

**SANTA MONICA MOUNTAINS CONSERVANCY**

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February 24, 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 (RECUR) of the Engineered Channels of the Los Angeles River Watershed Technical Report**

Dear Mr. Unger:

The Santa Monica Mountains Conservancy (Conservancy) commends the Los Angeles Regional Water Control Board (Regional Board) for starting 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 and respectfully submit this letter to share our experience, concerns and aspirations for the future recreational uses of the Los Angeles River and its tributaries. We appreciate the time and efforts the Regional Board has expended to work with the community and prepare the RECUR study. We have reviewed the report in detail and we are providing comments in support of maintaining REC-1 for the Los Angeles River and its tributaries.

**Experience**

The Conservancy and a joint powers partner, the Mountains Recreation & Conservation Authority (MRCA), have been revitalizing the Los Angeles River for more than 20 years by building park projects along the River, enhancing access to the River, developing regional plans to promote the social and ecological benefits of the River system, providing recreation and education programs to connect people to the River, and most recently by managing the first Los Angeles River Pilot Recreation Zone (Rec Zone) in Reach 3. In just four (4) months approximately 3,000 people enjoyed kayaking down the River in the Rec Zone (Reach 3).

The Conservancy has invested approximately \$70 Million in building parks along the Los Angeles River and its tributaries to fulfill our mission to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails and wildlife habitats that are easily accessible to the general public. Since 1980, the Conservancy has preserved over 70,000 acres of parkland in both wilderness and urban settings, and has improved more than 114 public recreational facilities throughout Southern California. 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 the Conservancy's work, 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 defined as "a continuous ribbon of open space, trails, active and passive recreation areas, and wildlife habitat" (page 3).

The nature education programming funded by the Conservancy serves 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." 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.

These efforts have been supported on state and federal levels, such as through the adoption of Senate Bill 1201 that encourages additional use of the River and through the designation of the Los Angeles River by USEPA as one of seven pilot watersheds in the nation to be included in the Urban Waters Federal Partnership that serves to revitalize urban waterways in under-served communities. Maintaining a REC-1 designation for the Los Angeles River and its tributaries is also aligned with the President's America's Great Outdoors initiative, the Presidential Proclamation 20<sup>th</sup> Anniversary of the Executive Order 12898 on Environmental Justice and the First Lady's Let's Move program.

**Concerns**

Using RECUR to delist or redesignate stretches of the water body does not reflect currently underway or yet to be planned revitalization projects along the Los Angeles River and its tributaries. We are extremely concerned that the study has the potential to undermine efforts capable of providing enormous environmental, economic, and social benefits to the County.

While there was only one (1) survey respondent for Compton Creek (page 56), we wanted to reiterate that based on our experience working along the Compton Creek, the multi-purpose path is being used by many for walking, bicycling, outdoor education programs and cleanups. Public feedback on current uses of Compton Creek can be found in planning studies such as the Compton Creek Regional Garden Park Master Plan (2006) and the Compton Creek Trail System Equestrian Recommendations (July 2013). Moreover, the community gave feedback on current and potential uses of the Creek during the planning process for the newly opened (November 2013) Compton Creek Natural Park at Washington Elementary, located along the Creek at 941 West Cressey, Compton, CA 90222. The park provides enhanced access to the Creek. A Compton Creek Outdoor Classroom is also located along the Creek on the campus of Compton High School. The eco-club conducts creek related programs in the pocket park during the school year.

Similarly, Reach 1 of the River was found to have fair access and little recreational use (page 42), despite it being the longest reach of the mainstem, at 16 miles. Its length is four times the length of most of the other reaches, and should have received four times as many site visits, but didn't. The Rivers and Mountains Conservancy (RMC) actively funds projects in this area and should be consulted for additional usage numbers.

This kind of disparity between the RECUR study and the reality of usage underscores the importance for the Regional Board to conduct ongoing monitoring of the conditions of our River system, but also to include monitoring that has been done by others, in order to truly represent beneficial uses.

It should also be noted that MRCA is developing a recreation trail and several water treatment parks along the Pacoima Wash per the Pacoima Wash Vision Plan (2011). 8<sup>th</sup> Street Park will be opened in 2014 and El Dorado Park is currently being planned. The Conservancy has contributed funds to develop Aliso Park at the confluence of Aliso Canyon Wash and the Los Angeles River.

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### **Aspirations**

We urge the Regional Board to not pursue any Basin Plan amendments to beneficial uses of the Los Angeles River and its tributaries, unless they are adding uses. Existing beneficial use should be maintained, “whether or not they have been attained, in order to implement state mandates or goals” (page 5 of RECUR). Per 40 CFR 131.10 (h), the State is prohibited from removing designated uses if it is a recreational use as defined by 40 CFR 131.3, unless a use requiring more stringent criteria is added; or such uses will be attained by implementing effluent limits required under section 301(b) and 306 of the Act and by implementing cost-effective and reasonable best management practices (BMP). The River Parkway projects the Conservancy funds are such cost-effective BMPs. Tujunga Wash Greenway project is 1.2 mile stream restoration that uses a gravity-fed, natural system infiltrate and treat stormwater before entering the Tujunga Wash. During a year with average rainfall, as much as 325,000 gallons of water per day will flow through the naturalized streambed and can produce enough groundwater to provide 760 families with drinking water for an entire year. As mentioned earlier, the Conservancy is at the forefront of revitalizing Los Angeles’ waterways into River Parkways with dozens of projects currently in the planning and construction phases.

Current revitalization efforts occurring along the water way have changed how Angelinos view and use the River. The Regional Board should be working towards protecting recreational uses along the River, not removing them.

Thanks you for this opportunity to comment, if you have any concerns please don’t hesitate to contact Rorie Skei at (310) 589-3200, extension 112 or skei@smmc.ca.gov, or Melissa Guerrero at (323) 221-9944, extension 130 or melissa.guerrero@mrca.ca.gov.

Sincerely,

LINDA PARKS  
Chairperson

cc: Kirsten James, Heal the Bay