



MOUNTAINS RECREATION & CONSERVATION AUTHORITY
Los Angeles River Center & Gardens
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November 6, 2013

Josephine R. Axt, Ph.D.; Chief, Planning Division
U.S. Army Corps of Engineers, Los Angeles District
P.O. Box 532711
ATTN: Ms Erin Jones, CESPL-PD-RN
Los Angeles, CA 90053-2325

Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report

Dear Dr. Axt:

The Mountains Recreation and Conservation Authority (MRCA) commends the City of Los Angeles Bureau of Engineering (City) and the U.S. Army Corps of Engineers' (Corps) efforts on the Los Angeles River Ecosystem Restoration Feasibility Study, Draft Integrated Feasibility Report (ARBOR) and offers this comment letter regarding the potential for transformation of the Los Angeles River (River). The Santa Monica Mountains Comprehensive Plan, adopted in 1979 to preserve and protect what is now the Santa Monica Mountains National Recreation Area and other areas, is a direct parallel to the Los Angeles River Ecosystem Restoration. While considered a daunting endeavor at the time, the past three decades have witnessed the investment of \$750 million in land acquisition and park improvements, creating an interlinked system of parkland protecting the mountains' many jewels. River restoration is at a similar situation today: The path forward is long and arduous, but in 30 years our children will look back and view a restored Los Angeles River as an inevitable outcome and an essential part of the City's fabric.

We appreciate the time and efforts the Corps and City have expended to work with the community and prepare the ARBOR study. We have reviewed the report in detail and we are providing comments in support of Alternative 20 presented in the document. While Alternative 13 has been identified in the ARBOR study as the Tentatively Selected Plan, we found this alternative to lack the comprehension in key areas essential for adequate ecosystem restoration of the Los Angeles River.

Institutional & Technical Recognition

“Per USACE Engineering Regulation (ER) 1105-2-100, significance of resources and effects will be derived from institutional, public, or technical recognition,” page xx. The Mountains Recreation and Conservation Authority (MRCA) is listed on pages xxii and 1-13 as being involved in revitalization activities on the Los Angeles River since the 1990s by constructing a series of pocket parks along its banks. Per page 4-8, the MRCA also participated in the charette process. Per page 3-61, MRCA is recognized as managing the Los Angeles River Pilot Recreation Zone.

It should also be noted that the MRCA has invested many millions in building parks along the Los Angeles River and its tributaries to fulfill our mission, which is dedicated to the preservation and management of local open space and parkland, watershed lands, trails, and wildlife habitat. The MRCA manages and provides ranger services for almost 69,000 acres of public lands and parks that it owns and that are owned by the Santa Monica Mountains Conservancy (Conservancy) or other agencies and provides comprehensive education and interpretation programs for the public. The MRCA works in cooperation with the Conservancy and other local government partners to acquire parkland, participate in vital planning processes, and complete major park improvement projects. We should also be recognized as an organization at the forefront of creating natural recreation amenities and programs in the second (2nd) largest metropolis in the nation. In particular, the MRCA manages and operates nine (9) parks along the River in the ARBOR study area.

By all accounts, the current state of the River is **unacceptable and degraded**. On pages 2-17 through 2-19, ARBOR enumerates the ecological problems with the River especially as impacted by urbanization and flood risk management. The need for restoration is demonstrated by our institutional and technical recognition of the importance of the River and its tributaries to the region's ecosystem function and resiliency.

Public Recognition

The MRCA has provided nature education programming in the ARBOR study area for **more than 20 years**, serving thousands of children and their families. These programs include public campfire programs at pocket parks along the River, 12-week Junior Ranger Programs with community-based partners, field trips for local schools and organizations, and interpretive programs for all ages. One pre-school program is even called “Mommy, the River and Me.” This summer the MRCA managed the opening of a section of the River within the study area to kayaking and water craft through a partnership with the Corps and City. The Los Angeles River Pilot Recreation Zone, as the program was called, gave Angelinos an opportunity to see and experience the River in a different way, increasing the understanding of the River as a vital natural resource

and expanding the constituency for recreation and education along the River. The popularity of these programs, serving an audience that is both local and regional, illustrates a widespread interest and engagement on the part of the public. Clearly, the general public recognizes the importance of the Los Angeles River as an environmental resource, as evidenced by the large numbers of people engaged in the above activities.

The Value of Recreation

Per page 6-3, the third ARBOR study objective is to Increase Passive Recreation. As a local agency, we know there is a great demand for both active and passive recreation in the adjacent neighborhoods. In America's second largest city there is a serious lack of open space and recreational opportunities. We urge the Corps to revise the proposed recreation plan for Alternative 20.

The aforementioned interest and engagement with the River should be supported with restoration designs that allow additional appropriate public access and interpretation of the restoration, watershed and habitat. The recreation plan should take advantage of such locally popular passive recreation opportunities as kayaking, bicycling, hiking, bird-watching and community gathering by maximizing the relationship between nature and people. The recreation plan will be the way the Corps garners public support for the restoration efforts, but only if the plan is as robust as possible. Furthermore, the opportunity to use the restored wetlands and habitat areas as an educational resource for local schools and the community at large should not be wasted. Design of trails, for example, should accommodate group gathering on the edges near educational opportunities and allow for placement of interpretive signs. Corps policy allows the recreation plan to cost up to 10% of the construction plan per the Corps' Engineer Regulation 1105-2-100: Planning Guidance Notebook, Appendix E – Civil Works Mission and Evaluation Procedures, page E-182. To accommodate a more robust recreation plan for Alternative 20, we urge the Corps to spend the maximum of 10% as opposed to the 1% that was projected to be spent on the plan for Alternative 13. Recreation is a critical component to keeping the River's restoration safe and functional.

The annual operations and maintenance cost is estimated to be \$42,206 (Appendix C, Attachment 6, page 6-1). Based on over 20 years experience managing natural parks and trails in urban Los Angeles, we are concerned that this estimate will only fund the bare essential tasks to upkeep materials and facilities. Restoration of the River in the ARBOR study area is bound to become a tourist and regional attraction in its own right, but also because it is in close proximity to existing attractions like the Los Angeles Zoo, Griffith Park, Dodgers Stadium, Downtown Los Angeles and The Walt Disney Studios in Burbank, California. It should be anticipated that the site will be heavily used, in addition to the common challenges of maintaining natural amenities in urban areas. In our experience, these challenges include graffiti on hardscape and tree trunks, theft of locked metal equipment, theft of vegetation, prolonged illegal camping and the like. The

MRCA costs to maintain a one mile long stretch of linear stream restoration along the Tujunga Wash is \$80,000 annually. We recommend the cost estimate of annual maintenance and operations for the recreation component of the project should be increased to anticipate site over-use and increased vandalism in the urban environment.

While vandalism cannot be prevented, we have found that “good uses” are effective deterrents to “bad uses.” Costs for multi-week nature education programs can cost approximately \$10,000. The kayaking program we administered this summer did need resources from our ranger, interpretation and planning divisions. In addition to maintenance funding, funding should be set aside to develop and operate robust interpretation programs.

Cost-effectiveness

Cost is a factor in today's constrained economic environment, but any real ecosystem restoration plan will take several decades to implement. We cannot take a shortsighted view of today's economics for this vital long-term plan. The Verdugo Wash and other components of Alternative 20 capture the long-term watershed value by linking the River to multiple large corridors and refuges in the mountains and along the river banks. In so doing, we will provide benefits in restoring a balance for the species in the ecosystem and the public within an urban setting.

Real estate costs are a major factor in any development in an urban area, including ecosystem restoration developments. Land acquisitions in the City will be expensive. However, the scarcity of habitat and ecosystems in an urban area are far more valuable than in other parts of the nation because of that scarcity. The City of Los Angeles is the second largest city in terms of population in the U.S. The value of the ecosystem should be valued even higher in light of the dearth of such habitat in the area.

Alternative 20 is a “Best Buy” plan. It was determined to be efficient but not the most efficient of the four final plans as measured by the cost effectiveness/ incremental cost analysis (CE/ICA). Throughout the discussion of CE/ICA in the Integrated Feasibility Report, statements are made that this is a tool to assist in plan formulation and evaluation “to help inform a decision” (Section 4.11, pages 4-34 and 4-35). However, Alternative 20 is the most complete, cost-effective, and acceptable plan in terms of true ecosystem restoration and sustainability. We believe that if the decision criteria are structured to conform to the Corps' own analysis, and other values discussed above are given adequate consideration, either in additional habitat units or by some other means, it will become clear that the incremental benefits of Alternative 20 relative to the costs will make Alternative 20 the Preferred Plan.

The increased effectiveness of the Alternative 20 is commensurate with the increased costs:

- Alternative 20 restores 6.4 miles of habitat or 58% of the ARBOR length which is two times the length of habitat restored in Alternative 13 (3.2 miles or 29% of ARBOR).
- According to the estimated quantities for demolition of concrete presented in the Appendix C: Cost, Alternative 20 removes 117,918 cubic yards of concrete while Alternative 13 only removes 36,891 cubic yards. Thus, Alternative 20 removes 3.2 times more concrete than Alternative 13.
- Alternative 20 provides the greatest connectivity of the final four plans. Alternative 20 adds 205% connectedness in the Study Area over Alternative 13. The restoration of a more natural connection to Verdugo Wash substantially enhances the benefits of the ecosystem restoration by providing connectivity for wildlife and plants into the historic floodplain of the Verdugo Wash and into the Los Feliz Golf Course, the Verdugo Mountains, and the San Gabriel Mountains.
- The greater connectivity and biodiversity provided by Alternative 20 will provide the restoration improvements greater ability to naturally be self-sufficient, meaning the annual maintenance costs will likely be less than that of Alternative 13. The thin linear planting areas in Alternative 13 are more susceptible to become overrun by invasive species and urban vandalism.

The ARBOR study claims the cost of not doing the project is \$0, however, this is not an accurate cost valuation. On page 4-32, Figure 4-1 *Baseline to Future HU Comparison* demonstrates there will be a loss of about 1,000 habitat units over 50 years if no restoration is done. This further degradation of the River will further isolate the community from regional visitations which help to boost local economies and property values. Page 4-61 shows values annual net recreation benefits at \$2,905,732 versus \$5,295,376 in annual recreation benefits provided by Alternative 13. The value would be greater for Alternative 20. Without the restoration, there is also a loss of such public health benefits as increased options for active lifestyles, better air quality and better water quality. According to a Forbes magazine "The Business of Obesity, What it Costs Us" (2013), obesity in American costs \$152 Billion in direct costs including health care services, medical tests and drugs to treat comorbidities. Reducing the obesity rate by 5% could lead to savings in health care costs that could pay down the federal deficit by 13%. The increase of plants and living soil within the River restoration zone will naturally clean and filter stormwater runoff, saving municipalities hundreds of thousands of dollars in industrial water treatment.

The Time is Now

Cost and construction feasibility will always be factors that hem in a plan, which why as a planning document, the ARBOR study should be visionary and recommend Alternative 20. If not now, then when? The country has little patience for public investment re-studying an area. We urge the Corps to select Alternative 20 as the final Federal plan, as it provides the greatest net sum of economic and restoration benefits.

Dr. Josephine Axt
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The local sponsor, the City of Los Angeles, has committed to its cost-sharing responsibilities. This is the right plan for restoring the ecosystem values lost by the construction of the Los Angeles River and for the people of our great City.

Sincerely,

George Lange
Chairperson

cc: Dr. Carol Armstrong, City of Los Angeles, River Project Office
Lewis MacAdams, Friends of the Los Angeles River

Atch: Photos of the Los Angeles River in the ARBOR study area







