

**SANTA MONICA MOUNTAINS CONSERVANCY**

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Mr. Gregg BeGell, P.E.  
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900 South Fremont Avenue, 5<sup>th</sup> Floor  
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Via email: [gbegell@dpw.lacounty.gov](mailto:gbegell@dpw.lacounty.gov)

**Draft Program Environmental Impact Report for the  
Enhanced Watershed Management Programs**

Dear Mr. BeGell:

The Santa Monica Mountains Conservancy (Conservancy) commends the Los Angeles County Flood Control District (LACFCD) for coordination and implementation of the Draft Program Environmental Impact Report (PEIR) for the Enhanced Watershed Management Programs (EWMP) for the twelve distinct watershed groups within Los Angeles County. We appreciate the opportunity to provide comment and respectfully submit this letter to share our experience and aspirations for stormwater management and for future of water in Los Angeles. We have reviewed the report in detail and are providing comments in support of projects that transform stormwater and dry weather runoff into a sustainable source of clean water to meet water quality, supply, community, and ecological needs.

Each of the permittees within the watershed groups are identified in the 2012 Municipal Separate Storm Sewer System (MS4) permit from the Los Angeles Regional Water Quality Control Board (LARWQCB) and responsible for meeting conditions for discharges occurring within their jurisdiction. The Conservancy understands that the goal of each EWMP will be to customize stormwater programs to achieve compliance with applicable receiving water limitations (RWLs) and water-quality-based effluent limits (WQBELs) in accordance with the MS4 Permit through implementation of stormwater best management practices (BMPs) or watershed control measures. One method for permittee compliance is to develop an EWMP, which would identify potential and priority structural and non-structural BMPs within the region's stormwater collection system to improve runoff water quality.

## **Experience**

The Conservancy and joint powers partner, Mountains Recreation & Conservation Authority (MRCA), are deeply invested in advancing “smart” stormwater capture and reuse projects that can help meet water quality improvement goals in receiving waters while also meeting important conservation and community needs, particularly in communities most in need of new parks, natural lands and green open space. The Conservancy and MRCA have been implementing multi-benefit, watershed revitalization projects throughout the Los Angeles area for more than 20 years by building urban multiple-benefit park and greenway projects (e.g. Marsh Park, Tujunga Wash Greenway, Pacoima Wash Natural Park, Compton Creek Natural Park, etc.), developing regional plans to promote the social and ecological benefits of watersheds, providing recreation and education programs to connect people to rivers and streams, and most recently by managing the first Los Angeles River Recreation Zone (Rec Zone).

The Conservancy has invested approximately \$70 Million in building parks within the Los Angeles River watershed 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 is 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 throughout our agency parklands, 12-week Junior Ranger Programs with community-based partners, field trips for local schools and organizations, and interpretive programs for all ages. One

program is called “River Ambassadors” that educates and enables youth to advocate as stewards for watershed protection in their communities. 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.

### **Aspirations**

We strongly recommend that each EWMP’s approach to selection of projects it will analyze for potential implementation not be limited to projects already identified as potential projects in the plan. This approach is fundamentally subjective and limits the planning process. Additionally, this subjective approach does not take into account the valuable stormwater and dry weather capture, treatment and storage that can be provided by many different land use types (e.g. public and private lands) over a long period of time. Given the size of the distinct watersheds, a broader-brush approach should be used that evaluates all public lands potentially suitable for BMP stormwater capture and reuse projects. The final list of potential multiple benefit runoff projects should be more broad and distributed throughout the watershed, to provide water quality, water supply, conservation and community benefits to all communities in the watershed. The PEIR and EWMPs should include the following relevant regional plans and projects identified within in order to leverage the resources and planning efforts already committed:

- *Los Angeles River Revitalization Master Plan*
- *Pacoima Wash Vision Plan*
- *Pacoima Wash Greenway Master Plan*

The Conservancy would like to point out that our work includes the acquisition of private and developed lands for the purpose of creating multiple benefit stormwater capture projects. There seems to be a bias against projects on private land based on the assumption that they cost more to develop. It is our experience that it is easier (and faster-therefore more cost effective) to purchase land and redevelop, than it is to execute an agreement with public agencies to change the existing land use. We believe that this is an important part of planning in the EWMPs, and recommend inclusion of these types of acquisition projects and this approach in the plan.

The River Parkway projects the Conservancy funds are cost-effective BMPs. The Tujunga Wash Greenway project is a 1.2 mile stream restoration that uses a gravity-fed, natural system to 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

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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. We urge you to work with staff from the Conservancy and MRCA to help incorporate critical multiple-benefit projects that have been identified by staff into the EWMP planning efforts.

Thank 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](mailto:skei@smmc.ca.gov), or Brian Baldauf at (323) 221-9944, extension 110 or [brian.baldauf@mrca.ca.gov](mailto:brian.baldauf@mrca.ca.gov).

Sincerely,

LINDA PARKS  
Chairperson