



May 13, 2021

Sent via email

Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, California 91803
LARiver@dpw.lacounty.gov

Re: 2020 LA River Master Plan

Dear LA River Master Plan Team:

These comments are submitted on behalf of the Center for Biological Diversity (“Center”) on the 2020 LA River Master Plan (“LARMP”).

The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States, including residents of Los Angeles County. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life.

The Center believes the LARMP as drafted is not a proper master plan. As demonstrated by the 2019 OurCounty Sustainability plan, an impactful regional planning document should include a clear vision as well as quantitative metrics of success that are prioritized based on scale of impact and need. These metrics should be specific enough to ensure that the vision will be realized if the targets are met within the designated timeframe. Despite the OurCounty having many of these metrics already outlined, the LARMP does not follow this model. Instead, it provides a ‘menu approach’ of possible actions along the River, which does not provide any clarity on the regional impact of implementation. This lack of detail could lead to continued ecological degradation and displacement of local communities along the river, which are the very things that constituents have voiced their concern about throughout the public engagement process.

To avoid these potential harms, the Center requests that Los Angeles County make substantial changes to the LARMP before its final adoption. Specifically, we ask for the following changes:

I. Articulate a Clear Vision for the Future of the LA River

The Plan should be a pathway to achieving a clear vision for the region that prioritizes ecological restoration, cultural values and provides opportunities for all Angelenos. As written, the LARMP's vision statement, goals, and Kit of Parts do not accomplish these things and are at times contradictory. The Plan's lack of clarity, specificity, prioritization, or inclusion of any metrics prohibits the community and decision-makers from assessing the document. It also allows for those with power, influence and monetary resources to be the primary decision makers for how the region is developed, as almost any project could be justified under the current plan.

II. Restore Ecological Function

The LA River watershed sits within one of the world's most diverse Mediterranean biodiversity hotspots. Today, the entire 52-mile river is designated as warm freshwater habitat, while the upper portion of the river and mouth are designated as wildlife habitat, used by rare, threatened, or endangered species.

The Center requests that the LARMP be written to minimize impact on wildlife movement and restore native plants ecosystems wherever possible. The Kit of Parts should also be implemented with an eye towards enhancing and interconnecting larger habitat areas in the San Gabriel, Santa Monica, and Santa Susana Mountains at the headwaters near Canoga Park, and between Griffith Park and the Verdugo Mountains at the Glendale Narrows, so that plant and animal species endemic to the River are more likely to survive and thrive. Clear targets that align with the OurCounty metrics on "no net-loss of native biodiversity" and "increase the percentage of protected wildlife corridors to 100% by 2035" should be stated as a component of the strategy for implementing the LARMP.

In addition, restoring the channel to soft bottom habitats is critical to enhancing the ecological function of the river and should be prioritized as a measure to protect native biodiversity and enhance recreational benefits for surrounding communities. The OurCounty Plan lists "preserving and enhancing open space, waterways and priority ecological areas" as a strategy under their Goal #5. The essential ecological function of the LA River was significantly stunted with channelization and the only way to enhance this is to restore it to the soft bottom ecosystem it once was.

Finally, acknowledging that the scope of this plan includes the entire watershed and that impacts to tributaries and surrounding habitat should be analyzed and avoided if the plan is going to preserve the ecological function of the river.

III. Prioritize the Needs of the Local Communities

Around 38,100 households within 1 mile of the LA River are currently at risk of displacement (Steering Committee #7 Summary 2019.)¹ The 2019 OurCounty Sustainability

¹ Los Angeles River Master Plan Update, Steering Committee Meeting #7 Summary (Sept. 25, 2019), available at <https://pw.lacounty.gov/wmd/watershed/lar/docs/LARMP-SteeringCommittee7SummaryandAppendices.pdf> (p.54)

Plan lists “Equitable and sustainable land use and development without displacement” as it’s third goal. Thus, The County and river-adjacent cities must invest heavily in anti-displacement programs, no longer criminalize the actions of community members seeking community stability, and adopt enforceable policies now, so that they may be implemented before any real project planning is underway. Special attention should be given to the communities between Downtown LA and Long Beach where displacement risk is most pervasive and the City of Bell Gardens and other communities that are already in a state of advanced displacement (Steering Committee #7 Summary 2019).¹ System-level mitigation measures should include a mix of supportive housing, affordable rental, affordable homeownership units, and other anti-displacement measures that would ensure community stability.

IV. Conclusion

We appreciate the effort that went into the planning process. However, the deficiencies in the LARMP indicate that it fails to prioritize the health and wellbeing for all Angelenos and wildlife. As such, the Center urges the County to substantially revise the LARMP to include prioritization of and measurable outcomes for: biodiversity preservation, riparian ecological function and community stabilization.

The Center appreciates the opportunity to submit comments on the LARMP. Please do not hesitate to contact us with any questions.

Sincerely,



Elizabeth Reid-Wainscoat
Urban Wildlands Campaigner
Center for Biological Diversity
660 S. Figueroa Street #1000
Los Angeles, CA 90017
Tel: (831) 428-3312
ereidwainscoat@biologicaldiversity.org