

January 4, 2018

Dan Sharp
Senior Civil Engineer
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900 Fremont Ave
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RE: Draft Lower LA River Revitalization Plan

Dear Dan,

Assembly Bill No. 530, authored by Assembly Speaker Anthony Rendon, provides the opportunity to develop a revitalization plan for the Lower LA River that addresses the unique character and diverse needs of Lower LA River communities. Friends of the Los Angeles River (FoLAR) has had the privilege to be actively involved in the development of the Lower LA River Revitalization Plan as a member of the Working Group and several of its Plan Element Committees. A revitalization plan for the Lower LA River has the potential to bring essential quality of life improvements for both the Lower LA River and the communities that surround her. The plan also promises to set an important regional precedent for community-based river-revitalization planning and brings essential resources to communities that bear a disproportionate burden of environmental degradation.

We thank Speaker Rendon for his leadership in convening this Working Group to help realize the benefits of a renewed river for the communities of the Lower LA River.

It is in that spirit of promise and opportunity, having devoted substantial time and effort in helping shape this plan, that we (FoLAR) make these comments/recommendations on the Draft Lower LA River Revitalization Plan (Draft Plan) before its adoption. Our comments here are intended to provide feedback on the overall content, direction, and effectiveness of the Draft Plan and recommend corrective steps. Recommendations on specific language and format will be submitted separately for your consideration in editing the document.

1. The Draft Plan provides very minimal improvements to the Lower LA River's ecological health or its natural river-functions.

One of the intended goals of the Lower Los Angeles River Working Group was the development of a revitalization plan based on "watershed planning methods" (AB 530

Rendon). The Draft Plan utilizes a planning boundary of roughly one-mile around the LA River corridor from Vernon to Long Beach. (Appendix A: Baseline Conditions) A watershed-planning method would extend this boundary to communities of the Lower LA River connected by both wet-weather and dry-weather flows. The established 1-mile buffer severely limits the ability of the Draft Plan to provide restoration benefits that rely on understanding inputs and outputs on a watershed or sub-watershed scale. These benefits, such as river habitat restoration, water quality improvement, and improved flood risk management consistently score lower on the Opportunity Assessments (Appendix B.2: Opportunity Assessments) of revitalization projects – less than 67% for Conserve, Enhance, and Restore Habitat, Biodiversity and Floodplain functions, Improve Environmental Quality, and Manage Flood Risk.

Furthermore, the highlighted Signature Concepts (Cudahy River Park, Rio Hondo Confluence, and Willow Street) provide little river restoration benefits outside of vegetated terracing. The Rio Hondo Concept lacks any mention of the unique opportunity of the confluence to increase in-channel wetland habitat through new flood control infrastructure. The Willow St Concept – which boasts the only soft-bottom portion of the Lower LA River in the study area – is scored at 100% for nearly all Water and Environment metrics, yet proposes no habitat restoration and no water quality remediation features.

The Draft Plan does include a template for Channel Enhancements, which includes terracing for vegetation and public access into the river channel. However, this terracing physically separates vegetation from the river's biological and hydrological functions, limiting its value as a river restoration feature.

The Lower LA River possesses unique opportunities to provide key benefits to river's ecological health. These benefits are key components of the Water and Environment - Goals and Objectives for the Draft Plan (Appendix A.2: Goals, Objectives and Metrics), as well as regional restoration efforts for the Los Angeles River. Furthermore, these benefits are essential to communities of the Lower LA River already disproportionately burdened by substantial environmental degradation.

In order to address these concerns, FoLAR strongly recommends the following:

1. As examples of projects taken to a higher level of design and concept, the Signature Concepts should include clear amenities that provide greater improvements to the river's ecological health as underscored by the established Water and Environment Goals, Objectives and Metrics.

2. The Signature Concepts should also identify and prioritize site-specific opportunities to meet the plan's Goals and Objectives that are limited at other locations.
3. To help guide the other listed projects, the Draft Plan should describe what further study or analysis would be necessary to incorporate better improvements to the river's ecological health and natural riparian functions.

2. Though intended, the Draft Plan did not include the robust community outreach and engagement the working group originally desired.

To be clear – we applaud the efforts of the County and the Speaker's office to form an inclusive process that provides a valuable framework for future planning efforts. Specifically, the robust working group comprised of many NGOs doing work in the River and the local communities is an important step forward for planning in the River. While there has been robust and sustained participation from members of the Lower River Working Group over the course of two years, there has been substantially less involvement from general public in the formation of the Draft Plan and its revitalization projects.

Early in the process, the Community Engagement Committee proposed existing programs that could be leveraged to magnify the level of community engagement. Unfortunately, the budget allocation was insufficient to cover these programs at their intended scale and the outreach impact was minimized.

According to the Draft Plan, approximately one thousand members of the public have been engaged through various outreach and engagement efforts (both digital and in-person). However, the Draft Plan has the potential to impact hundreds of thousands community members. There is a clear need to expand public awareness of the Draft's Plan potential to bring significant improvements to the Lower LA River communities.

In order to address these concerns, FoLAR strongly recommends the following:

1. Engage the print and broadcast media to help build awareness about the Plan and its potential impact for the Lower River communities.
2. Develop a public engagement strategy that includes a sustained platform of engagement, such as a website and management team to provide steady updates to the public on the progress of the Revitalization plan. This is particularly important as "Signature Concepts" are further refined and implemented through what will hopefully be an increasingly robust public process.

3. The Draft Plan could provide greater transparency and public input.

Over the two year process, the Working Group and its Committees performed substantial work developing Goals, Objectives and Metrics that would help guide revitalization projects to deliver the most crucial benefits for the Lower River communities. In the Draft Plan, those Goals and Objectives are relegated to Appendix A and missing from the main content of the Revitalization Plan. As guiding principles for the Draft Plan, it is crucial for the public and stakeholders to understand both the intention and direction of revitalization projects.

Similarly, the Community Stabilization Toolkit was developed after months of work by Working Group members to ensure the Revitalization Plan included some safeguards against the potential economic displacement of vulnerable community members. Those potential safeguards are relegated to the Appendix which obscures how relevant these policies are to the development of the Revitalization Plan.

Lastly, the Draft Plan's public comment window does not provide sufficient time for the public to effectively review and provide feedback on the Draft Plan. The Draft Plan was released to the public on December 7th with comments due by January 11th. The end of year holiday season effectively reduces this comment window by two weeks as most people travel or spend time with family for holiday celebrations. This provides less than thirty days for the public to review and submit comments for a Draft Plan that most are unfamiliar with. We strongly urge you to extend the comment deadline to provide the public with sufficient time. Revisions to the plan can begin to be incorporated while the comments are continued to be received in order to meet project deadlines.

In order to address these concerns, FoLAR strongly recommends the following:

1. The Goals and Objectives included in Appendix A should be synthesized into a report and included as a main chapter in the Draft Plan.
2. The Community Stabilization Toolkit should be included as a main chapter of the Draft Plan.
3. The comment period for the Draft Plan should be extended from January 11th to January 30th.

We would like to note, there are several important benefits the Draft Plan does provide:

- Opportunities for new park and recreational amenities, turning former brownfields into new publicly accessible spaces.

- Increased neighborhood connectivity through additional multi-modal trails and bridge crossings along the river.
- Opportunities to highlight community character, fostering community pride, through programmable public spaces, and additional opportunities for public art.
- Preliminary planning resources to Lower River municipalities that individually lack the resources or authority to develop a river revitalization plan
- A Watershed Education Plan that makes environmental education and programming opportunities more accessible to Lower River communities.

Nevertheless, the rush to deliver the Draft Plan has minimized some of the most important breakthroughs the Working Group and stakeholder spent months developing. We sincerely hope you will take these comments into consideration. Please feel to contact us if you have any questions regarding any of our statements above.

We look forward to seeing the Lower LA River Revitalization Plan lay the foundation for river-revitalization that achieves a healthier river in support of healthier river communities. Thank you for your leadership in these efforts.

Sincerest regards,
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