

September 27, 2012

William Roschen
President
City Planning Commission
200 North Spring Street
Los Angeles, CA 90012-2601

Re: *NBC Universal Evolution Plan (Project)*

Dear Mr. Roschen:

We are writing to respectfully request that the Planning Commission **DENY** the proposed NBC/Universal Evolution Plan (which seeks valuable general plan amendments, zone changes, and development agreements to enable NBC/Universal's development and operation of 1.45 million square feet of studio and office space, a 327,000 square foot theme park, and two 500-room hotels) because it is **INCONSISTENT** with the City and County River Master Plans, other elements of the City's General Plan, and recently adopted Senate Bill 1201. Accordingly, the Planning Commission should send the Plan back to Staff for a revision to include a pedestrian/bicycle greenway, 12-17 feet in width, on the south bank of the Los Angeles River from Lankershim to Barham, along with a schedule and commitment for providing the greenway.

Both the City and the County River Master plans expressly call for a pedestrian/bikeway along the south bank of the Los Angeles River from Lankershim to Barham. See County Plan Page 60 and City Plan Page 10-28.¹ This segment is crucial to river revitalization because it provides the opportunity for a non-automotive pedestrian and bike path along the river connecting the greater San Fernando Valley to Griffith Park. A County-owned service road (Muddy Waters Drive) along the river presently exists between Lankershim and Barham. This road segment is subject to a public trust in that it is a Congressionally authorized flood control project which must be dedicated to compatible public uses such as the pedestrian/bikeway called for by the City and County Plans. The Evolution Plan's essential privatization of this road segment – which is critical to supporting a continuous greenway along the LA River – is inconsistent with that public trust.

The Evolution Plan's failure to include the greenway along the LA River is also inconsistent with Senate Bill 1201 (authored by Senator Kevin de León and signed by Governor Brown in August

¹ The Environmental Impact Report for the Evolution is fundamentally defective in that it fails to analyze, disclose and mitigate the Evolution Plan's inconsistency with these adopted land use and environmental policies and programs. The **Los Angeles River Revitalization Master Plan** (adopted by the Los Angeles City Council in 2007 via Council File 07-1342) in its recommendations #4.12 and #5.1 (page 5-5) calls for continuous uninterrupted movement along the river on greenways, bikeways, and multi-use trails. The **Los Angeles County's LA River Master Plan** provides for a continuous bikeway throughout the San Fernando Valley, including the specific recommendation for a trail along the LA River adjacent to Universal City (page 262) adopted by the Los Angeles County Board of Supervisors in 1996. The Los Angeles City Council adopted an accompanying Resolution of Support in the same year (Council File 96-0870). The **City's 2010 Bicycle Plan**, which was adopted by the Los Angeles City Council in 2011 (Council File 10-2385-S2) calls for a fully-constructed, uninterrupted bicycle path along the LA River as part of a Green Network (page 45-47; page 101; Appendix D). The **2012 County of Los Angeles Bicycle Master Plan** calls for the LA River bicycle path to be completed along to Universal City from Lankershim Boulevard to Barham Boulevard (page 92). No project in this entire master plan earned a higher priority score than this segment of the LA River Bikeway (145 of 205 points). The **Metro Bicycle Transportation Strategic Plan** of 2006 supports closing the gaps in the LA River Bikeway, which is a major issue for bicycle connectivity (page 105). The creation of walking and biking trails, which were identified by the citizens of Los Angeles as the highest priority need for recreational facilities by the Department of Recreation and Parks' **2009 Citywide Community Needs Assessment** (Executive Summary page 9).

2012). In enacting SB 1201, the California Legislature has established a clear policy that the Los Angeles River is to be managed for public recreational and educational purposes, as long as these purposes are not inconsistent with flood control and water conservation. SB 1201 specifically finds that the river must be held in trust for the public under Section 4 of Article X of the California Constitution and managed for public access and use with long planned for parkways, open space, bicycle and pedestrian paths and other recreational opportunities.

While the best course is for the Planning Commission to return the Evolution Plan to Staff to incorporate the greenway, as an alternative the Planning Commission should condition any recommendation of approval to require (as mitigation of CEQA land use impacts, overriding consideration for other unavoidable environmental impacts, and public benefit consideration for any development agreement) as follows:

Within 12 months of project approval, the applicant shall prepare improvement plans for a Class I pedestrian/bikeway 12-17 feet in width on the south bank of the river within the existing County right of way (commonly known as Muddy Waters Drive) from Lankershim to Barham and submit such plans to the City and County Planning Commissions and to the County Department of Public Works for their respective review, conditioning and approval. Upon approval, the applicant shall bond (or otherwise guarantee to the satisfaction of the County Department of Public Works) the cost of completing the pedestrian/bikeway. The applicant shall complete improvement of the pedestrian/bikeway within 24 months of approval of the plans by the City and County Planning Commissions and the County Department of Public Works.

The creation of a greenway along the LA River is clear adopted City, County and State policy. Without the incorporation of the greenway in the Evolution Plan, that goal cannot be realized – and indeed – would be frustrated. The City of LA and LA County must be united in their commitment to implement that policy so that the LA River trail system can be completed, and should adopt the goal of completing the greenway by the end of the decade (LA River Greenway 2020).

Please safeguard and support the public interest by requiring the incorporation of the LA River greenway as part of the Evolution Plan. Thank you for your consideration.

Sincerely,



Lewis MacAdams, President
Friends of the Los Angeles River



Bruce Saito, Executive Director
Los Angeles Conservation Corps



Jennifer Klausner, Executive Director
Los Angeles County Bicycle Coalition



Omar Brownson, Executive Director
Los Angeles River Revitalization Corp.



Irma Munoz, Executive Director
Mujeres de la Tierra



Mark Kenyon, Executive Director
North East Trees



Tori Kjer, Program Manager
The Trust for Public Land



Meredith McKenzie, President
Urban Rivers Institute



Miguel Luna, Executive Director
Urban Semillas

Cc: The Honorable Zev Yaroslavsky, Supervisor of the Los Angeles County
The Honorable Antonio R. Villaraigosa, Mayor of the Los Angeles & Members of City Council
Col. R. Mark Toy, Los Angeles District Commander, U.S. Army Corps of Engineers
Gail Farber, Director of Department of Public Works for Los Angeles County
Gary Lee Moore, City Engineer, City of Los Angeles