian trail width design considerations, but does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response C1-7*

The commenter argues that, based on the design considerations and stated assumptions offered in prior comments C1-4 through C1-6, that the Project’s equestrian trail should be 24.5 feet wide in order to allow for a simultaneous, side-by-side turnaround maneuver by two horses at the same location on the trail. This comment, however, does not raise any specific substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response C1-8*

The commenter questions where the bicycle path goes, and if the City is "going to threaten the lives of the horse and riders" and citing a safety-related incident at another trail location. The commenter then provides photographs illustrating the points raised regarding horse dimensions and turning movements, as well as estimating the existing space constraints along the Project Site ROW. As noted in the Draft IS/MND, the Project's bike path component will require that cyclists and non-equestrians using that facility turn back and head eastbound toward Riverside Drive. As noted in **Master Response No. 3: Operations and Maintenance for the Proposed Facilities**, the fencing would be regularly inspected and maintained to prevent unauthorized user access from the Project Site to equestrian facilities both on- and off-site. The commenter provides statements to suggest that the equestrian trail component of the Project does not provide adequate space for safe operation by equestrians, does not identify any specific substantive issues regarding the analysis presented in the Draft IS/MND. Furthermore, the trail width concerns cited by the commenter are also applicable to the existing Mariposa Bridge and Tunnels 6 and 7, which are all enclosed features with a width of 10 feet or less, but these features appear to regularly operate with high volume usage without serious incident. Furthermore, as discussed in **Master Response No. 1: Separation of Path-Trail User Types**, the Project's equestrian trail design was reviewed by iAssist Equestrians in April 2025 (see Appendix L of this Final IS/MND) to assess the safety and function of the proposed facilities; overall, based on its review of the Project, iAssist Equestrians concluded that the Project, if implemented as planned, will not adversely impact users of the existing equestrian trail, and is adequate to preserve the existing equestrian usages of the trail within the Project Site. As such, it is speculative to assume that based solely on the width of the equestrian trail that it presents an inherent safety risk to equestrian users, as this assertion is not supported by any evidence. No further response is necessary.

*Response C1-9*

The commenter provides a concluding statement that requests that decision-makers physically tour the Project Site but does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

**LETTER C2**

---

**From:** Alyce <hwoodstar@gmail.com>
**Sent:** Wednesday, March 12, 2025 4:05 PM
**Subject:** RE: Fwd: Fw: Proposed Project - LA RIVER PHASE IV BIKE PATH - Notice of Intent to adopt a CEQA Mitigated Negative Declaration Inbox

**The wording in this document is incorrect and misleading. And I hope you actually read the reports that have been forwarded to you. I also would like to meet you on the section of the trail in question to show you how unsafe what you are planning is.....** C2-1

==========

PROJECT DESCRIPTION: The proposed Project would upgrade an existing **maintenance road [NOT A MAINTENANCE ROAD, THE MARIPOSA TRAIL aka RIVER BRIDLE PATH IS ALREADY A LEGAL EQUESTRIAN/PEDESTRIAN TRAIL FOR OVER 80 YEARS]** into a new section of the Los Angeles River Bikeway. The Project would construct an asphalt concrete pavement Class I bicycle and pedestrian path along the **south bank access road [NOT A SOUTH BANK ACCESS ROAD, THE MARIPOSA aka RIVER BRIDLE PATH IS ALREADY A LEGAL EQUESTRIAN/PEDESTRIAN TRAIL FOR OVER 80 YEARS]** of the Los Angeles River, and a partially separated equestrian trail. The Project would extend the Los Angeles River Bikeway by approximately one mile from its current western terminus near Riverside Drive and would provide **new equestrian trail facilities [THERE IS NO NEED FOR NEW EQUESTRIAN TRAIL FACILITIES, THE MARIPOSA aka RIVER BRIDLE PATH IS ALREADY A LEGAL EQUESTRIAN/PEDESTRIAN TRAIL FOR OVER 80 YEARS AND THERE IS ALREADY A BIKE PATH ON ZOO DR. WHERE THE BICYCLISTS DON'T HAVE TO TURN AROUND AND GO BACK THE SAME WAY THEY CAME**]** near the Los Angeles Equestrian Center. The proposed Project would connect to the active transportation network throughout the region and provide new pedestrian, bicycle, and equestrian access and connectivity to transit, residential homes, schools, jobs, parks, and other community-serving amenities for the surrounding communities. The proposed Project would add to the region's livability by expanding active transportation options and providing new access to public transit, homes, schools, work, parks, and other community-serving amenities. C2-2

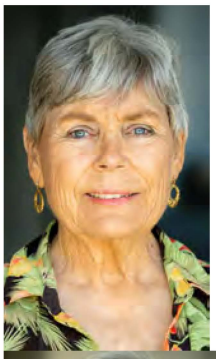
==========

Alyce

** And believe me when I say the bicyclists will do as they have done for years; put their bikes/rideable wheeled vehicles over, under and through the barrier - will even cut the fence opent so they don't have to go back the same way. And remember that the lack of knowledge of the physicalness and psyche of horses has already caused the death of a horse on the "finger bridge" in Atwater. C2-3

---

Alyce Heath - Cell: 818-681-9715



sag/aftra
**POSH TALENT AGENCY**
**310-497-5825**
http://resumes.actorsaccess.com/alyceheath
http://www.imdb.me/alyceheath

BALDWIN TALENT, INC.
310-827-2422

*aka Alyce Schwartz, Asst. Prod. Acct./Payroll*
*Local 871*
*also available for free-lance data-entry, word processing, bookkeeping, etc.*

**Letter C2**
Alyce Heath Schwartz
March 12, 2025

*Response C2-1*

The commenter provides an introductory statement that asserts that the Draft IS/MND is "incorrect and misleading" and requests that decision-makers physically tour the Project Site but does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

*Response C2-2*

The commenter provides text from the Draft IS/MND Project Description, with comments inserted suggesting that the Project Site is an existing equestrian trail historically used for this purpose and arguing against the need for the bike path along this segment of the LA River. See **Master Response No. 2: Project Site Existing Ownership and Authorized Users** regarding authorized users and jurisdiction of the Project Site. This comment does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

*Response C2-3*

The commenter argues that cyclists will circumvent the Project bike path terminus barriers as has occurred in other locations and that a lack of knowledge or horses will lead to safety risks to equestrian users and horses. See **Master Response No. 1: Separation of Path-Trail User Types** regarding separation of non-equestrian users from equestrian facilities and **Response B3-18** regarding horse behavior considerations in Project design. No further response is warranted.

**LETTER C3**

From: **Alyce** <hwoodstar@gmail.com>
Date: Wed, Mar 12, 2025, 7:20 PM
Subject: re: Phase 4 meeting that started at 6pm March 12, 2025
To: Christopher Adams <Christopher.adams@lacity.org>

I wasn't sure if what I said in my 2 minutes wasn't said too quickly....so here's an email to cover what I wanted to get across

There is a whole section of the trail that is only around 24 feet wide from the river fence to the free way fence.

Re: images shown with 1 horse on the trail, the 10' trail. The average length of a horse from the tip of the nose to the back of the tail is around 10' and the width of a horse with a rider is around 2.5' So 2 horses walking past each other on the 10' trail would take up 5'. BUT, there needs to be space between horse A going East and the North fence, space between Horse B going West and the South fence as well as space between the two horses. For safety issues there should be no less than 2' in each of these cases so that would be 6' needed for safety's sake. So you are now looking at 11' needed to have horses pass SAFELY on a 10' trail - which does not take into consideration if a horse stretches its neck or tries to kick. C3-1

And what happens if one horse feels threatened by a loud backfire, a crash, a piece of trash blowing across the trail or the other horse? What happens when two horses have to turn at the same time? The first instinct of a horse is turn and run and, being herd bound animals, when one says "danger" every horse's instinct is to leave. So when one

horse that is 10.5'turns on a 10' wide trail that is a problem where the horse will hit the fence. And when two turn at the same time you have 21' of horses trying to turn on 10' trail

C3-1 (cont.) 2

Re: chain link fence, the current fence next to the $1000+ has been cut open since the gate was put in and prior to that gate, the fence was cut many times.

C3-2 2

Also, a fence that is put up that can't be seen through by a horse can cause the horse to feel threatened by something that can't be seen - as happened on the "finger" bridge in Atwater.

During the meeting, I found it very disconcerting when some of the speakers said they rode the trail regularly which means that they were going through the cut fence and ignoring the signage that says "No Bicycles Allowed", which, yes, in many cases the signage has been destroyed but it is posted at every entrance to the park.

C3-3

Regarding the manure question, horse manure is organic.

C3-4 4

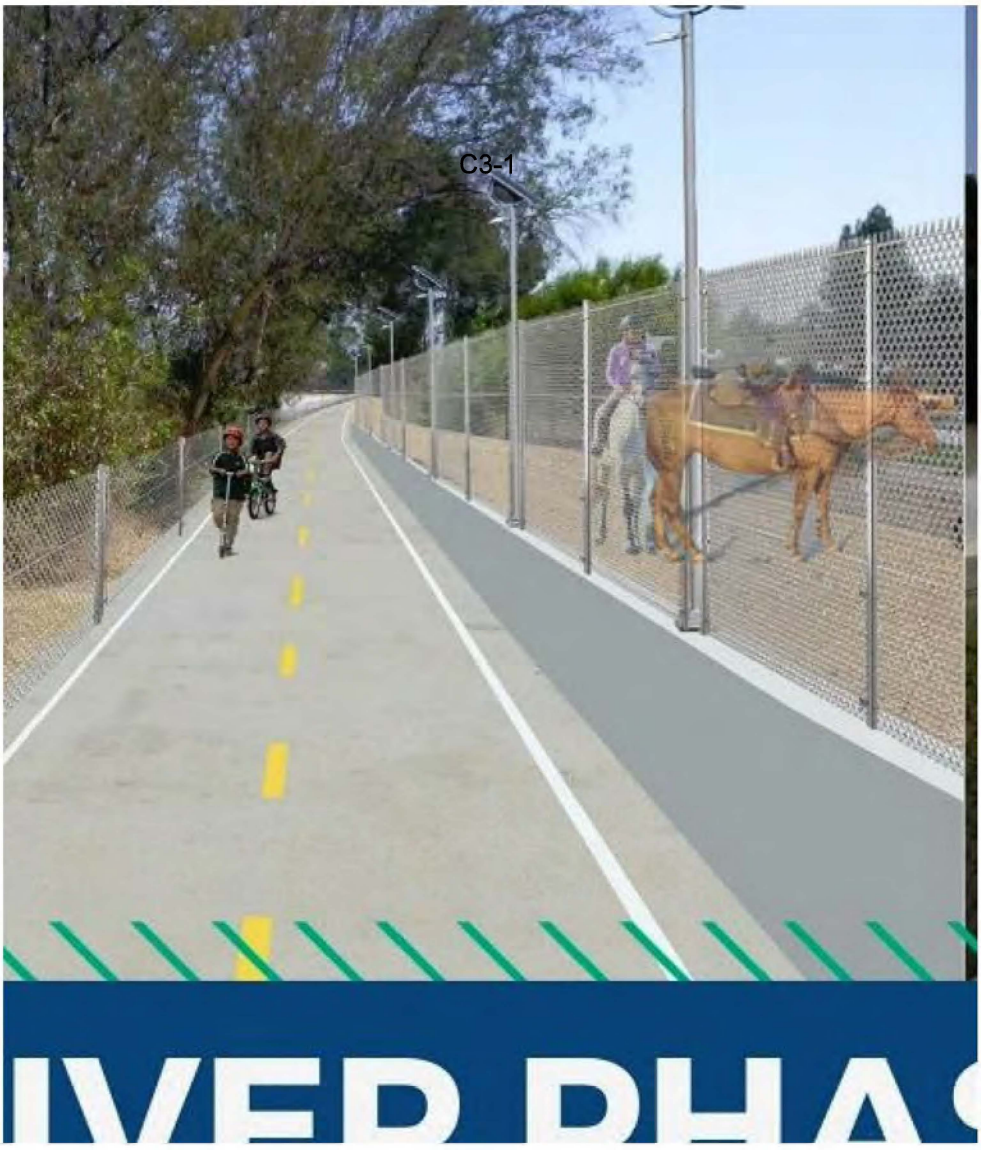
Finally, while it is a photoshopped picture, I've attached what it looks like when a horse turns around on your 10' trail....

C3-5 5

Alyce

Alyce Heath - Cell: 818-681-9715

sag/aftra
**POSH TALENT AGENCY**
**310-497-5825**
http://resumes.actorsaccess.com/alyceheath
http://www.imdb.me/alyceheath
BALDWIN TALENT, INC.
310-827-2422
*aka Alyce Schwartz, Asst. Prod. Acct./Payroll*
*Local 871*
*also available for free-lance data-entry, word processing, bookkeeping, etc.*




C3-5
(cont.)

C3-5
(cont.)

**Letter C3**
Alyce Heath Schwartz
March 12, 2025

*Response C3-1*

Refer to **Response C1-8** above regarding horse dimensions and trail widths. No further response is necessary.

*Response C3-2*

Refer to **Response B3-10** above regarding existing fence damage and the Project's fencing and barriers. Also see **Response A4-3** regarding Project fencing and horses' visibility of their surroundings. No further response is necessary.

*Response C3-3*

The commenter notes other public commenters stating that they ride bicycles along the Project alignment under existing conditions, stating that this is not currently permitted. As discussed in **Master Response No. 2: Project Site Existing Ownership and Authorized Users**, existing cyclist activity in the area is acknowledged. However, this comment does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

*Response C3-4*

The commenter asserts that horse manure is organic. This comment, however, does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

*Response C3-5*

The commenter provides graphic representations depicting horses in various positions within the Project visual renderings. This comment, however, does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

**LETTER C4**

From: **Alyce** <hwoodstar@gmail.com>
Date: Wed, Mar 12, 2025, 4:04 PM
Subject: RE: Fwd: Fw: Proposed Project - LA RIVER PHASE IV BIKE PATH - Notice of Intent to adopt a CEQA Mitigated Negative Declaration Inbox
To:

**The wording in this document is incorrect and misleading. And I hope you actually read the reports that have been forwarded to you. I also would like to meet you on the section of the trail in question to show you how unsafe what you are planning is.....** C4-1

==========

PROJECT DESCRIPTION: The proposed Project would upgrade an existing **maintenance road [NOT A MAINTENANCE ROAD, THE MARIPOSA TRAIL aka RIVER BRIDLE PATH IS ALREADY A LEGAL EQUESTRIAN/PEDESTRIAN TRAIL FOR OVER 80 YEARS]** into a new section of the Los Angeles River Bikeway. The Project would construct an asphalt concrete pavement Class I bicycle and pedestrian path along the **south bank access road [NOT A SOUTH BANK ACCESS ROAD, THE MARIPOSA aka RIVER BRIDLE PATH IS ALREADY A LEGAL EQUESTRIAN/PEDESTRIAN TRAIL FOR OVER 80 YEARS]** of the Los Angeles River, and a partially separated equestrian trail. The Project would extend the Los Angeles River Bikeway by approximately one mile from its current western terminus near Riverside Drive and would provide **new equestrian trail facilities [THERE IS NO NEED FOR NEW** C4-2

**BACK THE SAME WAY THEY CAME**]** near the Los Angeles Equestrian Center. The proposed Project would connect to the active transportation network throughout the region and provide new pedestrian, bicycle, and equestrian access and connectivity to transit, residential homes, schools, jobs, parks, and other community-serving amenities for the surrounding communities. The proposed Project would add to the region's livability by expanding active transportation options and providing new access to public transit, homes, schools, work, parks, and other community-serving amenities.

==========

Alyce

** And believe me when I say the bicyclists will do as they have done for years; put their bikes/rideable wheeled vehicles over, under and through the barrier - will even cut the fence opent so they don't have to go back the same way. And remember that the lack of knowledge of the physicalness and psyche of horses has already caused the death of a horse on the "finger bridge" in Atwater.

C4-3

---

Alyce Heath - Cell: 818-681-9715

sag/aftra
**POSH TALENT AGENCY**
**310-497-5825**
http://resumes.actorsaccess.com/alyceheath
http://www.imdb.me/alyceheath
BALDWIN TALENT, INC.
310-827-2422

*aka Alyce Schwartz, Asst. Prod. Acct./Payroll*
*Local 871*
*also available for free-lance data-entry, word processing, bookkeeping, etc.*

**Letter C4**
Alyce Heath Schwartz
March 12, 2025

*Response C4-1*

This comment is a repeat of a prior comment from Letter C2. Refer to **Response C2-1**.

*Response C4-2*

This comment is a repeat of a prior comment from Letter C2. Refer to **Response C2-2**.

*Response C4-3*

This comment is a repeat of a prior comment from Letter C2. Refer to **Response C2-3**.

**LETTER C5**

---------- Forwarded message ---------
From: **Alyce** <hwoodstar@gmail.com>
Date: Wed, Mar 12, 2025 at 9:11 PM
Subject: re: something that was mentioned at tonight phase 4 zoom meeting....
To: Christopher Adams <Christopher.adams@lacity.org>

Sorry to bother you, Christopher, but as I was driving home from taking care of my mare at the barn I was trying to come to terms about the fact that during the comment section two people said they were bicyclists who rode "that trail" all the time. And that means that they have on numerous occasions committed an illegal act....and that it didn't bother them and it didn't bother anyone on the committee because no one took them to task. I'm sure several of the "horse" people - including myself - wanted to say something but with only two minutes to talk.....well....keeping the ability of horses and horseback riders to keep a safe trail was a tad more important....

C5-1

Alyce

**Letter C5**
Alyce Heath Schwartz
March 12, 2025

*Response C5-1*

The commenter points to other public commenters stating that they ride bicycles along the Project alignment under existing conditions, stating that this is not currently permitted. As discussed in **Master Response No. 2: Project Site Existing Ownership and Authorized Users**, existing cyclist activity in the Project area is acknowledged. However, this comment does not raise any substantive issues regarding the Project or the Draft IS/MND. No further response is warranted.

# LETTER C6

---------- Forwarded message ---------
From: **Benjamin Hillman** <hillmanbd@gmail.com>
Date: Wed, Mar 26, 2025, 2:33 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris, my name is Ben Hillman.

I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. C6-1

The Mariposa Street Bridge is a bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street. C6-2

Thank you,
Ben Hillman

**Letter C6**
Benjamin Hillman
March 26, 2025

*Response C6-1*

The comment expresses support for the Project. Additionally, the comment has been shared with the City of Burbank City Council because of concerns over the lack of formal connection between the Project and the City of Burbank's bicycle infrastructure. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C6-2*

This comment states that the City of Burbank prohibited cyclists and pedestrians from using Mariposa Street Bridge beginning in 2016. The comment recommends that the City of Burbank reappropriate funds for a bicycle and pedestrian bridge at Mariposa Street. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

# LETTER C7

---------- Forwarded message ---------
From: **Brittany rochford** <brittany.n.rochford@gmail.com>
Date: Wed, Mar 26, 2025 at 4:08 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris,

I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. A bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street. C7-1

I utilize the LA River bike path frequently as a way of exercise on the weekends, and also as a way of commuting when I volunteer at Sante D'or in Atwater. This bike path was a main draw for me to stay in Burbank, as it provides alternative modes of transportation to DTLA and the other neighborhoods along its path. Adding additional routes and access to Burbank's cycling network adds great value to this city I've called home for a decade now. C7-2

Regards,

Brittany Rochford

**Letter C7**
Brittany Rochford
March 26, 2025

*Response C7-1*

The comment expresses support for the Project. Additionally, the comment has been shared with the City of Burbank City Council because of concerns over the lack of formal connection between the Project and the City of Burbank's bicycle infrastructure. This comment states that the City of Burbank prohibited cyclists and pedestrians from using Mariposa Street Bridge beginning in 2016 and recommends that the City of Burbank reappropriate funds for a bicycle and pedestrian bridge at Mariposa Street. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C7-2*

This comment identifies personal benefits (exercise, alternative mode of transportation) of the LA River Bikeway and that the Bikeway was a motivating factor to reside in the City of Burbank. The comment states that adding additional routes and access to the City of Burbank's cycling network adds value to the City. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

## LETTER C8

---------- Forwarded message ---------
From: **Dave Weinstein** <dave.weinstein1978@gmail.com>
Date: Wed, Mar 26, 2025 at 3:17 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris, I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure.

I ride the LA River and through Griffith Park above Travel Town most days. Getting there feels incredibly unsafe. I don't use the Mariposa bridge since cyclists were banned, and truly, I don't like making horses feel scared so I always like to give them space .
Victory from Riverside Dr to Zoo Dr is a total nightmare on a bike. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street. C8-1

Thanks to those of you on the council who are trying to make it safer for cyclists and pedestrians.

Dave Weinstein

**Letter C8**
Dave Weinstein
March 26, 2025

*Response C8-1*

The comment expresses support for the Project. Additionally, the comment has been shared with the City of Burbank City Council because of concerns over the lack of formal connection between the Project and the City of Burbank's bicycle infrastructure. See **Master Response No. 1: Separation of Path-Trail User Types**. Additionally, the comment recommends the reappropriation of City of Burbank funds for a bicycle and pedestrian bridge at Mariposa Street. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

# LETTER C9

---------- Forwarded message ---------
From: **Jonathan** <wilder.jonathan@gmail.com>
Date: Thu, Mar 27, 2025, 4:43 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris,

I'm reaching out to express my support for Phase IV of the LA River Bike Path. I'm glad that LA is committed to improving this area around the LA River. While I think this plan is an excellent evolution in bike infrastructure, I am a concerned citizen from Burbank who wants to ensure that this new bike path will be accessible to Burbank cyclists coming from/heading back to the other side of the LA River. I have cc'd the Burbank City Council on this comment to request that this concern be addressed. C9-1

If no formal connection is made between Burbank and this bike path, then cyclists will have no other option than to ride across the equestrian-only Mariposa Street Bridge. To avoid that issue, my request is for the Burbank City Council to reappropriate the $2 million from the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street that can connect to this LA River Bike Path. C9-2

Thank you,
Jonathan Wilder

**Letter C9**
Jonathan Wilder
March 27, 2025

*Response C9-1*

Refer to **Response C8-1** above.

*Response C9-2*

Refer to **Response C8-1** above.

## LETTER C10

From: **Kyle Parkinson** <kyle.parkinson@gmail.com> Date:
Wed, Mar 26, 2025 at 7:04 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris,

I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path.

I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. A bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. C10-1

Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street. C10-2

Thank you,
Kyle Parkinson
Burbank resident & cyclist

**Letter C10**
Kyle Parkinson
March 26, 2025

*Response C10-1*

Refer to **Response C8-1** above.

*Response C10-2*

Refer to **Response C8-1** above.

# LETTER C11

From: **Lelan Fernando** <fernandolelan@gmail.com> Date:
Wed, Mar 26, 2025 at 5:10 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris,

I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. A bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street. C11-1

Thank you,
Lelan Fernando
Burbank Resident

--
Lelan Fernando
Managing Director, Development
Teach For America

**Letter C11**
Lelan Fernando
March 26, 2025

*Response C11-1*

Refer to **Response C8-1** above.

# LETTER C12

From: **Robby Apples (Robby Echo)** <robbyecho@gmail.com>
Date: Thu, Mar 27, 2025 at 8:43 AM
Subject: Build a Bridge to the LA River Bike Path Phase IV To:
<christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris, I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. A bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street.

C12-1

Sincerely,
Mark Martin

**Letter C12**
Mark Martin
March 27, 2025

*Response C12-1*

Refer to **Response C8-1** above.

# LETTER C13

From: **Nathan Adair** <nadair05@gmail.com>
Date: Wed, Mar 26, 2025 at 3:59 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris,

I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. A bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street. C13-1

Personally, I have a season pass to the LA zoo, and would love to ride my bike there. Unfortunately, the best option I have to cross the LA River on a bike is going down Riverside drive which turns into a harrowing experience for the final quarter mile. C13-2

If a bike bridge existed at Mariposa then I could easily cross there, ride down the LA River Path to the Riverside drive exit, and then get onto Zoo Dr. it would be a much safer and much more pleasant route.

Thanks,

Nathan Adair

**Letter C13**
Nathan Adair
March 26, 2025

*Response C13-1*

Refer to **Response C8-1** above.

*Response C13-2*

Refer to **Response C8-1** above.

# LETTER C14

From: **Samantha** <gr8samwich@gmail.com>
Date: Wed, Mar 26, 2025 at 3:37 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris,

I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. A bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street. C14-1

In addition, a greater initiative by the City of Burbank should go into completing dedicated connections from Chandler Bike Path to the Burbank Channel Bikeway, and then to this Phase of the LA River Bike Path. Every day that the City remains complacent, cyclists and pedestrians safety and lives are at risk as they compete with street traffic, just for the right to recreate. C14-2

Thanks for your attention,

Samantha Moulton

**Letter C14**
Samantha Moulton
March 26, 2025

*Response C14-1*

Refer to **Response C8-1** above.

*Response C14-2*

The commenter suggests the City focus on other routes for cyclists before implementing this Project. See **Master Response No. 7: Alternative Routes for Cyclists and Equestrians** regarding other potential bike and equestrian alignments/connections.

# LETTER C15

From: **Sarah Tucker** <sarahetucker@gmail.com>
Date: Wed, Mar 26, 2025 at 2:46 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Mr. Adams,

I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. A bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street. C15-1

I live along the Chandler bike path and it is such an enriching part of my daily life and of Burbank's community. I fully understand how much a bike path improves health, community ties and benefits the environment. C15-2

Thank you,
Sarah Tucker

**Letter C15**
Sarah Tucker
March 26, 2025

*Response C15-1*

Refer to **Response C8-1** above.

*Response C15-2*

The commenter provides opinions about cycling and bicycle facilities in the area. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

# LETTER C16

From: **skylar chavez** <skylarchavez497@outlook.com>
Date: Thu, Mar 27, 2025 at 9:31 AM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: christopher.adams@lacity.org <christopher.adams@lacity.org>
Cc: citycouncil@burbankca.gov <citycouncil@burbankca.gov>

Hi Chris, I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. A bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street.

C16-1

Sent from my iPhone

**Letter C16**
Skylar Chavez
March 27, 2025

*Response C16-1*

Refer to **Response C8-1** above.

# LETTER C17

From: **Nick Schenck** <nicholasschenck@gmail.com> Date:
Fri, Mar 28, 2025, 11:52 AM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris,

I am writing to express my full support for Phase IV of the LA River Bike Path. I've included the Burbank City Council in this message because I am concerned about the absence of a formal connection between this project and Burbank's existing bike infrastructure. Without such a connection, cyclists will be forced to cross the Mariposa Street Bridge, which Burbank repurposed exclusively for equestrian use in 2016, removing access for cyclists and pedestrians. C17-1

Given this situation, I strongly encourage the Burbank City Council to reconsider the $2M allocated for the Bob Hope Bridge and instead dedicate those funds to establishing a bicycle and pedestrian bridge at Mariposa Street. C17-2

Thank you for your attention to this matter.

Best regards,
Nick Schenck

**Letter C17**
Nick Schenck
March 28, 2025

*Response C17-1*

Refer to **Response C8-1** above.

*Response C17-2*

Refer to **Response C8-1** above.

# LETTER C18

From: **Cal Ramsey** <calramsey0@gmail.com>
Date: Fri, Mar 28, 2025, 3:29 PM
Subject: Build a Bridge to the LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris, I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure. If no formal connection is made, then cyclists will have no other option than to ride across the Mariposa Street Bridge. A bridge which Burbank took away from cyclists and pedestrians in 2016, and dedicated exclusively for equestrian use. Because of this, I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street.
I would love to be able to safely utilize the LA river bike path on my bike. Cycling in Burbank already feels much too unsafe.

C18-1

Thank you

**Letter C18**
Cal Ramsey
March 28, 2025

*Response C18-1*

Refer to **Response C8-1** above.

# LETTER C19

From: **Hunter Gibson** <huntergibsonnoho@gmail.com>
Date: Fri, Mar 28, 2025, 4:25 PM
Subject: Re: LA River Bike Path Phase IV
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris,

I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. The considerations taken will make equestrian users feel very comfortable. Unfortunately, the plan does not take into consideration safe connection & usage for bicyclists due to Burbank outlawing both pedestrian and bike usage of the Mariposa Street Bridge.

I've copied the Burbank City Council on this comment because I'm concerned about the lack of a formal connection between this project and Burbank's bike infrastructure.

C19-1

If no formal connection is made, then Burbank cyclists will either have to illegally cross at the Mariposa Street Bridge, or try to cross at the Riverside Bridge. As a regular user of that bridge, it is very dangerous. It is both an on and off ramp right before the 5/134 interchange, making it a speedway for motorists of all kinds. Only very confident bikers use it, and we are limiting access and connection to the city of Burbank by using this as the sole connection to the LA River Bike Path.

I'd like to encourage the Burbank City Council to reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street. If both cities could work together to make these projects interact in a meaningful way, that would improve access and safety for all users.

Again, super excited for this project, just want to see it be the best version of itself!

Thank you,
-Hunter Gibson

**Letter C19**
Hunter Gibson
March 28, 2025

*Response C19-1*

Refer to **Response C8-1** above.

# LETTER C20

| | |
|---|---|
| **From:** | egluddy@aol.com |
| **To:** | Christopher Adams |
| **Cc:** | Jan Green Rebstock; Ricardo Acosta; Edward Giron; Rachel McPherson; Tamseel Mir; Thomas Sarkisyan; Mehmet Berker; Michelle Munoz; Kyle Flake; David Crook |
| **Subject:** | Re: LA River Bike Path IV Civil Plans - Follow-up from Public Meeting comment |
| **Date:** | Friday, March 28, 2025 3:59:55 PM |
| **Attachments:** | instagram_new1600.png<br>facebook-256.png |

Chris,
Thank you for sending these.
I see a few folks on the cc so perhaps someone can answer questions:

where is the 2% cross-flow on the equestrian trail destined ? will it then flow longitudinally? will there be periodic drains? C20-1

what kind of material will the trail surface be? And will it be installed over a prepared subsurface? C20-2

What kind of material is represented by the basket weave convention in these plans? C20-3

I have not found details. For example on Sheet C-6 there is a reference to "101." Are there specifications of details for the fencing other than the BSS standard plan? C20-4

FInally, it isn't clear in the area of the Caltrans right of way acquisition what kind of fencing will replace Caltrans ROW fencing. Can some clarify that? C20-5
Thank you,
Emily

On Friday, March 28, 2025 at 09:15:29 AM PDT, Christopher Adams <christopher.adams@lacity.org> wrote:

> HI Emily,
>
> Attached are the full set of plans that you requested during the LARBIV Public Meeting.
>
> Please let me know if you need any further assistance.
>
> Thank you,
>
> Chris Adams
> Environmental Management Division | Environmental Specialist III
> Bureau of Engineering | Department of Public Works
> 1149 S. Broadway, Suite 600
> Los Angeles, CA 90015
> Cell: 818.233.9026 (preferred) Office: 213.485.5910
> ENGINEERING
> CITY OF LOS ANGELES

**Letter C20**
Emily Gabel
March 28, 2025

*Response C20-1*

The commenter provides an introductory statement and poses the following questions: “where is the 2% cross-flow on the equestrian trail destined ? will it then flow longitudinally? will there be periodic drains?” Based on information provided by the Bureau of Street Services (BSS) design team, the retaining walls will have drains to allow the runoff from the equestrian trail to drain off the trail to prevent ponding. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C20-2*

The commenter asks, “what kind of material will the trail surface be? And will it be installed over a prepared subsurface?” According to BSS, the tread surface will consist of decomposed granite/crushed rock with fines on top of base material. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C20-3*

The commenter asks, “What kind of material is represented by the basket weave convention in these plans?” BSS has indicated that the basket weave hatch under the bike path is base material. Equestrian trail hatching will be revised in future plan sets to better represent surface material and base material. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C20-4*

The commenter asks, “Are there specifications of details for the fencing other than the BSS standard plan?” Per BSS, the proposed 5-foot-tall fence will be standard chain link fence per the City Bureau of Engineering (BOE)’s standard plans. The 8-foot-tall fence separating bike path and equestrian trail will include standard posts from BOE standard plans with mini mesh chain link fence material. Specifications will be provided to the construction contractor. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C20-5*

Lastly, the commenter asks, “in the area of the Caltrans right of way acquisition what kind of fencing will replace Caltrans ROW fencing. Can some clarify that?” BSS responded that standard chain link fence matching the existing fence height will be installed along the Caltrans ROW. This comment does not raise any issues with respect to the content and adequacy of the

Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

# LETTER C21

From: <dp3@marks.org>
Date: Sun, Mar 30, 2025 at 11:44 PM
Subject: Suggestions for the Los Angeles River Phase IV Bike Path project
To: <christopher.adams@lacity.org>

Hi,

I attended the video meeting on March 12 for the Los Angeles River Phase IV Bike Path project.

I am an equestrian, and I also cycle along the LA River bike path.

I support this project, but I have a few concerns. C21-1

It seems that the horse bridal path and bike path will cross at bridge #6. Such a juncture could be hazardous, especially since it appears that the horses and bikes will approach each other at a shallow angle, possibly with limited visibility. C21-2

Someone in the video meeting mentioned that the Atwater bridge was the location of a serious accident with a horse, at the juncture where the LA River bike path and horse path meet. As both an equestrian and a bicyclist who regularly traverses that bridge and that bike path, it is easy to see why that is such a dangerous crossing.

I fear that the juncture of the bike and horse paths at bridge #6 will be similarly perilous. C21-3

I can think of a few solutions to make both of those crossings safer. What's crucial to making those junctions less hazardous is properly "presenting" the crossings to the horses (and equestrians) and applying methods to slow down the cyclists. C21-4

It would make sense to extend the bike path a few feet, so that bicylists could continue on the bike lane along the Forest Lawn Drive. Of course, doing so would require a modification to the existing traffic lights to allow cyclists to safely access Forest Lawn Drive, while crossing the traffic entering and exiting the freeway.

Otherwise, this new bike path is just a dead-end, which might not attract many cyclists. C21-5

On the other hand, if the dead-end was transformed into an interesting "destination" (perhaps with benches, shade trees, a drinking fountain and some sort of scenic view), it might get a fair amount of bike traffic. C21-6

It appears that the lighting fixtures shown in the project drawings primarily illuminate the bike path, but it may be safer to arrange those fixtures so that they illuminate both the bike path and the horse path. C21-7

Finally, it might be wise to have a solid wall dividing the two paths instead of a fence. Such a wall would block most of the sights and sounds of passing, fast-moving cyclists that would spook horses on the other side of a chain link fence. However, with a solid wall, it might be C21-8

more difficult to make the bike/horse crossings safe.

C21-8
(cont.)

Thanks,
-Dale Marks

**Letter C21**
Dale Marks
March 31, 2025

*Response C21-1*

The commenter provides an introduction to the comments provided in the comment letter. Responses to the comments included in this letter are provided below in **Responses C21-2 through C21-8**.

*Response C21-2*

The commenter suggests that "[i]t seems that the horse bridal path and bike path will cross at bridge #6." However, while it is not clear to which feature the commenter refers with "bridge #6" but it is assumed to refer to either the Mariposa Bridge or Tunnel 6. In either case, the Project does not involve any "crossings" of the bicycle/pedestrian and equestrian components of the Project at any point along the alignment. There would be no physical interaction between user groups on the equestrian trail and bike path components of the Project, as they would be separated by a continuous 8-foot-tall barrier fence from Tunnel 6 until the Project's western terminus, which is located nearly 800 feet to the east of the Mariposa Bridge. Nonetheless, this comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C21-3*

See **Response C21-2** above. The commenter notes an incident at a bike path/trail intersection at another location to demonstrate the safety hazard concerns expressed in prior comments. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C21-4*

The commenter suggests ideas about how to address at-grade equestrian/bicycle intersections to make them operate more safely. However, the Project design does not include any such intersection features, and further, this comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C21-5*

The commenter suggests an alternative design for the Project's bike path component. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Also see **Master Response No. 7: Alternative Routes for Cyclists and Equestrians** regarding potential alternative routes and facilities suggested by commenters.

*Response C21-6*

See **Master Response No. 5: Project Design Refinements and Ancillary Facilities** regarding potential ancillary facilities for the Project such as parklets or shade areas. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C21-7*

The Project's light fixtures would be placed along the 8-foot-tall barrier fence and would be directed downward, primarily lighting the bike path, but also indirectly lighting the equestrian trail to a lesser degree. Lighting would be adjusted, as appropriate, upon installation by qualified experts and in compliance with existing codes and specifications. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C21-8*

See **Master Response No. 1: Separation of Path-Trail User Types** regarding fencing and separation of user groups and **Master Response No. 5: Project Design Refinements and Ancillary Facilities** regarding potential changes to the final Project design. This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

# LETTER C22

From: **Caleb Neubauer** <caleb.neubauer@gmail.com>
Date: Mon, Mar 31, 2025, 8:24 AM
Subject: Fund a SAFE bridge to the LA River Bike Path (Phase IV)
To: <christopher.adams@lacity.org>
Cc: <citycouncil@burbankca.gov>

Hi Chris,

I'm emailing to let you know that I fully support Phase IV of the LA River Bike Path. The full LA path is one of the most beautiful and environmentally-friendly endeavors of the entire region. Two sides of one coin:

1. Burbank residents deserve a safer connection to *access* nearby areas.
2. Burbank deserves safer avenues to *attract* nearby visitors to our area.

C22-1

I've copied the Burbank City Council on this comment because **I'm concerned about the lack of a formal connection between this project and Burbank's phenomenal bike infrastructure.** If no formal connection is made, then cyclists will have no other option than to keep riding exclusively across the sketchy I-5 crossing Riverside Drive Bridge—rather than the Mariposa Street Bridge, *a river-crossing bridge taken away from cyclists and pedestrians in 2016 and* dedicated exclusively for equestrian use.

We want *safe* bridge options for *all* users, not just prioritizing cars or horses.

We want *safe* options to access a feature of the LA basin that could transform transit and public health.

C22-2

Because of this, I urge the Burbank City Council to **reappropriate the $2M that they set aside for the Bob Hope Bridge, and dedicate it to creating a bicycle and pedestrian bridge at Mariposa Street.** This can open up the west side of the city—not to mention the entire eastern SFV—to the expanse of Glendale, Silver Lake, and the rest of the nearby areas.

C22-3

Best,
Caleb

Caleb Neubauer (they/them)
caleb.neubauer@gmail.com
(541) 848-0296

**Letter C22**
Caleb Neubauer
March 31, 2025

*Response C22-1*

Refer to **Response C8-1** above

*Response C22-2*

Refer to **Response C8-1** above

*Response C22-3*

Refer to **Response C8-1** above

**LETTER C23**

From: **Nori Walla** <pippiandshadow@gmail.com>
Date: Mon, Mar 31, 2025, 4:44 PM
Subject: LA Riverway Phase IV Bike Path
To: christopher.adams@lacity.org <christopher.adams@lacity.org>

Dear Mr. Adams,

I have attended several of the community meetings regarding the LA Riverway Phase IV Bike Path Project, the most recent meeting via Zoom on March 12, 2025. Thank you and your colleagues for all of the efforts you have made thus far in attempting community outreach on this proposed project. C23-1

As you know, when CEQA applies to a project, the public agency prepares an initial study to determine if the project may have a significant effect on the environment. When an initial study identifies potentially significant effects on the environment, the agency may prepare a "mitigated negative declaration" (MND). However, the City is required to prepare an "environmental impact report" (EIR) if the record includes substantial evidence of a fair argument that the project may have a significant impact on the environment. C23-2

In the case of the LA Riverway Phase IV Bike Path, the MND does not show that the current project plan would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and there is substantial evidence, in light of the whole record before the lead agency, that the project, as revised may have a significant effect on the environment. Furthermore, even if the City could proceed by means of a MND rather than an EIR, its MND lacks information that CEQA requires.

I request that the City prepare a full EIR for the following reasons:

1. Questions asked at the Zoom Community Meeting were not answered (as of the writing of this Comment);
2. As one of the Nominees for historic status of the Mariposa Street Bridge, requests for consultation with the City's consultant, ESA, pursuant to Section 106 of the National Historic Preservation Act (NHPA) were sent, but no consultation took place; and
3. Horses are Sensitive Receptors within the meaning of CEQA and the project's mitigation measures are insufficient.

C23-3

**Questions Asked at the Zoom Community Meeting Remain Unanswered**

As noted above, I attended the Zoom Community Meeting on March 12, 2025. During that meeting several questions were asked, and with regard to my question, I specifically requested a response via email prior to the deadline of the Comment period. I have received no answer to my question or the questions of others, specifically: C23-4

- *The MND states that some of the design features are not or may not be feasible. Is there a list of these infeasible features and can I get that?* (My question)

- *There is a lot of detail including specific measurements in the proposed Project. Where can a I get a copy of the full set of Project Detail Plans?*

- *How is the project funded? What percentage of the funding is state, local, and federal?*

- *Is there a map of the Caltrans right-of-way to be acquired or a parcel list?*

C23-4 (cont.)

**Failure to Engage with the Nominees of the Historic Mariposa Street Bridge as Consulting Parties on the Project**

Emily Gabel-Luddy and I requested of ESA to be Consulting Parties on the Project due the project's proximity to the Mariposa Street Bridge. That request was made twice. In between those two requests, a request to be a Consulting Party was made to Caltrans. Caltrans responded and granted us Consulting Party Status. However, we were not consulted prior to the release of the MND. (See attached "Request to Consult on Bike Path" and "Papin&Smith_9 25 24".)

C23-5

**Horses are "Sensitive Receptors" Within the Meaning of CEQA – Mitigation Measures are Insufficient**

There is incomplete and incorrect information provided in the MND regarding the horse population on the north side of the LA River and Griffith Park, the legal use of the Historic Mariposa Street Bridge, the legal use of the Tunnels under the 134 freeway, and no information regarding the behavior of horses when encountering loud and sudden noises, ground vibrations, and certain visual stimuli. For these reasons alone, a full environmental impact report is mandated.

<u>The Equestrian Community on the North Side of the River.</u>

The Equestrian Community on the north side of the LA River includes not only the Los Angeles Equestrian Center (LAEC), but the Burbank and Glendale Ranchos. These Rancho communities are zoned to permit residential horse-keeping, and to permit commercial stables. There are 5 commercial stables, including 3 rental horse stables that provide guided trail rides on horseback through Griffith Park, and there is a 6$^{th}$ commercial boarding stable under construction. One of the rental barn stables is literally feet from the Mariposa Street Bridge in Burbank.

All of the backyard horses and the horses commercially boarded in the Ranchos, and all of the rental horses regularly traverse the Mariposa Street Bridge in order to ride the trails of Griffith Park or to access the only available large, fenced, public arena – Martinez Arena – located on the north side of the Park. (See Map of the Rancho showing both the Burbank and Glendale residential horse-keeping zones,

C23-6

the Commercial Boarding Barns, the Horse Rental Barns, and of course, LAEC.)

Furthermore, while the MND refers to 500 stalls at LAEC, the actual number of stalls is over 1,000:

> *The Los Angeles Equestrian Center (LAEC) is a 75-acre City equine boarding and training facility and an exhibition and banquet destination located across the Los Angeles River within the boundaries of Griffith Park. Facilities to board over 1,000 horses are available at LAEC along with rings for training and competitive equestrian contests, a 3,500-seat riding and exhibition arena and a total of 13,000 square feet of multi-use event space, including a café and wine bar open during horse show events.* (See attached RAP Board Report 24-278. December 19, 2024.)

C23-6 (cont.)

In addition to the horses permanently boarded at LAEC, additional horses regularly board there for various horse shows, including the Rose Parade horses for Equestfest. Quite often the visiting horses take a trip across the Mariposa Street Bridge and into Griffith Park to enjoy the 52 miles of dirt trails.

The MND states in various sections that the users of the trail along the south side of the River are pedestrians, bicyclists, and equestrians. The fact is that the only legal users of that trail are pedestrians and equestrians. The bicyclists that currently travel on that trail, from the Riverside/Victory Bridge to the Mariposa Bridge, are doing so illegally. It is not currently a bike path. It is now and has historically been an equestrian trail, with posted signage advising that it is an equestrian trail and advising "no bikes." That signage is often either defaced or totally removed, reports are made to RAP, and the new signage eventually appears, only to be defaced or removed again, and replaced yet again. (See recent sample photos of Defaced Signage.)

C23-7

Likewise, the tunnels under the 134 freeway are also only legally accessed by pedestrians and equestrians, with posted signage that is routinely defaced, illegally removed, and replaced.

Equestrians routinely notify the Park Rangers of bicyclists on the dirt trails to no avail.

The MND also states in various sections that the current uses of the Mariposa Street Bridge are pedestrians, bicyclists, and equestrians. The fact is that the only legal users of the Mariposa Street Bridge are pedestrians and equestrians. The bicyclists that travel on that Bridge, whether riding their bikes, walking their bikes, or carrying their bikes, are doing so illegally. The Bridge is only 7-feet wide. The Burbank Municipal Code states:

C23-8

> **6-1-2802: SPECIAL RULES APPLICABLE TO THE USE OF THE MARIPOSA STREET BRIDGE:**
> In addition to the Rules of the Road, as set forth in 6-1-2801 A-E, and K, which

are incorporated herein by this reference, the following special rules for the Mariposa Street Bridge (Bridge) are as follows:

A. Every equestrian rider shall proceed over the Bridge in a safe, slow manner, and shall cause the horse to be in a walking gait while on the Bridge.

B. No person shall ride, walk, or carry a bicycle on the Bridge.

C. Pedestrians are allowed to use the Bridge.

D. The Public Works Director is authorized to place and maintain adequate signage, and/or markings to inform equestrians, cyclists and pedestrians of these rules. [Added by Ord. No. 16-3,875, eff. 3/25/16.]

C23-8 (cont.)

None of the above issues were explored in the MND – and they should be! The current design of the project provides for a "soft-stop" at the proposed western terminus, with only posted signage telling the bicyclists to go no further. And while not all bicyclists flaunt the signage, there is a significant number of them that do (we have all been watching them for years), and those that ignore the signage by biking on a designated equestrian trail whether on the flats or around a blind curve in the hills, or through a concrete tunnel, or on a narrow bridge, put all of our lives at risk.

The MND is absolutely insufficient in mitigating the risk of those that ignore signage, and in many respects makes the risk greater by lawfully extending the bike path significantly closer to the Mariposa Street Bridge, the only access equestrians have to Griffith Park from the north side of the River.

<u>The Importance of Recognizing that Horses are "Sensitive Receptors" Within the Meaning of CEQA</u>

I am a resident of the City of Burbank, and have a horse boarded at the Los Angeles Equestrian Center at the northern rim of Griffith Park. I have been riding my horse over the Mariposa Street Bridge, through the tunnels, and on the trails in Griffith Park for the last 24 years. I am among a very large population of hikers and equestrians that utilize the trails in Griffith Park daily. Our use and enjoyment of Griffith Park will be negatively impacted by the addition of the proposed extension of the bike path on the south side of the River.

Furthermore, the project does <u>not</u> "provide improved equestrian trail facilities and facilitate connections to nearby off-site equestrian facilities including the Los Angeles Equestrian Center via an existing bridge (Mariposa Bridge) to the west and Griffith Park Main Trail via an existing tunnel (Tunnel 6) to the east" Instead, it diminishes equestrian trail facilities by reducing our existing trail width, requiring us to ride closer to the freeway than we otherwise would, and adding a bike path where any number of bicycles will be travelling at any speed at our horses from behind, and at any speed at our horses from the front. Erecting a fence, see-through or not, will not diminish in the horse's mind, that something is coming at him or her. Our safe access to Griffith Park will be at risk, not just through the construction phase, but also once the project is completed.

C23-9

In addition, we already have access to Tunnel 6 via the existing equestrian trail on the south side of the River, and the existing equestrian "Main Trail" on the south

side of the freeway.

Horses are "*Sensitive Receptors*." They are "prey" animals with an acute sense of hearing and an innate sense of self-preservation. A sudden loud noise (like the sound of a gunshot, a car back-firing, or the sudden sound of a jackhammer or bulldozer removing a hard surface, or a chainsaw cutting down 77 trees) will certainly trigger their natural reaction to spin, bolt, and gallop away from the sound that frightens them. While this activity is dangerous for a lone rider, it is even more dangerous if there are multiple riders travelling together, as a single horse can easily set-off a stampede. And while the sudden loud noise may be temporary, the effect of that noise many be substantial and not temporary if a rider is thrown from their horse as a direct result of the impact of the noise on the horse, resulting in severe injury or death to the horse, the rider, and anyone else in the immediate vicinity.

**The Startle Factor**

What frightens horses and mules is not always obvious. Anything that moves suddenly or makes an unexpected noise can rouse an animal's survival instincts and prime it to bolt. This natural reaction – often referred to as a startle reflex – is the result of remarkably acute senses.

C23-9
(cont.)

…a horse is instinctively on alert, assessing the situation for danger.

Horses and mules have excellent vision, hearing, and tactile senses. They are even capable of feeling vibrations through their hoofs, which often alert them to others long before the rider becomes aware. Horses and mules need a comfortable operating space. When they can see something suspicious from afar, they can more easily evaluate the danger and react accordingly. There is a fine line between what is comfortable for horses and mules and what seems dangerous.

In addition to confined spaces and predators, things that can startle a horse or mule include:

- Loud or unexpected noises – Buzzing model airplanes, exploding firecrackers, batting practice, or a falling tree
- Quick or unexpected movements – Fast-moving bicycles …
- Things in unusual combinations – Hikers with large backpacks or vehicles with strange loads
- Highly contrasting or reflective surfaces …
- …Narrow or constricted spaces – Bridges, gates, or tight passages
- …..

So, what happens when horses and mules are startled? They have a range of responses, from remaining calm to becoming severely frightened. The more conditioned the animal is to uncomfortable situations, the more likely its response will be subdued. When something makes it nervous, an animal may dance around, inadvertently step on things, or balk. Horses or mules that are severely unnerved may run, jump, spin, or do a creative combination of all these things. When horses and mules feel the need to protect themselves,

they may kick, bite, or strike. Experienced riders can hold a well-trained animal in check under most circumstances. There is a point, though, where a stimulus becomes so great that even the best conditioning will not override the animal's innate fight-or-flight instincts. (See attached: *United States Department of Agriculture, United States Forest Service, Equestrian Design Guidebook, Chapter 1, page 2.)*

Putting the "Startle Factor" in context to the location of the proposed project is significant. Less than 200 feet across the River from the project is the Perimeter Trail of LAEC, travelled by hundreds of horses daily, and at all times of the day and night. Immediately to the north of the Perimeter Trail, separated by a chain link fence, are the stables and exercise rings of LAEC. Included in those exercise rings are rings devoted to LAEC'S Traditional Equitation School (TES) which has hundreds of students of all ages, some as young as 4 years old, that are learning to ride a horse. And included in the group of TES students are children that have a disability and are undergoing equine therapy.

The 3 horse rental barns that provide guided tours of Griffith Park on horseback, serve a variety of members of the public – also a great many children – and the great majority of those riders are novices or beginners. And they all cross the Mariposa Street Bridge in order to get to the trails of Griffith Park. (See photos attached.)

The residential horse-keeping zones and Commercial boarding barns, LAEC included, also bring a variety of experienced and unexperienced horses and riders who, depending upon where they originate, may cross the Allen Avenue Bridge, the Irving Avenue Bridge, the Easter Field Bridge, travel along the Perimeter Trail of LAEC, and cross the Mariposa Street Bridge. All to get to Griffith Park. (See Map of the Rancho showing both the Burbank and Glendale residential horse-keeping zones, the Commercial Boarding Barns, the Horse Rental Barns, and of course, LAEC.)

C23-9 (cont.)

As stated earlier, I have been watching bicyclists on the trail on the south side of the River for 23 years. I have seen them in the morning, in mid-day, and in the evening. I have watched them squeeze through the small space between the double chain-link gates and hand their bike to a person on the other side. I have watched them climb the chain link gate. I have watched them ride across the Mariposa Street Bridge. And I have encountered them, on my horse, on the Oak Canyon trail.

Again, while the bicyclists I am describing violating existing signage are most likely in the minority, "opening up the floodgates" by extending the bike path onto a pre-existing equestrian trail, will exacerbate this problem. There is no question about that.

The current MND fails to take into consideration all of the above factors. As such, a full environmental impact report is not only needed, it is required. Public health and safety of <u>all</u> users demands a much more thorough investigation into the potential environmental impacts of this project.

**Conclusion**

This project has a current price tag of $9 Million. The City of Los Angeles has a $900 Million deficit for 2025-2026. There is already a dedicated bike path on Zoo Drive that connects the bicyclists to Forest Lawn Drive. It has shade. There is no need to cut down 77 trees as the Phase IV plan provides. The project will not be done in time for the Olympics. The federal government is slashing and/or eliminating funding for numerous projects that so many Angelenos absolutely require to even survive. How will these life necessities be funded? At this time, should $9 Million be spent to install a parallel bike path?

C23-10

Thank you for your consideration. I appreciate that the bicyclists want to have a safe and enjoyable ride through Griffith Park. So do the horseback riders.

Sincerely,

Nori Anne Walla

**BOARD REPORT** **NO.** 24-278

DATE December 19, 2024 C.D. 4

**BOARD OF RECREATION AND PARK COMMISSIONERS**

SUBJECT: LOS ANGELES EQUESTRIAN CENTER – APPROVAL OF PROPOSED BOARDING RATES – STATUTORILY EXEMPT FROM THE PROVISIONS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO ARTICLE 18, SECTION 15273 [ESTABLISHMENT, MODIFICATION, STRUCTURING, RESTRUCTURING, OR APPROVAL OF RATES, TOLLS, FARES, OR OTHER CHARGES BY PUBLIC AGENCIES] OF CALIFORNIA CEQA GUIDELINES AND ARTICLE II, SECTION 2(o) OF CITY CEQA GUIDELINES

| | | | |
|---|---|---|---|
| * B. Aguirre | BA | M. Rudnick | |
| B. Jones | | C. Santo Domingo | |
| C. Stoneham | | N. Williams | |

General Manager

Approved _____ Disapproved _____ Withdrawn _____

RECOMMENDATIONS

1. Approve the proposed boarding fee rate increases at the Los Angeles Equestrian Center as set forth in this Report;

2. Determine that approval of the proposed boarding fee rate increases is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Article 18, Section 15273 [Establishment, modification, structuring, restructuring, or approval of rates, tolls, fares, or other charges by public agencies] of California CEQA Guidelines and Article II, Section 2(o) of City CEQA Guidelines, and direct staff to file a Notice of Exemption (NOE) with the Los Angeles County Clerk and the California Governor's Office of Land Use and Climate Innovation;

3. Authorize RAP's Chief Accounting Employee to prepare a check to the Los Angeles County Clerk in the amount of $75.00 for the purpose of filing an NOE; and

4. Authorize RAP's Chief Accounting Employee to make technical corrections as necessary to carry out the intent of this Report.

SUMMARY

The Los Angeles Equestrian Center (LAEC) is a 75-acre City equine boarding and training facility and an exhibition and banquet destination located across the Los Angeles River within the

boundaries of Griffith Park. Facilities to board over 1,000 horses are available at LAEC along with rings for training and competitive equestrian contests, a 3,500-seat riding and exhibition arena and a total of 13,000 square feet of multi-use event space, including a café and wine bar open during horse show events.

LAEC, Inc. operated the equestrian center under a concession agreement from May 1990 until January 31, 2024. Under the terms of that agreement, LAEC Inc. oversaw all services, including boarding, hosting horse shows and equine competitions, facility and horse barn maintenance, horse riding rentals and instruction, commercial filming coordination and the hosting of banquets, exhibitions, and meetings.

On May 5, 2022 the Board approved an interim agreement for a term of two years with a one-year extension option with ASM Global Arena Management, LLC (ASM) to assume the management and operation of LAEC under direct supervision by RAP, as further described in Board Report No. 22-114. ASM assumed management of the facility on February 1, 2024 following the resolution of litigation involving LAEC, Inc. and RAP.

Under the interim agreement, ASM is responsible for the following:

- maintaining the facility and grounds;
- developing horse rental operations;
- determining best strategies for ensuring continuity of service to current boarders, trainers and sub-tenants;
- improving the facility and coordinating the horse shows, general event, banquet and social event calendars; and
- identifying capital improvement needs, service enhancements and addressing any fire, life and safety concerns.

After reviewing operating costs incurred since ASM began managing the facility, ASM and RAP have confirmed that greater investment in maintenance, general upkeep and repair of the equestrian amenities, grounds and buildings at LAEC is appropriate. Additionally, in review of existing horse boarding rates and associated revenue, some barns and boarding rates were found to be discounted well below comparable rates in the region. As such, in order to transition toward a more sustainable operating model that better supports adequate maintenance and staffing of the facility, ASM proposes the following boarding rates:

Stall Locations with Current and Proposed Monthly Boarding Rates

| Stall Location | A, B & C Barns | D, E & F Pipe Barns | D, E & F Barns Double Stalls | Polo Barns | Polo Barns Double Stalls |
|---|---|---|---|---|---|
| Current Stall Rate | $831 | $635 | $908 | $658 | $908 |
| **Proposed Stall Rate** | **$875** | **$667** | **$976** | **$691** | **$976** |
| Percentage Increase | 5% | 5% | 7.5% | 5% | 7.5% |

As shown in the above chart, ASM recommends boarding rate increases of:

- 5% for equine animals boarded in stalls located in the A, B & C box stall barns and the D, E & F pipe stall barns; and
- 7.5% for equine animals boarded in double stalls in D, E & F and polo barns.

The proposed rates will cover operating costs and are in line with market rates at other local boarding facilities. A rate comparison, cost breakdown and list of amenities are detailed in Attachment 1 of this Report.

Upon the Board's approval, the proposed rates will (i) become effective immediately for newly boarded equine animals, and (ii) take effect on February 1, 2025 for existing boarded animals.

ASM held two meetings with boarders to explain the calculations underlying the new proposed rates, including sharing all of the operating costs with attendees. A copy of the presentation from those meetings is attached to this Report. During these meetings, several boarders requested that ASM address the inequities involving the cost of hay cubes, which is currently included in the boarding fees paid by ***all*** boarders even if some do not use any cubes. This process was implemented by prior management, and then continued under ASM to minimize disruption during the transition between operators. ASM further analyzed the issue and determined that only 38% of the boarders use the provided cubes. Therefore, ASM has proposed removing the cubes as an amenity under the new rates. ASM will continue purchasing and feeding the cubes as an optional service, with a commensurate rate based on the amount of feed requested by the boarder.

Staff recommends approval of the proposed boarding rates.

## TREES AND SHADE

The approval of this Report will have no impact on existing trees and shade at LAEC.

## ENVIRONMENTAL IMPACT

The proposed action consists of approving the modification of existing rates for the use of a public facility for the purpose of meeting operating expenses and obtaining funds for capital projects, necessary to maintain service within the existing service areas of LAEC.

According to Article 18, Section 15273 of the California Environmental Quality Act (CEQA), CEQA does not apply for the establishment, modification, structuring, restructuring, or approval of rates, tolls, fares, or other charges by public agencies which are not meant to fund capital projects for the expansion of a system.

Since this rate increase will not fund an expansion of LAEC and is limited to covering operating expenses and capital projects needed to maintain an adequate level of service, staff recommends that the Board determine that the proposed action is statutorily exempt from the provisions of CEQA pursuant to Article 5, Section 15273 of California CEQA Guidelines and Article II, Section 2(o) of City of Los Angeles CEQA Guidelines. Staff will file a Notice of Exemption with the Los Angeles County Clerk and with the Governor's Office of Land Use and Climate Innovation.

## FISCAL IMPACT

The projected annual increase in revenue at the current occupancy level under the proposed new rates is $222,000. When all vacant stalls are occupied at the proposed rates, the annual increase

in revenue is projected to be approximately $1,000,000. The projected total revenue at LAEC for calendar year 2025 is approximately $7 million. All revenue will be used to support the facility's ongoing operating expenses, with no negative impact on RAP's General Fund.

STRATEGIC PLAN INITIATIVES AND GOALS

Approval of this Board Report advances RAP's Strategic Plan by supporting:

**Goal No. 6:** Build Financial Strength and Innovative Partnerships
**Outcome No. 1:** RAP's operating budget meets the needs of the park system for all Angelenos

This Report was prepared by Rachel Ramos and Mark Stipanovich of the Concessions Unit, Special Operations Branch.

LIST OF ATTACHMENTS

1) Supplemental Information
2) ASM Boarder presentation and details on LAEC rates, market comparisons and amenities

# Supplemental Information

## Los Angeles Equestrian Center
## Proposed Boarding Rates
## December 19, 2024

# OVERVIEW OF LOS ANGELES EQUESTRIAN CENTER

- The Los Angeles Equestrian Center (LAEC) is a 75-acre City equine boarding and training facility and an exhibition and banquet destination located in the northern portion of Griffith Park along the Los Angeles River. Built in the early 1980's, the Equestrian Center hosted its first horse show in June of 1982.

- Facilities to board over 1,000 horses, of which 520 stalls are used for boarding, are available at LAEC along with rings for training and competitive equestrian contests, a 3,500-seat riding and exhibition arena and a total of 13,000 square feet of multi-use event space, including a café and wine bar open during horse show events. The LAEC is also home to over a dozen professional trainers and a riding academy known as the Traditional Equitation School (TES). TES provides classes to children and young adults on how to ride and care for horses. The LAEC provides access to many miles of trails within Griffith Park.

- The LAEC, with its many amenities and access from all areas within Los Angeles County, remains a stand alone facility supporting the equestrian community in the greater Los Angeles area.

# BACKGROUND

- A private company, LAEC, Inc., operated the equestrian center under a concession agreement from May 1990 until January 31, 2024.
- On May 5, 2022 the Board approved an interim agreement for a term of two years with a one-year extension option with ASM Global Arena Management, LLC (ASM) to assume the management and operation of LAEC under direct supervision by RAP.
- ASM assumed management of the facility on February 1, 2024 following the resolution of litigation involving LAEC, Inc. and RAP. Previous to this date, ASM and RAP had limited access to the facility.
- Upon assuming operation of the equestrian center, ASM has identified significant deferred maintenance issues and a variety of capital improvement needs.
- The interim agreement with ASM will expire November, 2026; in advance of that expiration, RAP will be undertaking an RFP process for a longer term operations and maintenance agreement.

# Highlights - Repairs and Capital Improvements

## Projects Completed to Date

- 160 boarding stalls refurbished and power washed
- Eye wash stations installed
- AED's installed in barn areas
- Fire Extinguishers installed
- Electrical lighting upgrades in barns A, B and C (in progress)
- Reconditioned existing footings in main arenas
- Rebuilt and painted main entrance archway
- Rain damaged roads and aisles repaired
- Repairs to the Cricket Home
- Gas leaks in kitchens repaired
- Repairs to wash racks
- Removal of trash and debris

## Capital Improvement Needs Identified

- Footing base replacement  in all arenas
- Paving of main drive, parking lots, etc
- Lighting around parking lots and main road
- Heat mitigation and water pipe cooling in all barns
- Arena Lighting
- Equidome and Cricket House Roof Replacement
- Sun Pen grading
- Extensive repairs to Barns A, B and C
- HVAC for event rooms and main office
- Tree trimming throughout the LAEC
- Replacement of perimeter fence

# Proposed Boarding Rate Increases - Background

- In review of existing horse boarding rates at LAEC, some barns and boarding rates were found to be discounted below comparable market rates, despite previous incremental CPI increases.

- After several months of operations, and a better understanding of operating expenses, RAP and ASM began preparing recommendations for increases to horse boarding rates.

- In July 2024 RAP recommended that the Board approve increases to boarding rates for NEW equines. The Board continued the recommendation and directed RAP staff to further analyze revenue and expenses and meet with boarders and LAEC stakeholders to discuss the issue.

- ASM facilitated two meetings with boarders on September 19 and 21, 2024 where proposed new rates were presented for input and discussion. Based on the input received, ASM and RAP updated the proposed rates and met again with LAEC stakeholders on October 23, 2024.

# Proposed Monthly Equine Boarding Rates

| Stall Location | A, B & C Barns | D, E & F Pipe Barns | D, E & F Barns Double Stalls | Polo Barns | Polo Barns Double Stalls |
|---|---|---|---|---|---|
| Current Stall Rate | $831 | $635 | $908 | $658 | $908 |
| **Proposed Stall Rate** | **$875** | **$667** | **$976** | **$691** | **$976** |
| % Increase | 5% | 5% | 7.5% | 5% | 7.5% |
| % Increase (Cubes) | 16% | 19% | 17% | 19% | 17% |

**Note: % Increase (Cubes) assumes $90/month in alfalfa cubes @ $0.30/lb.**

# Proposed Feeding Option - Alfalfa Cubes

- **Traditionally, LAEC has provided alfalfa cubes and labor to feed horses as a service included in the monthly boarding fees.**
- **When soliciting input from boarders one significant grievance was that many of the boarders (roughly 62%) are paying for alfalfa cubes and the feeding service but not utilizing the feed and service; instead opting to hire their own feeding staff and purchasing feed from outside sources.**
- **In response, RAP and ASM are recommending that the alfalfa cubes and feeding service be modified and offered as an added service, on top of the boarding rate.**
- **ASM will continue to provide alfalfa cubes, storage and labor to feed the horses; however the cubes will be sold at cost to those boarders who wish to continue feeding their horses alfalfa cubes.**
- **The total rate increase for a boarder who opts to purchase cubes will depend on the amount of cubes needed. For example, if a horse in as single stall in Barn D consumes 5lbs of cubes twice a day, the cost would be approximately $90/month. This added cost would represent a total increase of 16% over the current rates, inclusive of the 5% base rate increase for those barns (see chart).**

# 2025 Draft Revenue Projections

- **Boarding income is projected to increase by $222k annually, at the current occupancy if the proposed boarding rates are approved. When occupancy increases, additional boarding revenue would be realized.**

- **ASM and RAP are working to maximize revenue from equestrian events, private events, and sponsorship.**

- **The selling of alfalfa cubes is not considered a revenue stream as the cubes will be sold to boarders at cost.**

- **Trainer fees, which are considered an ancillary activity, are not accounted for in budgeted boarding income, as boarders are not required to have a trainer to rent a stall.**

| Revenue Category | Projected 2025 |
|---|---|
| Boarding | $4,286,784 |
| Equestrian Events | $1,145,296 |
| Food & Beverage | $284,000 |
| Private Events | $831,136 |
| Retail Leases | $389,357 |
| Sponsorships | $100,000 |
| **TOTAL** | **$7,036,573** |

# 2025 Expense Projections

- **The LA Equestrian Center complies with the City of LA's LWO, which is currently set at a minimum of $25.23/hour.**

- **Selling, General and administrative costs account for operational expenses for departmental activities not directly related to event production (i.e., Management & Office, Finance, HR, Marketing).**

- **Based on these expense estimates, the 2025 Projected Operating deficit is $1.7 million**

| Expense Category | Projected 2025 |
|---|---|
| Wages and Benefits | $4,605,006 |
| Selling, General and Admin | $638,120 |
| Contracted Services | $1,051,909 |
| Facility Operations | $577,397 |
| Equipment | $55,500 |
| Supplies | $1,103,300 |
| Insurance | $59,225 |
| **TOTAL** | **$8,808,383** |

# BOARDING, DIRECT & INDIRECT COSTS

**Boarding rates cover direct costs associated with providing boarding services. However, there are significant indirect costs that support this service that are not directly accounted for in the advertised boarding rates.**

| DIRECT | INDIRECT |
|---|---|
| Feed | Electricity |
| Bedding | Water/sewage |
| Pest Control | Gas |
| Security | Insurance |
| Fuel | Capital improvement |
| Composting | Sanitation |
| Maintenance | Gen & Admin |
| Staffing | |

# Recommendations and Next Steps

- **Board approval of Horse Boarding Rates contained in BR 24-278**
- **RAP Finance staff is currently auditing financial data at the LAEC**
- **RAP Finance and Concessions staff continues to work with ASM to reduce projected expenses and maximize revenue for 2025**
- **RAP staff to report back to the Board with fund transfer recommendations to address capital improvement needs and the projected operating deficit**

Los Angeles EQUESTRIAN CENTER

ATTACHMENT 1

# Los Angeles Equestrian Center Boarder Meeting

## ASM Global
## October 2024

# RELATIONSHIP BETWEEN ASM GLOBAL & THE CITY OF LOS ANGELES

Los Angeles Recreation & Parks (RAP) has entered into a management agreement with ASM Global (ASM), moving away from the previous concessionaire model. Under this new structure, RAP retains full decision-making authority, while ASM contributes efficiencies and insights from its extensive experience. Importantly, all revenues generated at the center are reinvested back into the facility to address deferred maintenance, ensure proper upkeep, and facilitate improvements.

# LAEC BEST PRACTICES

Implemented since Feb 1, 2024

- Implemented a digital process for onboarding, invoicing, and tracking payments, providing historical payment history for all users.
- Renewed the process with the City for the facility to serve as an Emergency Evacuation site as needed.
- Implemented a Pest Control Plan in all areas, with a 2-year rolling plan.
- Established a collection process for health records for all horses.
- Put in place daily and annual arena maintenance programs for both competition and trainer arenas.
- Provided premium bedding products for use in the boarding areas.
- Implemented a process for training barn workers.
- Addressed the removal of discarded scrap left by prior management and established a system to provide bins for ongoing removal.
- Made the horse show area arenas, including the Equidome, available for use when not in use by events, which required daily maintenance.
- Provided a work order system for boarder-requested repairs.
- Implemented a composting program to reduce the manure stored on site and addressed the volume of material left from prior management.
- Implemented a sponsorship program and established a process through the Parks Foundation to receive donations.
- Implemented 24-hour security.
- Implemented facility policies and procedures.
- Established a communication schedule that included social media, newsletters, and emails with all stakeholders.
- Provided a communication system to inform boarders of events on the property.

# PROJECTS COMPLETED TO DATE

**Administrative:**

- Creation of boarder, trainer, & horse database within Barn Manager
- New electronic billing system
- Completed over 500 new contracts
- Created a new maintenance submittal process
- Hired Allied Security for 24-hour coverage
- New alfalfa cubes feeding program with controlled inventory
- Six AEDs installed strategically around the property
- Eye wash station installed in maintenance barn
- First aid kits upgraded
- New branding and logo
- Installation of main entrance and office signs
- Biosecurity and emergency evacuation plans

**ABC Barn area:**

- Gutters cleaned in all 3 barns
- 76 stalls repaired - leveling of ground, mats, painting of walls, replacement of wood, replacement of feeders and waterers, and reconfiguration
- Repair and leveling of ground from rain flooding
- Repair of shavings bay gates
- Clearing of clutter in the aisles and common areas for fire and life safety
- TES arena weed removal around the perimeter
- Trees were trimmed, palms pruned, and fallen trees replanted
- Removed non-functional hot walkers

**DEF Barn area:**

- Repaired shavings bay
- Parking area and around the barns leveled w/ DG
- Removed weeds
- 33 stalls repaired with DG, pipe stalls secured w/footings, replacement of wood, waters, and feeders
- TES arena had the sand pulled from the sides and was leveled
- TES arena weed removal around the perimeter
- Trees were trimmed, palms pruned, and fallen trees replanted

**Polo Barn Area:**

- 51 stalls refurbished w/ new wood and leveled w/ DG
- All aisles and surrounding areas were repaired with DG and releveled
- Removal of dead trees near RV parking
- Repair of downed power lines
- Electrical outlets added
- Additional sun pens installed

# PROJECTS COMPLETED TO DATE CONT...

**General Maintenance:**

- Establishment of Pest Control Program
- Leveling and addition of DG of maintenance area
- Alfalfa containers relocated to the maintenance area
- Cleanup of dirt parking lot
- Moved the location of roll-off bins
- Cleaned up trash/debris
- Rebuilding the main archway before painting
- Repair of archway lights
- All carts and alfalfa tracks are on a pm for weekly service w/ brake and battery checks
- Relocation of staff lockers to a centralized location in the maintenance area
- Replacement of pumps in ballroom fountains
- Office remodel
- Repair of historic “Little White House”
- Hoisting of new American Flag on Hunt Field
- Replacement of 87 fire extinguishers
- Fuel pump repaired
- Refurbishment of the former barn manager's office with the removal of a tree that was damaging the building
- Updated ansul fire suppression systems in kitchens
- Compressor replacements in progress in refrigeration
- Gas leaks identified and repaired in kitchens
- Crossties installed at wash racks
- Landscaping cleanup by Four Seasons
- Crosswalks and curbs repainted

**Horse Show Barns, Arenas & Banquet Spaces:**

- Equidome roof leaks repaired
- Equidome, Hap Hansen arena, and East Oval base repair and footing reconditioned
- Schooling area footing reconditioned
- All areas and gutters cleared of weeds
- Saloon reconfigured and created a bar and grab-and-go market
- All stalls power washed
- Converted offices and tack rooms in barns back into stalls
- Installed upgraded lighting in and around the barns
- Rain-damaged roads and aisles repaired and leveled
- Magnets over the entire site to remove any nails, screws & metals
- Tree was removed near Rein Cafe to remove concrete and repair a large leak, which has been an issue for years
- On-going repairs, including roof replacement and reconfiguration of Rein Cafe to make it functional once again
- Deep cleaning of all three ballrooms
- Power washing of the exterior of the main building
- Power washing of Equidome
- Painting of the Equidome kickboard
- Installation of sunshades at all arenas and between the saloon and show office
- Painting of the show office

# PROJECTS IN PROGRESS

- A phased electrical renovation to upgrade and modernize the facility's electrical systems, enhancing safety and reliability
- Additional repairs and renovations in A, B, and C Barns
- Extensive repairs to improve structural integrity of A, B, and C Barns

# PROJECTS PROPOSED

- Footing in 6 arenas
- Security gate replacement
- Repair and replacement of perimeter fence
- Sun pen grading and reconfiguration
- Paving of main drive, restriping of Gold, RV, and Silver lots
- HVAC repair in Main Office
- Lighting around facility (main road and parking lots)
- Relocation of manure pit from D, E, F Barn area
- Equidome roof replacement
- Little White House roof replacement
- Termite mitigation
- Heat mitigation and water pipe cooling in all barns
- Arena lighting
- Repair of termite ridden wood in main building and barns
- Replacement of doors and windows in ballrooms
- Tree trimming

# ROLLING FORECAST

Projected Feb 1, 2024- Dec 31, 2024

| | | |
|---|---|---|
| **REVENUE** | | |
| General Operations | $ | 64,957 |
| Boarding | $ | 3,567,793 |
| Equestrian Events | $ | 1,225,583 |
| Private Events | $ | 348,611 |
| Food & Beverage | $ | 141,250 |
| Sponsorships | $ | - |
| **Total Net Income** | **$** | **5,348,194** |
| | | |
| **EXPENSES** | | |
| General Operations | $ | 2,915,918 |
| Boarding | $ | 3,913,162 |
| Equestrian Events | $ | 415,092 |
| Private Events | $ | 20,538 |
| Food & Beverage | $ | 67,566 |
| Sponsorships | $ | - |
| **Total Expenses** | **$** | **7,332,278** |
| | | |
| **Net Income** | **$** | **(1,984,083)** |
| | | |
| **Facility Start Up Expenses** | $ | 1,010,927 |

# RATES AT LOS ANGELES EQUESTRIAN CENTER

| | Current Rate Scenario with Cubes included | | | | |
|---|---|---|---|---|---|
| | A B C Barns | D E F Barns | D E F Doubles | Polo Barns | Polo Doubles |
| Revenue | **$831** | **$635** | **$908** | **$658** | **$908** |
| Expenses | $717 | $717 | $1,133 | $717 | $1,133 |
| Profit | $114 | -$82 | -$225 | -$59 | -$225 |
| Margin | **14%** | **-13%** | **-25%** | **-9%** | **-25%** |

| | Comparative Rates shown at Boarder Meetings | | | | |
|---|---|---|---|---|---|
| | A B C Barns | D E F Barns | D E F Doubles | Polo Barns | Polo Doubles |
| Market Rate | **$997** | **$751** | **$1,153** | **$776** | **$1,153** |
| Expenses | $717 | $717 | $1,133 | $717 | $1,133 |
| Profit | $280 | $34 | $20 | $59 | $20 |

| | Comparative Rates w/o Cubes Proposed to RAP | | | | |
|---|---|---|---|---|---|
| | A B C Barns | D E F Barns | D E F Doubles | Polo Barns | Polo Doubles |
| Market Rate | **$875** | **$667** | **$976** | **$691** | **$976** |
| Expenses | $596 | $596 | $942 | $596 | $942 |
| Profit | $279 | $71 | $34 | $95 | $34 |

| Historical Rates | | | | | |
|---|---|---|---|---|---|
| Year | A B & C Barns | Polo Stalls | D E F Stalls | Double Polo & D E F Stalls | % Increase |
| Market Rate | 875 (5%) | 691 (5%) | 667 (5%) | 953 (7.5%) | Doubles - 1.38% & 1.50% increase over single |
| 2024 | $831 | $658 | $635 | $908 | 0.0% |
| 2023 | $831 | $658 | $635 | $908 | 3.2% |
| 2022 | $806 | $638 | $616 | $880 | 8.0% |
| 2021 | $747 | $591 | $571 | $815 | 3.9% |
| 2020 | No raise due to pandemic | No raise due to pandemic | No raise due to pandemic | No raise due to pandemic | 0.0% |
| 2019 | $719 | $569 | $550 | $785 | 2.7% |
| 2018 | $700 | $554 | $536 | $765 | 3.80% |
| 2017 | $675 | $534 | $517 | $737 | 2.7% |
| 2016 | $658 | $520 | $504 | $718 | 0.170% |
| 2015 | $647 | $512 | $496 | $706 | 0.466% |
| 2014 | $644 | $510 | $494 | $703 | 0.94% |

***Footnotes***

* Expenses based on actuals 2/1/2024 - 7/31/2024
* Electrical & stall renovation bring Barns A B C to market rate
* Hourly labor has increased twice since 2/1/2024 and will increase again in January
* Costs do not include utilities insurance salaries for marketing communications or F&B staff repair/maintenance of equipment or arena maintenance
* Trainer rates were removed from analysis. Eligible for one single stall discounted at 60% for every 10 client horses boarded at facility.
* Polo team analysis removed as that is a separately negotiated contract inherited by ASM from previous management. Will be renegotiated.
* Double stall rate previously calculated at 1.38% & 1.43% of single
* Propose to move trainer & TES per horse fee from $47 to $57 per horse
* Removal of cubes per boarder meeting feedback would now have all boarders paying for feed on top of board

| Monthly Boarding Costs | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Monthly Exp | Hay Cubes | Pest Control | Shavings (same product in all barns) | Stall Maintenance Supplies | Stall Maintenance Labor | Overhead Labor | Fuel | Composting | Security | Waste Management | Total |
| All Barns | $ - | $ 5,850 | $ 77,751 | $ 16,000 | $ 71,481 | $ 65,610 | $ 6,300 | $ 22,500 | $ 17,250 | $ 13,000 | **$ 295,742** |

# COMPARABLE PROPERTIES & SERVICES

| Facility | Location | Comparable to | Facility Size | # of Stalls | Stall Rates | Stall Cleaning | Shavings | Hay | Cubes | # of arenas | Trail Access | Onsite Horse Shows | Onsite Trainers |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **LAEC** | Burbank | | 75 acres | 637 | 12x12 - $831 | x | x | | | 14 | x | x | x |
| | | | | | DEF 10x10 - $635 | | | | | | | | |
| | | | | | Polo 10x10 - $658 | | | | | | | | |
| | | | | | DEF 10x20 - $908 | | | | | | | | |
| | | | | | Polo 10x20 - $908 | | | | | | | | |
| ***ABC COMPARISONS*** | | | | | | | | | | | | | |
| **Flintridge** | | ABC | 40 acres | 180 | 12x12 - $965 | x | x | x | | 6 | x | x | x |
| **Hansen Dam*** | Sylmar | ABC | 38 acres | 200 | 12x12 - $775 | x | x | | x | 13 | x | x | x |
| *must be with trainer | | | | | *price before went to dry stalls | | | | | | | | |
| **Middle Ranch*** | Terrace | ABC | | | 12x14 - $965 | x | x | x | | 8 | x | | x |
| *must be with trainer | | | | | | | | | | | | | |
| **The Paddock** | Atwater | ABC | 20 acres | | 12x12 - $895 | x | x | extra | x | 6 | | x | x |
| ***DEF COMPARISONS*** | | | | | | | | | | | | | |
| **LA Horse Rentals** | Glendale | DEF | < 2 acres | | 12x12 - $700 | | | | | 0 | x | | |
| *Not open to public | | | | | | | | | | | | | |
| **Sunset Ranch** | Hollywood | DEF | | | 12x10 - $750 | x | | x | | 1 | x | | |
| ***POLO COMPARISONS*** | | | | | | | | | | | | | |
| **Monteverde Ranch** | Terrace | Polo | 14 acres | 150 | In & Out 12x24 - $760 | x | x | x | | 3 | x | x | x |
| | | | | | 12x20 - $795 | | | | | | | | |
| **Triple R** | Glendale | Polo | < 2 acres | | 12x12 - $656 | x | x | | x | 1 | x | | x |
| **Whispering Willow** | Glendale | Polo | 3 acres | 60 | Box Stall 10x10 - $700 | x | x | x | | 1 | X | | x |
| | | | | | Box Stall 12x12 - $720 | | | | | | | | |
| | | | | | In & Out - $750 | | | | | | | | |
| **Center** | Lakewood | Polo | | 206 | Box Stall 12x12 - $535 | x | x | extra | | 9 | | | |
| | | | | | Box Stall 24x12 - $685 | | | | | | | | |
| | | | | | Box Stall 20x10 - $585 | | | | | | | | |
| | | | | | Pipe Stall 24x12 - $510 | | | | | | | | |
| | | | | | Part covered Pipe Stall 24x12 - $485 | | | | | | | | |
| | | | | | Full Cover Pipe Stall 24x12 - $535 | | | | | | | | |
| | | | | | 3/4 Cover Pipe Stall 24x12 - $480 | | | | | | | | |
| | | | | | Part covered Pipe Stall 24x12 - $460 | | | | | | | | |
| | | | | | Part covered Pipe Stall 24x12 - $460 | | | | | | | | |

# AMENITIES AT LAEC

- Capacity to board 500 horses and 460 Show Barn stalls
- 16 Arenas for training and competitive equestrian contests
- A 3,500-seat Equidome covered riding arena and exhibition area
- 13,000 square feet of multi-use event space
- Access to 50 miles of trails in and around Griffith Park
- Sun Pens and Turnouts
- Dustless Shavings included in board
- Cubes fed twice daily included in board
- Access to see and participate in a variety of equestrian events and competitions each year on property
- Access to 20 professional on site trainers and their programs
- Storage available for trailers at nominal additional cost
- Community Events through out the year on site
- Access to grazing areas on Hunt Field
- 75 acre garden oasis property in the heart of the Burbank/Glendale Rancho Community
- Lawns and areas for lead line grazing as well as proximity to Betty Davis Park
- Access to property perimeter trail.
- Support of RAP for capital improvements
- Professional management
- Upgraded arena surfaces as well as daily maintenance for arenas
- RV sites on-premises

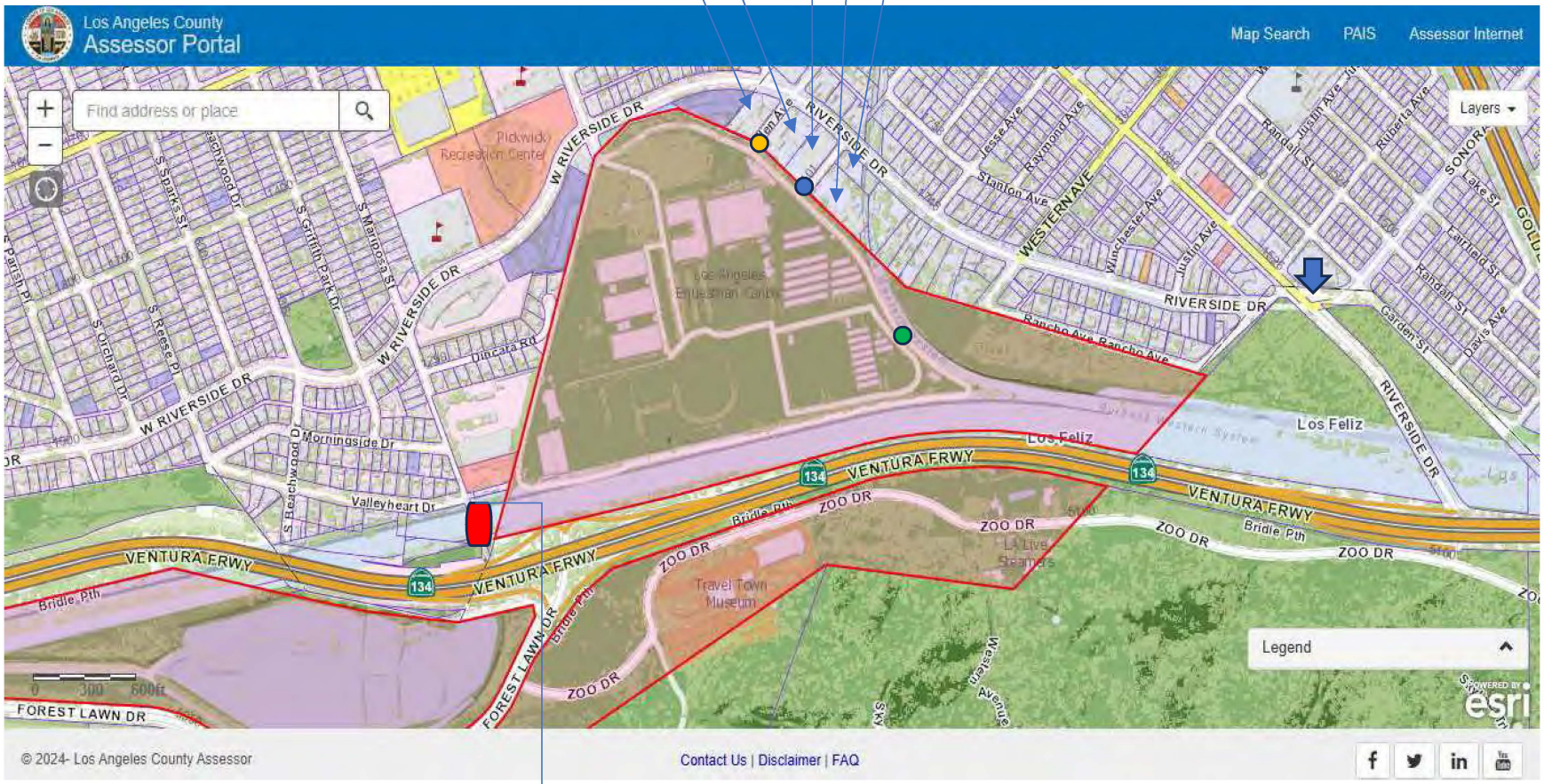
NO VEHICLES
CAN'T
KEEP
BIKES
OUT!

BOUNCE

**BURBANK**
**RESIDENTIAL HORSEKEEPING**

**GLENDALE**
**COMMERCIAL STABLES**

**GLENDALE**
**RESIDENTIAL HORSEKEEPING**




1. Silver Saddle Stables
2. LA Horse Rentals/TriKee Tack
3. Triple R Stables
4. Whispering Willow Stables
5. Griffith Park Horse Rentals
6. Studio Horse Rentals (Burbank)

- Mariposa Equestrian Bridge
- Allen Ave. Bridge
- Irving Ave. Bridge
- Easter Field Bridge

*Emily Gabel-Luddy and Nori Walla*
*c / o 440 West Elm Avenue*
*Burbank, CA 91056*

VIA EMAIL
September 25, 2024

ESA
633 West 5th Street
Suite 830
Los Angeles, CA 90071
ATTN: Shannon Papin, M.A. spapin@esassoc.com and
Valerie Smith, Architectural Historian, vsmith@esassoc.com

**RE: Second Request to be Consulting Party, Corrections to Project Description and Maps**

**Section 106 of the National Historic Preservation Act of 1966, Los Angeles Phase IV Bike Path Project located in Griffith Park**

Dear Ms. Papin and Ms. Smith,

In a letter dated August 21, 2024, my colleague Nori Walla and I requested information about the above-cited Project. On August 23, Ms. Smith confirmed she had received my call and had forwarded our requests to Ms. Papin. As of today, there has been no response to our original request and questions.

We nominated the Mariposa Street Bridge, secured its listing on the National Register and as the Nominating Party, we want to be a Consulting Party on this Project pursuant to Section 106. We also brought to your attention the presence of notable inaccuracies in the Project Description (and also maps) and requested a meeting with you — and whomever may have been responsible for the Project Description — in order to correct it before the Project moved forward. An NOI should not be issued until the description is accurate.

In addition to our specific request to become a Consulting Party under Section 106, I formally request the organizations listed below be notified of any and all agency notifications related to environmental assessments/studies for notices of intent (NOI), notices of preparation (NOP), drafts, etc. pursuant to NEPA review; and any CEQA review of the Project. They are listed below.

**Second Request to be Consulting Party, Correct Project Description/Maps/2**

Notices should be sent to:

Friends of the Equestrian Bridge: Darcy Conkle, President
(friendsofeqbridge@gmail.com)

Friends of Griffith Park: Gerry Hans, President,
(gerry@friendsofgriffithpark.org)

Griffith J. Griffith Trust: Mike Eberts, Director, (meberts@glendale.edu)

We look forward to hearing from you. Please do not hesitate to contact either Nori or me.

Thank you,

Emily Gabel-Luddy
213-280-5784 c

Nori Walla
pippiandshadow@gmail.com

cc: Julianne Polanco, State Historic Preservation Officer (SHPO)
Natalie Lindquist, Local Govt/Environmental Compliance (SHPO)
Jeff Carr, Caltrans HQ, Cultural Studies Office
Joshua Knutson, Caltrans, District 7

Attachment: August 21, 2024 letter/Project Description

*Emily Gabel-Luddy and Nori Walla*
*c / o 440 West Elm Avenue*
*Burbank, CA 91056*

VIA EMAIL
August 21, 2024

ESA
633 West 5th Street
Suite 830
Los Angeles, CA 90071
ATTN:
Valerie Smith, Architectural Historian, vsmith@esassoc.com
Shannon Papin, M.A. spapin@esassoc.com

**RE: Section 106 of the National Historic Preservation Act of 1966, Los Angeles Phase IV Bike Path Project located in Griffith Park**

Dear Ms. Smith and Ms. Papin,

This updates our prior August 16, 2024 letter sent by email to Ms. Papin. Please discard that letter.

We recently became aware of your outreach in support of compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA) related to the Los Angeles Phase IV Bike Path Project located in Griffith Park.

The Mariposa Street Bridge, identified on your Project Maps, was listed on the National Register of Historic Places on March 25, 2024. Due to our concern over this vital link to the equestrian trails, we nominated the Mariposa Street Bridge and secured its listing on the National Register. As the Nominating Party, we would like to be a Consulting Party on this Project pursuant to Section 106.

Among our concerns at the outset are several notable inaccuracies in the Project Description (attached). While you may not have been responsible for its preparation, this Project Description requires corrections prior to moving forward.

Furthermore, based upon the Project Description, there appears to be a potential for significant adverse effects to the integrity of the Mariposa Street Bridge that we would like to discuss.

We look forward to meeting with you (and those who prepared the Project Description) at your earliest convenience.

It is best to contact us at our emails: egluddy@aol.com and pippiandshadow@gmail.com.

Sincerely,

Emily Gabel-Luddy

Nori Walla

Attachment: "Attachment A," Project Description, LA Phase IV Bike Path Project, Section 106 Compliance

cc: Julianne Polanco, California State Historic Preservation Office
Friends of Griffith Park
Friends of the Equestrian Bridge
Griffith J. Griffith Trust

# Los Angeles Phase IV Bike Path Project – Project Description

The Project location is in the Hollywood Community Plan area within the central portion of the City of Los Angeles in Los Angeles County, within the Hollywood Community Plan area. It is bordered by the River, Los Angeles Equestrian Center, Bette Davis Picnic Area and City of Burbank to the north; Riverside Drive and the City of Glendale to the east; State Route 134 (134 Freeway) and Griffith Park to the south; and Forest Lawn Drive and the City of Burbank to the west. The Project area is an approximately one-mile alignment along an existing paved service road owned by the Los Angeles County Flood Control District and under the jurisdiction of the U.S. Army Corps of Engineers (USACE). The road is currently accessible only to pedestrians, cyclists, and equestrian users via an existing pedestrian/equestrian bridge to the west of the alignment and a tunnel beneath the 134 Freeway that connects to Griffith Park/Zoo Drive to the south. The eastern terminus of the alignment includes a locked gate which is also the western terminus of the existing Los Angeles River Bikeway segment to the east of the Project area. The western terminus of the Project alignment is located approximately 200 feet east of the northern terminus of Forest Lawn Drive.

The City of Los Angeles Department of Public Works, Bureau of Engineering (BOE) as lead agency under CEQA, and the Los Angeles Department of Transportation (LADOT) as project proponent, proposes to implement the Los Angeles River Phase IV Bike Path Project (Project), which would construct a new multi-use trail segment along the south side of the Los Angeles River (River) from the existing western terminus of the Los Angeles River Bikeway located just to the west of Riverside Drive westward to approximately 200 feet east of Forest Lawn Drive in the Hollywood Community Plan area of the City of Los Angeles. The total length of the Project is just under one mile (approximately 4,600 feet). The trail segment would include a new paved path on the northern side of the proposed trail alignment for use by pedestrians and cyclists, an equestrian-only unpaved trail on the south side of the alignment, and associated retaining walls, concrete fencing, street lighting path lighting, and limited utility relocations.

The purpose of the Project is to provide recreational opportunities and bicyclist connectivity in the Hollywood Community Planning Area. The proposed Project would connect the existing Los Angeles River Bikeway and close existing bikeway gaps along the River. The proposed Project would provide connections to the active transportation network throughout the region and provide new pedestrian, bicycle, and equestrian access and connectivity to transit, residential homes, schools, jobs, parks and recreational facilities, and other community-serving amenities for the surrounding communities. The Project is a key component of the City's effort to revitalize the River with increased access, amenities, recreational opportunities, and stormwater management. The City of Los Angeles Department of Transportation (LADOT) is working with partner agencies towards creating a continuous, paved bikeway along the entire length of the River, from the headwaters in West San Fernando Valley to the Long Beach Harbor. Currently, access to the LA River and its bikeways and trails is highly variable along the 51-mile stretch of the Los Angeles River. In the proposed Project area, multi-use trails and Class I bikeways are located to the east in the Narrows Riverwalk area.

The Los Angeles Equestrian Center is located on the north side of the river and provides a 75-acre complex featuring areas for equestrian events, over 500 boarding stalls, along with access to the Griffith Park equestrian trails. In addition to the Los Angeles Equestrian Center, various private stables provide equestrian trail riding access. These stables are adjacent to the river and the trails that cross the river and provide access to the wide network of trails throughout Griffith Park.

STUDIO
RSE RENTAL
343-9890

Gmail Nori Walla <pippiandshadow@gmail.com>

# Consulting Party Status for the LA River Bike Path Phase IV Project

**Harbert, Claudia A@DOT** <claudia.harbert@dot.ca.gov> Mon, Sep 30, 2024 at 3:08 PM
To: "egluddy@aol.com" <egluddy@aol.com>, "pippiandshadow@gmail.com" <pippiandshadow@gmail.com>, "spapin@esassoc.com" <spapin@esassoc.com>, "vsmith@esassoc.com" <vsmith@esassoc.com>, "Polanco, Julianne@Parks" <Julianne.Polanco@parks.ca.gov>, "Lindquist, Natalie@Parks" <Natalie.Lindquist@parks.ca.gov>, "Knudson, Joshua@DOT" <Joshua.Knudson@dot.ca.gov>, "Carr, Jeffrey@DOT" <Jeffrey.Carr@dot.ca.gov>

Hello Ms. Gabel-Luddy and Ms. Walla,

Thank you for your interest in the LA River Bike Path Phase IV Project, particularly the potential effects to the historic Mariposa Street Bridge.

As the Caltrans District 7 Heritage Resource Coordinator, I would like to grant you Consulting Party status under Section 106 of the National Historic Preservation Act.

We will be in touch soon to continue consultation regarding the project.

Thank you.

Claudia Harbert

Senior Environmental Scientist (Supervisory)

Heritage Resource Coordinator

Cultural Resources Unit

Division of Environmental Planning

Caltrans District 7

213.335.0124

---

**From:** egluddy@aol.com <egluddy@aol.com>
**Sent:** Wednesday, September 25, 2024 11:32 AM
**To:** Shannon Papin <spapin@esassoc.com>; Valerie Smith <vsmith@esassoc.com>
**Cc:** Nori Walla <pippiandshadow@gmail.com>; Polanco, Julianne@Parks <Julianne.Polanco@parks.ca.gov>; Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>; Knudson, Joshua@DOT <Joshua.Knudson@dot.ca.gov>; Carr, Jeffrey@DOT <Jeffrey.Carr@dot.ca.gov>
**Subject:** Second Request to be Consulting Party Pursuant to Section 106 – LA River Bike Path Phase IV

**EXTERNAL EMAIL.** Links/attachments may not be safe.

Hi Ms. Papin and Smith,

Please see our attached letter regarding our second request. In addition, by this letter we are requesting notification of any and all environmental assessments pursuant to NEPA or CEQA be sent to us as well as habitat and historic organizations impacted by the Phase IV Bike Path. Their contact information is listed in our attached letter.

Thank you,

Emily

Emily Gabel-Luddy, FASLA

---

**Papin&Smith_9.25.24.pdf**
1438K

**Letter C23**
Nori Anne Walla
March 31, 2025

*Response C23-1*

The commenter provides an introduction to the comments provided in the comment letter. Responses to the comments included in this letter are provided below in **Responses C23-2 through C23-10**.

*Response C23-2*

The commenter argues that the Draft IS/MND "does not show that the current project plan would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur," and thus an EIR must be prepared. However, the comment does not point to any specific issue, analysis, or conclusion that they suggest is inadequate or specific impacts that they claim would be significant as a result of the Project. No further response is warranted.

*Response C22-3*

The commenter offers several points to support the notion that the analysis presented in the Draft IS/MND is not adequate and thus preparation of an EIR is required. However, the points offered do not trigger the need to prepare an EIR or are not supported by any evidence. First, the City is under no obligation to provide plans, materials, or responses to commenters during the public review period since, as required by CEQA, written responses are to be provided once all comments have been received and considered by the lead agency. Second, as discussed in **Response B2-3**, consultation as part of NHPA Section 106 is not related to the evaluation of impacts under CEQA, but rather a subsequent environmental review process pursuant to NEPA. Lastly, the analysis of impacts to sensitive receptors was prepared in accordance with CEQA requirements, which is focused on sensitive land uses and associated activities (e.g., hospitals, schools, parks, etc.). However, the same measures that are protective of sensitive land uses are also applicable to issues such as biological resources and recreation, as suggested by the commenter. The analysis of impacts presented in the Draft IS/MND necessarily considered the presence of horses in the Project area during construction and operation of proposed facilities. However, it must also be acknowledged that while sensitive land uses cannot be moved to avoid proximity-based impacts such as noise, vibration, and air pollutant emissions, sensitive users are able to avoid a given area to avoid adverse effects. As such, the ability of the Project to adequately address impacts depends on the location of those receptors. In the case of horses being considered "sensitive receptors" as suggested by the commenter, it is not feasible to accurately analyze the impacts of, and mitigation for, noise impacts for horses recreating in the Project area, for instance. The Draft IS/MND therefore recognizes sensitive uses such as the nearby parks, residences, and equestrian-related land uses in the area as sensitive receptors, but it is speculative to attempt to more specifically analyze impacts to individual equestrian users, who as noted above, have the ability to avoid construction areas while noise is being generated on-site. Nonetheless, refinements to Mitigation Measure MM-NOI-1 have been made to more specifically address potential effects on horses, as shown in **Clarifications and Modifications** of this Final IS/MND.

*Response C23-4*

As noted above, the City is under no obligation to provide plans, materials, or responses to commenters during the public review period since, as required by CEQA, written responses are to be provided once all comments have been received and considered by the lead agency. However, with regard to the stated questions, the following provides the City's responses. See **Response B3-11** regarding the feasibility of various design features suggested in public meetings. The full set of the latest version of the Project's plans were provided to the commenter on March 28, 2025, which was still during the public comment period (though as noted above the City did this as a courtesy as it was not required). The commenter requests details regarding the funding sources for the Project. While it is acknowledged that the Project would involve various funding sources, the specific amounts from each funding source are not germane to the analysis presented in the Draft IS/MND. With regard to "the property to be acquired" from Caltrans for the Project, a figure (**Figure 10**, *Project Site Jurisdiction*) has been added to the IS/MND illustrating the location of the small portion of Caltrans ROW to be utilized for the Project via an easement, subject to issuance of an encroachment permit by Caltrans (see **Clarifications and Modifications** of this Final IS/MND). This comment does not raise any issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C23-5*

Refer to **Response B2-3** above. As noted therein, consultation as part of NHPA Section 106 is not related to the evaluation of impacts under CEQA, but rather a subsequent environmental review process pursuant to NEPA. No further response is warranted.

*Response C23-6*

See **Master Response No. 2: Project Site Existing Ownership and Authorized Uses** regarding existing ownership, jurisdiction, and authorized users of the Project Site. The commenter provides additional contextual information regarding the LA Equestrian Center and surrounding equestrian-oriented community to stress the long history and prolific nature of equestrian presence in the area. The commenter claims that the Draft IS/MND does not adequately evaluate the implications of horse behavior specifically and thus preparation of an EIR is necessary. However, the comments do not point to any impacts for which horse behavior would affect the conclusions of the analysis in the Draft IS/MND, nor suggest how the evaluation of such species-specific evaluations should be conducted or how they differ from the technical analyses that have already been prepared for the Project. This comment does not raise any specific issues with respect to the content and adequacy of the Draft IS/MND. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

*Response C23-7*

Refer to **Response B3-6** above. No further response is necessary.

*Response C23-8*

See **Master Response No. 2: Project Site Existing Ownership and Authorized Uses** regarding existing ownership, jurisdiction, and authorized users of the Project Site. The commenter erroneously claims that the Project design provides a "soft stop" at the western terminus with signage to "suggest" that users turn back to head east. However, as discussed in **Master Response No. 1: Separation of Path-Trail User Types**, the Project would include a robust barrier system at the western terminus of the proposed bike path component to prevent unauthorized access to the pedestrian- and equestrian-only facilities further to the west along the River channel. As such, no safety issues associated with user group conflicts suggested by the commenter would be attributable to the Project. No further response is warranted.

*Response C23-9*

The public comment submitted raises multiple concerns regarding the Project's potential environmental impacts, particularly on equestrian users and horses in and around Griffith Park and the LA Equestrian Center. This comment raises a number of issues including the following:

- Potential equestrian trail impacts including concerns that the project diminishes existing equestrian trail facilities, narrows trail widths, increases proximity to the freeway, and introduces faster-moving bicycles into equestrian areas, increasing safety risks;
- Potential safety concerns regarding the potential for serious injury or death due to horses being startled by construction or post-construction activities (e.g., noise, vibration, sudden movement);
- Recognition of horses as "sensitive receptors" and horses' heightened sensitivity to environmental stimuli, especially noise and movement;
- Recognition of a "startle factor" for horses and that sudden or unexpected noise, vibration, and movement can cause unpredictable and potentially dangerous behavior in horses;
- The Project's proximity to LAEC, its perimeter trail, and facilities serving vulnerable populations (e.g., children, disabled riders) potentially increasing the risk of adverse impacts to uses of these facilities;
- Existing bicycle activity and conflicts, for which the Project potentially presents conflicts with equestrian users; and
- A request for an Environmental Impact Report (EIR) due to the potential risks to public health and safety.

With respect to equestrian trail impacts and safety risk, see **Master Response No. 1: Separation of Path-Trail User Types**. Signage would be provided to clearly illustrate user types and access restrictions for both the bicycle/pedestrian path and equestrian trail components of the Project. Furthermore, user types would be physically separated to preclude the potential for interactions or conflicts with different user types.

With respect to safety concerns regarding noise and vibration, the Project is required to implement stringent noise mitigation including the use of noise barriers, construction equipment vibration dampers or similar controls, mufflers, and rubber mats to reduce the generation of loud

and instantaneous noise. Therefore, as shown in **Clarifications and Modifications** of this Final IS/MND, the text of Mitigation Measure MM-NOI-1 has been clarified to include further specifications for the protection of the equestrian-related facilities to ensure the noise reductions are realized at the nearby equestrian uses.

With regard to safety issues related to interactions between horses and other user groups such as cyclists and vulnerable populations (e.g., children, disabled riders), as shown in the Project plans, the proposed bike path component of the Project would terminate at the western end of the alignment, and the turnaround location for that portion of the path would be fully secured by robust fencing, gates, operable locks for emergency and maintenance access, and signage to preclude non-equestrian users from proceeding beyond the Project Site to the equestrian- and pedestrian-only path to the west (refer to **Master Response No. 1: Separation of Path-Trail User Types**). It should be noted that the western terminus of the Project alignment is located approximately 800 feet to the east of the Mariposa Bridge, which represents a substantial spatial separation between the western terminus of the Project and the most frequently traveled equestrian route between Griffith Park and uses to the north of the River channel.

As relates to the proposed width of the equestrian trail, refer to **Response A3-3** above.

In summary, the concerns raised in the public comment regarding the Project's potential environmental impacts, particularly with respect to public health and safety, and noise and vibration, have been adequately evaluated in the Draft IS/MND, appropriately addressed through the Project's design, Project BMPs, and through the implementation of required mitigation measures. As such, preparation of an EIR is not required by CEQA. No further response is warranted.

*Response C23-10*

The commenter provides a concluding statement and offers opinions regarding the costs involved for, and overall merits of, the Project, but does not raise a substantive issue regarding the Draft IS/MND. No further response is warranted.

# LETTER C24

From: **Alyce** <hwoodstar@gmail.com>
Date: Mon, Mar 31, 2025 at 10:30 PM
Subject: Fwd: Griffith Park Advisory Board Meeting Thursday March 27th, 6:30pm
To: Christopher Adams <Christopher.adams@lacity.org>

I wasn't sure if you were on the list to receive this email that I send to the GPAB so I'm forwarding it to you.....

C24-1

Alyce

---------- Forwarded message ---------
From: **Alyce** <hwoodstar@gmail.com>
Date: Tue, Mar 25, 2025 at 9:52 PM
Subject: re: Griffith Park Advisory Board Meeting Thursday March 27th, 6:30pm
To: <ethics.commission@lacity.org>, <rap-gpab@lacity.org>

This is for the Phase IV Bike Path being added to the Horse Trail from the Riverside/Victory Bridge to the Maintenance gates at the Forest Lawn exit from the 134 freeway discussion. I have attached a report that I've put together to make sure the physicalness and the psyche of

horses is made known to those who want to add a bike path to the existing 80+ year old Mariposa (aka River Trail) Equestrian/Pedestrian Trail. I don't think you want a repeat of why a horse had to die because of how the Finger Bridge in Atwater was done.

C24-2

It would be great if you and the committee could actually come to see what is there and how unsafe what is being considered (and being considered for no reason since there is already a bike path that goes the same direction and doesn't force the bicyclists to turn around and go back the same way they just came) can be.

Thank you for your time and if you have any questions, just let me know.
Alyce

Alyce Heath - Cell: 818-681-9715

sag/aftra
**POSH TALENT AGENCY**
**310-497-5825**
http://resumes.actorsaccess.com/alyceheath

http://www.imdb.me/alyceheath
BALDWIN TALENT, INC.
310-827-2422
*aka Alyce Schwartz, Asst. Prod. Acct./Payroll*
*Local 871*
*also available for free-lance data-entry, word processing, bookkeeping, etc.*
*20+ Civilian Volunteer with the Los Angeles Sheriff's Dept. Mounted Posse, Altadena Station*

You always show only 1 horse in your "photos".....

This is what it looks like w/ two horses....there's barely enough room for one horse, how do you expect two horses to pass each other? And what happens when they both turn around at the same time?

# Phase IV Riverway Bike Path on LA City Council Agenda

**Re:**
Recommendations for Council action, pursuant to Motion (Raman - Blumenfield):

1. INSTRUCT the Los Angeles Department of Transportation (LADOT), with assistance from the Bureau of Street Services and the Bureau of Engineering (BOE), to report to the Council within 45 days on implementing a design for the LA RiverWay Phase IV Project that prioritizes maximizing space and enjoyment for all uses, and forms a continuous segment with an outlet at Forest Lawn Drive or another identified bicycle/pedestrian facility. This report should include encroachments/easements or other agreements necessary with other jurisdictions in order to eliminate mixing modal uses, maintain **a minimum 10 feet equestrian-only path**, **construct fencing**, bend cycling segments to slow cyclists at trail junctions, and any other needed design elements. The report should also outline steps to protect the trail from the negative impacts of the CA-134 freeway. The report should outline anticipated costs of any needed encroachments/easements and elements to protect the trail from the negative impacts of the CA-134 freeway and methods to cover those costs.

## WHAT Y'ALL NEED TO KNOW

**A:** the 80+year old Mariposa Trail (Equestrian/Pedestrian Trail, Bridle Trail, Horse Trail) has a whole section that from the chain link/barbed wire fence on the wall of the Los Angeles River to the chain link fence between the trail and the 134 Freeway (that gets cut open regularly) is around **24.5 feet** wide.

**B:** for safety's sake there should be(AT THE VERY LEAST!!!) **1.5 feet** between a horse and rider and a fence and from a horse passing by so you're looking at, FOR SAFETY'S SAKE at least **4 feet** of trail. The average horse and rider from the outside of the rider's right foot to the outside

**C:** the width of space one horse and rider take up going East on the Mariposa Trail is around 3 feet and one horse and rider going West takes up around 3 feet so that's 6 feet. Add on the 4 feet for the least amount of safety you're looking at 10 feet for two horses to be on the trail passing each other.

However, the average **LENGTH** of a horse from the tip of its forehead to the back of its tail is **10 feet**.

## PLEASE PAY ATTENTION TO THIS NEXT PART.....

**D:** The first instinct for a horse when it feels threatened is turn and run (and sometimes kick). And being herd bound animals when one horse says danger, run, so do the others. A crash on the freeway, a backfire, a piece of trash blowing across the trail, the horse passing by trying to bite or kick....is all it takes. So when horse and rider #1, going West on the Mariposa Trail and horse and rider #2 going East on the trail both turn at the same time you are looking at the need for (based on the LEAST amount of safety) **1.5 feet** between the freeway fence and horse #1, **10 feet** of horse #1, **1.5 feet** between horse and rider #1 and horse and rider #2, **10 feet** of horse #2 and **1.5 feet** between horse and rider #2 and the "proposed" fence between the horse trail (aka bridle path, equestrienne trail) and the proposed bike path making a total (again, least amount of safety) amount of space needed **24.5 feet**.

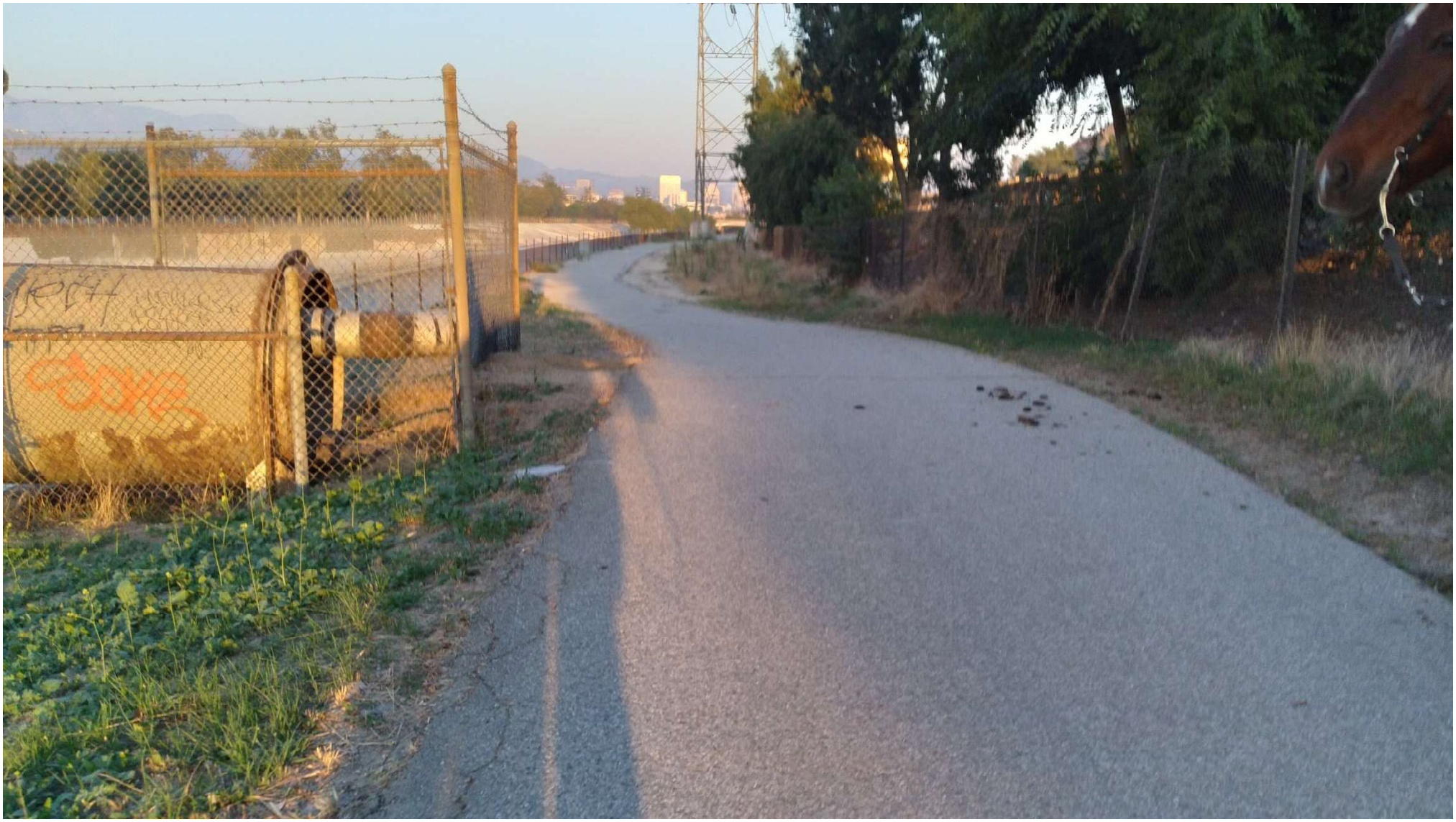
## WHERE DOES THE BICYCLE PATH GO?

## OR ARE YOU GOING TO THREATEN THE LIVES OF THE HORSE AND RIDERS?

## LOOK WHAT YOU DID WITH THE FINGER BRIDGE IN ATWATER!!!!

**AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**

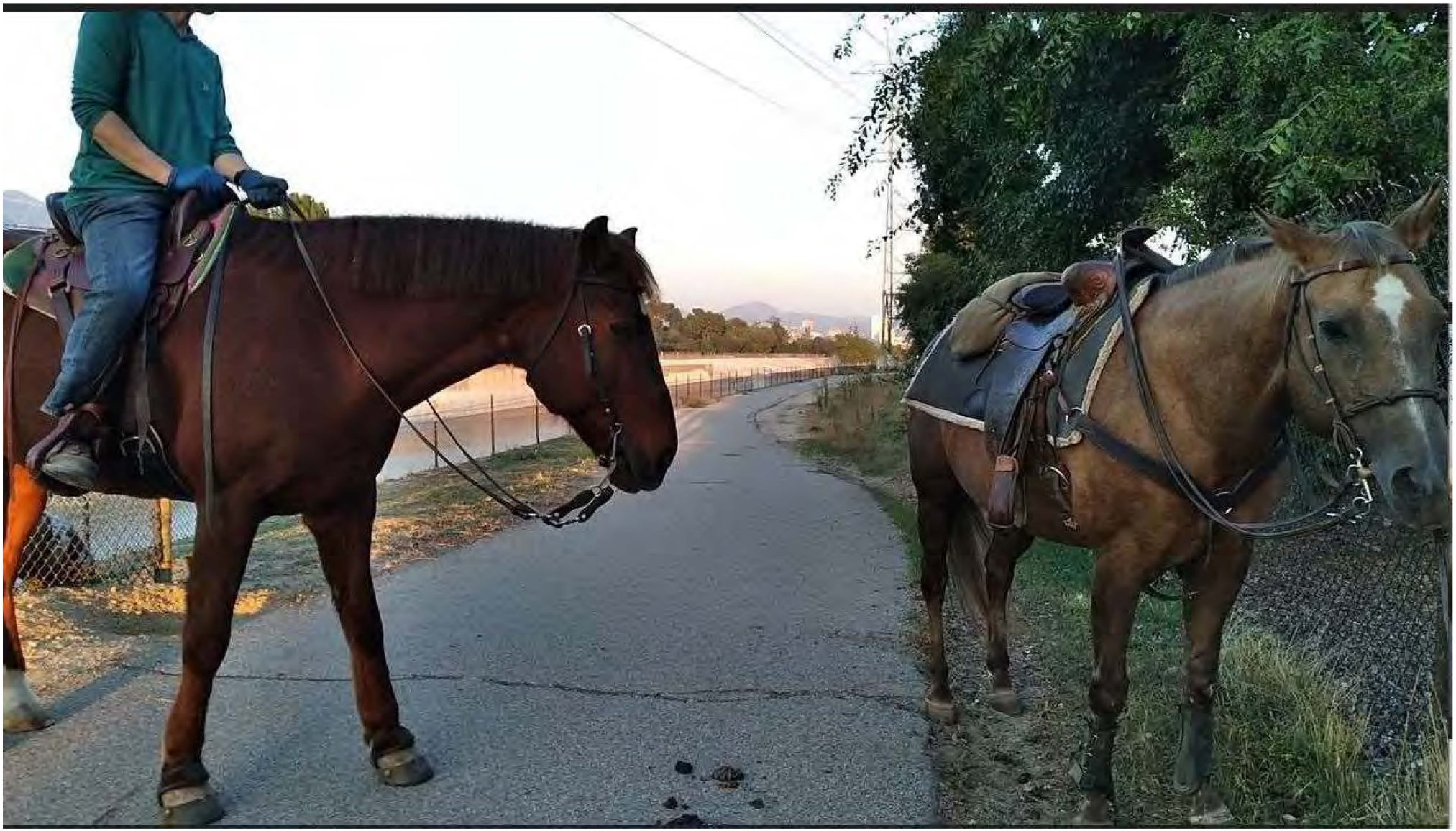
THE TRAIL BY THE PIPE [**34.156856, -118.302896**}



**btw, this 80+ year old bridle path was paved in the mid 1980s most likely to make life easier for the maintenance truck drivers who were maintaining the river crossing for horses at the Riverside Bridge - but in the mid 1990s it was decided to make the LA River "au natural" and that river crossing for horses was no longer maintained however was still usable as a way home if something happened to the 80+ year old Mariposa Bridge....BUT then it was decided to make life easier for the bicyclists and the LA River Bike Path was changed to go under the Riverside Bridge and the dirt ramp for the horses was removed so the escape route for getting home is now very dangerous.**

A HORSE GOING EAST AND A HORSE GOING WEST BY THE PIPE - **NOTE:** AS CLOSE TO EACH FENCE AS POSSIBLE (not the safest way to ride). **AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**

ONE HORSE GOING EAST, ONE GOING WEST BUT TURNING AROUND BY THE PIPE (NOTE: if a horse is startled, spooked or reacting to the another horse, their first instinct it to turn and leave.) ). **AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**



ONE HORSE GOING EAST, ONE GOING WEST BUT BOTH TURNING AROUND BY THE PIPE (NOTE: horses are herd-bound animals, if one turns to leave the other will want to do the same.) ). **AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**

THE SECTION OF THE TRAIL JUST EAST OF THE PIPE AND BEFORE THE MAINTENANCE GATES BY THE FOREST LAWN EXIT/ENTRANCE FROM THE 134 FREEWAY, BOTH EAST HORSE AND WEST HORSE TURNING (NOTE: unsafely close to each fence) [34.156830, -118.303388]. AND THIS SECTION OF THE TRAIL GOES TO 34.156233, -118.307287 ABOUT A QUARTER OF A MILE). **AND THE QUESTION IS, WHERE DO THE BICYCLES GO?**

As you can see when the safety for horses and riders is taken into account (and that includes the psyche and physics of equines) there's no place for bicycles to "share" this trail.

***OR*** if measurements are easier to understand: the trail at this section goes from around 25' to 22'. A horse with a rider going East (safely with no "issues") takes up around 5'. A horse with a rider going West (safely with no "issues") takes up around 5'  a horse going West. That equals 10'. ***BUT*** if the horse going East is startled,

spooked or reacting to the horse going West, the first instinct it to turn and leave. The length of a horse from the tip of its nose to the back of its tail averages 8’ so if the East horse turns that’s 8’ plus 5” which equals 13’. ***BUT*** horses are herd-bound animals and if one turns to leave the other will want to do the same. Now you’re looking at the East horse (8’) turning at the same time as the West horse (8’). That equals 16’. You also need to take into account, there’ll be space between the horses because they’re not going to want to hit each other so add 2 more feet to the total and now you have 18’ for two horses to somewhat safely pass each other on this trail. That brings up the question:

# WHERE DO THE BICYCLES GO?

**Alyce Heath Schwartz**

**hwoodstar@gmail.com**

**818-681-9715**

**Letter C24**
Alyce Heath Schwartz
March 31, 2025

*Response C24-1*

The commenter notes that the attached email was sent to the Griffith Park Advisory Board. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response C24-2*

The commenter provides context of the contents of the email being sent to the Griffith Park Advisory Board. The comments contained in this email are also contained in Comment Letter C1, which was submitted by the same commenter. Refer to **Responses C1-3 through C1-8** for responses to the comments raised in this letter. No further response is necessary.

---------- Forwarded message ---------
From: **Sabrina Silver** <sabrina_silver@yahoo.com>
Date: Tue, Apr 8, 2025 at 6:17 PM
Subject: Fw: Public Comment Submission Validation - Council File No.: 23-0722
To: Christopher Adams <christopher.adams@lacity.org>

My first comment

C25-1

Yahoo Mail: Search, Organize, Conquer

----- Forwarded Message -----
**From:** "Clerk.PublicComment@lacity.org" <Clerk.PublicComment@lacity.org>
**To:** "sabrina_silver@yahoo.com" <sabrina_silver@yahoo.com>
**Sent:** Mon, Mar 31, 2025 at 6:09 PM
**Subject:** Public Comment Submission Validation - Council File No.: 23-0722

To sabrina_silver@yahoo.com,

********** **PLEASE DO NOT REPLY TO THIS AUTOMATED EMAIL** **********

# Public Comment Submission Validation

Your Public Comment is now pending. For security purposes, please confirm your submittal by clicking on 'Click here to Validate' button below:

**Click here to Validate**

---

**Council File Number:** 23-0722

**Comments for Public Posting:**

COMMENT REGARDING LA RIVERWAY PHASE IV BIKE PATH PROJECT COUNCIL FILE 23- 0722 PROPOSED MITIGATED NEGATIVE DECLARATION _SCH - 2025021226 Christopher Adams City of Los Angeles Public Works, Bureau of Engineering 1149 S. Broadway, 6th Floor, Mail Stop 939 Los Angeles, CA 90015-2213 Dear Mr. Adams: As an equestrian user of the trail connecting the Mariposa Bridge to the interior trails of Griffith Park, I REQUEST a full EIR on the Mariposa Basin from the current terminus of the LA Riverway Bike Path, just west of the Riverside Drive Bridge through the 134 over crossing of the Los Angeles River. It is important that an accurate picture be considered for the use of the entire Mariposa Basin. Without such consideration, and if only done piecemeal, the cumulative effects cannot

C25-2

be understood. An EIR is needed to fully understand the scope of effects of the LA Riverway Bike path through the Mariposa Basin, from entry to exit(s). The cumulative effects of Phase IV cannot be fully appreciated without a study of the entire area, especially with regard to the effects on its historic use as a connecting horse trail. 1. This is the ONLY access equestrians have between north of the river/134 freeway. Introducing a new user group without complete study may separate these equestrians from these recreational trails. Equestrians have no other access option. To maintain safety and avoid incidents, equestrians generally choose safety. Any horse may startle, and inexperienced riders and those riding inexperienced horses may find the trail as proposed challenging and dangerous and may choose to avoid it in order to avoid risking their safety, thus Phase IV would disenfranchise them and separate them from their recreational options. This project does not BRING a new equestrian trail into the area. One already exists. 2. The project costs over $ 9 million for about a mile, stranding cyclists without an exit. Without knowing how the future path will exit, how can appropriate decisions be made? Will it be safe? Is there enough geographic room? Apparently, Cal trans must conduct a study. Shouldn't that study become part of the decision making process? How will the bike path and horse trails be designed to ensure that both stakeholder groups can safely cross each other's path to their designated exit, as would be needed? Will this be possible? The trail narrows considerably around the Forest Lawn freeway on/off ramps and under-crossing. Will there be enough geographical terrain to design/construct a safe multi-use trail? It is the finding of the Los Angeles Equine Advisory Board that "...that the impact to equestrians cannot be mitigated to a level of insignificance by any type of fence or barrier." 3. Due to the number of trees proposed for removal, an EIR should be done to study the cumulative effects of tree removal in the basin? 4. Have equestrian experts and equestrian trail expert guidelines been consulted and used regarding the entire pathway in/out of the basin? 5. Are the engineers aware of the nature of the horse? Have they conducted a site visit with horses? Again, a full EIR should be conducted. Please see my letter, attached. Thank you for your consideration, Sabrina Silver

C25-2 (cont.)

C25-3

C25-4

C25-5

C25-6

C25-7

C25-8

C25-9

C25-10

---

If the above button is not clickable or is broken, please copy and paste the entire URL (minus any spaces) into your browser window.

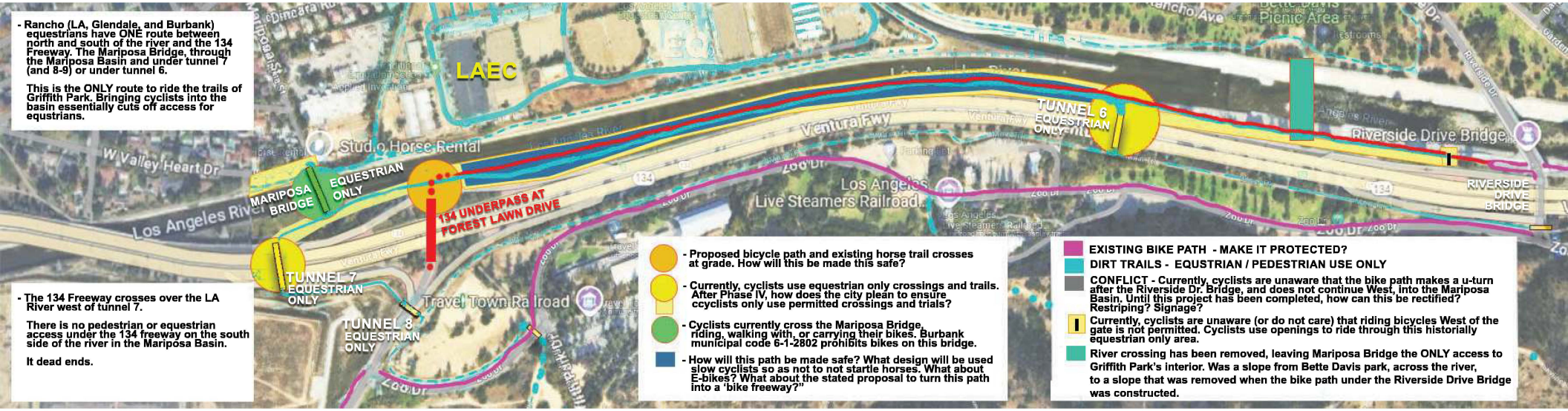
https://cityclerk.lacity.org/Confirmation/?EmailConfirmation=2&c=81A28764-4B26-48A3-AF4D-4BFA8E2B1ADB&em=sabrina_silver@yahoo.com

If you DO NOT want to submit this public comment, simply ignore this E-mail and do not click on the link above.

Thank you,

Office of the City Clerk
Council & Public Services Division
City of Los Angeles
https://clerk.lacity.org/council-and-public-services

C25-11


- Rancho (LA, Glendale, and Burbank) equestrians have ONE route between north and south of the river and the 134 Freeway. The Mariposa Bridge, through the Mariposa Basin and under tunnel 7 (and 8-9) or under tunnel 6.
This is the ONLY route to ride the trails of Griffith Park. Bringing cyclists into the basin essentially cuts off access for equstrians.
- The 134 Freeway crosses over the LA River west of tunnel 7.
There is no pedestrian or equestrian access under the 134 freeway on the south side of the river in the Mariposa Basin.
It dead ends.
LAEC
Stud o Horse Rental
W Valley Heart Dr
Los Angeles River
MARIPOSA BRIDGE
EQUESTRIAN ONLY
134 UNDERPASS AT FOREST LAWN DRIVE
TUNNEL 7 EQUESTRIAN ONLY
TUNNEL 8 EQUESTRIAN ONLY
Travel Town Railroad
Ventura Fwy
Los Angeles Live Steamers Railroad
TUNNEL 6 EQUESTRIAN ONLY
Bette Davis Picnic Area
Riverside Drive Bridge
RIVERSIDE DRIVE BRIDGE
- Proposed bicycle path and existing horse trail crosses at grade. How will this be made this safe?
- Currently, cyclists use equestrian only crossings and trails. After Phase IV, how does the city plean to ensure ccyclists only use permitted crossings and trials?
- Cyclists currently cross the Mariposa Bridge, riding, walking with, or carrying their bikes. Burbank municipal code 6-1-2802 prohibits bikes on this bridge.
- How will this path be made safe? What design will be used slow cyclists so as not to not startle horses. What about E-bikes? What about the stated proposal to turn this path into a 'bike freeway?"
EXISTING BIKE PATH - MAKE IT PROTECTED?
DIRT TRAILS - EQUSTRIAN / PEDESTRIAN USE ONLY
CONFLICT - Currently, cyclists are unaware that the bike path makes a u-turn after the Riverside Dr. Bridge, and does not continue West, into the Mariposa Basin. Until this project has been completed, how can this be rectified? Restriping? Signage?
Currently, cyclists are unaware (or do not care) that riding bicycles West of the gate is not permitted. Cyclists use openings to ride through this historially equestrian only area.
River crossing has been removed, leaving Mariposa Bridge the ONLY access to Griffith Park's interior. Was a slope from Bette Davis park, across the river, to a slope that was removed when the bike path under the Riverside Drive Bridge was constructed.

**Letter C25**
Sabrina Silver
March 31, 2025

*Response C25-1*

The commenter notes that the attached email is provided as their first comment. This comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is necessary.

*Response C25-2*

The commenter provides an introduction to the comments provided in the comment letter, and states that an EIR is required to adequately study the impact of bicycle use in the historically equestrian-oriented Project area. See **Response B3-6** regarding introduction of cycling into the area, and **Response B3-15** regarding piecemealing issues and related cumulative effects. No further response is necessary.

*Response C25-3*

The commenter states that equestrians typically choose the safest trail options, and suggests that novice riders and/or those riding inexperienced horses might avoid the area and the Project's equestrian trail component due to safety concerns, thereby disenfranchising them. However, while the points raised regarding rider preferences and horse behavior are noted, this comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. As such, no further response is necessary.

*Response C25-4*

Refer to **Response A5-6** above. The commenter questions the need for and merits of the Project given the future connections to the west have not yet been studied. However, this comment does not raise any substantive issues regarding the analysis presented in the Draft IS/MND. No further response is warranted.

*Response C25-5*

Refer to **Response A5-6** regarding the pending Caltrans study cited by the commenter. No further response is warranted.

*Response C25-6*

Any future improvements at Forest Lawn Drive are outside of the scope of work for the Project and would be analyzed in Caltrans' planning grant study. The Project would construct segment of new bike path and separated equestrian trail along the Project alignment, but would not involve any improvements further to the west, and would not include any intersections of user groups suggested by the commenter. No further response is warranted.

*Response C25-7*

Refer to **Response A3-3** regarding significant impacts related to fencing and signage. No further response is warranted.

*Response C25-8*

Refer to **Response A4-4**, above. Tree impacts would be fully mitigated by implementation of Mitigation Measure MM-BIO-1 (see **Clarifications and Modifications** of this Final IS/MND). Also see **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** regarding maintenance of the proposed facilities including tree monitoring. No further response is warranted.

*Response C25-9*

Refer to **Response A3-1** regarding trail design standards and guidelines referenced in the Project's equestrian trail design. Refer to **Response B3-18** regarding issues related to horse behavior and trail design. No further response is warranted.

*Response C25-10*

The commenter provides a concluding statement and restating that an EIR should be prepared but does not raise a substantive issue regarding the Draft IS/MND. No further response is warranted.

*Response C25-11*

The commenter provides an attached graphic illustrating potential trail conflicts noted in their comments. However, the commenter mischaracterizes the Project improvements and speculates on future conditions that have yet to be evaluated for potential bike path and trail connections to the west. More specifically, the Project would not prevent equestrian access to Tunnel 6 from the Mariposa Bridge, but rather the Project would provide a physical separation of the equestrian trail to prevent unauthorized access by cyclists. The Project would also not introduce cyclists anywhere west of the proposed western bike path terminus, as barriers would be constructed, inspected, and maintained to prevent unauthorized access by cyclists to the equestrian facilities of concern to the commenter further to the west, which would also preclude the potential for user conflicts in those areas. With regard to future improvements west of the Project Site, those are beyond the scope of the Project and would be further evaluated in coordination with Caltrans and other agencies with jurisdiction as a separate process. While not relevant to the analysis presented in the Draft IS/MND, future improvements and facility connections to the west of the Project Site would be subject to a separate planning and environmental review process where members of the public will have the opportunity to contribute to, and participate directly in, the design process. No further response is warranted.

**Public Meeting (PM) Comments Received March 12, 2025, 6–7:30 p.m.**

Commenter: Marian Dodge

***Comment PM-1***

*I have a couple of comments. One is about sensitive plant species. On page 75, you said that you would be training construction workers to recognize sensitive plants, and I suggest that a construction worker is unlikely to recognize plants. And I would suggest that you just have the biologists that you'd have to hire to train them. Just walk the pathway a couple of times, and identify any plants, and then the other one is just a question. It said that the chain link fence would block the view of bikes the horses, but in the illustration I can't see that there's anything that blocks the view. I see the chain link fence, but I can't see that it blocks the view. Thank you.*

*Response PM-1*

As discussed in Section 4.4, *Biological Resources*, of the Draft IS/MND, a biological resources assessment was conducted within the Project Site and surrounding area including the River channel, which were included as part of the Biological Study Area (BSA) evaluated in the analysis of impacts, the results of which were included in Appendix C-1, *Biological Technical Letter Report*, of the Draft IS/MND. Since no special-status plants were observed during initial site survey and the Project Site is isolated from natural communities where special-status plants may occur, it is unlikely that construction will encounter special-status species. Nonetheless, as required by BMP-BIO-1 in the Draft IS/MND, Workers Environmental Awareness Program (WEAP) training would be conducted for construction crews by qualified staff. Mentions of special-status plants in the WEAP training will be precautionary as there is a low potential to occur outside of the River channel. No further response is necessary.

Commenter: Dean Meinen

***Comment PM-2***

*Yes, thank you. I really support everything you guys are doing, and thank you so much. My only question, and it's a little bit adjacent, but I just don't want you to have to redo things. What I don't see in the plan… well I see a mile long of chain link fence, and what I don't see is access for 1st responders, in case there's need for law enforcement or paramedics for a medical emergency. What I'm not seeing is where there is that access point, and how those people access this. And if that needs to be adapted into the plan that would affect all the work that you're doing tonight.*

*Response PM-2*

Refer to **Response B3-39** above regarding emergency vehicles access from the east and west. As noted therein, emergency access would be provided subject to review and approval of Project plans by LAPD and LAFD, as appropriate. No further response is necessary.

Commenter: Damian Kevitt

***Comment PM-3***

*Great. Hi! My name is Damien Kevitt with streets are for everyone. Dean, thank you for that last comment, that was a really valid point. I just want to say first, just I really do like this overall. This is a like, I'm overall very happy with this, and I just want to say, thank you for the work on this 3 points I wanted to bring up very briefly, which is one chain link fencing is something that traditionally is easily vandalized and cut through, as evidenced by some of the photos in the reports of chain leak fence that has already been cut through by individuals, and a 5 foot chain link fence protecting areas, especially sections A, I think A, B-1, J, K, to me seems like an invitation to be cut through, and then it'll, it will not likely be repaired very easily. So I'd like to see if there's if there's other ways to address that particular area of fencing or other ways that could be better, better done in those sections, especially, other sections of the LA River Bike Path shift and create bumps and problems in terms of the actual quality of the pavement. I don't know if that's been, if it's understood exactly why that's happening, if that is properly addressed in this or not, I'm just highlighting it as an issue. I do think there's a missed opportunity towards Section A and B1 where there is some foliage, it's being fenced off (foliage on the River side, more River-facing side of the bike path, where that could be used as a parklet area, not necessarily removing the trees, I'm just pointing out that that is a missed opportunity that we could use to have more park space). And there we go. Those are my, I think, 4 points there.*

*Response PM-3*

See **Master Response No. 1: Separation of Path/Trail User Types** for a discussion of fencing design, **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** for further discussion regarding fencing and trail maintenance and repair, and **Master Response No. 5; Project Design Refinements and Ancillary Facilities** for further discussion regarding the inclusion of parklets under the Project. As discussed in Master Response No. 5, the Project Site is highly constrained in terms of available space given its location and would not accommodate a parklet area, though a decision to provide such additional facilities would be at the discretion of RAP, and such amenities are not part of the Project as proposed.

Commenter: Jennifer de la Rosa

***Comment PM-4***

*Hi, thank you so much for having this meeting, and thank you to everybody who's putting together all of these plans. I don't have near as many details of all of those intelligent humans. But I'm a cyclist, and I ride on that path quite often, so I just wanted to say, thank you, and I'm happy to hear that there's such attention to #1 keeping the cyclists separated from horses and or anyone else. I think that's the safest, and then also the involvement of the Native American community is pretty dope. Thank you so much.*

*Response PM-4*

The comment expresses support for the Project, specifically for the proposed separation of path users. As stated in the Draft IS/MND and in **Master Response No. 1: Separation of Path-Trail User Types**, the Project has been designed to allow for safe operation of the proposed facilities

by accommodating the various intended user types through a completely separated ROW for equestrians to keep horses and their riders continuously separated from cyclists and pedestrians along the entirety of the proposed path/trail segment. The comment is noted and will be forwarded to decision-makers.

Commenter: Lois Westfall

***Comment PM-5***

*Okay. Now, can you hear me? I am muted. Turn up volume. Can you hear me? Oh, okay, I just wanted to second what they were, somebody mentioned about the vandalism for fencing chain link fencing, I also wanted to bring up mitigation of noise along the freeway for the horses. I didn't see anything addressed there. I don't know if that's in your plan or not. And I also wanted to know, is there a map of the Caltrans right of way to be acquired, or a parcel list? And also, as far as the signage. You said there's going to be signage at the end for people to turn around, I want to know how you intend to really stop the bicycles from crossing the equestrian bridge where bicycles are prohibited. So those are my thoughts, my comments. Okay, thank you.*

*Response PM-5*

The comment raises concerns about vandalism and fencing. See **Master Response No. 1: Separation of Path/Trail User Types** for a discussion of fencing design and signage, and **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** for further discussion regarding fencing and trail maintenance and repair. The existing trail noted by commenters as being regularly traveled by equestrians does not currently provide any noise attenuation for the horses, and as noted in the Draft IS/MND, operation of the Project would result in less than a 3 dBA increase over ambient conditions. As such, operational noise impacts would be less than significant. No noise mitigation measures would be required for proposed operation. A new figure, **Figure 10**, *Project Site Jurisdiction*, has been prepared and is included below in **Clarifications and Modifications**, of this Final IS/MND, which depicts the Project Site jurisdiction limits between the City of Los Angeles (specifically RAP) and Caltrans, as well as the Project disturbance limits illustrating the amount of Caltrans property being utilized for the Project. As noted previously, approximately 3 percent of the Project Site is under Caltrans jurisdiction, while approximately 97 percent of the Project Site is owned by the City of Los Angeles/RAP. With regard to the western terminus turnaround, the Project would not require or contribute to the use of the Mariposa Bridge by cyclists, as all bicycle and pedestrian users along the Project's proposed bicycle path would be required to turn back and head east toward Riverside Drive, and would not have the ability to continue west past the turnaround barrier to Mariposa Bridge and other facilities that currently, and would continue to, prohibit use by cyclists. No further response is warranted.

Commenter: Hilary Norton

***Comment PM-6***

*Great. I just got the unmute. My name is Hilary Norton, and I work with Fastlink DTLA, and I'm also one of the co-founders of the Festival Trail. I want to second everything that Damien Kevitt has said, and also add a few things that we are very interested in the connection, and the long*

*term recommendations for the LA Riverway to extend past this projects western terminus across the 134, to meet with the pathway portion constructed as part of the head works project, but we feel like this is already doing a great service to prevent cyclists from accessing the Mariposa equestrian bridge. We are concerned about the possibility of, um, really people getting injured with the chain link fence, and would hope to see something more supported. And we'd like you to look into how people with disabilities, either in the parklets or around this space, get to enjoy this space as well as cyclists and equestrians. We also want to make sure that as we are designing all this and looking at how we provide shade, that we're in working with Shade LA, because they're looking at creating some more overarching shade possibilities and structures as part of preparations for the World Cup and the Olympics and Paralympics, and so consistency, and maybe some unique opportunities to innovate with shade and parklets and mobility hubs, would be really appropriate here. We're very appreciative that you have worked this hard to incorporate equestrians and cyclists, and we just want to see this expanded into all the work that we're doing to try to finish the LA River Bike path in time for the Olympics and Paralympics in 2028. Thank you very much.*

*Response PM-6*

The scope of work for the Project, as noted previously, does not include parklets, but shade will be provided throughout the alignment in the form of existing and replanted mitigation trees. Both the bike path and equestrian trail components of the Project are designed to be ADA-compliant, meaning that they both are under 5 percent longitudinal (lengthwise) slope and 2 percent cross (widthwise) slope. In addition, the Riverside Drive has a ramp for access which is also ADA-compliant. This comment does not raise a substantive issue regarding the Project or the issues raised in the Draft IS/MND. As such, no further response is warranted.

Commenter: Karen Kennedy

***Comment PM-7***

*Hi, I'm Karen Kennedy, and I wanted to first of all, thank you for the presentation and express my enthusiastic support for this project. I'm really happy to see it continuing, you know, moving forward. I just wanted to add on to the concern about chain link fence and what the end of the bike portion would be like. I know in the – I'm a cyclist – and in that area I've explored it, and there's at least when I was there an opening in the fence to get to Forest Lawn. And that's a very natural place to want to go. I know it's also a very dangerous area traffic wise, and I hope that that will be addressed, not just waiting for a redesign, but maybe finding ways to slow down traffic in that area anyway. Thank you.*

*Response PM-7*

The comment expresses support for the Project and raises concerns about fencing and traffic. See **Master Response No. 1: Separation of Path/Trail User Types** for a discussion of fencing design and concerns about the safety hazards to all user types. Section 4.17, *Transportation*, of the Draft IS/MND concludes that the Project would result in less than significant transportation impacts. As also stated in the Draft IS/MND, the Project is the extension of a bicycle, pedestrian, and equestrian path that would not interface with the vehicular street network. While temporary construction activities would intermittently result in construction-related worker vehicle and

construction equipment and vehicular movements on public streets in the immediate Project area, these activities would not notably affect vehicular circulation and access along public street rights-of-way. During Project operations, all Project-related activity would be limited to pedestrian, bicycle, and equestrian movements along the proposed respective bike path and equestrian trail segments, which would also involve turning bike path users back to the east away from Forest Lawn Drive and the equestrian- and pedestrian-only trails located to the west of the Project Site. No further response is warranted.

Commenter: Nicholas Connon

***Comment PM-8***

*Hi, there! Can you hear me? Okay. So so thank you for this, you know the presentation, I've been following this project development and been at some of the meetings on it for a while. I think it's and one of the things I love about the LA River path is the beautiful birds, the herons, the egrets, the geese that exist there, and I'm wondering if there has been any analysis of the impact that could happen with the birds, and I would hope that during the construction there would be some sensitivity to making sure that the bird life, that's actually quite stunning on the River, is not disrupted, so I wanted to note that I know that someone previously had talked about bumps along the LA River. I have experienced that, I think, in part, that is, either roots or something that's under the path, and I'm assuming that that's something that's going to be considered as this path is extended. Other thing I wanted to mention is that on the path, particularly when it rains, there's often a lack of drainage in some parts of the path. So, considering drainage for this expanded section would be great. I echo the chain link fence and people cutting that because I've seen that the chain link fence along the River cut for people to get access. So I think the comments on that were well taken, and then, finally, the access point about having some place where people who are less mobile than others might be able to park, and through a short distance gain access to this area would be a very nice feature. Thank you very much.*

*Response PM-8*

As discussed in Section 4.4, *Biological Resources*, of the Draft IS/MND, a biological resources assessment was conducted within the Project Site and surrounding area including the River channel, which were included as part of the Biological Study Area (BSA) evaluated in the analysis of impacts, the results of which were included in Appendix C-1, *Biological Technical Letter Report*, of the Draft IS/MND. The analysis discussed impacts to sensitive species and habitats, which were determined to be less than significant. Also see **Master Response No. 1: Separation of Path/Trail User Types** for a discussion of fencing design and damage to existing facilities and **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** for further discussion regarding fencing and trail maintenance and repair. As relates to surface drainage, both the bike path and equestrian trail components of the Project are designed to allow water to sheet flow across the path/trail and prevent ponding. Where the equestrian trail is elevated relative to the bike path (i.e., on the western end of the alignment), the surface water would flow toward the wall and drain through weep holes, thereby preventing ponding on the tread surface of the equestrian trail. In other portions of the Project, the water would surface flow toward infiltration basins. Both trails are designed with a running slope between 2 and 5 percent to prevent standing water. The remarks regarding additional access

points for users with mobility challenges are noted, but this comment does not raise a substantive issue regarding the analysis presented in the Draft IS/MND. No further response is warranted.

Commenter: Emily Gabel

***Comment PM-9***

*Okay. Can you hear me? Thank you so much for the presentation, it's quite interesting. You know, it, the MND has a lot of detail specific measurements in the proposed project. So where can I get a copy of a full set of those project detail plans before the deadline to submit comments. That's what I'm asking for is a copy of the full set of detail plans. Thank you.*

*Response PM-9*

The comment is requesting a copy of a full set of Project plans. The full set of the latest version of the Project's plans were provided to the commenter on March 28, 2025, which was still during the public comment period (though as noted above the City did this as a courtesy as it was not required). In addition, the full set of the latest Project design plans has also been included in a revised Figure 6, as shown in **Clarifications and Modifications** of this Final IS/MND.

Commenter: Nori (no last name provided)

***Comment PM-10***

*Good evening. Yes, no last name just Nori. I have a question, and I have some comments. My question is, the CEQA document mentions that some of the design features aren't or may not be feasible. Is there a list of these infeasible features? And can I get that? And I appreciate that you just told Emily we're not answering questions tonight, and so I and you have my email address and so I'm hopeful that you will either that you'll mail the answer to me before the time is due to submit written comments. And my other, my comments are this: I'm also concerned about the likelihood of the bicyclists turning around when there are signs telling them to turn around. It's very close to the Mariposa Bridge, the Mariposa equestrian bridge, where there are no bikes allowed. You can't ride them, you can't carry them, you can't hand walk them. And tunnel 7 – if there were to be a bike in the tunnel with a horse or a bike on the bridge that's only 7 feet wide, with a horse that got spooked, someone will be seriously injured. And so trying to figure out how to do a harder stop on the bike path, part of it would be appreciated. I'm also going to very quickly address the ADD – I think that would be great. I don't know how you're going to do it. And then I have another comment. The pedestrians should be on the same side as the horses, because they travel at the same speed as the horses, not the same speed as the bikes. Thank you very much for taking my comments. I appreciate it.*

*Response PM-10*

See **Response B3-11** above regarding feasibility of design features discussed at public meetings for the Project. Also see **Response B3-7** above regarding concerns about cyclists continuing beyond the Project's bike path limits and interacting with equestrians at Mariposa Bridge, Tunnel 7, or other locations not authorized for bicycles. With regard to ADA compliance (inferred from the meeting transcript), see **Response PM-6** above. Regarding the suggestions for combining pedestrian and equestrian user groups in one facility, while the decision-makers

will consider all public comments submitted regarding the Project, this comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Sabrina Silver

***Comment PM-11***

*Okay, great. I thank you for the presentation, and I appreciate that there have been efforts to mitigate some of the concerns, especially the safety concerns regarding equestrian riders and horses in such close proximity to the bicyclists. I do not feel that the measures that are proposed are sufficient to mitigate the circumstances. Given a horse's – just the nature of the animal and that they're a prey animal – and that if there is a perception that something is speeding up on them quickly, that that would be a predator. We had, we kind of asked for, like a 5-foot buffer between the trails and curving the bike path so to slow down the riders, and a wall. So a chain link fence was the suggestion, but that does not actually address the safety issues that the horse and rider might experience. Additionally, currently, there is signage and the bike path ends before the Mariposa basin, you know, just west of the bridge; however, often there are cyclists in this area, and a number of people have said, "Oh, I cycle in this area." Cycling in this area is currently not permitted. It is supposed to be, and historically has been, an equestrian access point, so that riders on the north side of the river can access the interior of Griffith Park. It is actually the only access point, that bridge and tunnel 6 and 7. And what's being proposed introduces an entirely different user set that will, maybe not at this moment, but that is planned to cross at the grade, level the horse path in multiple places. And that is dangerous. I thank you so much.*

*Response PM-11*

See **Master Response No. 1: Separation of Path/Trail User Types** and **Master Response No. 5: Project Design Refinements and Ancillary Facilities** for a discussion regarding the infeasibility of providing a setback buffer within the Project ROW. Also see **Response B3-7** above regarding concerns about cyclists continuing beyond the Project's bike path limits and interacting with equestrians at Mariposa Bridge, Tunnel 7, or other locations not authorized for bicycles. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Eli Lipman (Move LA)

***Comment PM-12***

*Ah, yes, Hi! This is Eli Lipman, I'm the executive director for Move LA and we are just calling in to support this project. We think it's an exciting project. We think it's a necessary project. And so we are grateful for the environmental documents being finished. And we're looking forward to this project moving forward as quickly as possible. We think that is the priority, because people have been asking for this connection in this particular section for too many years, and so the more that we can do to accelerate this project will ensure that we have more safer routes both for pedestrians, cyclists, but also for questions. And so we appreciate all the work that's been done. We, I'm also the co-director for the Festival Trail, and our goal is to create a seamless*

*opportunity for people to walk, bike, roll from the Sepulveda basin all the way to downtown and to LAX, and so, having this section completed, is critical to that. One thing that we think would be important is in Section A, leaving or not having a fence facility along there because there's such open space in the north of the path that you could create a nice parklet for people to stop off on their on their travels through this section of the path. I think we need to think of this more as regional infrastructure that folks are going to use to get to and from the places that they need to go, but also for recreation, obviously. And so, using this as a safe space for families to gather and use that area, I think, is very important. It's also a great space for people with disabilities, and as we're thinking about all the mega-events that are going to happen in the coming years, having these places and spaces for people to not only travel safely, but to celebrate with their community is gonna be important. So we encourage you not to include a fence along Section A so that there's the potential to utilize that space for community events and activations that'll also keep the path as we operate.*

*Response PM-12*

See **Master Response No. 5: Project Design Refinements and Ancillary Facilities** regarding ADA-compliant access, potential for parklets, and shade areas along the proposed Project ROW. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Pilar Reynaldo

***Comment PM-13***

*Hi! My name is Pilar Reynaldo, and I'm just wanting for everyone to think about the trees that will be replanted when they go to replant them because of our recent fires. A lot of trees have been identified to spread embers and have large oil content which can turn a very calm wind into a huge raging fire quickly, so please consider not planting the eucalyptus, the palms, and other oily trees. Thank you.*

*Response PM-13*

The comment is concerned about replanting activities associated with the Project. See **Master Response No. 4: Tree Replacement and Monitoring** for a detailed discussion regarding tree removal and replanting associated with the Project. As discussed in the Park Tree Inventory Report (Appendix C-3 of the Draft IS/MND), when a large number of trees are proposed for removal, the notification protocol in the RAP Policy must be followed. Tree replacement is guided by the RAP Policy and by the objectives and functions as defined by the Department. RAP trees are planted according to the RAP Reforestation Program. In situations where crowding or other physical constraints make it impossible to plant the same tree in the same place where it was removed, an alternate location is found. In addition, undesirable tree species are not replaced. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Darcy (no last name provided)

Comment PM-14

*Hello, can you hear me, Hello? Okay, great. Thank you. Thank you for the presentation. I have a few quick questions for you, one, and I know you're not answering tonight, but these are just questions being put out there. We'd like to know how this is being funded, what percent is state, local and federal. Then I'd like to know what studies have been done for the habitat impact as someone mentioned the birds. But there's so much more habitat that needs to be considered. One of the big ones that I actually have just found out about in the last year is our bat population, and how the lights that you're planning to put on that bike path will cause a large impact to our bats. So I think that's something that needs to be really studied. Plus that bridge, Mariposa Bridge, is a wildlife crossing, and so, with the increased activity it can affect that as well. And then, of course, I was going to ask about the keeping the bikes to stop where they're stopping, but everybody has brought up that, so I think, then are we going to remove the bike path off of forest lawn and give them back an extra lane, since we're now taking more bike path, or are that that can just be left so that there's lots of bike paths? Thank you.*

*Response PM-14*

The commenter requests details regarding the funding sources for the Project. While it is acknowledged that the Project would involve various funding sources, the specific amounts from each funding source are not germane to the analysis presented in the Draft IS/MND. As relates to habitat, as discussed in Section 4.4, *Biological Resources*, of the Draft IS/MND, a biological resources assessment was conducted within the Project Site and surrounding area including the River channel, which were included as part of the Biological Study Area (BSA) evaluated in the analysis of impacts, the results of which were included in Appendix C-1, *Biological Technical Letter Report*, of the Draft IS/MND. The analysis discussed impacts to sensitive species and habitats, including bats, which were determined to be less than significant. No special-status bat species have potential to occur within the project area, and lighting associated with the bike path would not significantly alter the lit environment adjacent to the 134 Freeway. Mariposa Bridge is over 750 feet to the west of the western terminus of the Project Site, and the Project would not provide cyclist access westward from that location. In fact, the Project would physically restrict access to cyclists with the new turnaround feature to be constructed and maintained, where currently unauthorized bicycle access occurs due to damage to existing fences and barriers. The Project would not involve any changes to Forest Lawn Drive. No further response is necessary.

Commenter: Kate Adams

***Comment PM-15***

*Hi! Can you hear me? Thank you again. Sorry I never saw the unmute pop up. My name is Kate Adams. I'm an equestrian in the neighborhood. I've attended your open houses, and I appreciate the presentation, you know, that you gave us tonight, and the dedication to trying to find mitigation to our concerns. One of the concerns that I brought up at some of the open houses was talking about what type of fence you were going to be using at the dead end of this path. I also want to point out that you know a lot of people are calling this a connection, and, and how this is opening up to other trails and everything like that, but the reality is this is a dead end. And so I think we need to put emphasis on that dead end, and it is a dead end into an equestrian path. And I asked what type of fence you were using in the original design process, and it was just they described it to me as like what a fire road has in front, which is just 2 bars, kind of like in a triangle, so it could be opened, and as we know, that's easily you can lift your bike over and*

*get onto the other side, and so I've encountered cyclists aggressively approaching me on my horse, even to the point where I've had to call the cops when they wanted to cut me off on the trail. And this is a big concern, because remember that we are about 15 feet fall into the LA River, and so I think this is just opening up a can of worms at that ending, and I would love to hear what the mitigated findings were to what you're gonna create at that dead end. Because right now I don't see that in the plans and I don't think it should be accessible or being able to hop over or anything like that. And if it's chain link, we know everybody cuts those. So I would just love for you guys to really think that through and to what this path actually opens up to, because it once it's done, it's, you know, it's a living, breathing path. Thank you.*

*Response PM-15*

See **Response B3-7** above regarding concerns about cyclists continuing beyond the Project's bike path limits and interacting with equestrians at Mariposa Bridge, Tunnel 7, or other locations not authorized for bicycles. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Tyler Barkwill

***Comment PM-16***

*Good evening. Can you hear me? My name is Tyler Barkwell. I'm a frequent cyclist along the LA River, and I know that particular gate that already exists there off of Riverside Drive, so loving that this project is moving forward and appreciate all the effort that's been put into this. I saw a couple of points on this design that I had a concern with: one of those was the elevated portion of the, divider between the bike lanes and the equestrian side – concern I have there, what I see on other parts of the LA River path – is is for graffiti; so don't know what that design is, if that's just a concrete retaining wall or something, but that's a frequent target in other areas of the bike path. So hoping that can be lessened as a target for graffiti. I couldn't tell from the drawings, and I didn't see a detail about the height of the lights. I heard the concern with bats, and, and you know, other wildlife. I love that you guys are adding the lights, it looked to be solar. Hopefully they're hardened so that they can't be abused, or having the wires stolen, or whatever, so appreciate that but just that level of concern. And then, as was just mentioned, the end terminus, hopefully some signage will be added at the Riverside entrance to say that this path is ending in one mile, so people don't want to try and extend and go further beyond the end of that location. Thanks for your time.*

*Response PM-16*

See **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** for further discussion of ongoing maintenance of the proposed facilities, which includes addressing graffiti. Proposed lighting would be 10 feet in height, powered by modular solar lights, and directed downward to direct light only onto the proposed bike path and equestrian trail; issues related to security and theft of these features are not germane to the analysis presented in the Draft IS/MND. See **Response PM-14** above regarding impacts to bats and other wildlife. See **Response B3-7** above regarding concerns about cyclists continuing beyond the Project's bike path limits and interacting with equestrians at Mariposa Bridge, Tunnel 7, or other locations not

authorized for bicycles. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Samantha Kirkeby

***Comment PM-17***

*Unmute. Hi! Can you hear me? Hi, thank you. I came late to the meeting, so I hope I don't repeat stuff that's already been said. I'm a frequent rider in this area, horseback rider, but I also use these paths for biking with my boyfriend. We frequently go between Burbank and Atwater. I think that this particular addition to the bike path is unnecessary, and that's because I feel that the bike paths between the bike paths along Zoo drive between Victory and Forest Lawn are really big and spacious and pretty and nice, and I went over and measured them recently, and I don't, I can't bring up my photos because I'm I was kind of rushed getting here, but I think they were like really like 12 feet wide on both sides of the road, and and almost every day I pass, I pass, I, I go down Victory and take a left on Zoo Drive there to get to my barn, and almost every morning. There's so few cars parked there, and it's just a big, wide, nice, open space, I would imagine if I was biking it would be very nice for me frankly, much, much nicer than riding along the River, which is often, you know, as you know, sometimes has homeless people, or trash, or graffiti, or other debris along the road. So I think that the paths that are currently there are absolutely sufficient to make a nice, a nice go around for the bikes so that everybody's happy. The bikes can go from Victory to Forest Lawn, and the horse people can be happy. And then the bikes can actually have a path that is well maintained and well lit already, and doesn't cost anybody anything, and they actually are not going to a dead end, but rather to a path that continues on towards Warner Brothers and Toluca Lake. Thank you so very much for your time.*

*Response PM-17*

See **Master Response No. 7: Alternative Routes for Cyclists and Equestrians** regarding potential alternative bicycle or equestrian routes suggested by commenters. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Jean Schamberger

***Comment PM-18***

*Thank you. Good evening, and thank you for hosting this meeting and presenting your proposals for the bike, mixed use bike and equestrian lanes. I am a Burbank rancho and Glendale rancho equestrian, and I want to just support what a lot of my community colleagues have already said regarding equestrian safety. The point I haven't quite heard mentioned is the ripple effect of a broader circle of impact of bicycles on the side of the River that is Griffith Park. A lot of users of horses in our community use a trail that goes around the Los Angeles equestrian center called the Perimeter trail, and the backside of the perimeter trail runs exactly parallel to those paths on the opposite side of the River. Horses, as a lot of my colleagues have said, are very alert, very tuned in to activities, and so they will, they will notice immediately, and do any kinds of activity on the other side of the River, so it creates a safety hazard in what is really sort of the, the bunny slope, most beginner-friendly rental horse-friendly, green horse-friendly trail that we have in our*

*community. So I want to just emphasize the need to really consider the equestrian safety aspects of any implementation of the plan. Thank you very much.*

*Response PM-18*

Refer to **Responses B3-6 and B3-7** above regarding perceived introduction of bicycles into an equestrian area and related concerns for safety and cumulative impacts. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Matt Paulsen

***Comment PM-19***

*Hi, thank you. I just want to say this project's fantastic, and I'm very looking forward to seeing it be, being completed, and just had a couple of questions. I was wondering if there was any consideration to the equestrian waste that comes with having horses come on the trail, and if there was any other consideration about limiting the equestrian use of the trail as well? Thank you.*

*Response PM-19*

The comment is inquiring about consideration of equestrian waste and consideration about limiting equestrian use of the trail. As discussed in Draft IS/MND Section 2.8, LADOT has committed to maintaining the proposed bike path and equestrian trail and associated facilities to ensure they remain clean, safe, and functional for the public to utilize. These activities would include periodic clearing of debris and animal waste. As suggested in public comments provided by RAP, LADOT would execute a MOU with BOE to articulate the roles, responsibilities, activities, and procedures to be employed by LADOT or its designee for the ongoing maintenance and operation of the Project.. See **Master Response No. 3: Operations and Maintenance for the Proposed Facilities** for further discussion. Additionally, as detailed in **Master Response No. 1: Separation of Path Train User Types**, the Project has been designed to allow for safe operation of the proposed facilities by accommodating the various intended user types.

Commenter: Jennifer Gill

***Comment PM-20***

*Yes, hello. My name is Jennifer Gill. And I've been looking at this. Can you all hear me? Okay, great. I've been dealing with this issue for a while, and my question, I know you're not answering questions, my question – I have 2 questions – one is, first of all, it's not really a dead end. If you go under the 134 bridge and I know that's not part of Stage 4; so do you know when Stage 5 will come into effect? Because I do know there's a new trail idea that looks like it's going to include the, the, going under the 134 bridge. Do you know about that trail coming from LAX? It'll be part of the, the Olympics trail. Anyway, those are my questions.*

*Response PM-20*

The commenter inquires about future phases of the LA River Bikeway and related facilities, but this is beyond the scope of the Project at hand. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Dan Bednarski

***Comment PM-21***

*Hello! I just want to say that I appreciate that the City is making an effort to close the gaps in the River path, and I also appreciate the extra info given at the beginning of the call by the representative of Councilwoman's office to give context why the path ends where it does on the west for this particular project. I definitely appreciate the extra context, because I haven't seen it before. And I agree with other commenters about posting signs near Riverside Drive, so that way people who are going on this path, this part of the path, understand that it dead ends before it actually gets them anywhere. Because I do see people continuing on the path, and then when they get to the end, they'll probably do what people do today, which is, go around the gates at the end through a hole in a fence. So thank you very much.*

*Response PM-21*

Refer to **Response B3-4** above regarding signage instructing cyclists to turn back at the western terminus. No further response is required.

Commenter: Jill H. (no last name provided)

***Comment PM-22***

*Hi! Can you hear me? Okay? Yeah, it's, the concern is with the horses that I have a problem with is, first of all, it's, it's noted in everything, say that this is a maintenance, um, maintenance area, maintenance path. It's actually a dedicated horse trail, and I don't know why it keeps saying maintenance road. There are many concerns. Unfortunately, there has to be a fence there. I notice all the bike riders are mentioning, "Well, there shouldn't be a fence." Well, right now the bike riders are coming onto the equestrian trails where they're not even supposed to be there. They're crossing the bridge or causing so much safety issues that that there has to be a fence, and one gentleman just mentioned that maybe we can limit the equestrian use. Well, it's, it's originally a horse trail, and this is a one-mile dead End. What is going to stop these people from the bike riders, from being abusive to the trails that they are now, what's going to make it worse later on. There are so many safety concerns, and people just don't understand that. And again, this is a dedicated horse trail. This is not a maintenance road, and it's very concerning that that nobody seems to understand that. So again, it's, it's one mile to a stop, and that's it. You're spending 9 million dollars and phase 5 was probably going to not take effect for another 10 years.*

*Response PM-22*

Refer to **Response B3-7** above regarding existing authorized users of the Project Site and potential safety hazards from interactions between user groups. No further response is required.

Commenter: Alyce Heath Schwartz

***Comment PM-23***

*Hello? Okay. Fine. One. The length of a horse is approximately 10 and a half to 11 feet. The width of a horse with a rider is approximately 2 and a half feet. 2 horses walking past each other, with room between each horse and the fence and the rider, you're looking at 2, 4, 6 feet between the fence, the horses and the rider, plus the 5 feet of the 2 horses passing each other. You're now looking at 11 feet of 2 horses safely passing each other on a 10-foot trail! If something spooks the horse, threatens the horse, and the horse goes to turn, the length of the horse is approximately 10 and a half to 11 feet. When one horse turns, you are now looking at 11 feet on a 10-foot trail. If 2 horses turn at the same time, you're looking at over 22 feet on a 10-foot trail. You are not taking into account the physicalness or the psyche of a horse with a fence that you cannot see through a horse can be easily spooked. That is how the horse that was killed on the Finger bridge at Atwater died because of the way it was designed, without taking into account the physicalness and the psyche of a horse.*

*Response PM-23*

Refer to **Response C1-8** above regarding safety hazard concerns associated with the proposed equestrian trail design. No further response is necessary.

Commenter: ES (no first or last name provided)

***Comment PM-24***

*Hey? Can you hear me? Hey, just wanted to call on a voice my support of this project, it's really great that we're extending the portion of the bike path, the multi-use path. And just looking at a map here, and wondering whether the main trail within Griffith Park is a viable equestrian trail alternative that might alleviate some of the concerns from the equestrian community about having horses and pedestrians and bicycles together in the same path along the River. Just because it seems to me like they both connect to the same destinations. But anyways, just voicing my support. I think it's a great project, thanks.*

*Response PM-24*

The comment expresses support for the Project and requests clarification about whether the Main Trail within Griffith Park is a viable equestrian trail alternative. See **Master Response No. 7: Alternative Routes for Cyclists and Equestrians** for a detailed discussion about alternative routes. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft IS/MND. No further comment is warranted.

Commenter: Philip Armstrong

***Comment PM-25***

*Oh, hi, Philip Armstrong, thanks again for the presentation, I appreciate everything that has been said. Can you hear me? Okay. Okay, I, you know, the issue has been raised about whether you know this is a service road, it's a maintenance road, it's an equestrian trail, and I would hope that that question can be asked and answered in this, in the reports that you're going to be sending out because it seems to be generating a lot of tension. So, just hope that was something that you could resolve. I saw in the report that the area is actually owned by the Flood Control District, and so they should have some idea of what status of this of this particular piece of right-of-way is so. Thank you.*

*Response PM-25*

The comment requests clarification about the use of the project site. **Master Response No. 2: Project Site Existing Ownership and Authorized Users** provides clarification. The Draft IS/MND characterized the existing paved road within the Project Site as a "service road" and "maintenance road", but also notes that the existing road is currently accessed and used by various public user groups (whether authorized or unauthorized on this particular segment) including equestrians, pedestrians, and cyclists. The California Department of Transportation (Caltrans) owns the adjacent 134 Freeway ROW immediately to the south of the Project alignment as well as a small portion of the Project Site (which would be utilized by the Project through issuance of an Encroachment Permit by Caltrans), while RAP is the fee owner of the City-owned portion of the Project Site immediately adjacent to the River channel.

## CLARIFICATIONS AND MODIFICATIONS

The following clarifications and modifications are intended to update the Draft IS/MND to include text revisions and other modifications to the content of the document as a result of public comments received. The changes are generally limited to text clarifications regarding the Project Site jurisdiction/ownership and existing authorized users and activities, as well as limited refinements to best management practice and mitigation measure text in response to public comments. These changes constitute the Final IS/MND, to be presented to the City of Los Angeles for adoption. None of the changes to the IS/MND would require recirculation of the document. Revisions made to the IS/MND have not resulted in new significant impacts or mitigation measures, nor has the severity of an impact increased. None of the CEQA criteria for recirculation have been met, and thus recirculation of the IS/MND is not warranted.

The changes to the IS/MND are listed by page number; the page number refer to the draft IS/MND dated March 2025. Text which has been removed is shown in ~~strikethrough text~~, while text that has been added is shown in double-underlined text.

| Page | Clarification/Modification |
|---|---|
| Global | All instances of "service road" are revised to "equestrian trail/service road" |
| Global | All instances of "maintenance road" are revised to "equestrian trail/maintenance road" |
| Global | All instances of "8.5-foot-tall chain link fence" are revised to "8~~.5~~-foot-tall chain link fence" |
| IS Cover | **PROJECT LOCATION:** The project site is located in the Hollywood Community Plan area along the Los Angeles (LA) River, specifically an approximately one-mile alignment along an existing paved equestrian trail/service road owned by the ~~Los Angeles County Flood Control District~~ City of Los Angeles Department of Recreation and Parks. |
| IS Cover | **DESCRIPTION:** The proposed Project would upgrade an existing equestrian trail/maintenance road ~~in~~to include a new section of the Los Angeles River Bikeway. The Project would construct a~~n~~ new asphalt concrete pavement Class I bicycle and pedestrian path along the south bank ~~access road~~ of the Los Angeles River~~, and a partially separated~~ adjacent to an existing equestrian trail. The Project would extend the Los Angeles River Bikeway by approximately one mile from its current western terminus near Riverside Drive and would ~~provide new~~ improve the existing on-site equestrian trail facilities ~~near~~ to maintain equestrian access between the Los Angeles Equestrian Center and Griffith Park. The proposed Project would ~~connect~~ facilitate future connections to the larger active transportation network throughout the region and provide ~~new~~ improved pedestrian, bicycle, and equestrian access and connectivity to transit, residential homes, schools, jobs, parks, and other community-serving amenities for the surrounding communities. The proposed Project would add to the region's livability by expanding active transportation options |

and providing new facilities to promote access to public transit, homes, schools, work, parks, and other community-serving amenities.

2 ~~Section 7.0, Determination – Recommended Environmental Documentation: provides the recommended environmental documentation for the proposed Project; and,~~

Section ~~8~~7.0, References: provides a list of reference materials used during the preparation of this report.

3 The Project area is an approximately one-mile alignment along an existing paved equestrian trail/service road with an existing, variable 8- to 10-foot paved right-of-way (ROW) width. The existing equestrian trail/service road is owned by the City of Los Angeles Department of Recreation and Parks (RAP) and is under the jurisdiction of the U.S. Army Corps of Engineers (USACE), though the Los Angeles County Flood Control District ~~and under the jurisdiction of the U.S. Army Corps of Engineers (USACE) and~~ has an easement across the Project Site to conduct maintenance and service activities. A small portion of the Project Site (approximately 3 percent) is owned by the California Department of Transportation (Caltrans). The Project Site is currently legally accessible only to pedestrians~~, cyclists,~~ and equestrian users via an existing pedestrian/equestrian bridge to the west of the alignment and a tunnel beneath the 134 Freeway that connects to Griffith Park/Zoo Drive to the south (Tunnel 6).

8 The Project would upgrade an existing equestrian trail/maintenance road, which is currently under the jurisdiction of the USACE and owned by RAP, ~~into~~ by constructing a new section of the Los Angeles River Bikeway, adjacent to and incorporating the existing equestrian facility. The Project would construct an asphalt concrete (AC) pavement Class I bicycle and pedestrian path (Bike Path) along the south bank ~~access~~ equestrian trail/maintenance road of the River (see Figure 3). The path would contain two 4-foot-wide bike lanes with 2-foot-wide shoulders on each side, as well as a ~~partially~~ physically separated equestrian trail (Equestrian Trail) with an over 10-foot width ~~(with one isolated location having a width of 8 feet due to ROW constraints)~~ throughout the entire alignment. The Bike Path and Equestrian Trail would be separated by an 8~~.5~~-foot-tall chain link fence without any visual screening material for the entirety of the Equestrian Trail length, starting from the western terminus and continuing until the Equestrian Trail turns southward at its eastern terminus to connect to Tunnel 6 and the Griffith Park Main Trail on the south ~~site~~ side of the 134 Freeway.

19 **BMP-BIO-3**: Wildlife ~~Fencing~~ Signage. Interpretive signage will be installed ~~near all wildlife friendly fencing~~ to educate the public on LA River wildlife and habitat ~~sensitivity, and to encourage the public to not enter the restricted areas~~.

19 **BMP-BIO-4**: Where appropriate, as determined by a qualified biologist, Project fencing would be designed to provide some opportunities to allow native wildlife to ~~jump over or~~ crawl through to access the River. ~~Interpretive signage would be~~

~~posted on the fencing to educate the public on the sensitivity of wildlife (see **PDF-BIO-3**). Overall, such wildlife-friendly fencing would minimize impacts to habitat from human interference.~~

19 **BMP-WQ-4:** Maintenance activities for the proposed bike path and equestrian trail will involve a collaborative effort between various City agencies coordinated by LADOT as the lead agency for Project implementation. ~~LADOT will develop and enter into one or more use agreements with the U.S. Army Corps of Engineers, Los Angeles County Department of Public Works, and other agencies, as appropriate, to maintain all improvements built as part of the Project. Such use agreement(s) would be in place prior to the proposed bike path and equestrian trail being open to the public for use.~~ LADOT shall develop and enter into one or more use agreements with the Department of Recreation and Parks, Department of Public Works, U.S. Army Corps of Engineers, Los Angeles County Department of Public Works, and other agencies, as appropriate, to maintain all improvements built as part of the Project. Such use agreement(s) would be in place prior to the start of construction of the bike path and equestrian trail. The activities anticipated to be undertaken by LADOT, or through agreements with other agencies or third-party vendors, as part of long-term operation of the Project include:

21 Information in Table 2 is revised as follows:

| | | |
|---|---|---|
| Los Angeles Department of Recreation and Parks | Project Approval<br>Project Design Approval<br>Approval of Tree Removals<br>Approval of Right of Entry Permits for Staging Areas<br>Approval of Grant of Right/easement | Board approval required for Project approval, Project design, for tree removals and replacement ratios, ~~and~~ for post-construction monitoring of trees encroached during project construction, for Grant of Right/easement, and for right of entry permits for staging areas. |

32 [Figure 4f has been updated to correct a typo in the caption for Photograph 12 to change “eastbound” to “westbound”, which is provided below.]

35 [Figure 6 has been updated to include the full set of detailed Project plans, with the Project Site identified as “City of Los Angeles Department of Recreation and Parks”, which is provided below.]

45 [A new figure, **Figure 10**, *Project Site Jurisdiction*, has been added to the IS/MND following Figure 9, which is provided below.]

51 The path would contain two 4-foot-wide bike lanes with 2-foot-wide shoulders on each side and a partially separated equestrian trail with an over 10-foot width ~~(with one isolated location having a width of 8 feet due to ROW constraints~~.

52 Reach 1 is the upstream segment of the study area and is approximately 1.5 river miles in length. It connects the study area to the Pollywog Park area of Griffith Park, the USACE Headworks Ecosystem Restoration Study Site, and the city of Burbank

at Disney Studios. In this reach the River's channel has a rectangular concrete-lined configuration with subdrains and no low flow channel. Reach 1 would implement the habitat corridor with riparian planting on the overbanks. Areas of restoration include Pollywog Park, the bank between Headworks and the River with a connection under SR-134 to Headworks, the open area directly downstream of Headworks with a connection under Forest Lawn Drive on the same side of the 134 Freeway with Headworks, and on the left bank of Burbank Western Channel (tributary from the north/west).

69 Of the 291 trees, 131 are located within ~~the Project Site~~ RAP's property and 160 trees are located within the Caltrans ROW. Of the 131 trees located within ~~the Project Site~~ RAP's property, 46 trees protected by the City Ordinance, 18 special habitat value trees, 41 common park trees, and the remaining 26 are undesirable non-native invasive species. Of the 160 trees located within the Caltrans ROW, 31 trees are protected by the City Ordinance and 129 are unprotected trees.

70 Similarly, a total of 25 trees located within ~~the Project Site~~ RAP's property would require removal in order to accommodate the proposed construction activities. In the Caltrans ROW, a total of 15 trees would be encroached and 52 would require removal.

71 **Mitigation Measure MM-BIO-1:** The City shall provide replacement trees on-site and within other suitable locations in accordance with RAP Policy, and shall establish a tree monitoring program to be managed by a qualified arborist in coordination with and to the satisfaction of RAP on behalf of LADOT. The quantity of replacement trees shall be commensurate with RAP Policy and shall mitigate a cumulative total of 299.4 inches of removed Ordinance trees. It is at LA RAP's discretion to determine replacement tree trunk sizes and species palette to be used as replacement plantings. The monitoring program shall cover all phases of construction including pre-construction, active construction, and post-construction, and shall comply with the Department of Urban Forestry's establishment period of up to three (3) years. During this period, LADOT shall monitor tree watering schedules depending on the season and the soil types, maintain an 18-inch circumference around the trunk base of each tree free of sod, pull vegetation by hand, and remove tree ties and tree stake after 1–3 years, as determined by a qualified arborist. Fertilizers or weed killers shall not be used near the newly planted trees. If any encroached trees fail during construction or post-construction they shall be mitigated at the applicable rate per RAP Policy.

98 The following discussion of hazards and hazardous materials impacts is based on the information, analysis, and conclusions presented in the Project Initial Site Assessment Report, which was prepared by ESA in September 2024, and is included in ~~Appendix H~~ Appendix G of this Draft IS/MND.

99 a) The path would contain two 4-foot-wide bike lanes with 2-foot-wide shoulders on each side and a partially separated equestrian trail with an over 10-foot

width ~~(with one isolated location having a width of 8 feet due to ROW constraints~~.

99 b) **Less-than-Significant Impact**. As discussed above, all hazardous materials used during construction of the proposed Project would be contained, stored, and used in accordance with all applicable local, state, and federal regulations. No long-term uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal.

In addition, Caltrans has noted that there is the potential to encounter soils with elevated concentrations of aerially deposited lead (ADL) due to the proximity to the 134 Freeway. Reportedly, an in-house Caltrans library search discovered that ADL was detected in shallow soils near (but not on) the bike path at concentrations up to 1,600 milligrams per kilogram. To address the potential to encounter ADL at concentrations above action levels, if excess soil is generated, it should be tested for soluble lead to properly determine which class of landfill to transport the soil.

Therefore, with compliance with existing regulations, impacts related to the upset and accidental release of hazardous materials into the environment would be less than significant.

104 a) **No Impact.** The Project ~~s~~Site is currently an existing paved equestrian trail/service road owned ~~and maintained~~ by RAP ~~the Los Angeles County Flood Control District and under the jurisdiction of the USACE~~ and is currently legally accessible only to pedestrians~~, cyclists,~~ and equestrian users. The Los Angeles County Flood Control District also has an access easement over the Project Site, while the River channel and bank are under the jurisdiction of the USACE.

105 The path would contain two 4-foot-wide bike lanes with 2-foot-wide shoulders on each side and a partially separated equestrian trail with an over 10-foot width ~~(with one isolated location having a width of 8 feet due to ROW constraints~~.

116 Temporary mobile noise barriers shall be installed along the northern Project boundary ensuring that the Los Angeles Equestrian Center, the Bette Davis Park, and the Mariposa Bridge equine users and residences further northwest of the bridge and the southern Project boundary ~~where construction activity is currently active that is~~ are protected from both sight and sound from construction. The barrier will be made of sound blanket, plywood, or other solid material capable of reducing on-site construction noise levels by at least 9 dBA when measured from the outside of the barrier and is at minimum 8 feet tall. In addition, all applicable construction equipment and vehicles shall be fitted with proper/improved mufflers which will provide a reduction in construction noise levels by 6 dBA and for the construction equipment to have vibration dampers or any other best available noise control technology. It will be impermissible for a construction vehicle to have a muffler that is

not in good condition or no muffler. Truck beds and staging areas will have rubber mats as a preventative measure to reduce loud instantaneous noises. Furthermore, given that construction would occur within 500 feet from a sensitive receptor within the City of Los Angeles as well as to those in other jurisdictions the revised construction activity timeline will be used:

119 b) **No Impact.** The Project ~~s~~Site is currently an existing paved equestrian trail/service road owned ~~and maintenance~~ by ~~the Los Angeles County Flood Control District and under the jurisdiction of the USACE~~ RAP and is currently legally accessible only to pedestrians~~, cyclists,~~ and equestrian users. The Los Angeles County Flood Control District also has an access easement over the Project Site, while the River channel and bank are under the jurisdiction of the USACE.

Appendix C-3 – Park Tree Inventory Report

21 The eleven ~~eight~~ Common Park Trees proposed for removal must follow the guidelines set forth in the Appendix J, Tree Removal Procedures.

21 The eleven common park trees proposed for removal have a total combined trunk replacement value of 124.5 inches or rounded up for individual trees removed has a replacement value of 129 inches. ~~An example tree replacement scenario would be to 100 2-inch caliper replacement trees to meet the total combined replacement value of 199.4 inches.~~

PHOTOGRAPH 11: View eastbound from the Project alignment near the western terminus.

PHOTOGRAPH 12: View westbound of the western terminus of the Project alignment.

D202100667.07

SOURCE: ESA, 2024

Los Angeles River Phase IV Bike Path Project

**Figure 4f**
Project Site Conditions

ESA

Intentionally Blank

END OF WORK STA 53+78.55

EX. STORM DRAIN OUTLET
EX. CHANNEL WALL AND CLF
EX. SERVICE ROAD
EX. HILLSIDE
END 5' CLF STA 53+78.00
LOS ANGELES RIVER CHANNEL
3.5' CHAIN LINK FENCE W/ BARB WIRE ON TOP OF 12" CONCRETE WALL
TOE OF SLOPE
TOP OF SLOPE
C18
C19
C17
12'
10.75'
BIKE PATH
EQUESTRIAN TRAIL
ELEC. CABINET
MONITORING WELL
ACCESS HATCH
GRADE CHANGE
EX. CHAIN LINK FENCE
END FENCE STA 51+00.00
RIGHT-OF-WAY LINE
CITY OF LA DEPARTMENT OF RECREATION AND PARKS
CALTRANS
5'H CHAIN LINK FENCE
8" MULTI TRUNK
OAK 20"
EDGE OF HIGHWAY

MATCH TO STA 48+25 ON SHEET C-2

MATCH TO STA 48+25 ON SHEET C-1

LOS ANGELES RIVER
EX. CHANNEL WALL AND FENCE
BIKE PATH
EQUESTRIAN TRAIL
C16
C15
C14
C13
CITY OF LA DEPARTMENT OF RECREATION AND PARKS
CALTRANS
EX. STORM DRAIN OUTLET
START WALL 2 STA 43+36.84
END 8" CURB STA 47+50.00
START 8" CURB AND CLF STA 45+02.04
EX. CHAIN LINK FENCE
RIGHT-OF-WAY LINE
EDGE OF HIGHWAY
8" MULTI TRUNK
MULTI TRUNK
OAK 14"
OAK 12"
ERWY SIGN

MATCH TO STA 42+25 ON SHEET C-3

## CONSTRUCTION SYMBOLS

- CONSTRUCT
- EXISTING
- REMOVE
- REMODEL EXIST.
- REMOVE & CONST.
- WORK BY OTHERS

14. ASPHALT CONCRETE PAVEMENT, t=4"
16. UNTREATED BASE MATERIAL, t=6"
100. 5FT TALL CHAIN LINK FENCE PER STD PLAN S-691
101. 8FT TALL MINI MESH CHAIN LINK FENCE
102. 3.5FT RETAINING WALL

- ASPHALT CONCRETE PAVEMENT
- BASE MATERIAL
- COMPACTED SUBGRADE SOILS
- CONCRETE
- EQUESTRIAN TRAIL TREAD SURFACE

N

0 40
Feet

SOURCE: City of Los Angeles, Department of Public Works, Bureau of Street Services, 2025

Los Angeles River Phase IV Bike Path Project

**Figure 6a**
Project Detail Plan

ESA

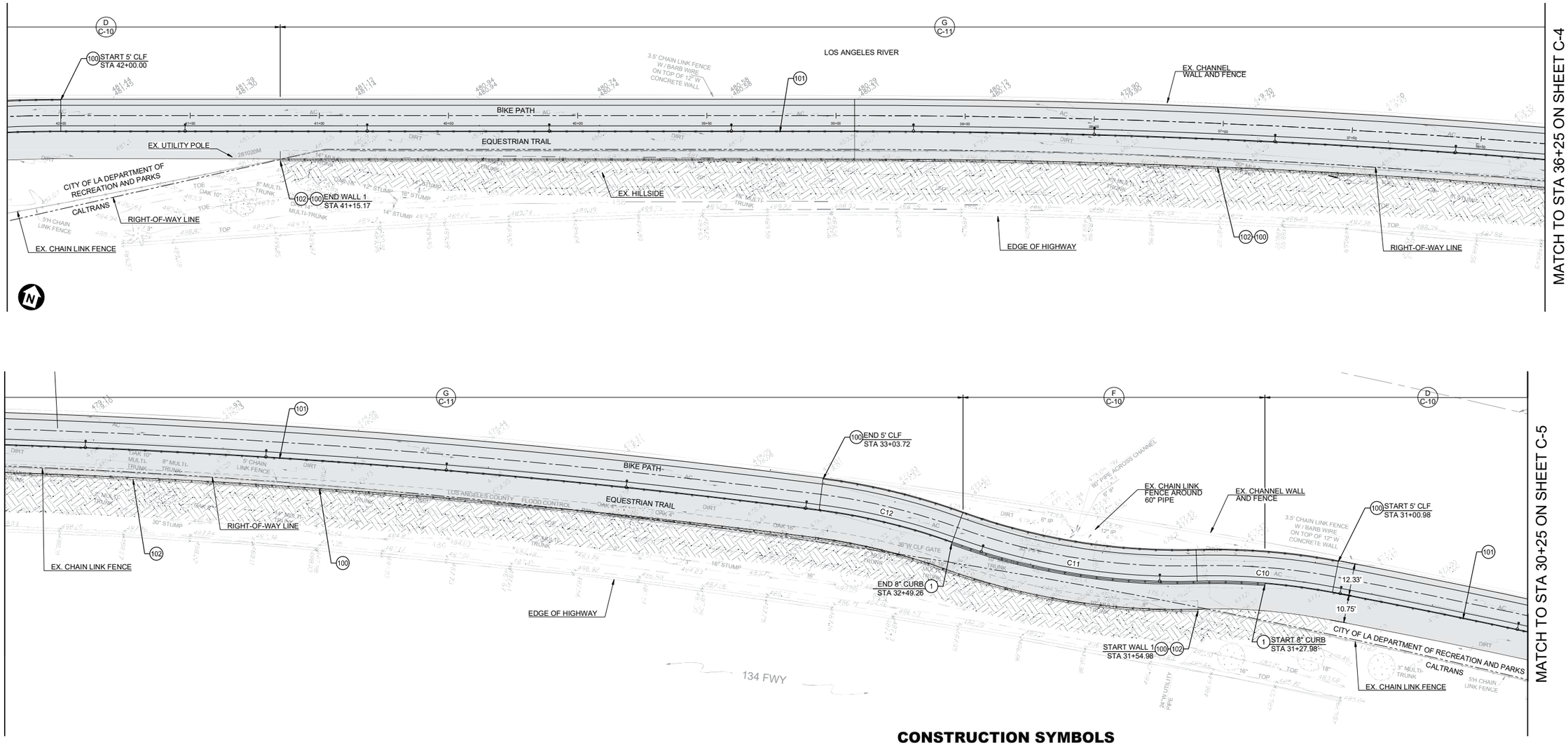
Z:\Shared\Projects\2021\D2021006\7_07 - LA River Phase IV Bike Path CEQA-NEPA\05 Graphics-GIS-Modeling-USE AZURE\ISMND\Final ISMND

MATCH TO STA 42+25 ON SHEET C-2

MATCH TO STA 36+25 ON SHEET C-4

MATCH TO STA 36+25 ON SHEET C-3

MATCH TO STA 30+25 ON SHEET C-5




## CONSTRUCTION SYMBOLS

- CONSTRUCT
- EXISTING
- REMOVE
- REMODEL EXIST.
- REMOVE & CONST.
- WORK BY OTHERS

14. ASPHALT CONCRETE PAVEMENT, t=4"
16. UNTREATED BASE MATERIAL, t=6"
100. 5FT TALL CHAIN LINK FENCE PER STD PLAN S-691
101. 8FT TALL MINI MESH CHAIN LINK FENCE
102. 3.5FT RETAINING WALL

- ASPHALT CONCRETE PAVEMENT
- CONCRETE
- BASE MATERIAL
- EQUESTRIAN TRAIL TREAD SURFACE
- COMPACTED SUBGRADE SOILS

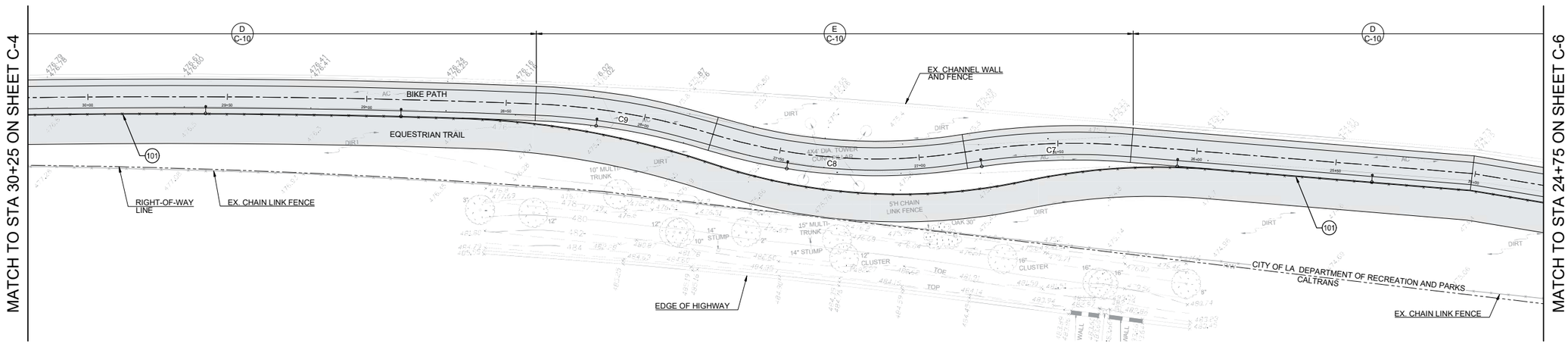
Z:\Shared\Projects\2021\D202100667.07 - LA River Phase IV Bike Path CEQA-NEPA\05 Graphics-GIS-Modeling-USE AZURE\MND\Final ISMND

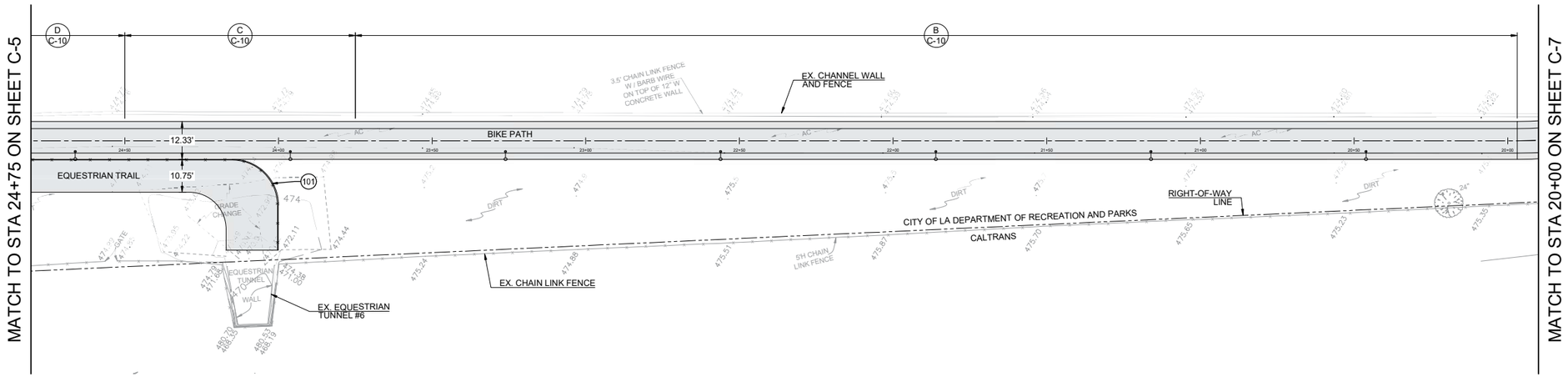
SOURCE: City of Los Angeles, Department of Public Works, Bureau of Street Services, 2025

Los Angeles River Phase IV Bike Path Project

**Figure 6b**
Project Detail Plan

ESA




## CONSTRUCTION SYMBOLS

- CONSTRUCT
- EXISTING
- REMOVE
- REMODEL EXIST.
- REMOVE & CONST.
- WORK BY OTHERS

14. ASPHALT CONCRETE PAVEMENT, t=4"
16. UNTREATED BASE MATERIAL, t=6"
100. 5FT TALL CHAIN LINK FENCE PER STD PLAN S-691
101. 8FT TALL MINI MESH CHAIN LINK FENCE
102. 3.5FT RETAINING WALL

- ASPHALT CONCRETE PAVEMENT
- CONCRETE
- BASE MATERIAL
- EQUESTRIAN TRAIL TREAD SURFACE
- COMPACTED SUBGRADE SOILS

N

0 40
Feet

SOURCE: City of Los Angeles, Department of Public Works, Bureau of Street Services, 2025

Los Angeles River Phase IV Bike Path Project

**Figure 6c**
Project Detail Plan

ESA

Z:\Shared\Projects\2021\D2021100667.07 - LA River Phase IV Bike Path CEQA-NEPA\05 Graphics-GIS-Modeling-USE AZURE\ISMND\Final ISMND

MATCH TO STA 20+00 ON SHEET C-6

MATCH TO STA 14+50 ON SHEET C-8

EX. TOWER FOUNDATIONS (TYP)

18" STORM DRAIN OUTLET

CHANNEL SIDE SLOPE

EDGE OF CHANNEL

BIKE PATH

12.33'

15'

RIGHT-OF-WAY LINE

EDGE OF HIGHWAY

EX. CHAIN LINK FENCE

CITY OF LA DEPARTMENT OF RECREATION AND PARKS
CALTRANS

MATCH TO STA 14+50 ON SHEET C-7

BEGINNING OF WORK STA 10+00.00

STA 10+00.00
NORTHING: 1879270.68
EASTING: 6472186.82
JOIN TO EX. BIKEWAY
START OF NEW BIKEWAY

12.05'

8"

DRIVEWAY 6'H CHAIN LINK GATE

## CONSTRUCTION SYMBOLS

- CONSTRUCT
- EXISTING
- REMOVE
- REMODEL EXIST.
- REMOVE & CONST.
- WORK BY OTHERS

14. ASPHALT CONCRETE PAVEMENT, t=4"
16. UNTREATED BASE MATERIAL, t=6"
100. 5FT TALL CHAIN LINK FENCE PER STD PLAN S-691
101. 8FT TALL MINI MESH CHAIN LINK FENCE
102. 3.5FT RETAINING WALL

- ASPHALT CONCRETE PAVEMENT
- BASE MATERIAL
- COMPACTED SUBGRADE SOILS
- CONCRETE
- EQUESTRIAN TRAIL TREAD SURFACE

0 40 Feet

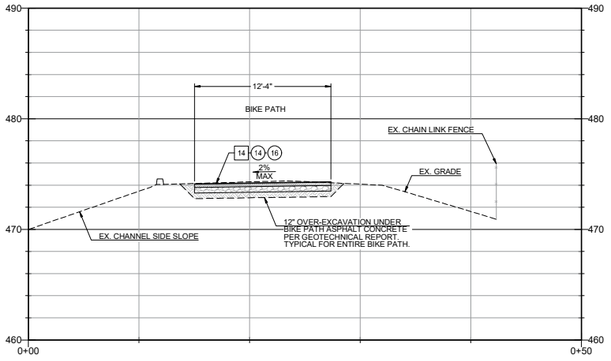
SOURCE: City of Los Angeles, Department of Public Works, Bureau of Street Services, 2025

Los Angeles River Phase IV Bike Path Project

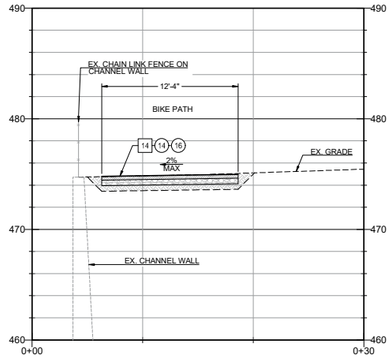
**Figure 6d**
Project Detail Plan

ESA

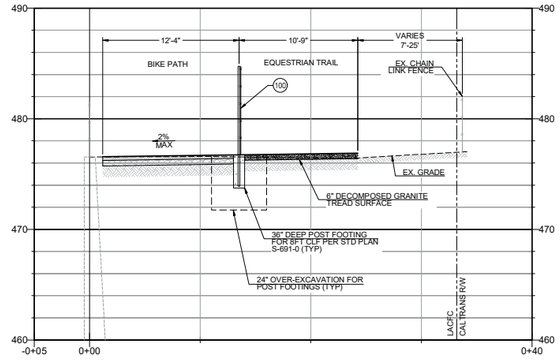
Z:\Shared\Projects\2021\D2021006\7_07 - LA River Phase IV Bike Path CEQA-NEPA\05 Graphics-GIS-Modeling-USE AZURE\SMND\Final ISMND



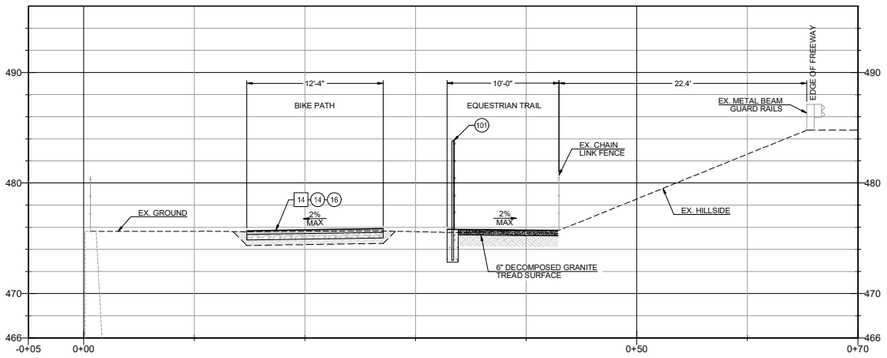

A C-7,C-8 SEGMENT A TYPICAL SECTION
VERT: 1" = 5'



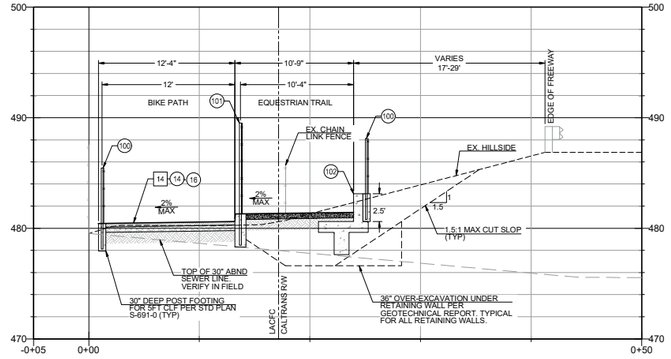

B C-6 SEGMENT B TYPICAL SECTION
VERT: 1" = 5'



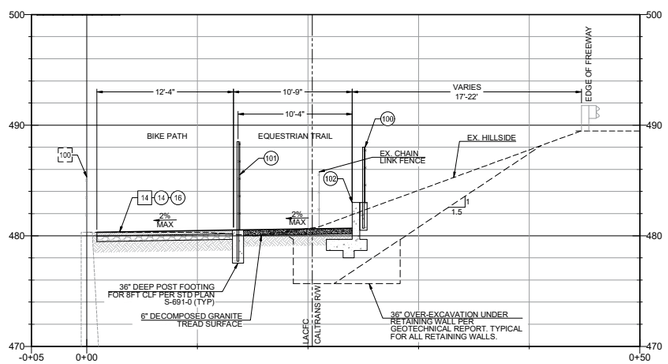

D C-5, C-6 SEGMENT D TYPICAL SECTION
VERT: 1" = 5'



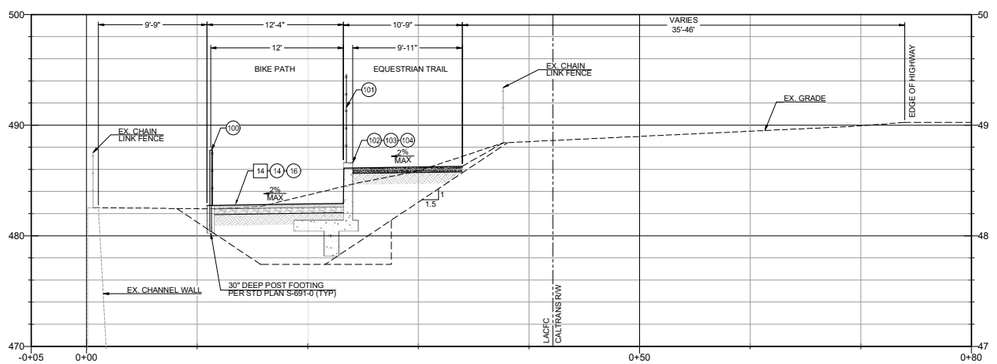

E C-5 SEGMENT E TYPICAL SECTION
VERT: 1" = 5'




F C-5 SEGMENT F TYPICAL SECTION
VERT: 1" = 5'




G C-5 SEGMENT G TYPICAL SECTION
VERT: 1" = 5'




H C-2 SEGMENT G TYPICAL SECTION
VERT: 1" = 5'

## CONSTRUCTION SYMBOLS

| | |
|---|---|
| CONSTRUCT | REMODEL EXIST. |
| EXISTING | REMOVE & CONST. |
| REMOVE | WORK BY OTHERS |

14. ASPHALT CONCRETE PAVEMENT, t=4"
16. UNTREATED BASE MATERIAL, t=6"
100. 5FT TALL CHAIN LINK FENCE PER STD PLAN S-691
101. 8FT TALL MINI MESH CHAIN LINK FENCE
102. 3.5FT RETAINING WALL

ASPHALT CONCRETE PAVEMENT

BASE MATERIAL

COMPACTED SUBGRADE SOILS

CONCRETE

EQUESTRIAN TRAIL TREAD SURFACE

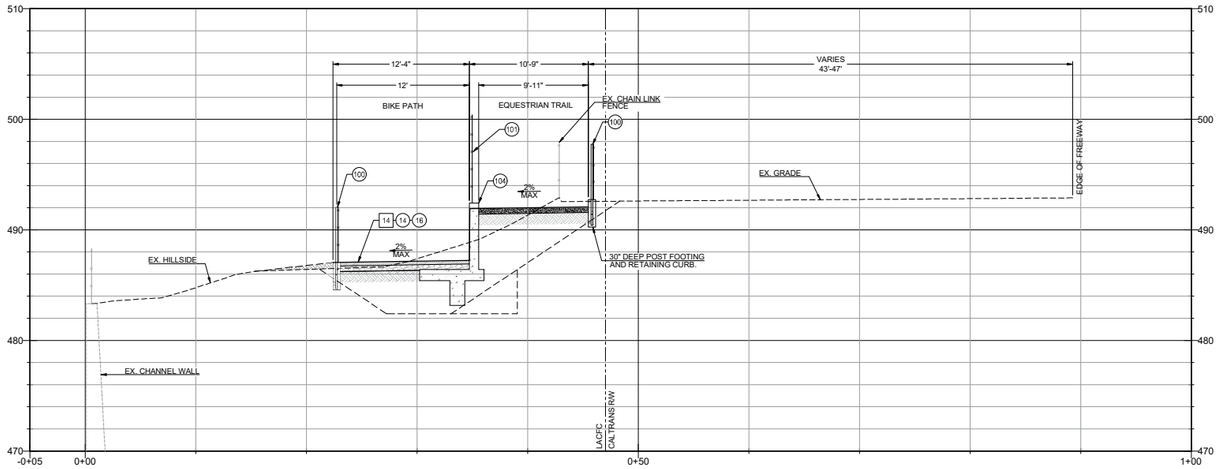
Z:\Shared\Projects\20211D2021006\07.07 - LA River Phase IV Bike Path CEQA-NEPA\05 Graphics-GIS-Modeling-USE AZURE\ISM\ND\Final ISM\ND

SOURCE: City of Los Angeles, Department of Public Works, Bureau of Street Services, 2025

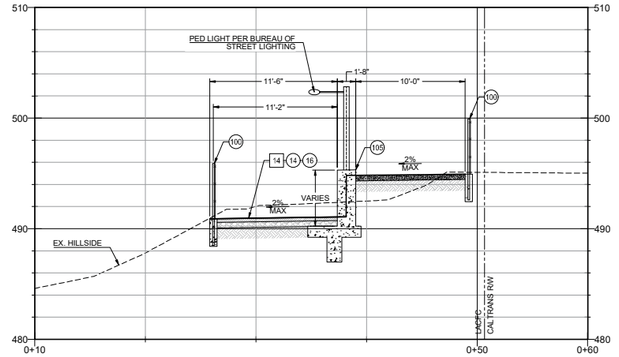
Los Angeles River Phase IV Bike Path Project

**Figure 6e**
Project Detail Plan

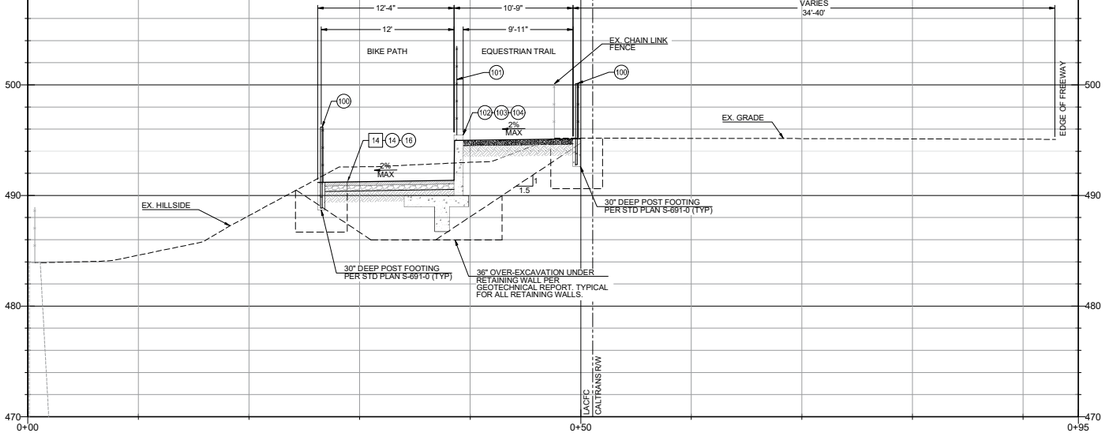
ESA



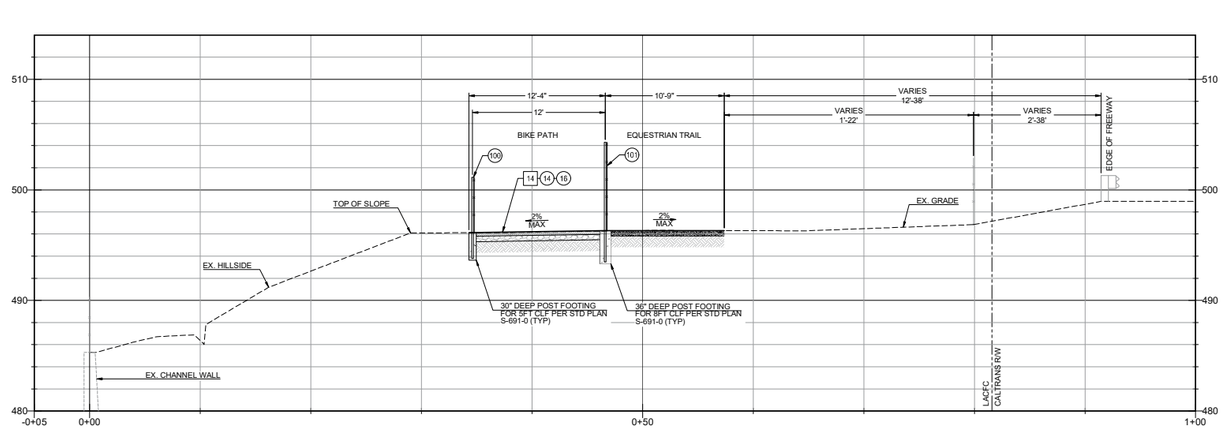

1 C-2 SEGMENT I TYPICAL SECTION
VERT: 1" = 5'




2 C-1, C-2 TYPICAL THICKENED WALL SEGMENT FOR PED LIGHT
VERT: 1" = 5'




J C-1, C-2 SEGMENT J TYPICAL SECTION
VERT: 1" = 5'




K C-1 SEGMENT K TYPICAL SECTION
VERT: 1" = 5'

## CONSTRUCTION SYMBOLS

- CONSTRUCT
- EXISTING
- REMOVE
- REMODEL EXIST.
- REMOVE & CONST.
- WORK BY OTHERS

14. ASPHALT CONCRETE PAVEMENT, t=4"
16. UNTREATED BASE MATERIAL, t=6"
100. 5FT TALL CHAIN LINK FENCE PER STD PLAN S-691
101. 8FT TALL MINI MESH CHAIN LINK FENCE
102. 3.5FT RETAINING WALL

- ASPHALT CONCRETE PAVEMENT
- BASE MATERIAL
- COMPACTED SUBGRADE SOILS
- CONCRETE
- EQUESTRIAN TRAIL TREAD SURFACE

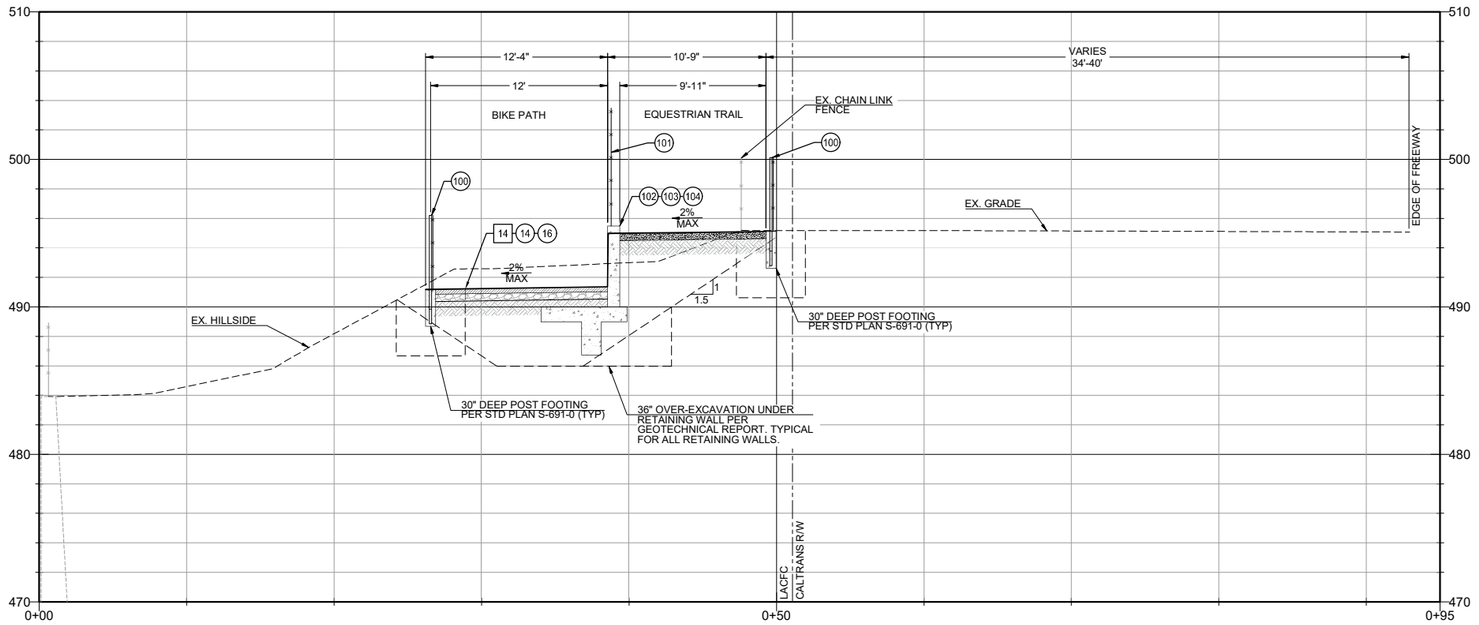
Z:\Shared\Projects\2021\D2021100667.07 - LA River Phase IV Bike Path CEQA-NEPA\05 Graphics-GIS-Modeling-USE AZURE\ISMND\Final ISMND

SOURCE: City of Los Angeles, Department of Public Works, Bureau of Street Services, 2025

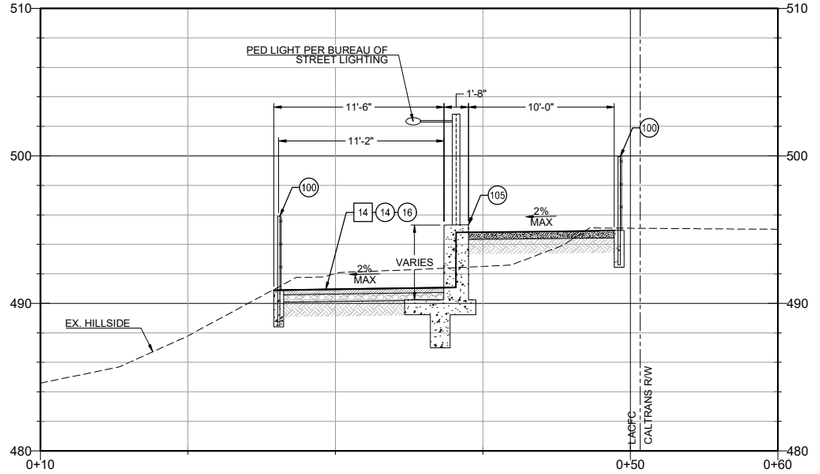
Los Angeles River Phase IV Bike Path Project

**Figure 6f**
Project Detail Plan

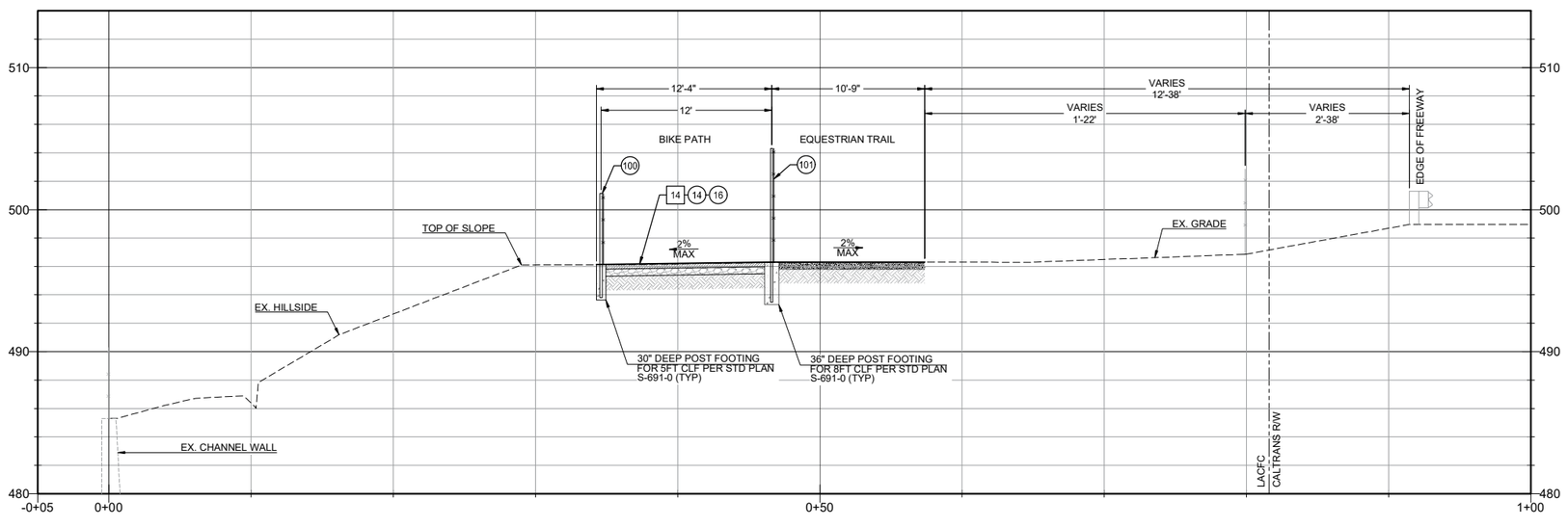
ESA




J C-1, C-2 SEGMENT J TYPICAL SECTION
VERT: 1" = 5'




2 C-1, C-2 TYPICAL THICKENED WALL SEGMENT FOR PED LIGHT
VERT: 1" = 5'




K C-1 SEGMENT K TYPICAL SECTION
VERT: 1" = 5'

## CONSTRUCTION SYMBOLS

- CONSTRUCT
- EXISTING
- REMOVE
- REMODEL EXIST.
- REMOVE & CONST.
- WORK BY OTHERS

14. ASPHALT CONCRETE PAVEMENT, t=4"
16. UNTREATED BASE MATERIAL, t=6"
100. 5FT TALL CHAIN LINK FENCE PER STD PLAN S-691
101. 8FT TALL MINI MESH CHAIN LINK FENCE
102. 3.5FT RETAINING WALL

- ASPHALT CONCRETE PAVEMENT
- BASE MATERIAL
- COMPACTED SUBGRADE SOILS
- CONCRETE
- EQUESTRIAN TRAIL TREAD SURFACE

SOURCE: City of Los Angeles, Department of Public Works, Bureau of Street Services, 2025

Los Angeles River Phase IV Bike Path Project

**Figure 6g**
Project Detail Plan

ESA

Z:\Shared\Projects\2021\D2021006670 - LA River Phase IV Bike Path CEQA-NEPA\05 Graphics-GIS-Modeling-USE AZURE\SMND\Final ISMND

SOURCE: ESA, 2025

Los Angeles River Phase IV Bike Path Project

**Figure 10A**
Project Site Jurisdiction Overview

ESA

Path: I:\GIS\GIS\Projects\2021xxx\202100667_07_LA_River_Phase_IV_Bike_Path\03_Project\Tree_Report.aprx Fig 10 - Project Site Jurisdiction, MCScott 4/25/2025

SOURCE: ESA, 2025

Los Angeles River Phase IV Bike Path Project

**Figure 10B**
Project Site Jurisdiction

ESA

Path: U:\GIS\GIS\Projects\2021xx\D2021090867_07_LA_River_Phase_IV_Bike_Path\03_Project\Trea_Report.aprx Fig 10 - Project Site Jurisdiction, MCScott 4/25/2025

SOURCE: ESA, 2025

Los Angeles River Phase IV Bike Path Project

**Figure 10C**
Project Site Jurisdiction

ESA

SOURCE: ESA, 2025

Los Angeles River Phase IV Bike Path Project

**Figure 10D**
Project Site Jurisdiction

ESA

Path: U:\GIS\GIS\Projects\2021xxx\D2102106867 07_LA_River_Phase_IV_Bike_Path\03_Project Tree_Report.aprx Fig 10 - Project Site Jurisdiction, MCScott 4/25/2025

SOURCE: ESA, 2025

Los Angeles River Phase IV Bike Path Project

**Figure 10E**
Project Site Jurisdiction

ESA

# Appendix L
## Equestrian Trail Design Memorandum

CITY OF LOS ANGELES CALIFORNIA
LA Phase IV Bike Path Project

**Equestrian Uses**

**Prepared by Kathy Hobstetter**
Founder and CEO, iAssist Equestrians

April 28, 2025

I have prepared this report at the request of the City of Los Angeles ("City") Department of Transportation regarding the City of Los Angeles, LA Phase IV Bike Path Project ("Project") concerning the Project's potential impacts to existing equestrian uses of the existing equestrian trail to which the Project's bike path use is proposed to be added.

**Qualifications and Experience**

Born and raised on a Quarter Horse breeding ranch in Colorado, I am a 77 year old, lifelong horseman having worked my entire life personally and professionally in the equestrian world. Some of my professional experience is the following:

- CEO and Founder, iAssist Equestrians. iAssist Equestrians is a resource organization with the only 'goal' of assisting, advising and consulting with horse people, equestrian facilities and organizations in the quest for informed, qualified information regarding horse issues. iAssist analyzes and researches issues and questions relating to the horse industry and equestrians focusing on safety, feasibility and the future.

- Board of Directors for California Professional Horsemen's Association, currently South Vice President. 2014 – present. Since 1964, the California Professional Horsemen's Association has represented and supported professional horsemen of all levels throughout California.

- Advisory Board member California Department of Food and Agriculture equine project 2024 – present. Appointed by California Professional Horsemen's Association. Advisory Board is deeply involved with medications and the Equine Herpevirus virus (EHC) and spread of it through horses. Of concern is the contamination and spreading process from horse to horse which results in quarantining dozens of horses at a time. The Los Angeles Equestrian Center in the City's Griffith Park (LAEC) has experienced these quarantine issues over the years. The spread to trail horses is an issue of ongoing discussion. Topic of issues before the Advisory Board has been horses on equestrian trails coming or going from public stables.

- Member of the Board of Directors of the Equestrian Coalition of Orange County. I addressed and submitted public opinion comments to Orange County Fairgrounds projects, Orange Park Acres issues, Orange County Fire Authorities, Trabuco Canyon trial and fire issues concerning potential impacts to equestrian uses. Also worked on the feasibility and safety of many

equestrian trail-related projects in Orange Park Acres, Trabuco Canyon, Coto de Caza, the Santa Ana riverbed riding, trails alongside Angel Stadium, trail access to the beach advice for Huntington Beach Equestrian Center boarders. Researched the feasibility of a specific equestrian dedicated 5-10 mile trail along the 5 interstate freeway and Santa Ana Riverbed for Rancho Del Rio Stables and Raney Stables. The majority of these projects included horse trails open to bikers, joggers, dog walking and horse traffic but specifically was asked to discuss feasibility and mitigation issues of varied use. 2006 – 2018.

- US Show Jumping Director for the 1996 Olympic Festival, appointed by the US Olympic Committee. The equestrian events at the festival outside of Denver, Colorado, included high performance show jumper competition management, cross country eventing, and Pathalon. Detailed coordination with issues surrounding the accessibility of horses from one venue to another including through a housing community, a shared trail along the creek, a highway, and bicycle paths all being open to the community during that time.

- Owner and operator of Fox Pointe Farm 1970-2014. A Hunter-Jumper equestrian barn at the Orange County Fair Grounds Equestrian Center. Fox Pointe Farm grew to board 82 horses serving 160 riders before I sold it. I worked to facilitate alternative riding at the center which required addressing the limitations of a fenced-off center with no trail access. Under my direction, Fox Pointe assisted in the planning of designated trails from the center to existing trails in the back bay area of Newport Beach. Also arranged for horses and riders of all ages to be transported to the many trails of Orange County, including the beach, Santa Mountains and occasional trips to Big Bear. Safety and sharing the trails and paths was a priority task.

- Advisory Board Member, Nevada Horse Park 2008 – 2014. A many-faceted project including all equestrian sports with 12-15 miles of trails open to the public. Assisted in the layout of shared pedestrian, bicycle, and horse trails throughout the park.

- Hunter/Jumper Director, Pacific Coast Horse Show Association, an organization dedicated to the sport of horse showing, primarily in the Hunter/Jumper, Western, and Reining disciplines. 2024-present.

- Executive Director for West Coast Active Riders for 8 years, 2008-2014. Created systems for high performance horses to compete domestically and abroad. One issue was providing open riding access directives for daily exercise outside of the show ring. Many times, this included a lengthy trail ride on trails shared with non-equestrian uses, mostly inside cities to and from competition arenas.

- United States Hunter-Jumper Association Zone 10 Hunter-Jumper committee member Chair or Co-Chair, 2008-2021. Focused on programming for riders of all levels, both in the show ring and out of the show ring. Included beginner and hobby riders of all levels.

- Board of Director, Orange County Press Club 2015 – 2024. My focus as a journalist for the Press Club was on horses in Orange County and issues surrounding their existence. Followed up on issues with horses riding through communities both on designated and shared paths and on or off the streets. Reported on horse issues throughout the County while

understanding co-existence of the general community and the equestrian community and the long history of horse culture in San Juan Capistrano, Orange Park Acres, and Norco specifically.

- Other committees I have served on:

    - United States Hunter-Jumper Association ("USHJA") Show Standards 2004 – 2011
    - USHJA Emerging Professionals Committee 2004 – 2011
    - USHJA Community Horse Show Committee 2005 – 2011,
    - USHJA Zone 10 Hunter Committee member 2008-2022

**The Project and My Investigation**

The Project is proposed to extend an existing bike trail alongside an existing equestrian trail located alongside the Los Angeles River in the City of Los Angeles. The Project is detailed in the February 2025 DRAFT Initial Study/ Mitigated Negative Declaration Los Angeles River Phase IV Bike Path Project document the City released to meet the requirements of the California Environmental Quality Act. which is found online at https://engineering.lacity.gov/about-us/divisions/environmental-management/projects/los-angeles-river-phase-iv-bike-path, ("Draft IS/MND")

As stated in the Draft IS/MND, at the location of a current equestrian trail, the proposed Project will create a new multi-use trail segment along the south side of the Los Angeles River from the existing western end of the Los Angeles River Bikeway located to the west of Riverside Drive westward to approximately 200 feet east of Forest Lawn Drive in the City. The Project trail will be just under one mile. The trail segment would include a new paved path on the northern side of the proposed trail for use by pedestrians and cyclists ("Bike Path"), an equestrian-only unpaved trail on the south side of the alignment ("Equestrian Trail"), and associated retaining walls, fencing, path lighting, and limited utility relocations. An equestrian tunnel under the 134 Freeway exists one end of the Project trail enabling horse traffic to enter into and out of Griffith Park. The tunnel is not open to bicyclists or pedestrians, is not part of the Project, and will not be altered by the Project.

The Project is designed to contain two 4-foot-wide bike lanes with 2-foot-wide shoulders on each side and a partially separated equestrian trail with an over 10-foot width as shown in final plans. The Bike Path and Equestrian Trail would be separated by an 8.5-foot-tall chain link fence rising from the ground. Although the Draft IS/MND states that slats will obscure visibility between the Bike Path and Equestrian Trail, the final IS/MND Clarifications and Modifications establish that visibility through the chain link fence will not include slats and will not be obscured, allowing horse riders and horses on the Equestrian Trail to have full visibility through the fence throughout.

As part of my investigation, on Friday, April 25, 2025, I drove the 134 freeway at various times of day going westbound from Freeway 5 and exited at the Forest Lawn exit 6 times to understand the traffic type and speed, it varied from 65+ miles an hour to a crawling 5-10 miles an hour in rush hours. On April 22, 2025, on horseback, I rode the entire length of the Equestrian Trail and rode through tunnel number 6 at one end of the Project under the 134 Freeway leading from the trail into Griffith Park, as well as tunnel number 7 at the other end of the Project. I observed that there are a number of horse boarding facilities near the Project, including the Los Angeles Equestrian Center located in Griffith Park and many private boarding facilities. Riders currently use the existing equestrian trail to enter

and exit horse riding trails on the other side of the 134 Freeway within Griffith Park. Also, equestrians utilize the Mariposa horse-only bridge at the end of Mariposa Street for access to the equestrian path.

In addition to the body of the Draft IS/MND, I reviewed the following materials in detail:

1. Project civil engineering plans for the east end of the Project trail found at Draft IS/MND, p. 44, Figure 6b, project Detail Plan.

2. Rendering #1: Proposed Bike Path Near Eastern Terminus, found at Draft IS/MND, p. 47, figure 7a.

3. Rendering #2: Proposed Bike/Equestrian Trail Near Trail Midpoint, found at Draft IS/MND, p. 48, figure 7b.

4. Rendering #3: Proposed Bike/Equestrian Trail Near Western Terminus, found at Draft IS/MND p. 49, figure 7c.

5. Project Site Conditions (Figure 4c) depicting a pipe pipeline crossing the LA River, found at Draft IS/MND p. 37, Photograph 6.

6. The River Bikepath Phase IV Civil Engineering Plan Set prepared by the City Department of Public Works, Bureau of Street Services, which I attach to this report labeled Exhibit A.

7. Views of the Project trail found on Google Maps using the Streetview Tool.

**Potential Impacts to Equestrian Use of the Existing Trail**

Based on my review of the Project and the existing conditions of the equestrian trail which will be adapted to provide separated bicycle and pedestrian use, I have determined the Project design and projected uses will not adversely impact the existing equestrian use of the trail. At tunnel number 6, the Project will add fencing that currently does not exist that will exclude persons from the tunnel who are not on the new Equestrian Trail, a feature that currently does not exist. Although not allowed by existing applicable law, it is currently easy for pedestrians, bicyclists, and others to improperly utilize the equestrian tunnel. The Project design will make it more difficult for anyone not on the Equestrian Trail to utilize the tunnel and will block users of the Bike Path from the existing equestrian tunnel.

Additionally, signage and lighting are included as part of the Project design that will alert the public that it is unlawful for motorized vehicles to utilize the Bike Trail and that only equestrian uses are permitted on the Equestrian Trail. Finally, signage will be installed as part of the Project that alerts bicyclists that they must ride slowly on this segment of the Bike Path.

Based on my review of the Project as stated in this report and my decades of experience working with horses, horse riders, and recommending design of facilities that serve them both, it is my opinion that

the Project implemented as planned will not adversely impact users of the existing equestrian trail and is adequate to preserve the existing equestrian usages of the trail within the footprint of the Project.

Respectfully submitted,

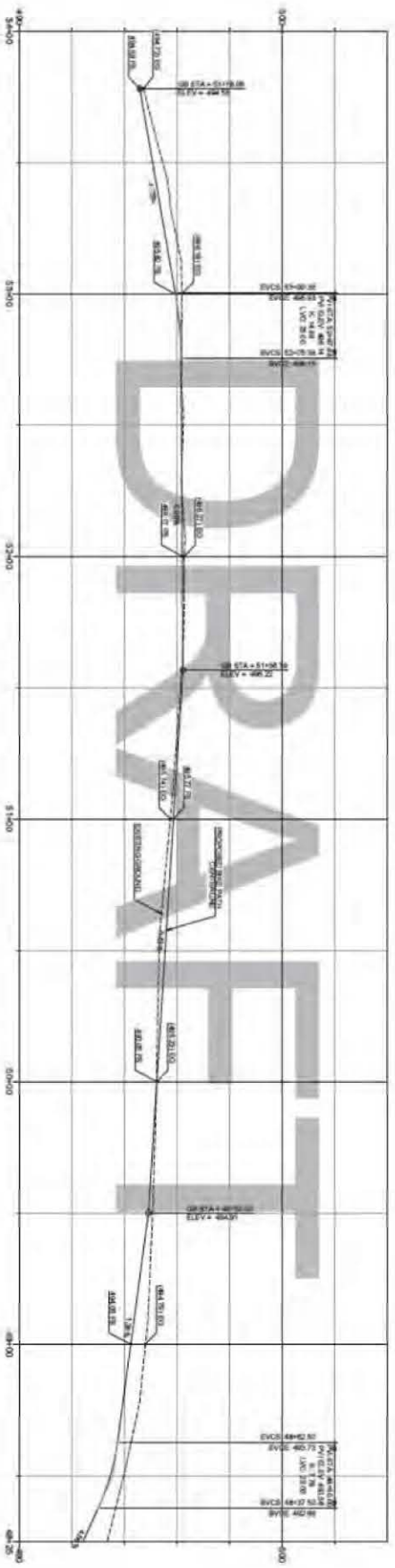
Kathy Hobstetter
iAssist Equestrians Founder and CEO

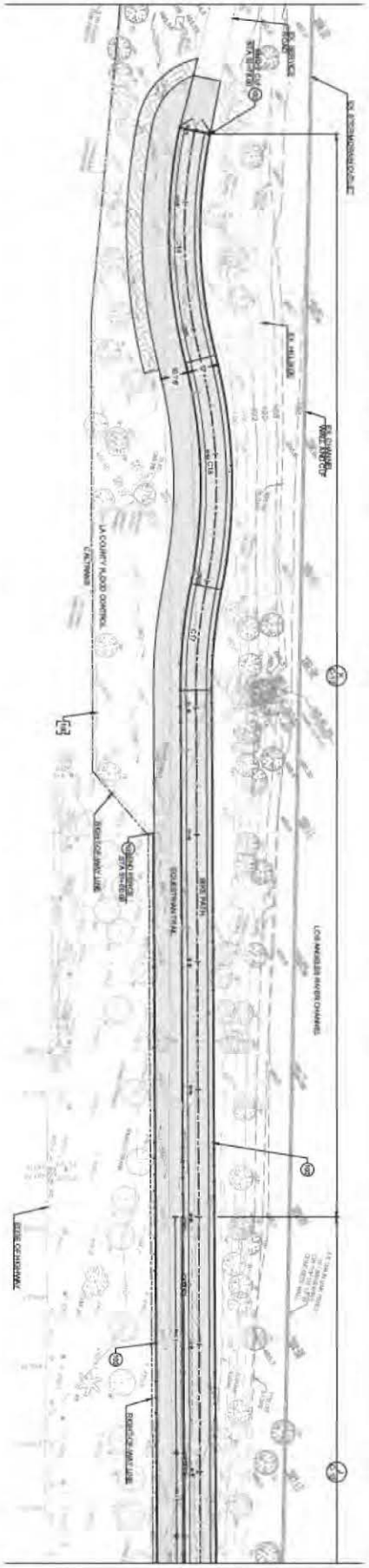
# Exhibit A

# Exhibit A

END OF WORK STA 53+78.55

| CURVE TABLE | | | | |
|---|---|---|---|---|
| | DIAGRAM | RADIUS | LENGTH | Δ | TANGENT |
| CV1 | CV1 | 250' | 41.64' | 9°32'40" | 20.87' |
| CV4 | CV4 | 250' | 90.13' | 20°39'01" | 45.64' |
| CV5 | 250' | 90.18' | 20°40'09" | 45.67' |




MATCH TO STA 48+25 ON SHEET C-2

**CITY OF LOS ANGELES** — **DEPARTMENT OF PUBLIC WORKS** — **BUREAU OF STREET SERVICES**

| | |
|---|---|
| VERTICAL CONTROL: (NGVD29) | |
| HORIZONTAL CONTROL: (NAD83/92) | |
| SHEET TITLE | PLAN, PROFILE, AND SECTIONS |
| PROJECT | LA RIVER BIKEPATH PHASE IV |
| ADDRESS | LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR |

C-1 — SHEET 3 OF 199 SHEETS — DRAWING NO. — WORK ORDER NO. M0014090

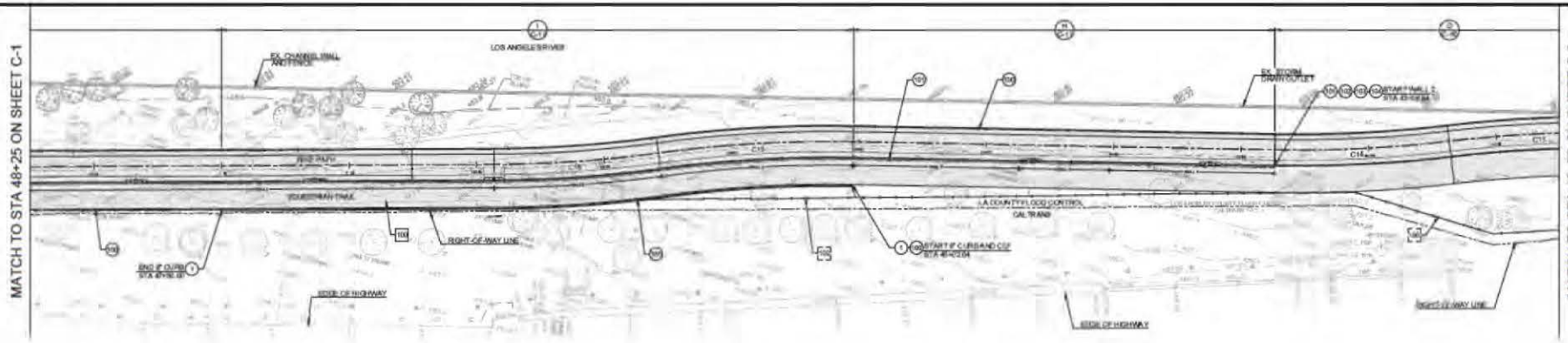
| KEITH MOZEE, EXECUTIVE DIRECTOR & GENERAL MANAGER | | |
|---|---|---|
| ENGINEERING SERVICES DIVISION | INITIAL | DATE |
| DRAWN BY: T. SARKISYAN | TS | 9/6/20 |
| CHECKED BY: R. ACOSTA | | |
| APPROVED BY: R. ACOSTA | | |
| APPROVED BY PROJECT MGR: R. ACOSTA | | |

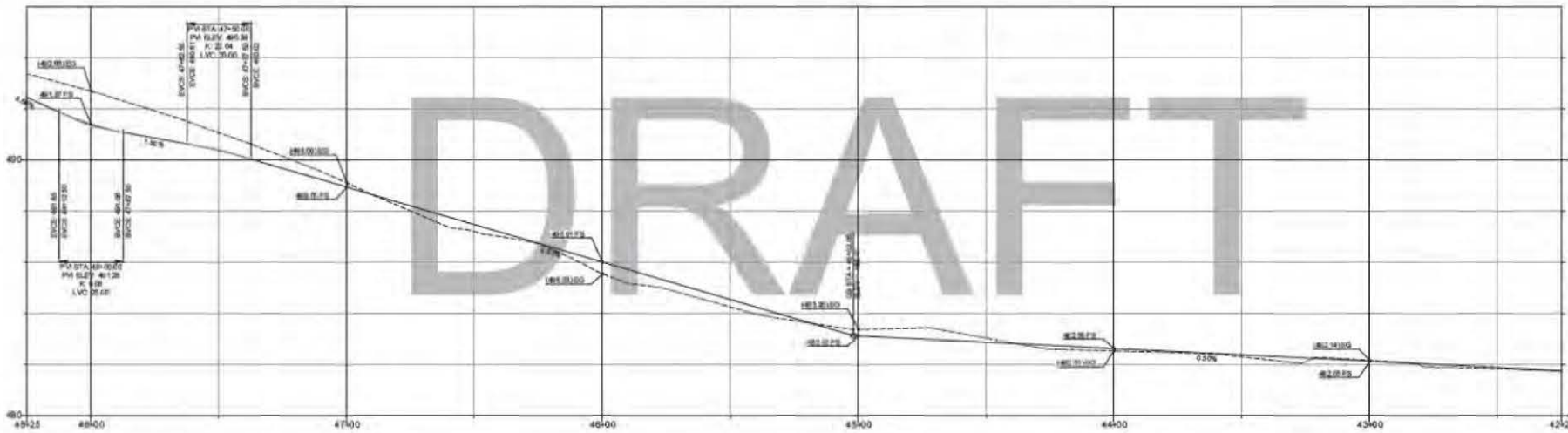
REGISTERED PROFESSIONAL ENGINEER — RICARDO M. ACOSTA — No. C69948 — Exp 9/30/20 — CIVIL — STATE OF CALIFORNIA

| NO | REVISION DESCRIPTION | DATE | BY |
|---|---|---|---|
| | | | |

INDEX NO.

STREETS LA



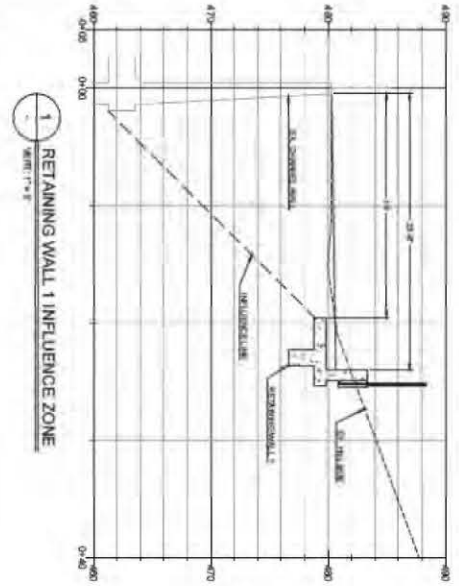



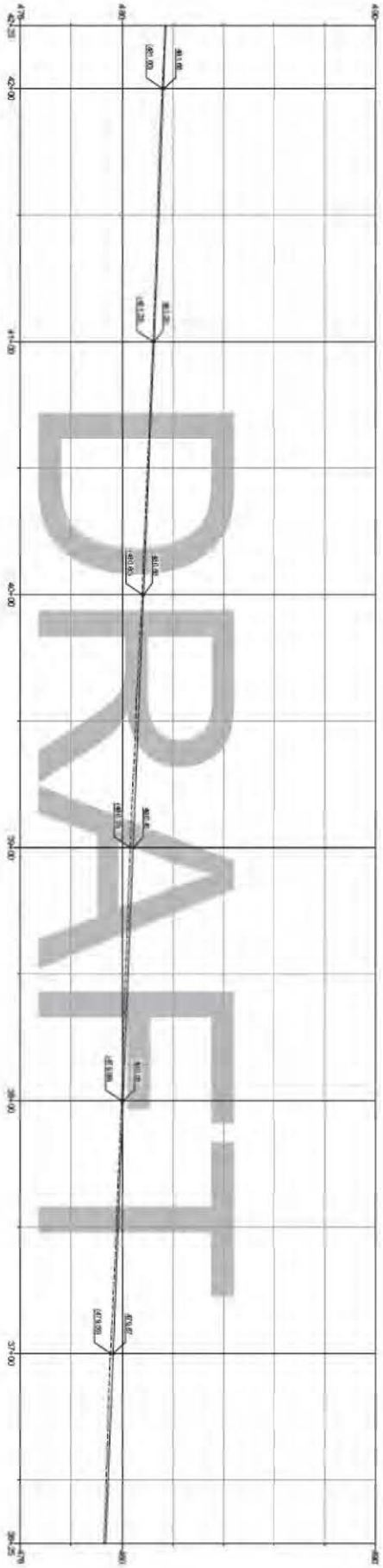

DRAFT

| CURVE TABLE | | | | |
|---|---|---|---|---|
| CURVE # | RADIUS | LENGTH | Δ | TANGENT |
| C13 | 800' | 68.35' | 7°19'04" | 34.23' |
| C14 | 800' | 68.35' | 7°19'04" | 34.23' |
| C15 | 800' | 76.01' | 8°08'24" | 38.06' |
| C16 | 800' | 64.66' | 7°43'10" | 32.38' |

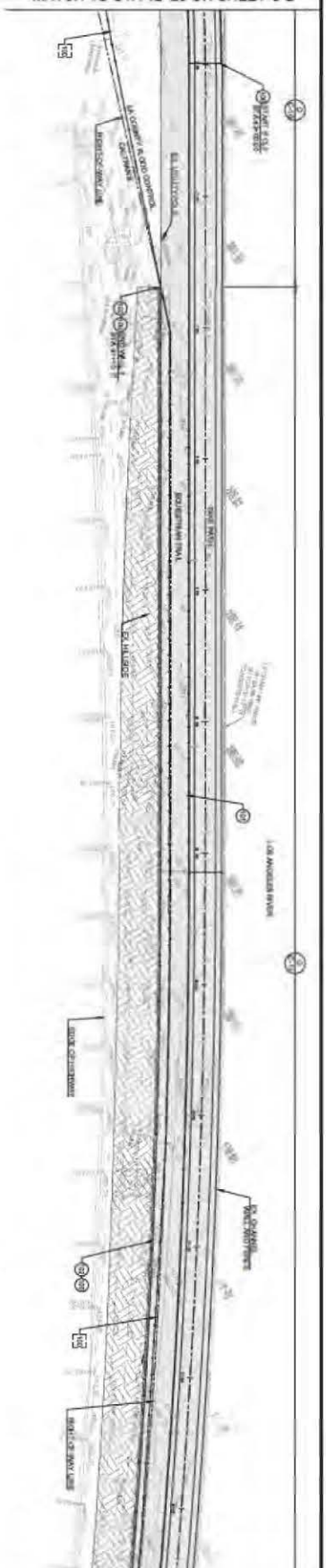
SCALE: 1"=20'-0"

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF STREET SERVICES
KEITH MOZEE
ENGINEERING SERVICES DIVISION
DESIGNED BY: T. SARKISYAN
CHECKED BY: R. ACOSTA
APPROVED BY: R. ACOSTA
APPROVED BY: R. ACOSTA
SHEET TITLE: PLAN, PROFILE, AND SECTIONS
PROJECT: LA RIVER BIKEPATH PHASE IV
ADDRESS: LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR
WORK ORDER NO: M0014090
DRAWING NO: C-2
SHEET 4 OF 199 SHEETS



MATCH TO STA 42+25 ON SHEET C-2



MATCH TO STA 36+25 ON SHEET C-4

DRAFT

CITY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

BUREAU OF STREET SERVICES

C-3

M0014090

PLAN, PROFILE, AND SECTIONS

LA RIVER BIKEPATH PHASE IV

LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR

KEITH MOZEE

ENGINEERING SERVICES DIVISION

DESIGNED BY: T. SARKISYAN

CHECKED BY: R. ACOSTA

APPROVED BY: R. ACOSTA

APPROVED BY: R. ACOSTA

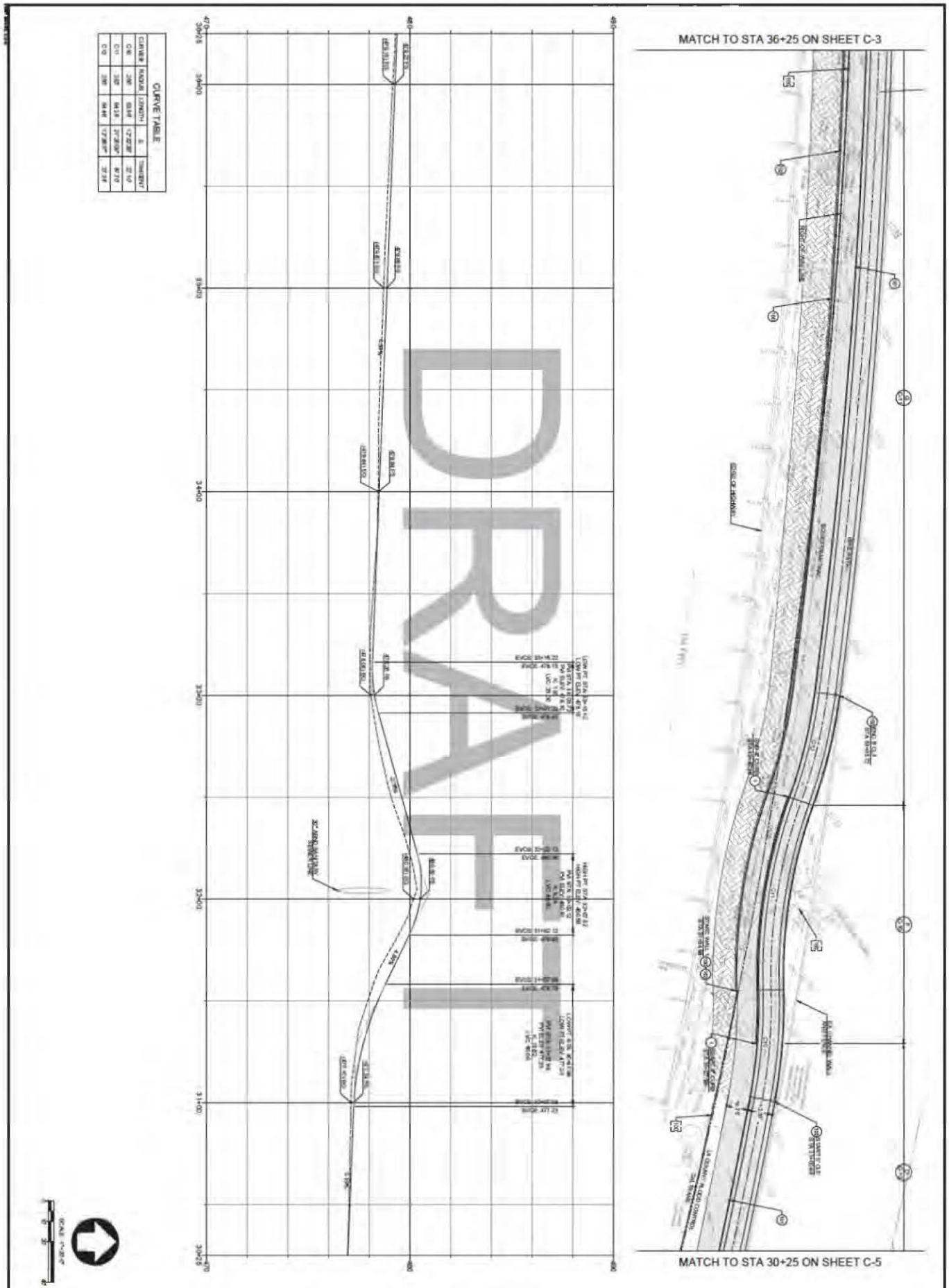
INITIAL: TS

DATE: 9/8/20

No. C59948 Exp 9/30/20 CIVIL STATE OF CALIFORNIA

REVISION DESCRIPTION | DATE | BY

INDEX NO.




| CURVE TABLE | | | | |
|---|---|---|---|---|
| CURVE # | RADIUS | LENGTH | Δ | TANGENT |
| C8 | 280' | 69.84' | 14°17'20" | 35.10' |
| C9 | 320' | 69.18' | 12°23'20" | 34.70' |
| C10 | 300' | 94.44' | 17°38'57" | 47.54' |

CITY OF LOS ANGELES — DEPARTMENT OF PUBLIC WORKS — BUREAU OF STREET SERVICES

DRAWING NO. C-4 OF 5 SHEETS

WORK ORDER NO. M0014060

VERTICAL CONTROL: (NGVD29)
HORIZONTAL CONTROL: (NAD83/92)

SHEET TITLE: PLAN, PROFILE, AND SECTIONS

PROJECT: LA RIVER BIKEPATH PHASE IV

ADDRESS: LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR

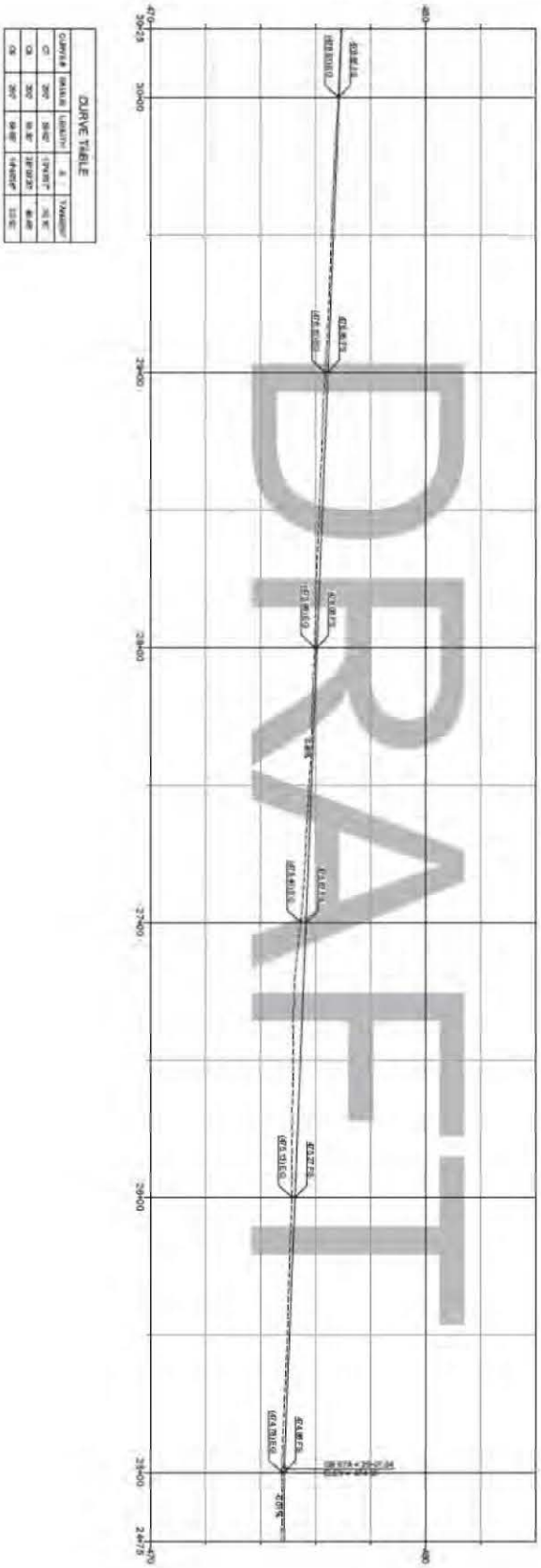
| KEITH MOZEE, EXECUTIVE DIRECTOR & GENERAL MANAGER | | |
|---|---|---|
| ENGINEERING SERVICES DIVISION | INITIAL | DATE |
| DESIGNED BY: T. SARKISYAN | TS | 3/6/20 |
| CHECKED BY: R. ACOSTA | | |
| APPROVED BY: R. ACOSTA | | |
| APPROVED BY: R. ACOSTA | | |

REGISTERED PROFESSIONAL ENGINEER — RAMON M. ACOSTA — No. C59948 — Exp 9/30/20 — Civil — STATE OF CALIFORNIA

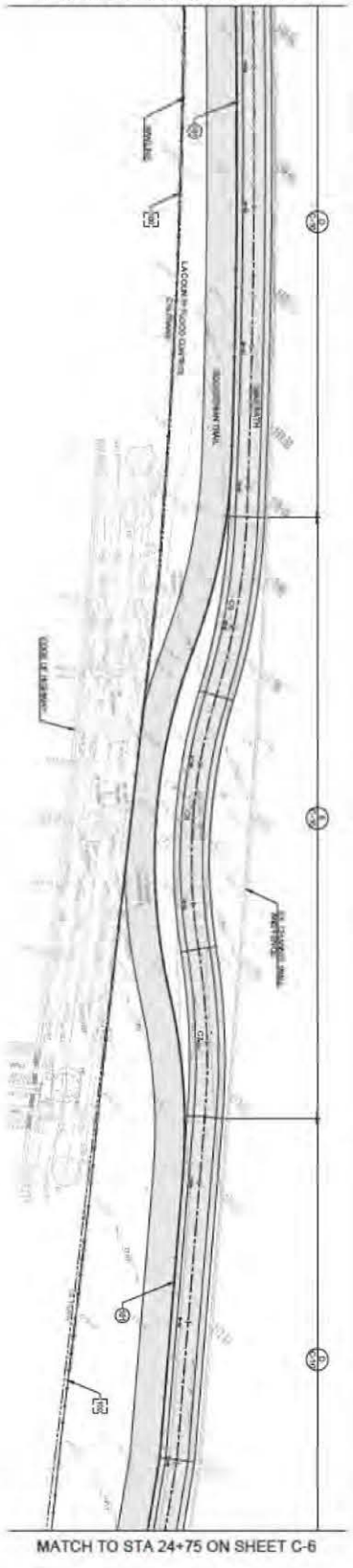
| NO | REVISION DESCRIPTION | DATE | BY |
|---|---|---|---|
| | | | |

INDEX NO.

STEERING



| CURVE TABLE | | | | | |
|---|---|---|---|---|---|
| CURVE # | RADIUS | LENGTH | Δ | TANGENT | |
| C1 | 250' | 39.92' | 9°09'07" | 19.99' | |
| C2 | 350' | 55.87' | 9°09'07" | 27.99' | |
| C3 | 350' | 55.87' | 9°09'07" | 27.99' | |
| C4 | 250' | 39.92' | 9°09'07" | 19.99' | |




DRAFT

CITY OF LOS ANGELES — DEPARTMENT OF PUBLIC WORKS — BUREAU OF STREET SERVICES

C-5

M0014060

VERTICAL CONTROL: (NGVD29)
HORIZONTAL CONTROL: (NAD27FIPS)

SHEET TITLE: PLAN, PROFILE, AND SECTIONS

PROJECT: LA RIVER BIKEPATH PHASE IV

ADDRESS: LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR

KEITH MOZEE — EXECUTIVE DIRECTOR & GENERAL MANAGER

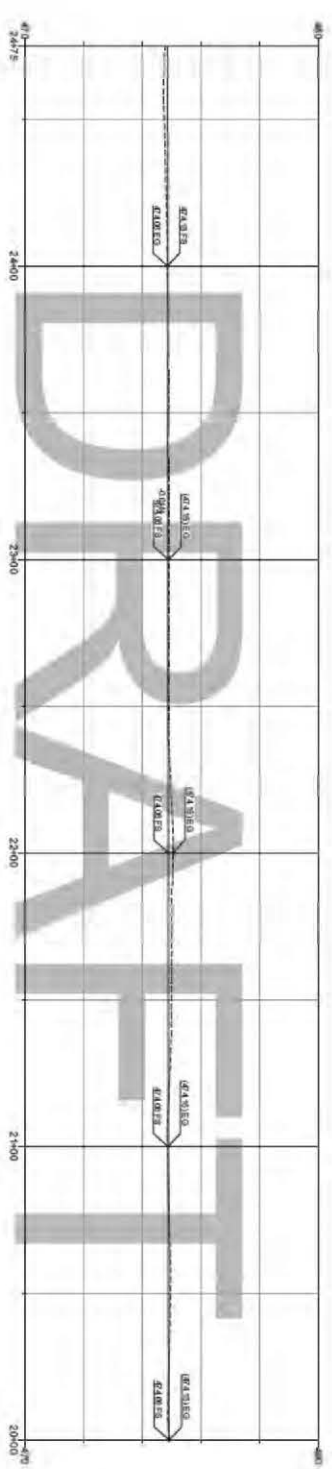
| ENGINEERING SERVICES DIVISION | INITIAL | DATE |
|---|---|---|
| DESIGNED BY: T. SARKISYAN | TS | MM/DD |
| CHECKED BY: R. ACOSTA | | |
| APPROVED BY: R. ACOSTA | | |
| APPROVED BY PROJECT MGR: R. ACOSTA | | |

REGISTERED PROFESSIONAL ENGINEER — RICARDO M ACOSTA — No. C69948 — Exp 9/30/20 — Civil — STATE OF CALIFORNIA

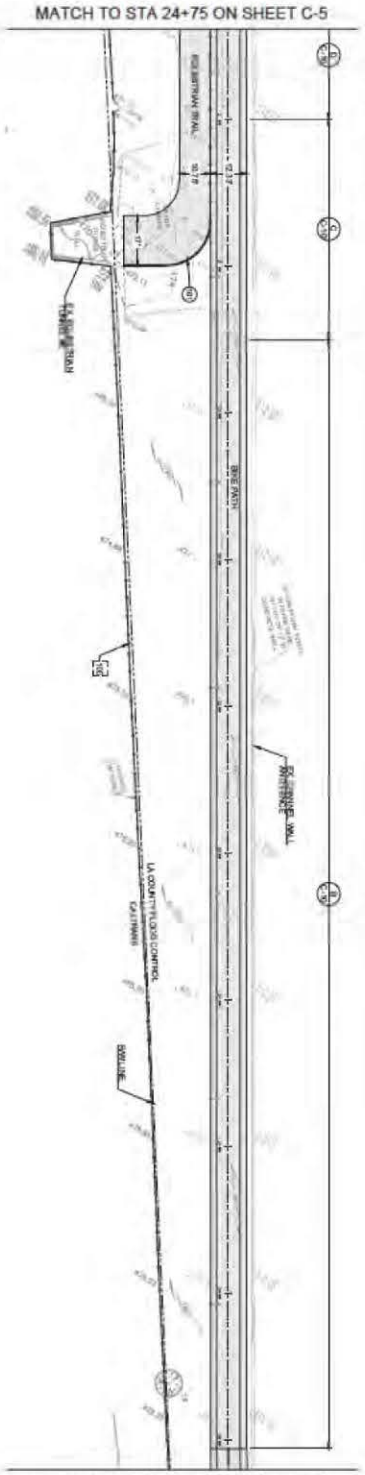
| NO | REVISION DESCRIPTION | DATE | BY |
|---|---|---|---|
| | | | |

INDEX NO.

STERNA




DRAFT



CITY OF LOS ANGELES | DEPARTMENT OF PUBLIC WORKS | BUREAU OF STREET SERVICES

C-6

DRAWING NO. 04090-MM

SHEET TITLE: PLAN, PROFILE, AND SECTIONS

PROJECT: LA RIVER BIKEPATH PHASE IV

ADDRESS: LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR

VERTICAL CONTROL: (ACSWR)

HORIZONTAL CONTROL: (NAD83/92)

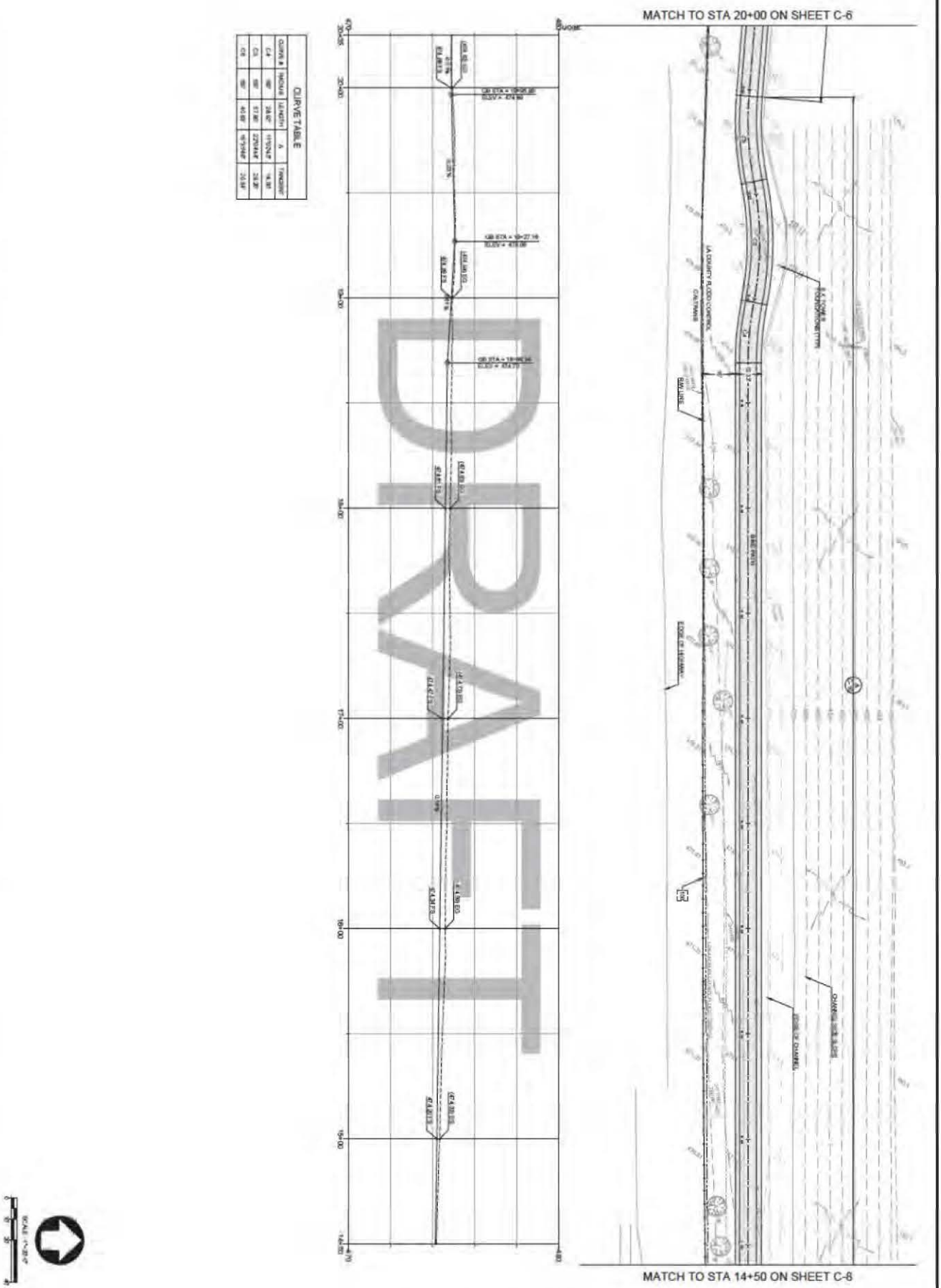
| KEITH MOZES, EXECUTIVE DIRECTOR & GENERAL MANAGER | | |
|---|---|---|
| ENGINEERING SERVICES DIVISION | INITIAL | DATE |
| DESIGNED BY: T. SARKISYAN | TS | 9/2020 |
| CHECKED BY: R. ACOSTA | | |
| APPROVED BY: R. ACOSTA | | |
| APPROVED BY PROJECT MGR: R. ACOSTA | | |

REGISTERED PROFESSIONAL ENGINEER — RONALD M ACOSTA — No. C59948 — Exp 9/30/20 — CIVIL — STATE OF CALIFORNIA

| NO | REVISION DESCRIPTION | DATE | BY |
|---|---|---|---|
| | | | |

INDEX NO.

ENGINEER




CITY OF LOS ANGELES — DEPARTMENT OF PUBLIC WORKS — BUREAU OF STREET SERVICES

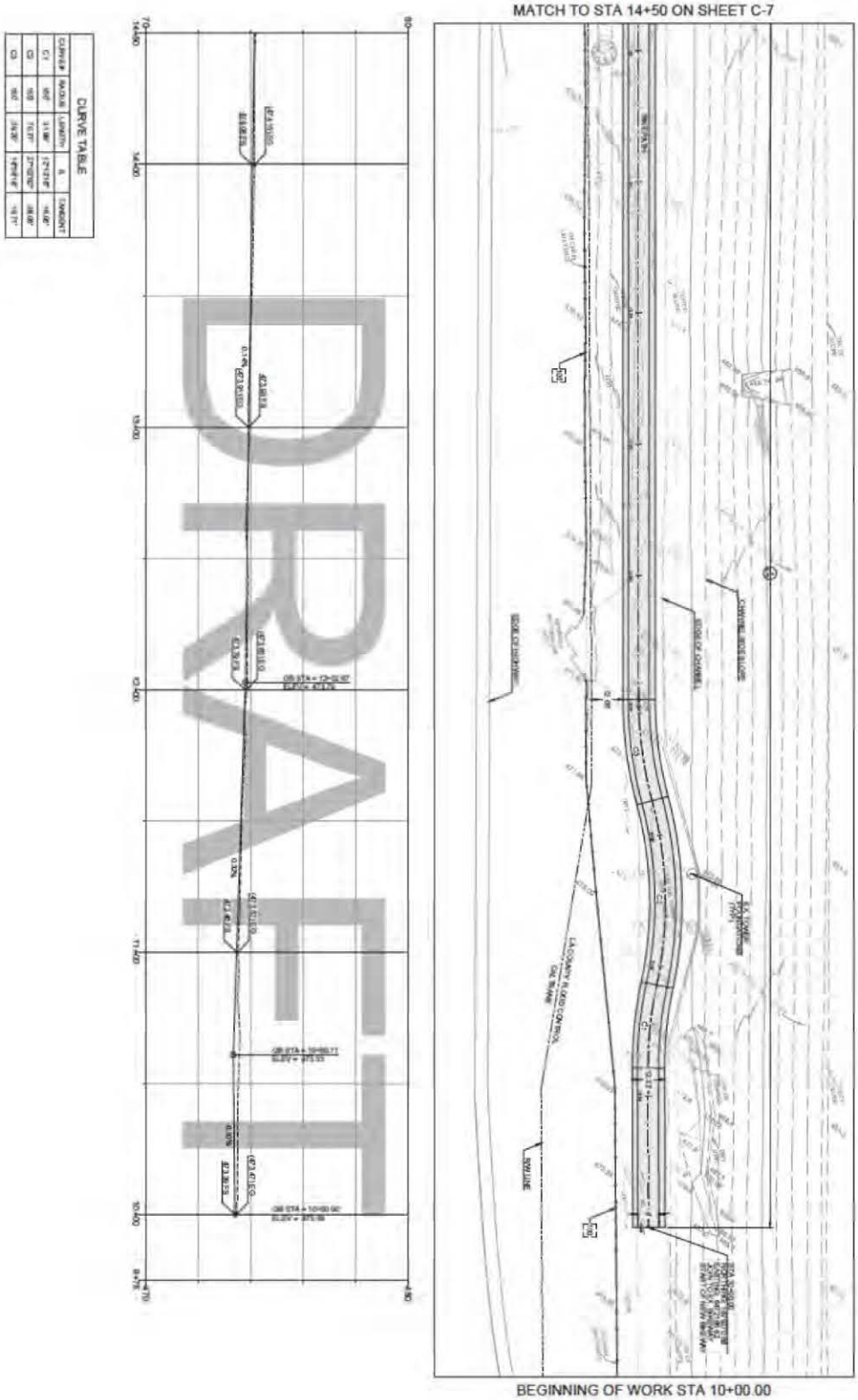
| | |
|---|---|
| SHEET NO. | C-7 |
| DRAWING NO. | MM01409 |
| WORK ORDER NO. | 090 |
| VERTICAL CONTROL | (NGVD29) |
| HORIZONTAL CONTROL | (NAD83/92) |
| SHEET TITLE | PLAN, PROFILE, AND SECTIONS |
| PROJECT | LA RIVER BIKEPATH PHASE IV |
| ADDRESS | LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR |

| KEITH MOZEE, EXECUTIVE DIRECTOR & GENERAL MANAGER | | |
|---|---|---|
| ENGINEERING SERVICES DIVISION | INITIAL | DATE |
| DESIGNED BY: T. SARKISYAN | TS | MM/20 |
| CHECKED BY: R. ACOSTA | | |
| APPROVED BY: R. ACOSTA | | |
| APPROVED BY: R. ACOSTA | | |

REGISTERED PROFESSIONAL ENGINEER — RAMON ACOSTA — No. C69048 — Exp 9/30/20 — Civil — STATE OF CALIFORNIA

| NO | REVISION DESCRIPTION | DATE | BY |
|---|---|---|---|
| | | | |

INDEX NO.




| CURVE TABLE | | | | | |
|---|---|---|---|---|---|
| CURVE # | RADIUS | LENGTH | Δ | TANGENT |
| C1 | 950' | 111.98' | 6°45'21" | 56.09' |
| C2 | 950' | 111.98' | 6°45'21" | 56.09' |
| C3 | 950' | 111.98' | 6°45'21" | 56.09' |

CITY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

BUREAU OF STREET SERVICES

| | |
|---|---|
| VERTICAL CONTROL: (MSL/NGVD) | |
| HORIZONTAL CONTROL: (NAD83/1983) | |
| SHEET TITLE: | PLAN, PROFILE, AND SECTIONS |
| PROJECT: | LA RIVER BIKEPATH PHASE IV |
| ADDRESS: | LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR |

C-8

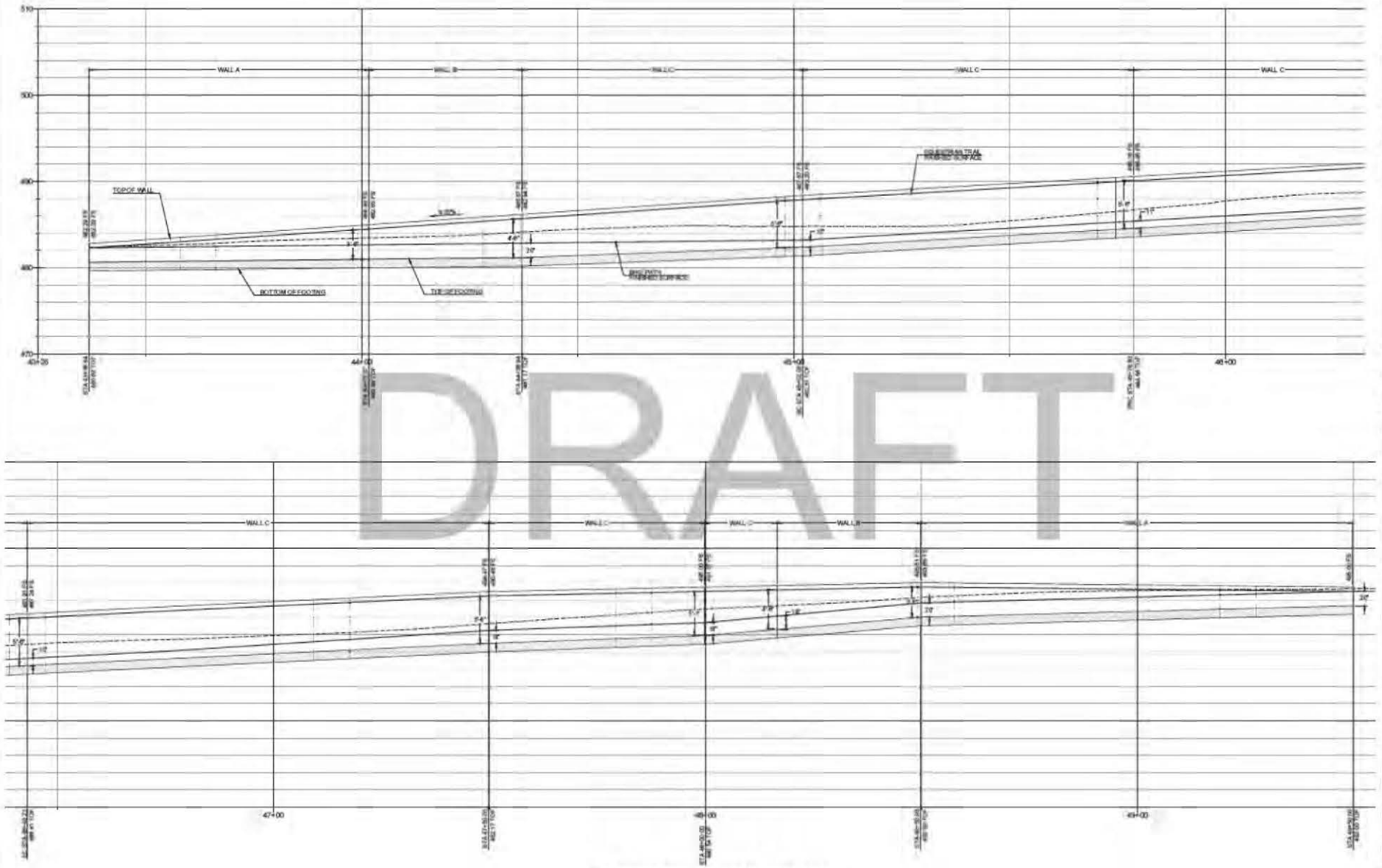
M0014060

| KEITH MOZEE | | |
|---|---|---|
| ENGINEERING SERVICES DIVISION | INITIAL | DATE |
| DESIGNED BY: T. SARKISYAN | TS | 9/6/20 |
| CHECKED BY: R. ACOSTA | | |
| APPROVED BY: R. ACOSTA | | |
| APPROVED BY: R. ACOSTA | | |

REGISTERED PROFESSIONAL ENGINEER
RICARDO M ACOSTA
No. C59048
Exp. 9/30/20
CIVIL
STATE OF CALIFORNIA

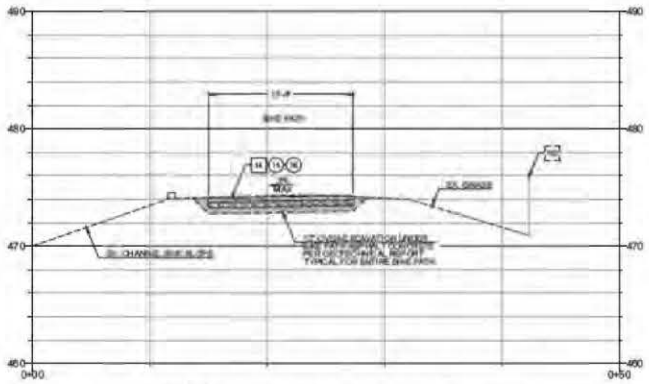
| NO | REVISION DESCRIPTION | DATE | BY |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |

INDEX NO.

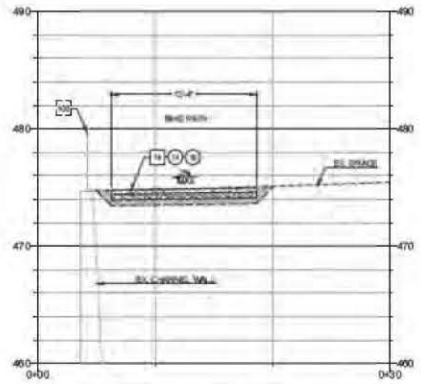
STREETS LA

DRAFT

3 C-10.02 RETAINING WALL 2 ELEVATION VIEW
VERT: 1" = 4'

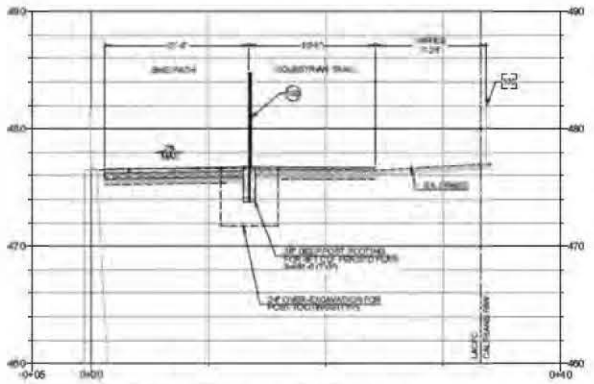
CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF STREET SERVICES
KEITH MOZEE
ENGINEERING SERVICES DIVISION
DESIGNED T. SARKISYAN
CHECKED R. ACOSTA
APPROVED R. ACOSTA
APPROVED R. ACOSTA
PROJECT TITLE: RETAINING WALL & PROFILE
PROJECT: LA RIVER BIKEPATH PHASE IV
ADDRESS: LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR
WORK ORDER NO. M0014090
DRAWING NO. C-10
SHEET 12 OF 198 SHEETS
INDEX NO.



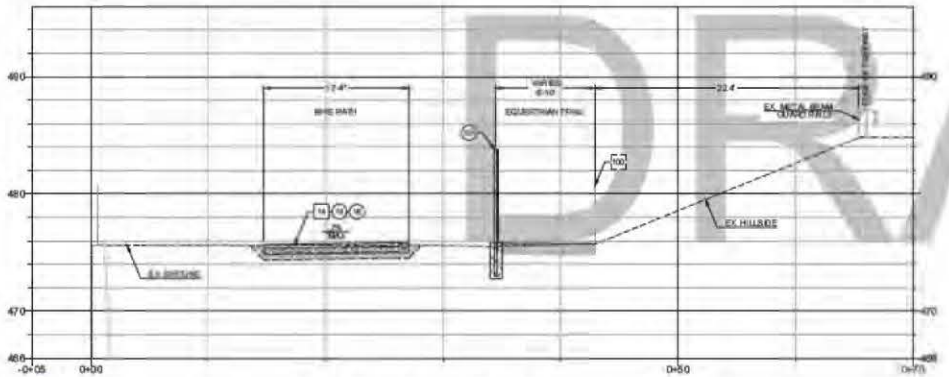
A SEGMENT A TYPICAL SECTION



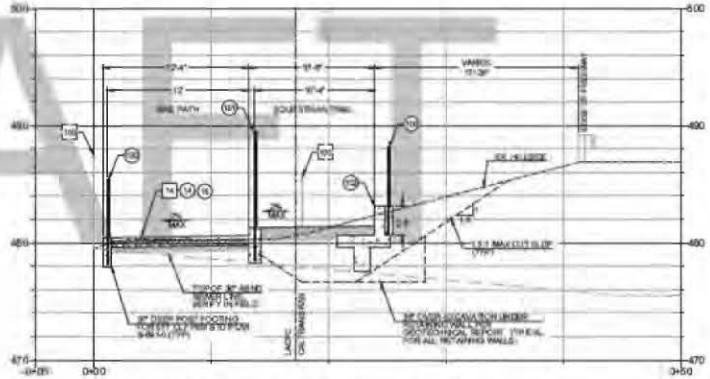
B SEGMENT B TYPICAL SECTION



D SEGMENT D TYPICAL SECTION



E SEGMENT E TYPICAL SECTION



F SEGMENT F TYPICAL SECTION

DRAFT

CITY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

BUREAU OF STREET SERVICES

KEITH MOZEE

ENGINEERING SERVICES DIVISION

DESIGNED T. SARKISYAN

DRAWN R. ACOSTA

APPROVED R. ACOSTA

CHECKED R. ACOSTA

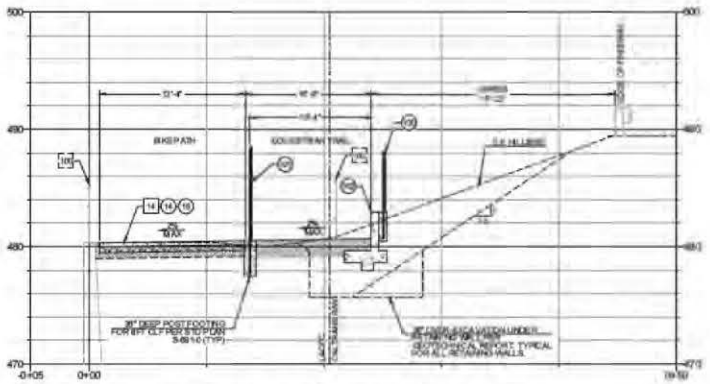
PROJECT: LA RIVER BIKEPATH PHASE IV

ADDRESS: LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR

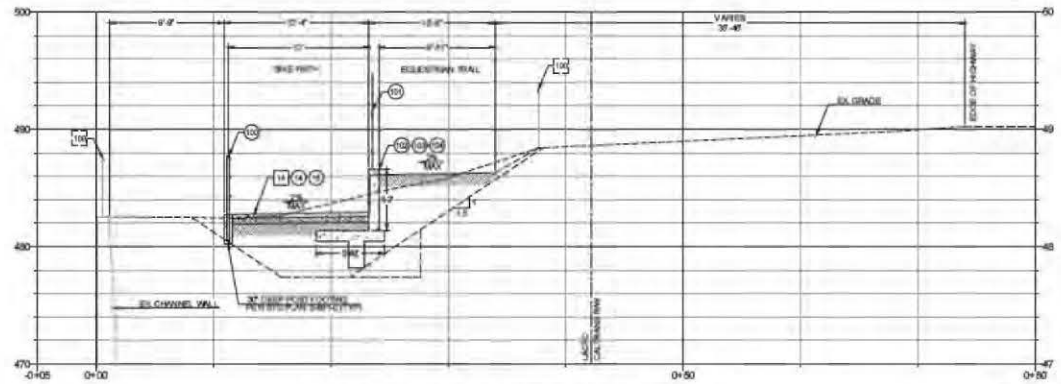
WORK ORDER NO. M0014090

DRAWING NO. C-11

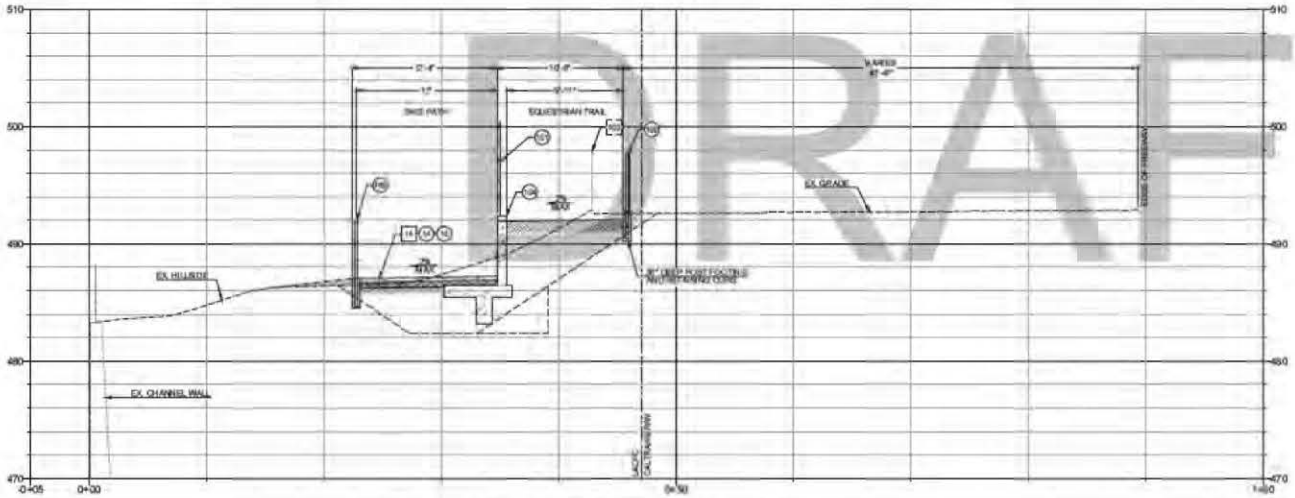
SHEET 13 OF TWR SHEETS




G SEGMENT G TYPICAL SECTION
C-5 VERT: 1" = 5'



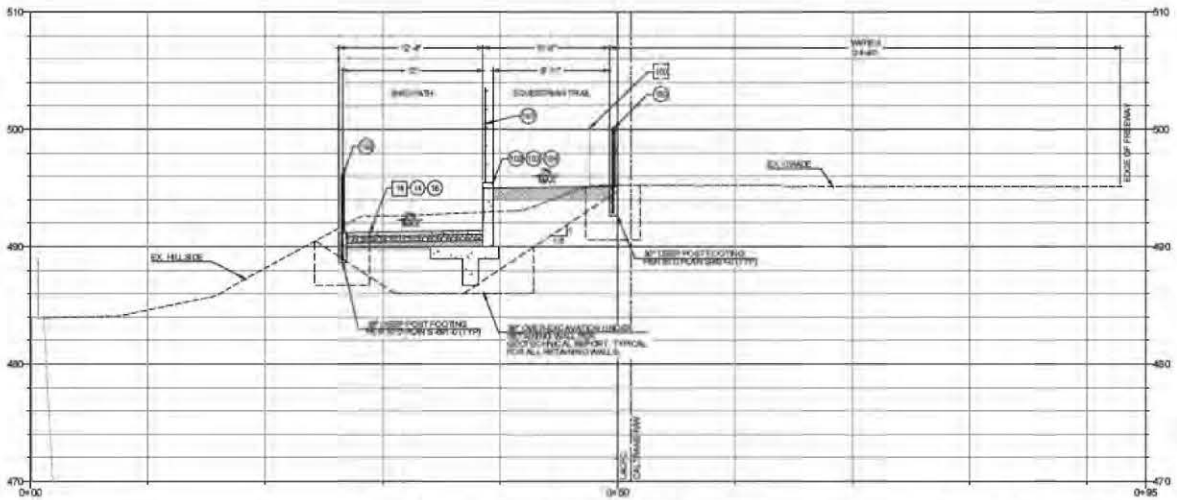

H SEGMENT G TYPICAL SECTION
C-5 VERT: 1" = 5'



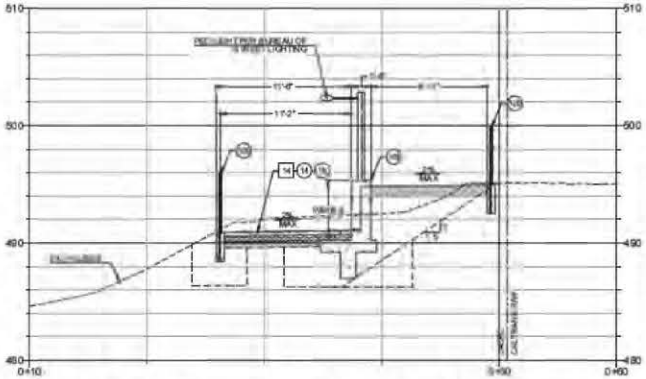

I SEGMENT I TYPICAL SECTION
C-5 VERT: 1" = 5'

DRAFT

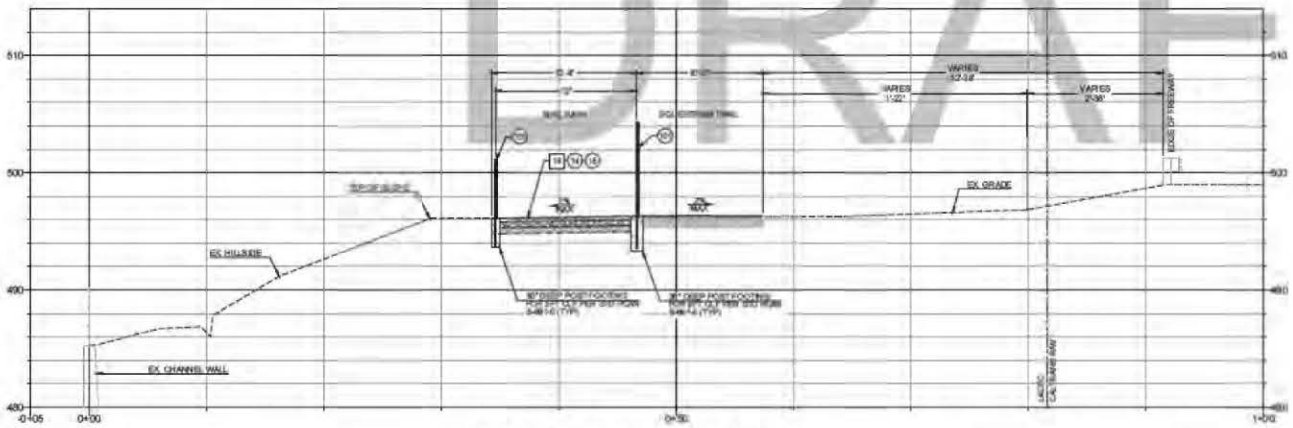
CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF STREET SERVICES
KEITH MOZEE
ENGINEERING SERVICES DIVISION
DESIGNED BY T. SARKISYAN
DRAWN BY R. ACOSTA
CHECKED BY R. ACOSTA
APPROVED BY R. ACOSTA
DATE 3/25
SHEET TITLE CROSS-SECTIONS
PROJECT LA RIVER BIKEPATH PHASE IV
ADDRESS LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR
WORK ORDER NO M0014090
DRAWING NO C-12
SHEET 14 OF TWO SHEETS




J SEGMENT J TYPICAL SECTION
C-1, C-2 VERT. 1" = 5'




2 TYPICAL THICKENED WALL SEGMENT FOR PED LIGHT
C-1, C-2 VERT. 1" = 5'




K SEGMENT K TYPICAL SECTION
C-1 VERT. 1" = 5'

DRAFT

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF STREET SERVICES
KEITH MOZEE
ENGINEERING SERVICES DIVISION
DESIGNED T. SARKISYAN
CHECKED R. ACOSTA
APPROVED R. ACOSTA
APPROVED R. ACOSTA
SPECIFICATION
PROJECT LA RIVER BIKEPATH PHASE IV
ADDRESS LA RIVER BIKEPATH FROM RIVERSIDE DR TO FOREST LAWN DR
CROSS SECTIONS
WORK ORDER NO. M0014090
DRAWING NO. C-13
SHEET 15 OF 190 SHEETS