FRIENDS OF THE LA RIVER

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June 10th, 2018

Dr. Christopher Solek
Biologist
Planning Division, Environmental Resources Branch
Ecosystem Planning Section Los Angeles District, U.S. Army Corps of Engineers
915 Wilshire Blvd., Los Angeles, CA 90017

RE: Los Angeles River Channel at Glendale Narrows, Reach 5C and Reach 6A, Accumulated Material Removal Project – Environmental Assessment

Dear Dr. Solek,

On behalf of Friends of the Los Angeles River (FoLAR), I would like to submit the following comments regarding the U.S. Army Corps of Engineers (USACE) Accumulated Material Removal Project proposed for the LA River at Glendale Narrows Reach 5c and 6A.

FoLAR is an environmental nonprofit with a long-standing legacy advocating for a publicly accessible and ecologically healthy Los Angeles River. Our +50,000 supporter base has been built through decades of community engagement, education and advocacy programs that have coalesced into a nationally recognized river stewardship movement. We have been intimately involved in the formation, funding and implementation of several river revitalization and restoration projects and policies including, the LA City River Revitalization Mater Plan (LARRMP) and USACE Los Angeles River Ecosystem Restoration Feasitbility Study (ARBOR).

Overall we find several concerns with the USACE sediment removal project as proposed, particularly with regards to the proposed project's impact to existing sensitive and unique riparian habitat, and established public access programs designed to increase education, stewardship and recreational opportunities within and along the LA River. These concerns and others are discussed further below.

## 1. Proposed Sediment removal program does not fully account its potential to impact unique riparian habitat

We greatly appreciate the proposed project designates "native species preservation areas" and "riparian zone preservation areas" that are meant to be protected from

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sediment/material movement activities in order to avoid the most egregious impacts to riparian ecology. However, the analysis still potentially overlooks its impacts to riparian ecology by making a significance determination without more complete and up-to-date understanding of the ecological functions and processes at work in this unique urban river ecology. As late as 2016, The Nature Conservancy conducted a comprehensive study of habitat enhancement opportunities along the LA River in Elysian Valley (within the proposed project's reach) which included results of biological surveys of current species occurrence and habitat use. The study found an incredible amount of species richness despite significant impacts from channelization and urbanization of its watershed. To our knowledge, this represents some of the most recent and comprehensive analysis of riparian ecology in the Glendale Narrows which reflects present conditions at the proposed project's site and yet the study's findings are not included or referenced. Similarly, several other monitoring efforts such as LA Waterkeeper's RAFT program, which collects habitat data in the Glendale Narrows based on the California Rapid Bioassessment Protocol (CRBP), provide preliminary indications that there exist significant biological functions even in sparsely vegetated soft-bottom sections of the LA River. These suggest a more complete and comprehensive understanding of the riparian ecology in this section of the LA River is necessary to make a qualified determination of potential impacts to biological resources. We encourage USACE reach out to these groups and perform the necessary studies in order to more completely account for potential project impacts.

## 2. The proposed project should fully consider its ability to impact Public Access Programs

The environmental assessment for the proposed project does not include a project timetable yet is sited within one of two seasonal "River Recreation Zones" established by the City of Los Angeles in order to promote safe public access and further river revitalization. The Elysian Valley Recreation Zone extends from Fletcher Dr. to just upstream of the I-5 fwy overpass and runs from Memorial Day to the end of September. This period is marked by significant public recreational use of the river including in-channel activities such as kayaking, fishing, walking, and river-adjacent activities such as biking, walking, bird-watching etc. Without a set project timetable, it is impossible to determine if these activities could be potentially impacted by the proposed project's activities.

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Furthermore, outside of the recreation season, river-advocacy organizations such as FoLAR conduct significant public engagement, education, and advocacy work within the area of the proposed project. Public programs such as the FoLAR's annual Great LA River Cleanup mobilizes thousands of volunteers to remove trash and other debris from the LA River providing both direct benefits to river ecology as well as immense public engagement opportunity. These events along with several other public engagement programs represent crucial literacy and stewardship building opportunities that encourage public awareness and participation in river-revitalization efforts. USACE should provide clear information regarding the proposed project's schedule and take into consideration dates and activities that represent significant public use in order to make correct determinations of impacts to public activities in and along the LA River.

## 3. The proposed project underscores the need for long-term planning for flood risk mitigation

The environmental assessment states the existing channel capacity is approximately a 7-year storm event (43,500 cfs) and with the project's removal of sediment "would increase conveyance to approximately a 15-year storm event capacity (54,000)." Yet this is far below the design capacity in this area which the EA states as 51-year storm event or 78,000 cfs. Further, the USACE 2016 Hydraulic report regarding LA River Floodplain Management Services Special Study shows significant flooding in the overbanks of the LA River for a 100-year storm along the Glendale Narrows. The proposed project will not achieve the level of flood-risk mitigation necessary for the design capacity nor the 100-year storm level. We need long-term strategies to flood-risk management that provide alternatives to stripping our waterways of remaining vegetation that still fail to meet our flood risk needs.

To summarize, FoLAR highly encourages USACE to:

- Take additional steps to analyze and consider the potential impacts of the project on biological resources based on recently emerging scientific data
- Take into consideration potential impacts to significant public access activities conducted in this section of the LA River
- Provide a project schedule and timetable for its activities
- Develop a long-term flood risk management strategy that includes alternatives to vegetation and sediment removal

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We appreciate the opportunity to provide comments on this project and your consideration of our concerns. Please feel free to contact us if you have any questions at 323-223-0585 or at smejia@folar.org.

Sincerest regards,

Stephen Mejia
Policy and Advocacy Manager
Friends of the Los Angeles River