

Communication from Public

Name: Dan Silver

Date Submitted: 05/22/2020 12:39 PM

Council File No: 20-0105-S1

Comments for Public Posting: Dear Mayor and Council: RE: 20-0105-S1 Bay Street Warehouse Endangered Habitats League (EHL), a Southern California conservation group, appreciates the opportunity to comment on this project. Our concern is over undisclosed and unmitigated impact to bats. Bats are an important part of urban and semi-urban ecosystems, where significant remnants of the original wildlife diversity still survive. This is particularly the case along the Los Angeles River. Bat are pollinators and control insect populations. The CEQA threshold for significance is that impacts to roosts of bats of any species as significant. The Bay Street IS and EIR claims "there is no potential habitat." But the City never did a study to show that no habitat is present, especially in a highly suitable location along the LA River with an abandoned warehouse. Furthermore, the Natural History Museum has recent records indicating that Western Mastiff bat, a CSC species, may use the River as a movement corridor. Warehouse eaves, etc. are indeed potential habitat, and the Remington memo of Feb. 2020 provides substantial evidence that impacts may occur. Demolition and potential loss of roosts should not occur without proper CEQA review. In this case, there is no substantial evidence to support a finding of no significant impact. We request that the City recirculate the EIR for Bay Capital Fund's Bay Street Mixed Use Project (Bay Street) to provide the "meaningful public review and comment" that was precluded when the EIR tiered to an Initial Study that wrongly dismissed key CEQA Checklist items as "no impact". If impacts are present, mitigation can and must be done. Thank you Dan Silver Executive Director

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Comments for Public Posting: Dear Mayor and Council: RE: 2110 Bay Street Mixed Use Project, Case No. ENV-2016-3480-EIR Endangered Habitats League (EHL), a Southern California conservation group, appreciates the opportunity to comment on this project. Our concern is over undisclosed and unmitigated impact to bats. Bats are an important part of urban and semi-urban ecosystems, where significant remnants of the original wildlife diversity still survive. This is particularly the case along the Los Angeles River. Bat are pollinators and control insect populations. The CEQA threshold for significance is that impacts to roosts of bats of any species as significant. The Bay Street IS and EIR claims "there is no potential habitat." But the City never did a study to show that no habitat is present, especially in a highly suitable location along the LA River with an abandoned warehouse. Furthermore, the Natural History Museum has recent records indicating that Western Mastiff bat, a CSC species, may use the River as a movement corridor. Warehouse eves, etc. are indeed potential habitat, and the Remington memo of Feb. 2020 provides substantial evidence that impacts may occur. Demolition and potential loss of roosts should not occur without proper CEQA review. In this case, there is no substantial evidence to support a finding of no significant impact. We request that the City recirculate the EIR for Bay Capital Fund's Bay Street Mixed Use Project (Bay Street) to provide the "meaningful public review and comment" that was precluded when the EIR tiered to an Initial Study that wrongly dismissed key CEQA Checklist items as "no impact". If impacts are present, mitigation can and must be done. Thank you Dan Silver Executive Director