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Belinda V. Faustinos  
Executive Officer

July 1, 2007

Mr. Minh Thai  
Planning Services Manager  
City Hall West  
11333 Valley Boulevard  
El Monte, CA 91731

Re: Program Environmental Report for the  
El Monte Urban Transit Village Specific Plan Project

Dear Mr. Thai:

The Rivers and Mountains Conservancy (RMC) is grateful for the opportunity to submit comments on the El Monte Urban Transit Village Specific Plan Project (UTV). The San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy, or Rivers and Mountains Conservancy (RMC) was established as an independent State agency within the Resources Agency of the State of California to preserve urban open space and habitats in order to provide for low-impact recreation and educational uses, wildlife and habitat restoration and protection, and watershed improvements.

The goals of the RMC are described in "*Common Ground*", the Conservancy's Watershed and Open Space Plan (found at <http://www.rmc.ca.gov/plan/intro.html>). The Plan presents a simple vision for the future: **restore balance between natural and human systems in the watersheds**. The centerpiece of the Plan is a series of "Guiding Principles" that cities, federal, state and local agencies, communities, groups and individuals can use to plan preservation, restoration and establishment of future open space, water resources, and habitat projects. More than 60 cities in Los Angeles County have adopted this document. The City of El Monte is a recipient of grant funding from the RMC for open space and trail projects and is a partner with the RMC in the Emerald Necklace planning process.

The RMC has reviewed the Draft Program Environmental Impact Report (PEIR) for the Urban Transit Village Specific Plan Project (Project) and submits the following comments for consideration:

**Section 4.5.3.2 Project Impacts:**

19-1 **1. Habitat.** This section neglects to assess the biological resources that will likely be present during the implementation phase of the Project. As discussed in our comments on the NOP for the Project, the Emerald Necklace Network is a plan that has been adopted by the city. The Emerald Necklace network will incorporate native landscapes long the Rio Hondo thus providing riparian and upland type habitats for native species of wildlife. We strongly recommend that the plan for the Project include an overlay identifying the Emerald Necklace corridor and that all Project landscaping on the western edge of the Project be consistent with the Los Angeles River Master Plan Landscape Guidelines. In recognition of this fact, the PEIR should identify measures to assess these values at the time of phased build outs. Such mitigation measures should include but not be limited to physical disturbance, impacts to hydrology and lighting.

19-2 The project impacts to mature trees are also evaluated under this section. The surveyed trees in the Project area provide habitat for urban wildlife that will be severely impacted by the Project. Section 4.5-3 does not adequately address this impact as the resulting opportunities for nesting and foraging will be matched by the mitigation measures: Smaller trees do not offer similar opportunities as taller mature trees do.

19-3 The Project is located in a dense urban part of the San Gabriel Valley subject to high levels of air pollution and smog. It is also located adjacent to a transportation hub that further aggravates this condition. Many studies support the fact that trees function as important filters of air pollution in such environments. According to a study of mature trees in New York City, air quality improvement in due to pollution removal by trees during daytime of the in-leaf season averaged 0.47% for particulate matter, 0.45% for ozone, 0.43% for sulfur dioxide, 0.30% for nitrogen dioxide, and 0.002% for carbon monoxide. ("The Effects of Urban Trees on Air Quality" (Washington, D.C.: U.S. Department of Agriculture Forest Service), <http://www.fs.fed.us/ne/syracuse/gif/trees.pdf>.) The study also finds that air quality improves with increased percent tree cover, i.e. canopy cover. The level of mitigation proposed under Section 4.5-3 of the PEIR does not adequately address the loss that will be sustained due to the removal of 257 of the 334 trees surveyed for the Project. The value of two replacement trees at the proposed size will not match the loss of canopy resulting from the project. We therefore recommend that an assessment of the total canopy area be made with the goal of replacing a minimum of 100% of that area within 5 years removal of the surveyed trees.

**2. Hydrology.**

19-4 The RMC support the goals of the Project to incorporate Green Design identified in Section 3 of the PEIR. The project offers many opportunities to achieve this goal. As such, the capture of run off and drainage system should be designed in tandem with those landscaped areas that can receive and retain and/treat the run off. Such landscapes can include riparian swales or clusters, natural or treatment wetland or bio-swales that will become an integral part of the project landscape. These areas will be located in the lower elevation and will be designed to receive the capacity of a storm event consistent with the regulatory retention of run off. Local areas of low elevation can be designed and integrated

19-4  
cont.

into the Project to capture run off, reduce the erosive velocity and reduce the need for irrigation. Stormwater detention areas should be designed to incorporate recreational and interpretive uses. Plant spacing and clearances will be consistent with the landscape guidelines for the LARMP. Green roofs may be considered to minimize run off. However vegetation for green roofs should not rely heavily on supplemental water or complete with the use of solar panels. Finally, a Project Operations Manual should be prepared to prevent and monitor the use and discharge of harmful agents such cleaning agents, pesticides and other chemicals.

### 3. Parks and Recreation.

19-5

As indicated above, the Emerald Necklace has been adopted by the City of El Monte among many other cities, agencies and community organizations. For this reason, Section 4.14.2.4 of the PEIR should address the opportunities presented by the Emerald Necklace both within the Project area and in the context of the Emerald Necklace within the City. By identifying a specific area of the Project that includes the Emerald Necklace and is adjacent to it, the Project could greatly enhance the recreation opportunities for the communities. Unlike many previous projects along southern California's waterways, the Project offers an opportunity to orient its design to a developing recreational element along the Rio Hondo, thereby offering enhanced recreational opportunities for the users of the Emerald Necklace and the residents of El Monte.

19-6

Section 4 of the PEIR indicates that the Project will add almost 3,700 additional residents, 3800 jobs and an unspecified number of daily users associated with the commercial area. Under the City's New Quimby Act Ordinance, the project would need to add 11.1 new acres of park space just to maintain the current already deficient ratio of park acres to population. The increased demand on recreation services posed by the increase in daily population as a result of the Project is not adequately addressed in the PEIR. While the document indicates that provisions will be made to match existing park facilities and elements, it does not indicate how potential conflicts resulting from the increased demand for recreation will be met, nor does it identify how the addition of park acreage and associated operating costs required under the Quimby Act Ordinance can be met in a timely manner.

19-7

Under this Section 4, the document makes reference to Quimby fees that will be paid to the City in lieu of the provision of park acres. However, the document does not identify how the City will use these fees to mitigate for the Project's impacts on recreation. The Emerald Necklace offers opportunities such mitigation and we recommend that the fees be used for implementation of Emerald Necklace projects.

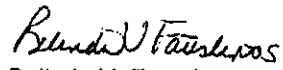
19-8

Section 4.14.3.2 Recreation discusses the use of synthetic turf as a means of off-setting the operating costs associated with the increased uses projected for the Project. However the Section offers no analysis to support the claim, nor does it discuss the life cycle costs associated with the conversion to synthetic turf. Furthermore, no reference is made to the qualitative values associated with the use of synthetic turf versus conventional turf. We recommend that this topic be subjected to further analysis.

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We look forward to seeing the Project exemplifying healthy watershed planning and sustainability. Please feel free to contact me or Frank Simpson, if you have further questions on these comments.

Sincerely,

  
Belinda V. Faustinos  
Executive Officer

cc: file