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May 26, 2020

City of Los Angeles
200 North Spring Street
Los Angeles, CA 90012

Response to comments submitted by Dan Silver

CAJA Environmental Services, LLC (CAJA) has reviewed the comments submitted by Dan Silver on May 22, 2020 to the City Planning Commission on the 2110 Bay Street Mixed Use Project's Draft Environmental Impact Report (DEIR) (CEQA: ENV-2016-3480-EIR, SCH: 2017031007), Case No. VTT-74564-1A.

The City of Los Angeles (City) prepared an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) for the 2110 Bay Street Mixed-Use Project (Project) to assess potential environmental impacts of the Project, as described below.

The EIR is comprised of two parts, the Draft EIR and the Final EIR. A Draft EIR was made available and circulated for public review and comment, pursuant to the provisions of CEQA, for a 46-day public review period from November 8, 2018 to December 26, 2018.¹ The Final EIR was released on April 2, 2019, and included responses to comments and text revisions to the Draft EIR based on input received.²

On January 8, 2020, the City Planning Commission (CPC) approved the Project's Vesting Tentative Tract Map and certified the EIR.

Response

A last minute comment was received from Dan Silver with the Endangered Habitats League. The commenter asserts that the Project Site could have potential for bat roosting given its location near the Los Angeles River. The commenter further asserts, without evidence, that absent a bat survey, the EIR's conclusion of no impact to biological resources, namely bats, cannot be supported.

However, the Initial Study determination of no impact to biological resources was based a site inspection by the EIR Consultant, CAJA Environmental Services, confirming on NavigateLA that the Site is not within Los Angeles Significant Ecological Area (Navigate LA, Significant Ecological Areas layer: <http://navigatela.lacity.org/navigatela/>) confirming that the Site is not within a Riparian or Wetland habitat according to the U.S. Fish and Wildlife Service (National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>), the Protected Tree Report (Appendix C to the Initial Study) as well as other physical site inspections including the Phase 1 Environmental Site Assessment.

¹ https://planning.lacity.org/eir/2110_Bay_Street/deir/DEIR%202110%20Bay%20Street%20Mixed%20Use%20Project.html

² https://planning.lacity.org/eir/2110_Bay_Street/FEIR/FEIR%202110%20Bay%20Street%20Project.html

The southern portion of the Site is occupied by a brick building and a partially enclosed shop-type building. The remainder of the Site is open space that is covered with asphalt pavement.”].) At the CAJA site inspection no birds or bats were observed.

Thus, in the absence of any evidence of impacts to biological resources, including bats, there was no need to conduct more focused surveys.

Conclusion

Sincerely,

CAJA Environmental Services, LLC

Seth Wulkan, Project Manager

FIRM BACKGROUND

CAJA is an environmental consulting firm that specializes in environmental planning, research, and documentation for public and private sector clients. For over 33 years, CAJA and its predecessor company Christopher A. Joseph & Associates have offered a broad range of environmental consulting services with a particular emphasis on CEQA and NEPA documentation. Having provided consulting services for hundreds of projects, successfully and efficiently guiding them through the environmental clearance process, the company and staff have earned a reputation for thorough and conscientious work. In addition to the high caliber work products that CAJA invariably delivers, the company’s status as a well-known and respected leader in the environmental planning field is largely based on the personalized, accessible, and honest service that CAJA guarantees to each and every client.

Seth Wulkan has over 13 years of experience and is responsible for all aspects of preparation of environmental review documents. He began his career with CAJA in 2007. Mr. Wulkan is proficient in drafting all sections of environmental review documents; incorporating technical reports into documents; and personally corresponding with public and private sector clients. Mr. Wulkan regularly participates in team strategy meetings from the beginning of the environmental review process through the final project hearings. Mr. Wulkan graduated with college honors from UCLA and completed a Certificate Program in Sustainability at UCLA Extension.