



Villa Marina Council

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200 North Spring Street, Room 75
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Re: ENV-2020-6762-EIR
Draft Environmental Impact Report (DEIR) for the
Updates to the Housing Element and the Safety Element

September 28, 2021

The Villa Marina Council (VMC) represents 18 Home Owners Associations (HOA) that include 685 townhomes. Our community is located within a block of California Highway 1, aka Lincoln Blvd, within a block of the 90 Freeway, and the Ballona Wetlands Reserve is our immediate neighbor. The VMC has an active interest in the Housing and Safety Elements of the City of Los Angeles.

The VMC appreciates the opportunity to comment on this DEIR.

HOUSING ELEMENT UPDATE

The VMC submitted a comment letter to City Planning in August 2020 as part of the long overdue update to the Community Plan for the Westside (specifically Del Rey). Our comments have not changed. They can be found at:

<https://villamarinacouncil.com/wp-content/uploads/2020/08/LA-City-Planning-Letter-8-19-20.pdf>

SAFETY ELEMENT UPDATE

Flooding:

Our Community borders the Ballona Wetlands Reserve and is a relatively short distance from the Pacific Ocean. We have on-going concerns about potential effects of climate change, tsunamis, and the proposed Ballona Restoration (the State's selected multi-million dollar project would change the Ballona Creek levees, and has not yet been approved by the Army Corps of Engineers).

How do we know if our community (near the intersection of La Villa Marina and Fiji Way) is within the City's designated Flood Hazard Area?

Note Section 10 of the 2018 Local Hazard Mitigation Plan (LHMP) is titled "Flood", and the maps of Flood Hazard Areas are not visible on the on-line LHMP. Specifically, page 10-14, with the title "Mapped Flood Hazard Areas in West Los Angeles APC" is basically blank, other than "Insert Flood Map".

1. Where can we locate the most recent Flood Maps for our community?
When were they last updated?
When will they be updated next?

The LHMP notes the importance of mapping flood hazard areas in Section 10.9, page 10-40, of the LHMP. That page lists 19 'flood-related issues relevant to the planning area'. The first three issues are:

- 1) The currently effective flood hazard mapping does not accurately reflect the true flood risk in the City.
- 2) The stormwater/urban drainage flooding risk is not mapped, which makes it difficult to assess this hazard, other than looking at historical loss data.
- 3) Planning tools whose use depends on flood hazard mapping are less effective due to the deficiencies in the currently available mapping.

What is the current status of each of the 19 issues on page 10-40?

2. What is the City's position on the proposed changes to the Ballona Wetlands Reserve, specifically the removal of existing concrete along the sides of Ballona Creek and the addition of above-grade earthen levees?
Has the City reached an independent conclusion about the effect of the proposed changes on flooding probabilities within the City limits, and if so where can we find it online?

Gas Storage:

The VMC Community is not far from the Playa Del Rey gas storage fields. Page 17-4 of the LHMP noted the 2015 Porter Ranch (aka Aliso Canyon) gas leak and its effect on Los Angeles residents and schools. An article in the L.A. Times noted 45,000 people live within 1 mile of the PDR gas storage field. See "The next Aliso Canyon could happen on L.A.'s Westside", dated April 7, 2021 at:

<https://www.latimes.com/business/story/2021-04-07/aliso-canyon-natural-gas-playa-del-rey>

Are the Playa Del Rey (PDR) gas storage fields specifically addressed in the 2018 LHMP?

What are the specific plans to prevent major events like Porter Ranch in the future?

What are the specific plans to prevent smaller events like what happened in 2019 in Marina Del Rey?

1. Is there a specific safety plan in the event of an event at the PDR gas storage fields? Where is that found online?
2. Will safety matters related to a potential blowout at the PDR gas storage fields be featured in detail in the next LHMP?

This letter was approved at the VMC's regular monthly meeting on September 28, 2021.

Thank you for your attention to our comments and concerns.

Sincerely,

Bob Herrera
President Villa Marina Council

ec:

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