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September 12, 2014

Mr. Ivar Ridgeway
Chief
Stormwater Permitting
California Regional Water Quality Control Board, Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

**RE: Comments on Enhanced Watershed Management Program (EWMP) Work Plan
for the Upper Los Angeles River Watershed**

Dear Mr. Ridgeway:

Community Conservation Solutions (CCS) is submitting comments on the Enhanced Watershed Management Program (EWMP) Work Plan for the Upper Los Angeles River Watershed (ULAR) prepared by the ULAR Watershed Management Group. CCS is a non-profit organization dedicated to solving the challenging environmental problems created when people and nature intersect. One of our primary programs is our 'Green Solution' program, which focuses on the transformation of stormwater and dry weather runoff into a sustainable source of clean water throughout California to meet water quality, water supply, conservation and community needs.

We respectfully request that the Regional Water Quality Control Board, Los Angeles Region and the ULAR Watershed Management Group integrate CCS' methodology and the results of our years of substantive research and analyses into the ULAR EWMP Work Plan. While the ULAR EWMP Work Plan makes mention of CCS' Green Solution work, it does not yet integrate CCS' methodology into its approach; nor does it include stormwater capture projects analyzed by CCS. In addition, the ULAR EWMP Work Plan neglects to include many green stormwater capture projects already implemented or planned in the watershed by the Santa Monica Mountains Conservancy, and this oversight needs to be corrected. The ULAR EWMP Work Plan literature review failed to include the following relevant regional plans:

1. San Gabriel & Los Angeles Rivers Watershed and Open Space Plan
(Common Ground: From the Mountains to the Sea)
2. Santa Monica Mountains Comprehensive Plan
3. Rim of the Valley Trail Corridor Master Plan
4. Pacoima Wash Vision Plan
5. Pacoima Wash Greenway Master Plan
6. Safe Routes to the River

We appreciate that the ULAR EWMP Work Plan mentions CCS' GIS-based analysis as a potential source of information, and we urge the ULAR Watershed Management Group to work with CCS in the next phase of work to fully integrate the findings, information, and quantitative and integrated GIS methodology we have developed for identification and prioritization of multiple benefit runoff capture reuse projects.

CCS has already invested over **eight years of research and analysis** and over \$1.5 million of primarily public funds, to develop an innovative, metrics-driven and science-based 'Green Solution' methodology to **prioritize where – and in what order – to implement stormwater and dry weather runoff capture projects in order to maximize water quality, water supply, conservation, community and other public benefits.** In addition to a Los Angeles County-wide study, we have focused our more advanced work on the ULAR and Santa Monica Bay watersheds. Our reports, including our findings and technical engineering reports can be found at <http://www.conservationsolutions.org/greensolution.html>.

Numerous public and private entities have funded CCS' Green Solution work to date; these include the U.S. Environmental Protection Agency; State Coastal Conservancy; Santa Monica Mountains Conservancy; Rivers and Mountains Conservancy; Association of Bay Area Governments; Trust for Public Land; James Irvine Foundation and Community Conservation Solutions. In particular, the State Coastal Conservancy and Santa Monica Mountains Conservancy 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.

CCS' Green Solution tool focuses on lands already in public ownership – to which runoff in storm drains and channels can be diverted – to develop networks of "smart" parks, habitat and open space to naturally capture, clean, store and infiltrate runoff, both to boost local water supplies and to recharge groundwater. We use state-of-the-art engineering combined with habitat restoration science to make optimal use of the natural filtration, uptake and physical and microbiological functions of soils and plants, restoring native habitat and creating new parks and open space in communities where these are most needed. This prioritization integrates hydrology, storm drain infrastructure, community and conservation needs and a vast range of GIS data which quantifies these components, so that prioritized projects can meet all of these needs. This tool helps decision-makers make project implementation decisions on a measurable basis, and ensures that limited public funds are invested wisely.

In the ULAR watershed, CCS' team of hydrology engineers and Geographic Information System (GIS) data analysts and mappers identified 1,597 parcels in public ownership potentially suitable for these Green Solution projects (Green Solution Project, Phase I-Los Angeles County, Community Conservation Solutions, 2008). At the request of our public agency funders, we have developed the most robust analyses for 268 of those parcels, all of which are within 500' of a storm drain or channel that is 3' in diameter or greater, ensuring capture of 100% of dry weather runoff and at least 85% storm events. All of these projects also provide important conservation and community benefits (Green Solution Project, ULAR Phase III, Community Conservation Solutions, 2013.)

We strongly recommend that the ULAR EWMP Work Plan's approach to selection of the projects it will analyze for potential implementation NOT be limited only to projects already identified as potential projects. This is fundamentally a subjective, not an objective approach, and unnecessarily limits and constrains the planning process. Of greater concern, this subjective approach ignores the potential important stormwater and dry weather capture, treatment and storage that can be provided by public lands in many different land use types over a long period of time. Given the size of the ULAR watershed, a

broader-brush approach should be used that evaluates all public lands potentially suitable for green Best Management Practice stormwater capture and reuse projects. The final list of potential multiple benefit runoff projects should be broad and distributed throughout the watershed, to provide both water quality, water supply, conservation and community benefits to all communities in the ULAR watershed.

This is also necessary to lay the groundwork for a plan that can be used to support potential local or regional stormwater funding measures that might be considered in the future.

We strongly support the use of a GIS-based approach to identify and prioritize projects for implementation. This will provide the strongest analytical approach. The list of screening criteria referenced in Section 3.1.2.3 should be expanded to include conservation and community needs; this is consistent with CCS' approach to quantifying multiple benefits.

CCS has consulted with the Santa Monica Mountains Conservancy (SMMC), a state agency which has been successfully implementing green integrated stormwater capture projects for many years. The SMMC points out that their work includes the acquisition of private lands for the purpose of creating multiple benefit stormwater capture projects. We believe that this is an important part of planning for the ULAR EWMP Work Plan, and recommend inclusion of these types of acquisition projects and this approach in the plan.

Existing and Potential Regional BMPs that Need to be Included in the Work Plan:

In CCS' Upper L.A. River Watershed, Phase III Report, four of the highest priority school and vacant land opportunity sites were selected for specific concept designs. These site-specific designs included stormwater and urban runoff treatment components, a water quality improvement assessment, solar power potential, runoff reuse potential, native habitat restoration, landscaping and public use components, and estimated costs. These four parcels could capture and treat polluted runoff from over 3,400 acres of the watershed, would result in a capacity of over 20 acre-feet of water storage, and create 80 acres of new parkland, habitat or open space.

Yet only one of these four sites for which CCS developed concept designs was included in the ULAR EWMP Work Plan list of potential regional BMPs in the ULAR watershed. The other three sites should also be included.

Also missing from the EWMP existing and planned regional BMPs lists (Appendices 3.B1 and 3.B2) are the following Santa Monica Mountains Conservancy and Mountains Recreation Conservation Authority existing and planned stormwater capture BMP projects:

1. Pacoima Wash Greenway-El Dorado Park (in planning)
2. Elysian Valley Bikeway Streetend BMP Sites (Dallas, Gatewood, and Fernleaf) (in construction)
3. Pacoima Wash Natural Park
4. Vista Hermosa Park
5. Sunnynook River Park
6. TreePeople Parking Grove
7. 6th Street Green Corridor
8. Elysian Valley Gateway Park
9. Pacoima Wash - 1st Street Park
10. Pacoima Wash - 5th Street Park
11. Pacoima Wash - Brownell Project
12. Headwaters Projects

13. Los Angeles River & Sepulveda Basin Rec Zones-Park and Access Improvements
14. Lopez Canyon Park Improvements
15. Ascot Hills Park Improvements
16. Coralitas Open Space
17. Northeast Los Angeles Open Space
18. Los Angeles River Arts District Whitewater Park
19. Los Angeles River Center Stormwater Improvements
20. Arroyo Seco - Artesia Park
21. West Mulholland Trailhead
22. Bell Creek Riverfront Park
23. Lederer Ranch
24. Arroyo Seco Greenway
25. Arroyo Calabasas at Fallbrook and Hatteras
26. Arroyo Calabasas at Ventura Boulevard
27. Glendale Narrows Riverwalk
28. Los Angeles River Greenway Extensions
29. Aliso and Limekiln Creeks at Vanalden
30. Brown's Canyon Wash at Plummer and Variel
31. Brown's Canyon Wash at Route 118 and Rinaldi
32. Richard Lillard Outdoor Classroom
33. Joughin Ranch Stormwater Improvements

Thank you for the opportunity to comment on this ULAR EWMP Work Plan. If you have any questions or would like to discuss the content of our comment letter, please do not hesitate to contact me at (310) 398-8584 ext. 1 or efeldman@conservationsolutions.org. Thank you very much for your consideration.

Sincerely,



Esther Feldman
President

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy
Ruskin Hartley, Chief Executive Officer, Heal the Bay
Steve Fleischli, Director- Water Program, Natural Resources Defense Council
Andy Lipkis, President, Tree People