



MOUNTAINS RECREATION & CONSERVATION AUTHORITY
Los Angeles River Center & Gardens
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November 5, 2014

Mr. Samuel Unger, Executive Officer
Los Angeles Regional Water Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013
Via email: samuel.unger@waterboards.ca.gov; Ginachi.Amah@waterboards.ca.gov

Recreational Use Reassessment of the Engineered Channels of the Los Angeles River Watershed - Part II, Assessment and Staff Recommendation

Dear Mr. Unger:

The Mountains Recreation and Conservation Authority (MRCA) commends the Los Angeles Regional Water Control Board (Regional Board) for conducting a water quality evaluation process in the Los Angeles River Watershed by conducting the Recreational Use Reassessment (RECUR) of the Engineered Channels of the Los Angeles River Watershed Technical Report. We appreciate the opportunity to provide comment on the draft Part II-Assessment and Staff Recommendation.

We have reviewed the Part II report and are providing comments **in support of Board staff's recommendation that the current recreational beneficial use designations be retained** for the engineered channels of the Los Angeles River and its tributaries. The data and analysis presented in the draft Part I of the assessment are insufficient to justify any modifications to recreational beneficial uses in the Basin Plan.

Experience

The Mountains Recreation & Conservation Authority (MRCA) has been revitalizing the Los Angeles River system for more than twenty years by building park projects along the River, enhancing access to the River, implementing regional plans to promote the social and ecological benefits of the River system, providing recreation and education programs to connect people to the River. The MRCA is a joint powers authority with the Conejo and Rancho Simi Recreation & Parks Districts and the Santa Monica Mountains Conservancy (Conservancy). As an institute at the forefront of science-based open space preservation and habitat restoration in the second largest metropolis in the nation, our park building and planning are guided by key planning documents:

- *Santa Monica Mountains Comprehensive Plan (1979)*
- *Rim of the Valley Trail Corridor Master Plan (1990)*
- *Common Ground from the Mountains to the Sea, San Gabriel and Los Angeles River Watershed and Open Space Plan (2001)*

The Common Ground plan sets goals for our work, and chief among them is the creation of River Parkways along the Los Angeles, San Gabriel, and Rio Hondo Rivers and their tributaries. River Parkways are a continuous ribbon of open space, trails, active and passive recreation areas, and wildlife habitat. MRCA has been a lead agency in the design, construction and operations of Los Angeles River Parkway projects in conjunction with the Conservancy and other local government agencies for over twenty years.

The nature education programming provided by the MRCA serves thousands of children and their families each year. These programs include public campfire programs at pocket parks along the River, 12-week Junior Naturalist Programs with community-based partners, field trips for local schools and organizations, and interpretive programs for all ages. Many of these programs are focused on the natural resources of the Los Angeles River Watershed, and their popularity illustrates a widespread interest and engagement on the part of the public.

Comments

The Board Should Follow the Staff Recommendation to Retain the Current Recreational Beneficial Use Designations.

Using RECUR to delist or redesignate stretches of the water body would not reflect currently underway or yet to be planned revitalization projects along the Los Angeles River and its tributaries. If the Board does not follow the staff recommendation to retain the current recreational beneficial use designations, this action would undermine efforts capable of providing enormous environmental, economic, and social benefits to the watershed.

Maintaining a REC-1 designation for the Los Angeles River and its tributaries is aligned with the following State and Federal programs:

- President Obama's America's Great Outdoors initiative;
- Presidential Proclamation regarding the 20th Anniversary of the Executive Order 12898 on Environmental Justice;
- The First Lady's Let's Move program;
- California Senate Bill 1201 that encourages additional use of the River; and
- US EPA's inclusion of the Los Angeles River in the Urban Waters Federal Partnership.

Updates on Status of Current River Recreation Projects

Since the draft Part I report was open for public comment, the following river recreation projects have occurred, all of which support recreational beneficial uses of the Los Angeles River:

- A second successful season of the Los Angeles River Recreation Zone occurred during summer 2014. Approximately 3,000 visitors enjoyed kayaking in the Los Angeles River, in both Elysian Valley and in the Sepulveda Basin.
- The Pacoima Wash Natural Park opened to the public in May 2014. The park is directly adjacent to the wash, increasing public access to these resources.
- Marsh Park Phase II opened to the public in August 2014. This three-acre park expansion includes the first public restroom to serve nine miles of the Los Angeles River Bikeway, and is expected to be frequently used as a starting point for visitors to the River.
- The design and planning process for the Pacoima Wash Bikeway commenced. This 3.25-mile bikeway will connect the Angeles National Forest to the communities of the San Fernando Valley. Project partners for the Bikeway project include the City of San Fernando, the City of Los Angeles, County of Los Angeles, Los Angeles County Bicycle Coalition, and Pacoima Beautiful.
- The design and planning process for Phase II of the Compton Creek Natural Park at Washington Elementary continued. Phase II of this project will feature a public restroom for users on the Compton Creek Bikeway. Construction completion is expected in 2015.
- The design and planning process for the Pacoima Wash-El Dorado Park continued with several public meetings. This park will provide visitors with direct access to the future Pacoima Wash Bikeway.
- MRCA and the National Park Service completed a study entitled "Safe Routes to the River". Working with a cohort of Los Angeles Unified School District (LAUSD) students, the study analyzed four high schools near the Los Angeles River and developed concepts and an implementation plan to enhance each school's direct connectivity to the River and its recreational resources.
- MRCA was awarded funds from the US EPA for a "River Ambassadors" program, which will introduce LAUSD students to local river and watershed issues, and facilitate youth to be capable to launch river awareness and stewardship in their community.
- Improvements to three street-ends in Elysian Valley were constructed, improving the

public's access to, and experience of, the Los Angeles River Greenway.

Each of these projects also includes water quality treatment BMPs, directly resulting in improved water quality in the Los Angeles River and tributaries. The improvements to the water quality also support continuing recreational beneficial uses. These additional resources are direct proof that recreational use of the River and its tributaries is increasing. It is clear that current revitalization efforts occurring along the Los Angeles River have changed how Angelenos view and use the River. The staff recommendation to retain the existing designations will help protect these recreational uses along the River.

Continued Study and Support is Needed

The Board should continue to document the recreational uses of the Los Angeles River and tributaries, establishing even more precedent for these designations. Expansion of current recreational use is clearly desired by the residents of the watershed, and many public agencies and non-profits already have plans and projects in place to facilitate it. Improving the water quality in the River and tributaries will greatly benefit these recreational uses, as well as supporting native habitat and environmental health. Funding for constructing physical improvements for beneficial uses, monitoring use, researching the effectiveness of BMPs, developing new BMPs and technologies, and watershed planning efforts is critical to accommodate the rising demand for river recreation.

Thank you for this opportunity to comment, if you have any concerns please contact Rorie Skei at (310) 589-3230, extension 112 or rorie.skei@mrca.ca.gov, or Melissa Guerrero at (323) 221-9944, extension 130 or melissa.guerrero@mrca.ca.gov.

Sincerely,

George Lange
Chairperson

cc: Kirsten James, Heal the Bay