



MOUNTAINS RECREATION & CONSERVATION AUTHORITY
Los Angeles River Center & Gardens
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August 5, 2020

Ms. Ariana Villanueva
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

<< Transmitted via electronic mail: LARiverCEQA@pw.lacounty.gov >>

RE: 2020 LA River Master Plan Draft Program Environmental Impact Report

Dear Ms. Villanueva:

The Mountains Recreation and Conservation Authority (MRCA) respectfully submits the following comments to the County of Los Angeles, Department of Public Works (Public Works) on the Notice of Preparation (NOP) for the proposed 2020 LA River Master Plan (Project) Program Environmental Impact Report (PEIR) which seeks to evaluate any potential impacts on the environment pursuant to the California Environmental Quality Act (CEQA). The proposed Project is located along the Los Angeles River (LA River) a 51-mile-long, 2-mile-wide corridor (1-mile on each side) of the LA River in Los Angeles County and spans 17 cities and unincorporated Los Angeles County (18 total jurisdictions). Although the LA River was channelized between the late 19th and mid-20th centuries to protect lives and property from flooding as the LA region rapidly grew and transformed to a largely urbanized area, habitat and wildlife have flourished throughout and along the river. Currently, an estimated 1 million people live within 1 mile of the river.

The MRCA is a public agency which was established in 1985 pursuant to the Joint Powers Act and is a partnership between the Santa Monica Mountains Conservancy (SMMC), the Conejo Recreation and Park District, and the Rancho Simi Recreation and Park District. The MRCA manages more than 75,000 acres of parkland and is dedicated to the preservation and management of local open space and parkland, wildlife habitat, watershed lands, and trails as well as ensuring public access to public parkland. As advocates for the Los Angeles River, we have actively acquired and developed open spaces adjacent to the River. We have and continue to develop and provide planning of River and tributary path greenways and existing parks and planned future parks. Additionally, the MRCA also operates and manages the only two River Recreation Zones, which were areas designated for in channel use, upon the river being deemed a traditional navigable waterway by the U.S. Environmental Protection Agency in 2010, which created protections throughout the river's watershed. The MRCA has been an active participant throughout the Project planning process serving on the LA River Master Plan steering committee.

We have compiled below a list of items which we would like to share with you and hope will be thoroughly addressed before the draft PEIR is approved.

Geography

Currently, this analysis is limited to the 51 miles of the LA River, beginning in Canoga Park within the City of Los Angeles, extending to Long Beach where the river meets the Pacific Ocean. Furthermore, the proposed project area extends up to 1-mile wide on each side of the river corridor, for a total of 2 miles, one on each side of the river, being defined as the study area. As subject experts know, the river does not begin at the headwaters in Canoga Park, but rather at the tributaries which originate in the mountain ranges in the Los Angeles Basin. The watershed is vast and although we realize it would be challenging to include all tributaries in the Los Angeles River watershed, there are significant tributaries which account for majority of the water in the river which should be considered for incorporation. The Upper Los Angeles River and Tributaries (ULART) Revitalization Plan analyzes and plans for major tributaries within the watershed; given that opportunities identified in the ULART plan are congruent with Public Work's mission, it would be highly beneficial to expand the County's reach to include tributaries within ULART under the PEIR, which would truly produce a cumulative analysis and regional impact, which the County has stated as being a goal of the Project.

Other planning efforts underway also include the CA High Speed Rail (HSR) project. The proposed alignment from Burbank to Los Angeles is currently in its planning process and poses significant and long-term impacts to the river and adjacent lands, including the threat to impede public access. Another project along the river with substantial beneficial impacts is the Los Angeles River Path project by Metro, which closes a significant 8-mile gap on the river path between the cities of Los Angeles and Vernon. The PEIR should have the foresight to include HSR cumulative impacts and address adverse impacts, as well as LA River Path alternatives included in the project analysis.

Aesthetics

Not only has public perception changed toward the LA River because of its navigable designation, but also because of its visual characteristics. When water, vegetation, habitat and wildlife are found in the river, like many river's outside of Los Angeles, it is then that people realize the value of a natural resource that once existed, a natural and wild river. The PEIR is expected to describe the existing visual character of the proposed Project study area and surrounding areas, and will identify key visual resources and scenic views. There are few naturalized areas in the LA River which remain and should be preserved, including the Sepulveda Basin, Griffith Park, and the Glendale Narrows. The probable impacts of the Project should not include substantial adverse effects on key visual resources and scenic vistas. Although one of the primary functions of the Flood Control District is to maintain flood capacity, it is our hope and expectation that many of the existing characteristics will not be compromised for flood control purposes, but rather will be preserved and enhanced to further create a thriving, riparian ecosystem. The mission of the Flood Control District has since been expanded to include maximum environmental and ecological benefits, as well as recreation - all of which contribute to river aesthetics.

Biological Resources

The LA River contains an abundance of biological resources, existing both in the river channel and adjacent to the river within the 2-mile-wide study area of the river corridor. The rich riparian habitat that thrives off the existing water sustains vegetation, plants and wildlife along with their habitat. The river and its adjoining areas is home to aquatic and non-aquatic invertebrates, endangered species, such as the Least Bell's Vireo, the red-legged frog, and more than 20 species of birds. Additionally, the river is a significant stop along the Pacific flyaway being essential for migratory birds. In order to best evaluate the impacts of the project, all of the following should be taken into consideration and assessed in the PEIR, along with appropriate consultation with the Department of Fish and Wildlife. Additionally, should the PEIR be sufficient to allow for channel modifications, such as those proposed in the City of Los Angeles Fish Passage Study led by Stillwater Sciences and funded by Wildlife Conservation Board, endemic and native endangered fish could be reintroduced.

Hydrology/Water Quality

An opportunity presented by the PEIR includes the ability to analyze the differences between the existing conditions and the future conditions with respect to Hydrology and Water Quality in the river. Analysis should thoroughly analyze pollutant sources and concentration of pollutants- how such pollution concentration levels would impact habitat, wildlife and human uses, thus affecting compliance with the Federal Clean Water Act and safe water quality uses. Also, changes in the impervious surfaces, application of stormwater infrastructure, and discharges, affecting sensitive habitats such as the estuary. Given the potential for reduced discharges, water quality standards could be affected, specifically as it pertains to water quality standards of surface/groundwater that could be degraded. Also, currently underway is a study by the State Water Resources Control Board analyzing river flows; the PEIR should include analysis for how the LA River Flows Study will be incorporated.

Land Use/Planning/Air Quality

There are a variety of land uses that occur adjacent to the LA River in the County and within each of the cities that which the study area analyzes. The PEIR should evaluate the compatibility of the proposed Project with neighboring areas within all of the jurisdictions, analyze and mitigate change to or displacement of existing uses. The proposed Project is located in such a publicly important area that public access should be a priority when planning for uses, while creating a cadence of accessways, access points and amenities. These opportunities offer current and future restored habitat on urban public lands which are scarce.

Given the scale of projects in the Kit of Parts, many of which are listed in the Project, those that specifically are related to housing should only consider transit-oriented developments (TODs) that are adjacent to public transportation, in order to reduce vehicle

miles traveled (VMT) and to mitigate the potential to drastically increase traffic congestion in already dense neighborhoods where air quality by the single largest polluter, being vehicles, would be exacerbated further contributing to Greenhouse Gas (GHG) emissions.

Public Services

It is anticipated that use of the river will increase and the PEIR should determine, at a program-level the impacts and need for Public Services — including fire protection, public safety which should be provided by the appropriate law enforcement, such as a Ranger, homelessness assistance and encampment cleanups, as well as other public facilities. The PEIR should assess available information on the current demand for public services against any new demand that is created by Project improvements. The PEIR should review the 2019 Los Angeles River Ranger Program Establishment Plan in order to ascertain the issues and recommendations provided through community consensus.

Recreation

Stakeholders and leaders have worked years to allow for recreation, both in channel and along the river. Today, passive recreation is one of the most popular uses of the river which include walking, running, biking, fishing and kayaking. The river offers opportunities for mental and physical health for the 18 jurisdictions throughout the study area, serving not only the estimated 1 million people who live within 1 mile of the river, but also those who travel from far distances to experience an urban river. The PEIR should address the proposed Project's potential impact on notable recreation areas and the river recreation zones; impacts to regional, neighborhood, and local parks and those in planning; trails; and other local recreational facilities and uses. The PEIR should analyze the Project's likelihood to increase the use of existing neighborhood and regional parks or other recreational facilities and the substantial physical deterioration that could be accelerated. Additionally, the PEIR should consider any adverse physical effects on the environment. Recreation access should only be enhanced for public use while fostering natural, recreation areas, and protecting existing investments that have been made in the river.

Population/Housing

While the state is in a housing crisis, the proposed Project's potential for inducing population growth and displacing people within the County remains a threat to both government and existing communities. As a member of the Los Angeles Regional Open Space and Housing (LAROSAH) Collaborative, the MRCA does not believe that affordable housing and open space protection need to be mutually exclusive; however, when planning for housing, we must propose solutions for the appropriate type of housing- affordable and low income, while maintaining protections for open space. The MRCA supports investments in communities which also protect the social fabric of respective neighborhoods. Other considerations should include the land use analysis, additional infrastructure and construction that would be required, as well as potential adverse effects to the environment and wildlife while undergoing improvements for population growth. Los Angeles is already a highly urbanized County, lacking open space,

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parks, sufficient habitat for wildlife, and permeable surfaces which should be championed throughout the PEIR for a cumulative analysis and regional environmental impact.

Thank you for your consideration of our comments. Please address any future documents, notices, and questions to myself at the above letterhead address, by phone at (323) 221-9944 x 109, and email at sarah.rascon@mrca.ca.gov.

Sincerely,

George Lange
Chairperson