

RIO DE LOS ANGELES STATE PARK

General Plan and Final Environmental Impact Report

Volume 2

SCH No. 2004091126

Section 3

Correspondence and Responses to letters #1–5



MAY 2005

California State Parks Mission:

To provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.

3. RESPONSE TO COMMENTS

This chapter provides a complete copy of the written comments received on the Preliminary General Plan/Draft EIR for RLASP, and presents responses to environmental issues raised in the comments, as required by CEQA Guidelines Section 15132. Comments pertaining to the content of the Preliminary General Plan are also included and addressed. Each letter is reproduced in its entirety, including attachments. The comment letters listed in Chapter 2 are included in this chapter, and all comments are individually numbered. The Department's responses, which follow each comment letter, are labeled with corresponding numbers.

Letter 1: Natural Resources Defense Council



NATURAL RESOURCES DEFENSE COUNCIL

April 21, 2005

Via Federal Express

California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108
Att'n: Dianna Martinez

Re: Comments on Proposed Rio de Los Angeles State Park (Taylor Yard): Preliminary General Plan and Draft Environmental Impact Report

Dear Ms. Martinez:

On behalf of the Natural Resources Defense Council (“NRDC”) and its over 1 million members and activists, more than 250,000 of whom live in California, I submit these comments to California Department of Parks & Recreation (hereinafter “State Parks”) on the Rio de Los Angeles State Park’s Preliminary General Plan and Draft Environmental Impact Report (“General Plan and Report”). NRDC believes that the proposed General Plan and Report will go a long way toward capturing the community’s vision of open space while serving as a catalyst for revitalization of the Los Angeles River channel and floodplain. The Rio de Los Angeles State Park (hereinafter “Taylor Yard”) envisioned in the General Plan and Report will serve as a refuge from the intensively urbanized surrounding areas for not only riparian plants and animals, but the ethnically-diverse communities of Los Angeles’ historic core.

Of the exigencies confronting Taylor Yard, connectivity and cohesiveness are the most challenging. As it currently stands, Taylor Yard is separated by an active railway line and multiple private properties that sever the two noncontiguous parcels and inhibit a fluid and interrelated park experience. We want to encourage State Parks to actively explore opportunities to improve street landscaping along San Fernando Road to attract pedestrian traffic, investigate opportunities to purchase additional property or easements to physically connect the two parcels – with special emphasis on the acquisition of parcel G-2 – and seek innovative strategies with outside partners to provide safe physical access across the active railway lines. As the history of Taylor Yard reveals, this can be best accomplished by engaging the elected officials, community partners and interested organizations in the adjacent communities, many of whom remain actively involved to this day, while continually striving to forge dynamic new relationships in the future.

1.1

NRDC commends State Parks for the thoughtful planning reflected in the General Plan and Report and we look forward to working with you and your staff as this long-range management tool is implemented on the project level. If you have further questions or comments, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Timothy Grabel', with a stylized flourish at the end.

Timothy Grabel, Esq.

Cc: Ruth Coleman, Director of California State Parks

RESPONSE TO LETTER 1

Timothy Gabriel, Natural Resources Defense Council

April 21, 2005

- 1.1 The Department thanks the Natural Resources Defense Council for their comments and support for the planning reflected in the General Plan.

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Letter 2: Leonard Pitt

Leonard Pitt, Ph.D.
3475 Stoner Ave.
Los Angeles, CA 90066-2819
fax: 310-398-5801
phone: 310-397-3917
email: ldpitt@earthlink.net

25 April 2005
Dianna Martinez-Lilly, Project Manager
California State Parks and Recreation
Sacramento, California

Dear Dianna:

Thank you for sending me the two plans that you distributed: “Proposed Los Angeles State Historic Park (Cornfield Site) Preliminary General Plan and Draft Environmental Report”; and, “Rio de Los Angeles State Park General Plan & Draft Environmental Report.” I will say without hesitation that like what I see in both draft documents.

Here are a few specific observations:

1. Classifying the Cornfield site as a “State Historic Park” is without doubt the ideal solution and naming it “Los Angeles State Historic Park,” is the very best possible designation---far superior to any proposed name we heard at the public meetings.
2. Establishing a broad “flow-of-history” as the thematic structure for the new Los Angeles State Historic Park, instead of focusing on a single decade or so, is an inspired idea and should work very well, provided that sufficient resources are devoted to the interpretive program (p. 70).
3. I understand your reluctance to overload a general plan with specific details about a build-out, but I can’t resist observing that the interpretive program for the “flow-of-history” will require a number of dedicated spaces. You will probably need a museum, an auditorium, an outdoor arena, an archives and library, administrative offices and other accommodations. If so, you should strongly consider restoring part of the Zanja Madre, the round-house footprint, and the depot and hotel, which was arguably the first lodging house in Los Angeles built specifically for tourists. As we know from the old illustration, the hotel was a small, handsome Victorian structure that will become an instant popular icon for the entire park.
4. The historical information in both plans is excellent. I particularly like section “2.2 Cultural Resources” of the Cornfield plan, although additional research into the U.S. Census and newspapers, etc. will further enrich the picture. As you suggest, partnering with universities will yield additional information over time. You also need to consult K-12 teachers and curricular specialists regarding ways for the interpretive program to meet the curricular demands of the California Social Studies Guidelines. But I’m sure you know all this.
5. I applaud the mention of a potential “folk museum” on or off-site at Los Angeles State Historic Park, but I believe the people who support this cultural activity prefer the term “folk-life museum.”

2.1

6. As for Taylor Yard, the designation of a generic “State Park” is the very best designation, and the name “Rio de Los Angeles State Park” fits the bill perfectly. The designation is short and to the point---absolutely the best name I’ve heard.

2.2

7. I am delighted to see that the plan for Rio de Los Angeles State Park provides for both organized sports and enjoyment of the riparian environment. This will have the effect of eliminating some of the pressures for soccer and for scientific interpretation at Los Angeles SHP, and will help the latter fulfill its mission as an historic park.

2.3

Best of all, I feel confident that Los Angeles State Historic Park is on the right track toward becoming not merely a fine neighborhood park but a “world-class park” for the enjoyment of all Californians.

2.4

In short, my congratulations to you and your colleagues for the quality of each separate general plan and for the coordinated vision of both plans considered in unison. It was not an easy task.

I also want to thank you for the skilful way you handled the Advisory Committee meetings. Despite the frequent disagreements, I found those gatherings very helpful in the planning process.

Cordially,

Leonard Pitt
Professor of History Emeritus
California State University, Northridge

RESPONSE TO LETTER 2

Leonard Pitt, Ph.D., California State Parks' Advisory Member

April 25, 2005

2.1 The Department thanks you for your comments on the Preliminary General Plan/Draft Environmental Impact Report for Los Angeles State Historic Park and Preliminary General Plan/Draft Environmental Impact for RLASP. Comments 1 through 5 are addressed in the Final EIR for the Los Angeles State Historic Park, issued by the Department on May 10, 2005 for the Preliminary General Plan/Draft Environmental Impact Report for Los Angeles State Historic Park (State Clearing House #2003031096). Comments pertaining to the General Plan/Draft Environmental Impact for RLASP are addressed below.

2.2 Thank you for your support in the Department's choice of name and classification for RLASP. The Department agrees the name, 'Río¹ de Los Angeles State Park' encapsulates a connection between this area of open space and the nearby Los Angeles River and communicates the vision to restore parcels D and G-1 into a healthy, functioning natural ecosystem with a vital role in the connection of other nearby habitat areas.

The PRC (5019.50) provides several classifications for State Park System units. The two most appropriate options that were considered include State Recreation Area and State Park. Due to the limited acreage and the disconnection between the two parcels, which are severed by an active railway line and multiple private properties, the State Park classification does not apply. The Department is requesting RLASP be classified as a State Recreation Area, however the name would be Río de Los Angeles State Park.

2.3 In 2003, the Department leased 20 acres on Parcel D to the City of Los Angeles to develop formalized sports related recreational facilities. Together, the City and State Park facilities provide a wide range of recreational uses, integrating a variety of facilities while avoiding disjunctive management boundaries. As indicated throughout the Preliminary General Plan and Draft EIR, this mix of recreation, educational

¹ Spanish for "river"

enrichment, and ecological enhancement will help to meet the strong demand for both formalized sports and more passive recreational opportunities.

- 2.4** The Department thanks the commenter for his comments in support of the RLASP General Plan and EIR.

Letter 3: Metrolink

FROM : CA STATE PARKS-SSC

FAX NO. :

Apr. 29 2005 08:34AM P1



SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY

Member Agencies:
Los Angeles County
Metropolitan Transportation
Authority
Orange County
Transportation Authority
Riverside County
Transportation Commission
San Bernardino
Associated Governments
Ventura County
Transportation Commission
Ex Officio Members:
Southern California
Association of Governments
San Diego Association
of Governments
State of California

April 22, 2005

Dianna Martinez
California Dept. of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

RE: Southern California Regional Rail Authority (SCRRA) Comments on the Preliminary General Plan and Draft Environmental Impact Report (DEIR) for the Rio de Los Angeles State Park (at Taylor Yard) SCH #2004091126

Dear Ms. Martinez-Lilly:

Although this document was released for public comment on 3/16/05, the SCRRA was not directly noticed and became aware of the comment period for this document 4/1/05. Please ensure that we are notified of future comment periods. Thank you for directing my staff to the web site with the electronic document and providing the opportunity to comment on this document. As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink on member agency-owned and on private freight railroad rights of way. Additionally, SCRRA provides a range of rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA member agencies are the Orange County Transportation Authority (OCTA), Los Angeles County Metropolitan Transportation Authority (Metro) – previously referred to as MTA, San Bernardino Associated Governments (SANBAG), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

3.1

The final version of this document will guide future management of the 37-acre State Park (17 acres on Parcel G-1 and 20 acres on Parcel D). The General Plan will not cover the remaining 20 acres of Parcel D that have been leased to the City of Los Angeles for a city park. The railroad right of way that is used by Metrolink, Amtrak and the Union Pacific Railroad (UPRR) that runs through the entire Taylor Yard area is owned by Metro, while SCRRA maintains and operates the right of way for Metro. Based on the proximity of the rail line to the park planning area, the following recommendations are being conveyed by SCRRA after reviewing the DEIR:

1. Page 2-2 under Surrounding Land Uses, needs to be corrected to read, "Parcel A is an embankment and railroad line used by Metrolink, Amtrak and Union Pacific Railroad

3.2

700 S. Flower Street 26th Floor Los Angeles CA 90017 Tel [213] 452.0200 Fax [213] 452.0425
www.metrolinktrains.com

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(UPRR), which runs through the center of the complex.”

2. Figure 2-4, the Park Concept Plan, notes where two traffic signals will be installed by the City of Los Angeles. South of both of the proposed traffic signals is the intersection marked as Kerr Road (Private Road) and San Fernando Road. This non-signalized intersection is the only vehicular access to Metrolink’s Central Maintenance Facility (CMF), a facility which extends along the Los Angeles River to the south of Taylor Yard. Currently, it is very difficult to turn south and even more difficult to turn north from the Private Road onto San Fernando Road. Pedestrians also experience safety issues at this intersection, while trying to use the sidewalk to the river in the easement along the south side of the Private Road. It is requested that a traffic study be completed to assess the current wait times at this intersection, so a baseline can be established. It is then requested that the traffic impacts be mitigated to avoid any increase in the current wait times or safety issues at this intersection. If the wait times or safety issues can be improved at this intersection (perhaps by timing the proposed southern park entrance traffic light to improve ingress and egress at the Private Road), it would be sensible to plan accordingly. It is important for this plan to address pedestrian and bike traffic between the proposed park and the existing sidewalk along the Private Road.
3. Page 2-43 discusses Rail Service and notes that Metrolink trains “pass through the Taylor Yard complex numerous time daily”. The FEIR should specify that as of April 2005, weekday rail traffic through the Taylor Yard complex consists of 54 Metrolink trains plus 12 Amtrak trains in addition to varying freight traffic. Currently, Metrolink service includes 8 passenger trains through Taylor Yard Saturday, but none on Sunday. Also, Amtrak runs 12 trains through Taylor Yard Saturday and Sunday.
4. Page 3-4 refers to the limited pedestrian access to the park property and that one of the many existing barriers limiting pedestrian access is the active railroad. The report goes on to state that local residents will be encouraged to walk to the park and that barriers limiting pedestrian access must be overcome in safe, practical ways. SCRRA wants to emphasize the importance of keeping pedestrians out of the railroad right of way. The best way to accomplish this is to construct substantial barriers separating the park from the railroad and to provide a grade-separated access for pedestrians, that allows them to walk the shortest possible distance, otherwise trespassing on the railroad is likely to occur and that causes a severe public safety issue.
5. SCRRA recommends adding a public safety mitigation measure that will require the construction of a minimum 8-foot high tubular steel fence along the entire project site adjoining railroad property. The steel fence is recommended versus a block wall, based on the state park being used for non-active recreational facilities. The fence will help prevent trespassing and illegal dumping on railroad property. It will also serve the purpose of separating the public park from the adjacent railroad activity. Additionally, a fence or some other separation should be installed along the south side of Parcel D, in order to control the flow of pedestrians and bicyclists going between the proposed park and the existing pedestrian/bike path along the Private Road. The park maintenance crew

3.2
cont

3.3

3.4

3.5

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will be responsible for maintenance of the fences.

- 6. Page 3-4 also points out the importance of connecting park users to the regional transportation system, including the Metro Gold Line station 1.5 miles away from the park and the Metrolink system with its closest stations at Glendale and Union Station. SCRRA urges California State Parks to develop public transportation links that bring visitors directly to the park entrance as suggested in the plan.

3.6

- 7. Page 4-10 states the intent of the Railroad Buffer Element - to "reduce the negative impacts on the visitor and staff park experience resulting from the active railroad tracks" that border Parcels D and G-1. "Using primarily trees, and other plantings (consistent with the other vegetation management goals and guidelines in this General Plan), the hope is to screen views of the rail lines from Parcel G-1. On Parcel D, a berm will separate a vegetated human-made depression and the property edge facing the railroad line. This will serve the dual purposes of creating the topography necessary for detention of water so that a riparian wetland can be created, as well as mitigating some train noise. On the 20 acres leased by the City of Los Angeles, clusters of trees and grassy upland areas will be provided from where park visitors can view the trains and the Los Angeles River."

3.7

The landscape plan for the proposed development should consider the adjacent railroad right of way and cause no negative impacts on the right of way - such as sprinklers spraying onto railroad property or tree branches hanging over the park fence into the right of way. Please refer to the Landscape Design Guidelines, which are posted on SCRRA's web site. Although these guidelines were written for landscaping actually on railroad property rather than adjacent to, they will still be useful to avoid negative impacts. Go to www.metrolinktrains.com > About Metrolink > Public Projects > Guidelines > Landscape Design Guidelines.

- 8. It appears that the storm water from Parcel D currently flows onto the railroad property. Development of the park property may substantially alter the existing drainage pattern, especially due to the proposed park riparian wetland. The riparian wetland should not soften the railroad embankment or cause any other negative impacts on the railroad property. SCRRA recommends adding a water mitigation measure that ensures there will be no increase in runoff draining to the railroad property to the west or south of Parcel D. Parcel D should be graded so that the railroad right of way and Parcel D drain toward an existing drain inlet and drain line on Parcel D, which then drains to the river.

3.8

- 9. Since this development is located adjacent to the railroad right-of-way owned by Metro and maintained by SCRRA, it will be necessary for the developer or his contractor to enter the right-of-way for clearing, grubbing, grading, shoring, drainage and other improvements. The developer or his contractor will be required to enter into SCRRA's Temporary Right-of-Entry Agreement (SCRRA Form No. 6) for the construction of the project. Go to www.metrolinktrains.com > About Metrolink > Public Projects > Right of Way Encroachments > Form No. 6.

3.9

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10. Page 4-46 lists nine Access Guidelines in order to obtain the park's access and transportation goal. The goal calls for safe and efficient access to the two park parcels, as well as *between the parcels*, in addition to encouraging multi-modal access of the park. SCRRA is very concerned by Access Guideline 2, which calls for strategies to move visitors between Parcel D and Parcel G-1, since the active railroad right of way separates the two parcels. Grade separated vehicle, bike and pedestrian access will need to be provided between the two parcels. Since the DEIR does not discuss plans to construct such access, the only way to move between the two parcels is the approximately 1-mile circuitous route underneath State Route 2, around existing development and along San Fernando Road. Unless the separation of the two parcels by the active railroad is addressed with construction of a grade-separated access, then direct access between the two parcels should be discouraged for public safety reasons. Also grade-separated vehicle, bike and pedestrian access will need to be established between San Fernando Road, the nearby arterial, and Parcel G-1, since the active railroad corridor separates the two features along the entire length of Parcel G-1
11. SCRRA would like to encourage California State Parks to implement Access Guidelines 5, 7 & 8 which address linking park pedestrian and bicycle access with other planned and existing systems, while considering safe, signalized intersections. These guidelines encompass comments previously suggested by the SCRRA for these parcels.
12. SCRRA track and signal maintenance crews currently access Control Point (CP) Taylor from Parcel D. This equipment house is in Metro's right of way, just east of Parcel D and north of the grade separated Private Road. The only access to the facilities is through Parcel D. The past owner of Parcel D, the UPRR, agreed to this access arrangement. Accessing this point from the east side of the tracks allows maintenance crews to avoid crossing the active right of way. Please ensure that all park designs include an access road with a locked gate at the property line, through which SCRRA should have access to maintain SCRRA's CP Taylor.
13. Metro and SCRRA should be noticed of any Taylor Yard development details that could impact the railroad right of way. Please also notify both agencies of public processes related to any of the Taylor Yard parcels, since both agencies also have an interest to protect regarding parcel G-2. SCRRA needs to maintain access to 1000' of the track closest to the river in G-2, in order to serve as alternative access to and from SCRRA's maintenance facility in the event that our primary access is obstructed.

3.10

3.11

3.12

3.13

Once again, thank you for allowing SCRRA's input on this DEIR. If you have any questions regarding these comments please contact Deadra Knox, Strategic Development Planner, at (213) 452-0359 or by e-mail at knox@d@scrra.net.

FROM : CA STATE PARKS-SSC

FAX NO. :

Apr. 29 2005 08:35AM P3

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Sincerely,



David Solow
Chief Executive Officer

cc: Patricia Chen, Metro
Susan Chapman, Metro
Freddy Cheung, UPRR
SCRRA Files

RESPONSE TO LETTER 3

David Solow, Metrolink
April 22, 2005

- 3.1 The Notice of Availability for the release of the Preliminary General Plan/Draft EIR for RLASP was sent to property owners adjacent to the project site, both public and private. The document was also available at local libraries and was provided online to facilitate access. The Department has added contact information for Metrolink to the list for any future environmental review on RLASP development projects.
- 3.2 The Department has amended text on page 2-2 of the General Plan/EIR to reflect the rail operators using these railroad tracks. Refer to Chapter 4 for specific changes to the text.
- 3.3 The Interim Public Use (IPU) Plan, Figure 5 (rather than Figure 2-4, as stated in comment letter 3) indicates the location of the proposed traffic signals adjacent to the park entrance. The plan shown in Figure 5 was analyzed previously by the City of Los Angeles and the Department for the Taylor Yard Sportsfield Development Project and the IPU on the Department-operated portion of Parcel D. This analysis was completed in a CEQA Mitigated Negative Declaration (MND) which was circulated for public review from February 27, 2004 through March 29, 2004. The Legislature approved funding in 2001 for the design and installation of the IPU facilities at Parcel D to allow for public access prior to the adoption of the General Plan for the Park. The IPU is allowable for the Department under PRC Section (5002.2(e)). A traffic study was prepared for this project, which evaluated the effects of the new signals on vehicle and pedestrian access and circulation. Consequently, the IPU, including the location of traffic signals and site-specific traffic and safety issues, is not reviewed in the General Plan/EIR for RLASP.

The General Plan/EIR for RLASP serves as a first-tier Environmental Impact Report (EIR), as defined in §15166 of the California Environmental Quality Act (CEQA) Guidelines and discussed in Chapter 5 of the Preliminary General Plan and Draft EIR . Consequently, as specific projects for the State Park are proposed in the future, project-specific CEQA analysis will be completed, with site-specific mitigation measures

- developed as appropriate. It is anticipated that this may include, (but not be limited to) the effect of traffic volumes, pedestrian and bike traffic, vehicular wait times, safety issues, and other baselines which will be evaluated at that time.
- 3.4** The Department has amended text on page 2-43 of the General Plan/EIR to reflect the railroad schedule for the tracks passing the park. Refer to Chapter 4 for specific changes to the text.
- 3.5** Currently, access from Parcel D across the railroad tracks is restricted by a 6-foot fence erected by the site's former owner, Union Pacific Railroad. A new 6-foot fence will be installed around the entire perimeter as described in the General Plan; however, an 8-foot tubular steel fence, as requested by CRRA, will be considered by the Department through site specific or individual environmental project review process, per CEQA guidelines. Furthermore, public safety, access and transportation are addressed in **Chapter 4, Park Plan** in **Section 4.4.11 Access and Transportation** and **Section 4.4.10.4 Safety/Security**. In these sections, the Department outlines future efforts to coordinate with federal, state, local, and railroad authorities to ensure that the Park and all its facilities provide a safe environment for park users.
- 3.6** Access to the Park via public transportation is addressed in **Section 4.4.11 Access and Transportation**. Guidelines in this section encourage multi-modal access and transportation to the Park optimizing regional transportation systems. As indicated in **Section 4.4.11, Access and Transportation, Guideline 8** (page 4-49), the Department would work with appropriate agencies to provide seamless connectivity between existing public transportation nodes and the park.
- 3.7** The Department recognizes the need for rail safety and appreciates the commenter raising the issue of the potential effect of landscaping on the condition of adjacent railroad tracks. The Railroad Buffer Element is included in the General Plan/EIR to separate railroad activities from ecological values and recreational activities at the Park and is not intended to extend beyond the boundaries of the Park. Furthermore, as indicated in response 3.3 above, the General Plan/EIR is a Program EIR, and future landscape enhancements would require a thorough site-specific or individual environmental project review process, per CEQA

guidelines. **Safety Guideline 2** in **Section 4.4.10.4 Safety/Security** has been amended to include consultation with adjacent land owners in the design of future park facilities. Refer to **Chapter 4** for specific changes to the text.

This comment addresses concerns regarding the potential for stormwater to flow onto the adjacent railroad property, and for the proposed wetland to affect stability of the railroad embankments. Parcel D has been re-graded under the MND for the Taylor Yard Park Development Project finalized in May 2004. The drainage from the site is now directed into a retention area on the park site to allow for percolation of storm water. The plan was designed to retain all runoff onsite by utilizing onsite retention and groundwater infiltration. The grading conforms to all applicable engineering standards and no impacts to adjacent properties were identified in the previous MND or in the General Plan and EIR for this project.

- 3.8** As indicated in response 3.3, the environmental review for the Taylor Yard Park development, including grading activities associated with the Department's IPU plan, has been completed in the MND described above. Any future projects proposed at the site will require a thorough site specific or individual environmental project review process, per CEQA guidelines.

In terms of the future park, **Guideline 5** in **Section 4.4.10.6, Geologic and Seismic Hazards**, requires that permanent BMPs be installed to prevent excessive rainfall runoff and minimize erosion potential. Furthermore, as indicated in **Section 5.6.6, Water Quality and Hydrology**, the total area of impervious surface is anticipated to decrease as a result of the park development. Combined with the proposed vegetated and water feature areas, runoff would be expected to remain at current levels or decrease as a result of implementation of the General Plan/EIR.

Water Guidelines 3 and 4 in **Section 4.4.2.2 Watershed and Water Quality**, allow for creation of wetlands, drainage basins, and other features to prevent any increase in runoff from the site. These guidelines encourage the inclusion of a wetland or similar water features in the final design; however, the possible location would be determined and analyzed in future project analysis.

- 3.9 Guideline 2 in Section 4.4.10.4, Safety/Security**, states that adjacent landowners would be consulted during the design of future park components. The design phase includes discussions regarding construction and maintenance, which would also be addressed in environmental reviews for future park components. Consequently, should access to the railroad right-of-way be required for park construction or maintenance work, adjacent landowners, including SCRRRA, would be contacted and consulted prior to entry.
- 3.10 Guideline 2 in Section 4.4.11 Access and Transportation** calls for exploration of options which address the short- and long-term need to provide access between both parcels. No at-grade crossings of the railroad tracks are proposed in the General Plan as this would violate the Safety/Security goal (page 4-38) of providing a safe environment for park visitors and staff. Future projects to connect Parcels G-1 and D would be subject to further CEQA review. As discussed in response 3.3 above, the RLASP General Plan/EIR serves as a first-tier EIR, as defined in §15166 of the CEQA Guidelines. Individual and/or site-specific projects and appropriate CEQA compliance will follow the General Plan/EIR. The analysis of broad potential environmental impacts discussed in the Chapter 5 of Volume 1 will provide the basis for future second-level environmental review, which will generate and evaluate more detailed information and analysis for site-specific developments and projects. These projects include management plans and facility development projects. Planning and feasibility studies for park management, recreation, and resource protection are ongoing and have occurred prior to the General Plan approval.

Note that the General Plan/EIR contains language consistent with the installation of grade-separated crossings per the following.

Section 3.1.2, Park Unit Connectivity and Cohesiveness: Ideas such as, lowering the grade of the railroad tracks could help to visually connect the parcels, and the possibility of undergrounding the train tracks into a tunnel could allow for safe physical access between the parcels via a vegetated covering over the tunnel (page 3-3).

Cohesiveness Guideline 5 in Section 4.4.4, Cohesiveness/Connectivity: Consider working with Union Pacific Railroad to lower the grade of the tracks and allow for a vegetated covering over the tunnel to provide visual, physical, and biological connectivity between parcel D and G-1 (page 4-25).

- 3.11** See response to Comment 3-6, above.
- 3.12** The Department can find no verification that SCRRA, Metro and MTA have a vested or alleged real property interest/easement(s) over the Department's property, nor, in speaking with the previous owner, Union Pacific Railroad, is there any evidence that a "Right of Entry" permit was ever issued or requested by SCRRA, Metro and MTA. The GP/EIR does not acknowledge or provide for such access. If SCRRA wishes to obtain access across State Park property, access must be formally requested from the Department to consider your request.
- 3.13** See response to Comment 3-1, above.

Letter 4: Department of Toxic Substances Control

FROM : CA STATE PARKS-SSC

FAX NO. :

Apr. 29 2005 08:35AM P1



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

April 26, 2005

Ms. Dianna Martinez
Department of Parks and Recreation
City of San Diego
8885 Rio San Diego Drive, Suite 270
San Diego, California 92108

NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE RIO DE LOS ANGELES STATE PARK PROJECT (SCH # 2004091126)

Dear Ms. Martinez:

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion (NOC) of a draft Environmental Impact Report (EIR) for the above-mentioned Project.

Based on the review of the document, DTSC's comments are as follows:

1. The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area.
2. The draft EIR needs to identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the draft EIR should evaluate whether conditions at the site pose a threat to human health or the environment. A Phase I Assessment may be sufficient to identify these sites. Following are the databases of some of the regulatory agencies:
 - National Priorities List (NPL): A list is maintained by the United States Environmental Protection Agency (U.S.EPA).
 - CalSites: A Database primarily used by the California Department of Toxic Substances Control.

4.1

4.2

♻️ Printed on Recycled Paper

FROM : CA STATE PARKS--SSC

FAX NO. :

Apr. 29 2005 08:36AM P2

Ms. Dianna Martinez
April 26, 2005
Page 2

- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
 - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
 - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
 - Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards (RWQCBs).
 - Local County and City maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
3. The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials/wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state laws, regulations and policies.
 4. All environmental investigation and/or remediation should be conducted under a workplan which is approved by a regulatory agency that has jurisdiction to oversee hazardous waste cleanup.
 5. If the subject property was previously used for agriculture, on-site soils could contain pesticide residues. Proper investigation and remedial action may be necessary to ensure the site does not pose a risk to the future residents.
 6. If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated

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4.6

FROM : CA STATE PARKS-SSC

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site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a "Border Zone Property."

4.6
cont

7. An environmental assessment should be conducted in the project area to evaluate whether the project area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste/materials. Potential hazard to the public or the environment through routine transportation, use, disposal or release of hazardous materials should be discussed in the draft EIR.
8. The draft EIR does not address the Hazards section checklist which includes the following questions:
 - Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
 - Would the project create a significant hazard to the public or the environment though reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
 - Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
 - Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
 - Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
 - Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
9. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the draft EIR should

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4.9

FROM : CA STATE PARKS-SSC

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Identify how any required investigation and/or remediation will be conducted, and the government agency to provide appropriate regulatory oversight.

4.9
cont

DTSC provides guidance for preparation of a Preliminary Endangerment Assessment (PEA), and cleanup oversight through, the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov.

4.10

If you have any questions regarding this letter, please contact Mr. Al Shami, Project Manager, at (714) 484-5472.

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

CEQA #1094

RESPONSE TO LETTER 4

Greg Holmes, Department of Toxic Substances Control

April 26, 2005

- 4.1** The history of the park property is well documented throughout the General Plan/EIR. Soil and groundwater contamination levels are discussed in Chapter 2 of the General Plan/EIR. Impacts related to hazards and hazardous materials are evaluated in **Section 5.6.5, Hazards and Hazardous Materials**, and mitigation measures are provided to address potential soil and groundwater impacts.
- 4.2** Pages 2-15 and 2-16 of the General Plan/EIR describe the hazards and hazardous materials conditions onsite and in the vicinity of the proposed park. Before Parcels G-1 and D were purchased, the Taylor Yard complex was designated by DTSC as a Brownfield site after analysis of soil samples, groundwater samples, and monitoring well results indicated that soils were contaminated. As a result, DTSC undertook an extensive analysis of the contaminated soils and developed an action plan for remediation, the Remedial Investigation/Feasibility Study (RI/FS). DTSC supervised the toxic cleanup on the Sale Parcels (Parcels A, B, C, D, E, F) in 1997. A number of remediation techniques were used, including soil-vapor extraction and chemical fixation, to treat the contaminated soil (SCC 2002).

Following the DTSC site remediation, approval was given for partial site closure of Parcel D while deed restrictions were under negotiation. Environmental Resources Management (ERM) prepared a LEADSPREAD model to evaluate the risk of lead exposure from the soil on Parcel D. On September 16, 1998, DTSC granted partial closure for soil at Parcel D (ERM 2003). Based on the evaluation, DTSC prepared the *Explanation of Significant Differences for Union Pacific Railroad Company Taylor Yard – Sale Parcel Site, Hump Yard Area [Parcel D]*, dated January 30, 1998. This report concluded that Parcel D has been cleared to be developed for residential/park standards or unrestricted use. This report is attached to this document as Attachment A.

Parcel G also underwent the RI/FS process; however, during the process Parcel G was subdivided into G-1 and G-2 to expedite the closure or partial closure of soil issues on G-1 for the site's future to the Department. In February 2003, a DTSC draft work plan for Parcel G-1 was prepared by ERM. When the Department purchased Parcel G-1 from UPRC, the site was zoned industrial. Therefore, UPRC was required to remediate only to industrial development standards. Before the Park can be developed, State Parks is required by law to remediate the land to residential/park standards.

In 2003, a hazardous materials database search was conducted for the Park site (Appendix A of the General Plan/EIR). This database search, conducted to American Society of Testing Materials (ASTM) standards, reviewed available environmental records of hazardous or toxic sites at or within a 1-mile radius of the Park. The database findings from the search include, but are not limited to:

- National Priorities List (NPL) - 1 site
- Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) - 2 sites
- Leaking Underground Storage Tank (LUST) - 27 sites
- Underground Storage Tank (UST) - 15 sites
- Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) - 10 sites
- RCRA Small Quantity Generator (SQG) - 44 sites
- California Hazardous Material Incident Report System (CHMIRS) - 17 sites
- Cortese² - 43 sites

A number of hazardous materials generators and underground storage tanks (USTs) were identified in the immediate vicinity of the Parcels D and G-1; however, none of the sites identified in the database were located on these parcels, with the exception of the NPL site. Sites listed on the NPL, or Superfund, are critical and priority cleanup areas, designated by the EPA. As noted in the Groundwater section above, the Park is underlain by

² A Cortese site is defined as one of the following: public drinking water wells with detectable levels of contamination; hazardous substance sites selected for remedial action, sites with known toxic material identified through the abandoned site assessment program; sites with USTs having a reportable release; and all solid waste disposal facilities from which there is known migration.

a contaminated groundwater site known as Area 4 (Pollock) of the EPA's SFVGB. A more detailed description of the hazardous materials on and near the Taylor Yard complex can be found in Appendix A of the General Plan/EIR.

- 4.3** As discussed above, DTSC has been involved in past remedial activities onsite. The General Plan/EIR states that "the potential for exposure to hazardous materials will be considered when planning new structures, roads, parking areas, multiple-use trails, or other facilities or improvements requiring ground disturbance within the Park". Potential exposures could occur both from potentially hazardous materials used during construction and from residual chemicals in soil and groundwater resulting from previous site use.

One of the goals identified in the General Plan/EIR is to provide for public and Park employee safety and prevent exposure to hazardous materials from construction activities and from residual contaminated soil or groundwater. Several guidelines are provided in the General Plan/EIR to address these potential hazards. **Guideline Hazmat 3** indicates that site-specific investigations may be necessary in any areas where new development is planned and where previous soil remediation was not conducted. The investigations may consist of literature review of existing soil, soil gas, and groundwater sampling, and possible additional soil, soil gas, and groundwater sampling. **Guideline Hazmat 4** states that DTSC and/or the Los Angeles Regional Water Quality Control Board (LARWQCB) will be consulted before any ground disturbing activities occur that may create an exposure pathway for contaminants in soil, soil gas, or groundwater.

Implementation of the General Plan is not expected to result in significant impacts on the environment, with the exception of potential impacts related to soil and groundwater contamination. Mitigation measures are provided in **Section 5.6.5, Hazards and Hazardous Materials** of the General Plan/EIR to address these potential impacts. Mitigation measure **HAZ-1** provides guidance for pre-construction coordination with DTSC regarding grading plans for Parcel G-1, soil sampling on G-1 during construction, and protocol to be followed in the event that hazards or hazardous materials are encountered during construction on either parcel. Mitigation measure **HAZ-2** provides guidance in the event that

groundwater or soil contamination is encountered during project grading or construction.

- 4.4** Refer to response to comment 4.3 regarding hazardous materials cleanup and disposal requirements during construction.
- 4.5** Soil contamination on Parcels D and G-1 is described in detail in the General Plan/EIR as discussed above. Refer to response to comment 4.4 for a discussion of the General Plan goals and guidelines and the EIR mitigation measures provided to address potential soil contamination issues resulting from the proposed project.
- 4.6** Parcels D and G-1 are located adjacent to Parcel G-2, which contains similar contaminants to those previously found on Parcels D and G-1. DTSC's comments regarding the future development of the site as it relates to the "Border Zone of a Contaminated Property" will be taken into consideration when a specific project is proposed for construction. As discussed above, the Department will coordinate with DTSC before any ground disturbing activities occur that could potentially create an exposure pathway for contaminants in soil, soil gas, or groundwater.
- 4.7** See response to comments 4.2 and 4.3 above, which describes DTSC's role in previous site clean-up activities and the hazardous materials investigations that have occurred onsite. In addition, response to comment 4.3, discusses the goals, guidelines, and mitigation measures that are provided in the General Plan/EIR to address potential soil contamination issues.
- 4.8** **Section 5.6.5, Hazards and Hazardous Materials** of the General Plan/EIR evaluates the impacts related to hazards and hazardous materials that would result from the implementation of the General Plan. The analysis considers the types of proposed uses at the Park and the standard equipment and materials used in operating and managing the Park in relation to proposed hazards that could affect Park visitors and staff. The thresholds of significance used to evaluate the potential impacts are based on the CEQA Appendix G checklist. Specifically, implementation of the General Plan would have a significant impact related to hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school.
- Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The same significance criteria would be used for evaluation when a proposed project requires further review under CEQA.

- 4.9** See response to comment 4.3, which discusses the goals, guidelines, and mitigation measures that address soil and groundwater contamination issues. These components of the General Plan/EIR specifically address DTSC's comments regarding soil and groundwater contamination that could potentially be encountered during construction.
- 4.10** DTSC's role in previous site clean-up activities is described in response to comment 4.2 above. Comment noted.

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Letter 4: Department of Toxic Substances Control

Los Angeles Unified School District
Office of Environmental Health and Safety

Y ROMER
Superintendent of Schools

TIM BURESH
Chief Operating Officer

ANGELO J. BELLOMO
Director

April 28, 2005

Ms. Dianna Martinez
California Department of Parks & Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

SUBJECT: Proposed Rio de Los Angeles State Park
SCH No. 2004091126

Thank you for giving the Los Angeles Unified School District (LAUSD) the opportunity to comment on the *Draft Environmental Impact Report for the Rio de Los Angeles State Park (SCH No. 2004091126)* located adjacent to the former Taylor Yard, a former Union Pacific Rail yard. The proposed development is for a 57-acre regional park. The area is located about 1,000 feet southwest of *Glassell Park Elementary School* at 2211 West Avenue 30 and about 400 feet south of the proposed *Central Region High School #13* at Parcel F of the Taylor Yard complex.

5.1

The LAUSD Office of Environmental Health and Safety (OEHS) both reviewed the Rio de Los Angeles State Park EIR and prepared the attached comments on school traffic, student safety, and potential transportation issues. These comments describe the mitigation measures necessary to protect school and walk routes during project grading and construction, and following project completion. Additionally, the LAUSD previously reviewed and commented on the *Taylor Yard Park Development Mitigated Negative Declaration (SCH #2004021121)* in a letter dated February 2004; as that project is presently under construction. We would like to respectfully remind you that the attached comments (for Rio de Los Angeles State Park) would also apply to the Taylor Yard Park Development project helping to reduce impacts related to school traffic, pedestrian routes, and transportation safety.

5.2

The measures set forth in these comments must be adopted as conditions of project approval to offset unmitigated impacts on the affected school's students and staff. Thank you for your attention to this matter. If you need additional information, please call me at (213) 241-3199.

Glenn Striegler – RG, REA
Environmental Assessment Coordinator

Attachments

c: Richard Alonzo
Sandra Carter
Pauline Garzon

333 South Beaudry Avenue, 20th Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

The Office of Environmental Health and Safety is dedicated to providing a safe and healthy environment for the 900,000 students and 80,000 employees of the Los Angeles Unified School District.

Los Angeles Unified School District

Office of Environmental Health and Safety

ROY ROMER
Superintendent of Schools

TIM BURESH
Chief Operating Officer

ANGELO J. BELLOMO
Director

ENVIRONMENTAL IMPACT RESPONSES

5.3

Approval and implementation of both the Rio del Los Angeles State Park (SCH No. 2004091126) and Taylor Yard Park Development (SCH No. 2004021121) projects would warrant the following mitigation measures to address environmental impact concerns related to school traffic, pedestrian routes, and transportation safety issues at the existing Glassell Park Elementary School and the proposed Central Region High School #13.

- LAUSD Transportation Branch at (323) 342-1400 **must be contacted** regarding the potential impact upon existing school bus routes.
 - School buses must have unrestricted access to schools.
 - During the construction phase, truck traffic and construction vehicles may cause traffic delays for our transported students.
 - During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may affect school buses' on-time performance and passenger safety.
 - Because of provisions in the California Vehicle Code, other trucks and construction vehicles that encounter school buses, using red-flashing-lights must-stop-indicators will have to stop.
 - The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District will provide School Pedestrian Route Maps upon your request.
- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian and vehicle routes to school may be impacted.
- Installation and maintenance of appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes will not pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards (at contractor's expense) is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractor's are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

333 South Beaudry Avenue, 20th Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

RESPONSE TO LETTER 5

Glenn Striegler, Los Angeles Unified School District

April 28, 2005

- 5.1** The General Plan/EIR for RLASP serves as a first-tier EIR, as defined in §15166 of the CEQA Guidelines. Individual and/or site-specific projects and appropriate CEQA compliance will follow the General Plan/EIR. The analysis of broad potential environmental impacts discussed in **Chapter 5** of Volume 1 of the General Plan/EIR will provide the basis for future second-level environmental review for site-specific developments and projects. These projects include management plans and facility development projects. Planning and feasibility studies for park management, recreation, and resource protection are ongoing and have occurred prior to the General Plan approval. It is anticipated that future analysis may include, (but not be limited to) potential effects on school travel routes and operations.
- 5.2** The Taylor Yard Park Development Project MND, released for public comment in February 2004, was completed by the Department and the City of Los Angeles for the IPU plan and formalized sports fields on Parcel D. A traffic study was prepared for the MND, which evaluated impacts at four intersections for typical weekend peak hour conditions when park use would be at its highest. No significant operational traffic impacts were identified in the traffic study. **Section 5.6.8, Transportation and Circulation**, of the General Plan/EIR evaluates the traffic impacts associated with long-term park operation and implementation of the General Plan. As concluded in the MND, no significant impacts related to transportation and circulation were identified for the General Plan project. **Section 4.4.11, Access and Transportation**, identifies several guidelines to promote safe and efficient access to and from the park.
- 5.3** Mitigation measures proposed by LAUSD are applicable at a project level of documentation. Refer to response to comment 5.2 above.