



June 10, 2022

Carolina Hernandez, LA County Public Works  
 Genevieve Osmena, LA County Public Works  
 Jessica Henson, The Olin Studio  
 Mark Hanna, Geosyntec Consultants

Via e-mail to: [lariver@dpw.lacounty.gov](mailto:lariver@dpw.lacounty.gov), [chernandez@dpw.lacounty.gov](mailto:chernandez@dpw.lacounty.gov), [gosmena@dpw.lacounty.gov](mailto:gosmena@dpw.lacounty.gov), [jhenson@theolinstudio.com](mailto:jhenson@theolinstudio.com), and [mhanna@geosyntec.com](mailto:mhanna@geosyntec.com)

Dear LA River Master Plan Team,

On behalf of the undersigned environmental, environmental justice, and community-based organizations, most of which served as members of the LA River Master Plan (“LARMP” or “Plan”) Steering Committee, we are writing to convey that **we do not support the final 2020 LA River Master Plan Update**. The final Plan wholly ignores the many comments that non-profit and community-based organizations raised during the drafting process, and falsely claims that the Plan engaged in robust community engagement and reflects feedback from members of the Steering Committee.

As such, **we are informing you that we are formally removing our organizational names and logos from the Plan. We do not give permission for our organizations’ names and logos to be used in support of the Plan in its current form or for any purposes related to participation in the Plan’s Steering Committee and community engagement. We expect the County to remove our names and logos from the Plan accordingly, unless and until our organizations are given the ability to make a formal vote and have that vote reflected in the final Plan.**

Throughout the planning process, our groups, and other organizations and community members, have engaged in earnest discussions with the LARMP team and have repeatedly noted our dissent by sharing our concerns about the lack of clear vision in the Plan and the failure to treat the LA River as a natural and living River. Most of the undersigned groups were members of the Steering Committee for the Plan and met with LARMP team members and County officials many times over a period of two years.

Among other things, we pleaded for the LARMP Update team to commit to the following:

- (1) prioritizing community and ecological resilience through nature-based solutions and targeted concrete removal, rather than adding more concrete through platforms and diversion channels;
- (2) greening river-adjacent communities with longstanding contamination;
- (3) taking a watershed level approach to planning, rather than focusing solely on river-adjacent lands,
- (4) achieving community stabilization, through formal requirements and displacement protections for future river projects, and
- (5) addressing governance challenges that preclude cohesive management.

**Attachment A** includes comment letters some of our groups submitted to the County on May 13, 2021 that reflect these concerns.

In addition, community surveys from February 2021 and September 2021 show that residents in river communities prioritize these same values. **Attachment B** includes reports of these past survey results.

**To our dismay, the final Plan fails to incorporate our feedback in any meaningful way.** The final Plan lacks a coherent vision and merely identifies a menu of possible options for future river projects, most of which would add concrete to the floodplain--including capping the River to build platform parks. The Plan affirmatively reiterates the LARMP team's antiquated and harmful position that the LA River is nothing more than a flood control channel, and that nature-based solutions to remove concrete and remediate contaminated land are infeasible. From a scientific and urban planning perspective, we know it is indeed feasible, less costly, and beneficial to surrounding communities to deploy nature-based solutions when managing floods (see, e.g., the Federal Emergency Management Agency's guidance on [Building Community Resilience with Nature-Based Solutions](#) and the U.S. Army Corps of Engineers' [ARBOR Study](#) for the LA River). The Plan also fails to require protections to ensure community stabilization for river residents with high pollution burdens and lack of access to park space. In the end, the Plan offers nothing measurable to ensure that future river projects are equitable.

**It is inaccurate and disingenuous for the LA River Master Plan team to represent that they engaged meaningfully with the Steering Committee and community members and incorporated our feedback into the Plan.** The Plan touts the many meetings with our organizations, yet these meetings were ultimately unproductive as they were conducted without any meaningful consideration of our feedback. The LARMP team refused to appoint a representative from the Gabrieliño Tongva community to the Steering Committee, despite repeated requests from the Gabrieliño Tongva community and allies to do so, leading to the absence of diverse local Indigenous voices. The LARMP team also ignored our repeated requests for the Steering Committee to have the right to vote on the final Plan before it was published, and to have that vote reflected in the final Plan.

The deficiencies in the process and Plan represent the loss of a once-in-a-generation opportunity to reshape the future of the River and adjacent communities to be healthier and more resilient, in ways communities want and need. We are greatly disappointed with the LARMP team's lack of vision under the Master Plan and the failure to prioritize climate resiliency, community stabilization, and community and ecosystem health. The Master Plan sets the County on a path toward a grim future for the LA River, one of continued ecological degradation and one that fails to view the River as anything more than a flood control channel. Our vision for a resilient River is not reflected in the Plan, and we refuse to have our names and logos associated with support for the Plan in its current form.

For these reasons, the County does not have our permission to use our names and logos in the Plan. **We are formally removing our names and logos from the Plan for any purposes related to participation in the Plan’s Steering Committee and community engagement unless and until our dissenting vote is included in the final Plan.**

Sincerely,

Laura J. Cortez  
Organizer & Co-Executive Director  
East Yard Communities for Environmental Justice

Bruce Reznik  
Executive Director  
Los Angeles Waterkeeper

Marissa Christiansen  
President/CEO  
Friends of the Los Angeles River

Angela Mooney D’Arcy  
Executive Director  
Sacred Places Institute for Indigenous Peoples

Katherine Pease  
Director of Science & Policy  
Heal the Bay

Shona Ganguly  
Associate Director, Southern California External  
Affairs  
The Nature Conservancy in California

Tori Kjer  
Executive Director  
Los Angeles Neighborhood Land Trust

Robin Mark  
Los Angeles Program Director  
Trust for Public Land

*With support from the following groups in solidarity:*

Elizabeth Reid-Wainscoat  
Urban Wildlands Campaigner  
Center for Biological Diversity

Paulina M. Flores  
Managing Director  
Promesa Boyle Heights

CC:

Supervisor Hilda Solis  
Supervisor Holly Mitchell  
Supervisor Sheila Kuehl  
Supervisor Janice Hahn  
Supervisor Kathryn Barger  
Assembly Speaker Anthony Rendon  
Mark Pestrella, Director, Los Angeles County Public Works  
Dan Lafferty, Deputy Director of Water Resources, Los Angeles County Public Works  
Michael Affeldt, City of Los Angeles, Riverworks  
Brian Baldauf, Chief of Watershed Planning, Mountains Recreation and Conservation Authority  
Rita Kampalath, Interim Chief Sustainability Officer, County of Los Angeles

# Attachment A

May 13, 2021

Carolina Hernandez, LA County Public Works  
Genevieve Osmena, LA County Public Works  
Jessica Henson, The Olin Studio  
Mark Hanna, Geosyntec Consultants

Via e-mail to: [lariver@dpw.lacounty.gov](mailto:lariver@dpw.lacounty.gov), [chernandez@dpw.lacounty.gov](mailto:chernandez@dpw.lacounty.gov),  
[gosmena@dpw.lacounty.gov](mailto:gosmena@dpw.lacounty.gov), [jhenson@theolinstudio.com](mailto:jhenson@theolinstudio.com), and [mhanna@geosyntec.com](mailto:mhanna@geosyntec.com)

Re: LA River Master Plan Update Draft

Dear LA River Master Plan Team,

On behalf of the undersigned environmental, environmental justice and community-based organizations that served as members of the LA River Master Plan ('LARMP' or 'Plan') Steering Committee, we are writing to express our significant concerns with the Plan as currently drafted. Our concerns fall into three main categories.

- First, we believe the LARMP as drafted is not a proper master plan. It lacks a meaningful vision, adequate prioritization, and metrics necessary to establish a clear future for the River and its adjacent communities.
- Second, by favoring a 'menu approach' of possible actions along the River, we believe the Plan could achieve the worst of all worlds – continued ecological degradation, failure to promote climate resiliency, and failure to protect local communities against displacement and other impacts.
- Third, despite claims that the LARMP reflects community desires provided during extensive community outreach, we believe the County left key constituencies out of the dialogue, and this Plan does not reflect the priorities articulated where the County did outreach.

Our groups greatly appreciate having been invited to serve on the Steering Committee, and the effort that went into coordinating that group over two-plus years. We all came into the LARMP planning process in good faith, ready to roll-up our sleeves and to work on the Plan, eager to engage in the challenging dialogue on how to best balance competing visions and goals for the River, and with the understanding that we would serve - as the Steering Committee designation would imply - as a group that would play a meaningful role in the formation of the Plan.

Unfortunately, this was not what we experienced through this lengthy process. Despite an impressive and diverse group of experts that were brought together, the Steering Committee process did not foster or even allow the opportunity for meaningful input into the Plan's formation. The full group sessions were, by-and-large, information dumps from the County to

the Committee, with very little time for actual discussion. While some dialogue occurred at the subcommittee meetings, these smaller groups were made up of people and groups interested in specific issues (e.g., ecology, water, community), and there was no space made at the subsequent full committee meetings (almost three months later) for report-outs and discussion. This meant that the entire process did not allow for a robust discussion across constituencies on how we can best balance potentially competing priorities. Furthermore, attempts to engage in this type of dialogue - including exploring the pros and cons of particularly contentious and consequential issues like platform parks - were actually quashed at the Steering Committee despite repeated efforts to engage in this type of dialogue. Absent such discussion, it is hard to see how this group could have even been called a Steering Committee. What was additionally disappointing was that we have seen examples where the County led stakeholder processes that much more successfully brought divergent viewpoints together in a meaningful way to craft critical plans, such as efforts around the creation of Measure W (The Safe Clean Water Program) and the OurCounty Sustainability Plan. It is important to note that in both those efforts, the NGO community did not 'win' every argument, but we did feel our viewpoints were heard and helped shape these critical plans...something we do not feel occurred during the LARMP process. As such, it is unfortunately hard to walk away from the LARMP process feeling anything other than that the outcome of this Plan was predetermined to be sufficiently vague to allow anything to occur on and along the River.

In this light, it is important to recognize what the LARMP is and isn't - namely, it *is* an excellent and very thorough compilation of information about the River; it *isn't* a Master Plan for the River. As such, our groups request that Los Angeles County demonstrate much-needed leadership by **committing to fund and support a continued planning effort that meaningfully addresses the significant shortcomings of the current LARMP**, including developing a true plan that outlines a clear vision and prioritized goals and metrics for the River; tackling issues that are critical for the implementation of such a plan, including a holistic governance structure; and reflects meaningful community engagement and input. Such an implementation plan could even be in the form of the County funding a People's Plan for the LA River that takes a more community-oriented approach to ensure that ecological and neighborhood health and resiliency are protected.

We also request that, as Steering Committee members, our concerns about the existing Plan are included in the Plan itself. The current Plan makes no mention of the dissenting opinions of steering committee members and that consensus was not reached on many topics including the fundamental vision for the River. **We therefore request that this comment letter be included, in full, in the LA River Master Plan.** We recommend that an appropriate place would be in Chapter 5, Engagement Summary, on or after page 130 where the summary of Steering Committee meetings is presented. We also ask that wherever the Steering Committee is mentioned throughout the Plan, that a footnote be added to note: "Steering Committee members represented a wide array of views and the final Plan does not necessarily represent the positions of all Steering Committee members. For differing viewpoints of some Members, see page XX [page number in Ch. 5 where letter is]."

Thank you for the opportunity to provide our more detailed comments on the public draft of the LARMP, following, and we look forward to continuing to work with the County to move forward with a Plan that presents a clear and compelling vision for the River that will help safeguard our environment and communities.

### **Charting a Clear, Compelling Future for the LA River**

The Plan suffers from a concerning and profound lack of vision for the River. The ‘Reimagined River’ vision statement reads like a laundry list of different (and sometimes competing) goals for the River, many elements of which we could say we achieve today:

“The iconic LA River flows through a 51-mile connected public open space that is seamlessly woven together with neighboring communities. It is an integral part of daily life in LA County—a place to enjoy the outdoors and to get across town, a place to appreciate the serene and to bring all people together, a place to celebrate a thriving urban habitat and understand infrastructure, a place to learn from the past and to shape the future.”

While some may view this critique as ‘academic’, it is actually fundamental to the Plan’s shortcomings. A plan’s vision statement provides the ‘north star’ for the rest of the plan (goals, measurable outcomes, actions), and as such is the foundation of any good planning effort. This broad, opaque vision then repeats itself in 9 goals that, while they may sound good on the surface, are similarly not specific (i.e., measurable) or clear, not prioritized, and sometimes at odds with one another.

This lack of clarity and inconsistencies then make their way into the Kit of Parts, which is presented as the pathway to achieve the goals of the Master Plan. The Kit of Parts, similarly, has no prioritization or distinction among the six design components in terms of their impacts on goals, possibility to do harm, and appropriateness reach by reach. In fact, many of the elements included in the Kit of Parts are in conflict with the Plan goals. For example, Crossing and Platforms, as demonstrated by the ‘Goals & Design Components’ matrices, are noted to achieve elements of Goal 3, ‘Support Healthy Connected Ecosystems.’ Yet adding concrete to the River channel does not at all support ecosystem function (Action 3.1), encourage cities to adopt sustainability strategies (Action 3.4), or use the River as a living laboratory (Action 3.6). We believe the Kit of Part elements should be prioritized based on the number of Goals they address. Similar to the way the 1996 Master Plan was able to prioritize 17 demonstration projects, ranked by site availability, availability of funding, community support, number of Master Plan goals the project would meet, project implementation timeframe, and willingness of a jurisdiction to maintain, this Plan should do the same. Prioritization adds direction to an otherwise unclear vision.

In short, the lack of clarity, specificity, prioritization or inclusion of any metrics that are at the very foundation of any Plan do not allow the community or decision-makers to assess or easily use the document, and will ultimately allow any future project to be rationalized as being consistent

with the LARMP. Again, one only need to look at something like the OurCounty Sustainability Plan (or LA's Green New Deal) to see examples of plans that include such metrics to meet bold aspirational goals.

## **Protecting Communities, Ecology and our Future**

### **Prioritizing Climate Resiliency**

The biggest threat to all our communities is climate change. We already see the impacts of climate-induced increases in heat, fires, and flooding throughout California. As climate experts warn - and as the current health crisis demonstrates - marginalized communities will undoubtedly continue to be hit first and hardest. Resiliency is discussed in the Plan (it is included in Goal 1), but it is not defined in a clear way and is not a driving factor for how projects throughout the watershed can mitigate climate risks. In truth, the only form of climate resilience that is at all considered in the plan is that of flood mitigation by way of an armored channel. In reality, climate resilience and the effects of climate change we can expect to experience are multi-faceted and go far beyond flooding. Global cities leading the way in climate preparedness design with nature, instead of against it. This plan is the antithesis of that. The Plan should have been developed with diverse approaches to resiliency, such as prioritizing various forms of nature-based solutions combined with some engineered solutions where required. Instead we are presented with precedent studies of large, single-use infrastructure projects (e.g. the TARP project in Chicago) to deal with our current problem of large, single-use infrastructure. After two-and-a-half years of steering committee meetings and millions of dollars of public money, we simply do not see the out-of-the-box, generational shift in philosophy we had expected to emerge from this plan. The County of Los Angeles is beholden to lead the charge in preparing its residents for climate change. This is a missed opportunity that Angelenos will pay for with their lives and property.

### **Taking a Watershed Approach to Planning**

The lack of climate resiliency as stated above stems from the plan's fundamental approach - without a watershed-wide analysis and a watershed-wide planning framework, there is no way to consider a more natural channel in any sort of substantive way. While the Plan states that it utilizes a watershed approach in its research and analysis, the focus on the main stem of the LA River precludes inclusion of systematic, nature and Indigenous knowledge-based<sup>1</sup> solutions that

---

<sup>1</sup> U.S. Fish & Wildlife Service, Traditional Ecological Knowledge Fact Sheet, February 2011. "Traditional Ecological Knowledge, also called by other names including Indigenous Knowledge or Native Science, (hereafter, TEK) refers to the evolving knowledge acquired by indigenous and local peoples over hundreds or thousands of years through direct contact with the environment. This knowledge is specific to a location and includes the relationships between plants, animals, natural phenomena, landscapes and timing of events that are used for lifeways, including but not limited to hunting, fishing, trapping, agriculture, and forestry. TEK is an accumulating body of knowledge, practice, and belief, evolving by adaptive processes and handed down through generations by cultural transmission, about the relationship of living beings (human and non-human) with one another and with the environment. It encompasses the world view of indigenous people which includes ecology, spirituality, human and animal relationships, and more."



would allow for a more naturalized, resilient, and multi-beneficial River. Friends of the LA River took a watershed approach in their [River Management Strategies for the Glendale Narrows Feasibility Study](#) (see attachment A). The study presents novel and multi-beneficial solutions that not only protect river adjacent communities from a 100- and 500- year flood event, but also identifies opportunities for channel widening to improve the health and function of the River. By taking a holistic approach, this study proves that flood control is not in conflict with ecological restoration. If we don't assess the entire watershed - tributaries included - for opportunities to relieve the river of storm pressures (i.e. permeability + stormwater detention + diversion tunnels), we are unable to make informed decisions about how best to protect residents from flooding, and we remain blind to where a more naturalized River may be possible. Please note, a 'more naturalized River' does not translate to 51 miles of concrete removal, nor would any member of this coalition ever advocate for widening the channel where it would cause displacement. These are strawman arguments. At this point in the trajectory of the 'River Revitalization Movement' most partners are clear on the limitations of concrete removal given the built out nature of the Los Angeles Basin. Only by examining the entire watershed will we be able to understand where we can make targeted and strategic improvements that will support all communities.

### *Protecting Local Communities*

River-adjacent communities have long demanded community-driven restoration and park access to the LA River. But as we have seen in some areas of the upper watershed (e.g. Atwater Village and the Elysian Valley) just the mention of large scale River investments has sparked gentrification and displacement that has made these historically low-income neighborhoods inaccessible.

As is the LARMP and PEIR does not treat both the ongoing displacement of Black, Indigenous, unhoused, and communities of color as an environmental justice issue and therefore does not analyze nor mitigate potential environmental impacts as a result. The plan lists all the policies and programs that each city, located near the LA River basin, has implemented that specifically respond to housing needs. However, it is very clear and alarming that there are uneven protections across these cities. For example in the Southeast LA cities, there is a lack of strong tenant protections and programs for unhoused and rent-burdened folks. Not all communities have sufficient and comprehensive enough policies and programs to meet housing needs. This is crucial as the "opportunities" cited in the LARMP will definitely increase housing prices, increase policing of these areas which will further criminalize and impact the unhoused, Black, Indigenous and People of Color, and already disenfranchised folks, and will cause further displacement across all these regions. The County needs to work towards increasing these protections and programs so that all the cities and unincorporated areas surrounding the LA watershed have the resources necessary to respond adequately to housing and tenant needs. The plan needs to be clear and direct with its approaches to combat the potential displacement of folks in these communities especially as housing injustices are being exacerbated due to the COVID-19 pandemic. The plan needs to treat this displacement and gentrification as a result of the LARMP as an environmental impact on local communities.

The County must invest heavily in and adopt anti-displacement programs and enforceable policies now, so that they may be implemented before any real project planning is underway. While the County doesn't directly have jurisdiction to control the policies of each individual city along the River, there are opportunities to support smaller cities to develop and implement policies to best address their specific needs. Just as we must protect residents from flooding, the County has the moral obligation to step-up and support our communities to stay in place and thrive, so all folks are able to enjoy the benefits the Plan proposes.

### *Treating the River Like a River*

Fundamentally, this plan continues to treat the LA River as a flood channel, rather than treating it as a river. The Plan does not prioritize the health or ecology of the River; worse, it actually overtly dismisses any prospects of a healthier river. The ecological prebuttal on pages 22-27, which is dedicated to debunking the notion of any level of concrete removal or in-channel restoration, is offensive and we request that it be removed, as it is contrary to the work others have done in this space. While recognizing the challenges of removing concrete in such a developed watershed and where communities have, for generations, lined the River, we do believe opportunities exist - and must be explored rather than foreclosed - to wild some portions of the River without impacting local communities if the County was willing to explore more out-of-box solutions.

Moreover, people regularly visit the River, particularly during the recreational season, to kayak, fish, participate in cleanups, and more. This Plan does not celebrate how Angelenos already engage with the River and lacks solutions to make these activities easier on visitors. Access should not stop at the edge of the River but should extend into the river channel so visitors can experience the River for what it is – a river. One can imagine a climate resilient future where the river provides a much needed respite of shade and urban cooling for those residents who are without air conditioning amidst a catastrophic heat wave. Keeping people out of the channel is to keep people away from a source of relief, refuge, connection, and sustenance.

The LA River Watershed also serves as a refuge for migratory birds along the Pacific Flyway, home for endemic fish species, and wildlife corridor for mammals that continue to be pushed out of their habitat. One particular species that several agencies, organizations, and community members are invested in is the steelhead (*Oncorhynchus mykiss*). If we strive to bring the steelhead back to its ancestral land, the Plan must prioritize the ecological health of the River. Major strides have been made specifically around the LA River Fish Passage and Habitat Structures design project. However, this Plan does not advance the findings of the [Final Technical Memorandum](#) and some design components of this Plan could preclude future opportunities to bring the Steelhead and other important riparian species back to the River. We must remember that this is a river plan, and we must also prioritize the other species that call the LA River home.

"What makes the L.A. River so peerlessly amazing is that its city actively "disappeared" it: We stopped calling the river a river. And it all but vanished from our collective memory. ... This act is unparalleled: A major American city redefined its river as infrastructure; decreed that the sole purpose of a river is to control its own floods; and said its river now belongs in the same category as the electrical grid and the freeway system and will forthwith be removed from the company of the Columbia, the Allegheny, the Salmon. In a city with a notorious, extreme tendency to erase both nature and history, L.A.'s ultimate act of erasure has been not just to forget but to deny|that the river it was founded on runs 51 miles -- 51 miles! -- right through its heart."

--Jenny Price, LA Explained: The Los Angeles River ([LAist](#))

### Greening Adjacent Communities

We must repair the land we have harmed in the past century of industrialization and the centuries of colonialism before that. The Plan has identified contaminated areas along the River but has not prioritized them as opportunity sites. Restoring these lands must be a high priority for the County as a means to deliver on the very goals laid out in the LARMP as well as the environmental justice called for by communities all along the River. By prioritizing contaminated sites we would be able to address numerous Actions such as, 1.8; 2.1; 2.3; 2.5; 2.6; 3.1; 3.2; 3.3; 4.1; 5.4; 6.3; 6.4; 6.5; 6.7; 7.1; 7.2; 7.3; 7.4.

Not including contaminated sites as opportunity areas within this Plan is more than a missed opportunity. It demonstrates a clear disregard for the environmental contamination present throughout many communities along the River and the long-term impacts that contamination presents. But rather than lift up the clear next step to delivering land for parks and increased River access, we see proposals for platform parks that would actually bury large segments of the River, further disconnecting Angelenos from our waterways.

Instead of building over the LA River with platform parks, dozens of locations exist in the vicinity of the planned platform parks that could potentially be transformed into community-based parks. The benefits of building community-based parks rather than one or two large platform park projects include a more dynamic variety of parks and green spaces throughout the community, greater accessibility to parks for more people, and the opportunity to locate parks in areas with the greatest park need (such as those identified in the LA County Parks Needs Assessment).

Potential community-based park locations include:

- Several EPA-identified brownfield properties,
- Publicly- and privately-owned industrial lots, and
- Over 100 active public schools in the cities of South Gate, Lynnwood, Paramount, and Compton

It is worth noting that while the LARMP goes out of its way to argue the absolute impossibility of naturalizing *any* segment of the River (no matter what we try to do), curiously there is no similar section that points out the extreme financial and regulatory impracticability (if not impossibility) of burying the River under massive concrete structures (which could also exacerbate flood risks if any support structures are needed within the river channel).

Research conducted by Los Angeles Waterkeeper has shown that similar “platform” park structures such as the 5.2-acre Klydd Warren Park built above a capped, eight lane freeway in Dallas, Texas, had an average cost of approximately \$21.2 million per acre<sup>2</sup>. Given that the LARMP suggests a 37-acre park in the Compton-Paramount Connectivity Corridor, the total cost (using the Klydd Warren Park per acre cost as a baseline) would amount to **\$785 million**. In contrast, community-based parks typically cost less than \$3 million per acre. Examples include the 30-acre Urban Orchard park located in the City of South Gate, which had a total project cost of \$22 million or \$700,000 per acre, or the 8.5-acre Del Amo Neighborhood Park currently being built on a former superfund site with a total cost of \$15 million or \$1.8 million per acre. Using the Del Amo Neighborhood Park for comparison, one can conclude that the cost of platform parks can be roughly **12 times greater** than a community-based park of the same size.

With the amount of money necessary for a platform park, we could afford to remediate lands, green heavily-concretized schools that are often at the center of neighborhoods, prepare for climate change, and stem the tide of displacement in river-adjacent communities. An emerging and very local example of this strategy can be seen in the multi-jurisdictional 100-acre partnership which covers three different contiguous parcels owned by separate agencies in the mid-river. These parcels were once operated as railyards and are thus significantly contaminated. The City of Los Angeles, Mountains Recreation and Conservation Authority, and CA State Parks have formed a mutually beneficial partnership to plan for the remediation and restoration of these lands for equitable public use. The City of Los Angeles has recently released an RFI aimed specifically at NGOs and CBOs to lead an equity strategy for the development of these 100 acres. This shows a proactive and creative approach to addressing systemic issues that cross jurisdictional boundaries.

### Tackling Governance

While the County has used the excuse that there are many jurisdictions that also have authority over sections of the River and adjacent communities in order to limit the scope of the Plan, this does not have to be the case. Just setting a clear vision and goals will be helpful in charting a new course for the River. Moreover, as was done in the OurCounty Plan, the LARMP could lay out with specificity the actions that it can take within its own purview, recommend what other jurisdictions can do that would help further the Plan’s goals, and identify areas where it could provide support to local jurisdictions to undertake actions that are consistent with the Plan. As long as the LARMP follows a top down governance and implementation approach, does not consult with BIPOC and unhoused communities, and in fact doesn’t take the lead of these communities while tackling governance, this plan and its implementation will replicate ongoing racist and settler colonial structures that created many of the injustices the plan claims to want to address in the first place.

---

<sup>2</sup><https://www.klydewarrenpark.org/about-the-park/our-story.html#:~:text=The%20%24110%20million%20p roject%20was,%2416.7%20million%20in%20stimulus%20funds.>

Lastly, recognizing that what is done upstream in a River (or watershed) necessarily impacts downstream communities, and the overlapping and byzantine nature of governance of the River undermines cohesive management, the Plan should also consider more creative governance models that include representation from all of the California Native American Tribes<sup>3</sup> with territories along the river and will facilitate achievement of the Plan's goals and vision. We request that an additional section be added to the LARMP that lays out a robust analysis of possible governance structures.

### **Ensuring Meaningful Community Participation**

#### **California Native American Tribes, Tribal Sovereignty, Free, Prior, and Informed Consent and Meaningful Engagement with California Native Nations and Indigenous Peoples**

California Native American Tribes are sovereign nations and there are multiple scenarios, including related to watershed management, river restoration, and development, which require state and local agencies to engage in government-to-government consultation with Native American Tribes as part of the planning process.

The United Nations Declaration on the Rights of Indigenous Peoples, adopted by the UN General Assembly in 2007, supported by the United States in 2010, adopted by California Assembly Joint Resolution 42 in 2014, and ratified by the Organization of American States in 2016, uplifts the concept of Free, Prior and Informed Consent in Article 32<sup>4</sup>, Section 2:

“States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.”

While applauding the County for bringing together a diverse group of experts as part of the LARMP Steering Committee, there were some constituencies missing from the group. Most glaring in absence was the lack of a representative from the Tongva, Indigenous Peoples with some of the longest relationships with the LA River. As you know, Indigenous Peoples have lived in the LA Basin for thousands of years. However, a diversity of Indigenous voices has not been included throughout the process, but rather in concentrated and separated outreach efforts that have left few visible fingerprints on the plan and its language. While there was one tribal representative on the Steering Committee, it is unacceptable that there was no Tongva representation, specifically, in the group. The LA County team needs to consult with and include all California Native American tribes with territories along the River, as part of a revamped

---

<sup>3</sup> California Native American Tribe is defined in California Public Resources Code Section 21073 “California Native American tribe” means a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004.

[https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140AB52](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52)

<sup>4</sup> UNDRIP Article 32, 1. Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources. 2. States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

LARMP or future implementation plan to ensure that tribal perspectives are lifted up, and Traditional Ecological Knowledge and tribal cultural and ceremonial spaces along the River are prioritized.

Additionally, the County has repeatedly claimed that the current draft Plan reflects community priorities. But closer scrutiny demonstrates that this claim cannot be supported. At the direction of LA Waterkeeper, CSUN Urban Planning graduate student Sulayman Jawaid undertook a detailed assessment of community responses from the 13 in-person community meetings held as part of the LARMP process (see attachment B). The first finding from this assessment was that even with 13 meetings and slightly more than 1,000 people providing input, several communities were underrepresented in these outreach efforts. These include some of the neighborhoods and cities most impacted by current and planned development, including Atwater Village, Boyle Heights, Huntington Park, and Maywood.

That said, of those 1,000+ people that did participate, some very clear themes emerged from meetings along all stretches of the River. Specifically, environmental protections and nature-based approaches to the River and adjacent communities consistently ranked as the top priorities for River planning. This was true for questions with specific prompts, where choices like 'parks and open space', 'healthy connected ecosystems', 'healthy, safe, clean water', 'native habitat', providing 'local water supply', 'how the river benefits and supports the environment', 'ecology, habitat & vegetation', and 'current hydrology' all were highly ranked answers for various questions (in many instances THE #1 choice). The same results were found in more open-ended narrative questions, where 'environment' was the most common theme (mentioned in 24% of responses), with the majority of those comments (59%) being related to conservation specifically.

Yet, the Plan as currently drafted does not reflect a similarly strong emphasis on ecological or community health. Just conducting community workshops does not mean that communities are being listened to, nor does it mean the Plan reflects community desires. And when a plan seems to run directly counter to what community members overwhelmingly say, such outreach runs the risk of seeming like window dressing for predetermined outcomes.

Lastly, the plan is too confusing, relies too heavily on engineering/landscape architecture jargon, and is far too lengthy to truly be read by anyone other than professionals. Additionally, the WiFi bandwidth required to download the document is far beyond what most residents in LA County have access to. If this plan is to be truly rooted in community feedback, you must actually talk to the community. And not just through large design development meetings, but through a varied series of events from larger community-wide meetings to smaller focus group gatherings that can support a direct dialogue with residents. Moreover, even the ways in which the County is soliciting feedback - through an online portal where interested parties have to reference specific page numbers and proposed changes - undermines meaningful public feedback on the Plan. Such a portal is geared more for experts to provide very technical comments, rather than hearing community voices who might just want to note their preference for the future of the River (which may be better accomplished through a short letter, which is not allowable with the current portal).

## **Next Steps**

In closing, we would like to recognize the County and planning team on the tremendous effort that went into the planning process. We appreciate the vast amount of data that was expertly compiled into a Plan that now serves as a wonderful repository of information on the LA River, as well as the efforts to engage the community in the process. However, the deficiencies in the process and Plan represent a lost opportunity to take advantage of the expertise and community voices that were gathered, as well as a lost once-in-a-generation opportunity to reshape the future of the River and adjacent communities to be healthier and more resilient.

Rather than trying to correct the existing plan to make it something it clearly is not, we renew our call for Los Angeles County to build upon the excellent compilation of information included in the current Plan, and **commit to fund, support and immediately embark on a continued planning effort that meaningfully addresses the significant shortcomings of the current LARMP** (possibly through support of a People's Plan), and:

- Provides a clear and compelling vision for the River and riverfront communities, including prioritization *of*, and measurable outcomes *for*:
  - Greening surrounding neighborhoods (improving air quality, cooling communities, reducing flood risk, enhancing outdoor recreation, etc.) to promote healthy and vibrant communities
  - Preventing displacement of current river-adjacent residents through enforceable requirements and investing in affordable housing
  - Enhancing ecosystem health of the River, including fully incorporating existing greening plans and not pursuing projects that foreclose future restoration opportunities
- Fully assesses and takes all steps needed to minimize the impact that our changing climate will have on our River and riverfront communities, including maximizing greening of communities throughout the LA River watershed to reduce flood pressures on the River
- Tackles the critical issue of River governance (e.g., through a JPA or other management structure) to ensure cohesive management of the entirety of the River (among all jurisdictions with a management role of the River) that also incorporates community input (e.g., public seats) in a meaningful way
- Brings together diverse stakeholders with different interests, as well as community voices from along the *entirety* of the River, to foster a meaningful dialogue to inform such a (People's) Plan

Again, the County does not need to look far for a recent, successful example of such a process - we think the OurCounty Plan effort was a much more community-informed process that might provide a good example for how to move forward.

Thank you for your consideration; we look forward to a continued dialogue on how we can build on the efforts to date to provide a truly compelling vision for a healthy and resilient LA River and surrounding communities.

Sincerely,



Marissa Christiansen  
President/CEO  
Friends of the Los Angeles River



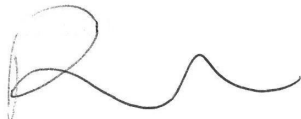
Shelley Luce  
Executive Director  
Heal the Bay



Bruce Reznik  
Executive Director  
Los Angeles Waterkeeper



Shona Ganguly  
External Affairs Advisor  
The Nature Conservancy



Robin Mark  
Los Angeles Program Manager  
The Trust for Public Land



Alessandro Negrete  
Director of External Affairs  
East Yard Communities for EJ



Tori Kjer, PLA  
Executive Director  
Los Angeles Neighborhood Land Trust



Sacred Places Institute

CC:

- Supervisor Hilda Solis
- Supervisor Holly Mitchell
- Supervisor Sheila Kuehl
- Supervisor Janice Hahn
- Supervisor Kathryn Barger
- Assembly Member Anthony Rendon
- Mark Pestrella, Director, Los Angeles County Public Works



Dan Lafferty, Deputy Director of Water Resources, Los Angeles County Public Works

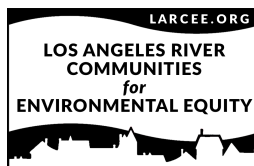
Michael Affeldt, City of Los Angeles, Riverworks

Brian Baldauf, Chief of Watershed Planning, Mountains Recreation and Conservation Authority

Gary Gero, Chief Sustainability Officer, County of Los Angeles



Clockshop



May 13, 2021

Carolina Hernandez, LA County Public Works  
Genevieve Osmena, LA County Public Works  
Jessica Henson, The Olin Studio  
Mark Hanna, Geosyntec Consultants

Via e-mail to: [chernandez@dpw.lacounty.gov](mailto:chernandez@dpw.lacounty.gov), [gosmena@dpw.lacounty.gov](mailto:gosmena@dpw.lacounty.gov), [jhenson@theolinstudio.com](mailto:jhenson@theolinstudio.com), [mhanna@geosyntec.com](mailto:mhanna@geosyntec.com), and [lariver@dlwp.county.gov](mailto:lariver@dlwp.county.gov)

Dear LA River Master Plan Team:

On behalf of the 45 environmental, environmental justice, and community-based groups listed below, we are writing to express our concerns with the LA River Master Plan (LARMP) as currently drafted. Our concerns fall into three main categories.

First, we believe the LARMP as drafted is not a proper master plan. It lacks a meaningful vision, adequate prioritization, and metrics necessary to establish a clear future for the River and its adjacent communities.

Second, by favoring a ‘menu approach’ of possible actions along the River, the Plan could achieve the worst of all possibilities– continued ecological degradation, failure to promote climate resiliency, and failure to sufficiently protect local communities.

Third, despite continued claims that the LARMP reflects community desires provided during extensive community outreach, the County left key constituencies out of the dialogue, and this Plan does not reflect the priorities articulated where the County did outreach.

We request that Los Angeles County demonstrate much-needed leadership by **making substantial changes to the Plan before its final adoption or instead committing to an implementation plan that meaningfully addresses the significant shortcomings of the current LARMP.** Specifically, we ask for the following three changes to the LARMP or for their incorporation into a robust implementation plan:

**1. Chart a Clear, Compelling Future for the LA River**

The Plan lacks any profound vision for the River. The Plan should spark the imagination and set a bold course for our living waterway that prioritizes restoration, addressing past harms, and opportunities for future generations. The Plan’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 and will ultimately allow any future project to be rationalized as consistent with the LARMP.

**2. Protect Communities, Ecology, and our Future**

*Prioritizing Climate Resiliency*

The biggest threat to all our communities is climate change. We already see the impacts of increased heat, fires, and flooding throughout California. Resiliency is discussed in the Plan, it is part of Goal 1, but it is not a driving factor for how projects throughout the watershed can mitigate the risks. The County should have developed the Plan with diverse approaches to resiliency, such as various forms of nature-based solutions combined with engineered solutions where required.

### *Taking a Watershed Approach to Planning*

While the Plan states that it utilizes a watershed approach in its research and analysis, the focus on the main stem of the LA River precludes the inclusion of systematic, nature-based solutions that would allow for a more naturalized, resilient, and multi-beneficial River. If we do not look at the entire watershed, tributaries included, we cannot make informed decisions about how best to protect residents from flooding and where a more naturalized River may be possible. Only by examining the entire watershed will we be able to understand where we can make targeted and strategic improvements that will support all communities.

### *Protecting Local Communities*

River-adjacent communities have long demanded community-driven restoration and park access to the LA River. But as we have seen in some areas of the upper watershed, just the mention of large-scale River investments has sparked gentrification and displacement that has made historically low-income neighborhoods inaccessible. The same is now occurring in the lower portion of the LA River. As is, the plan does not adequately address past harms which leave these communities vulnerable to ongoing land speculation and gentrification due to the LA River revitalization, and it fails to adequately protect these communities from future displacement. 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.

### *Treating the River Like a River*

Fundamentally, this Plan continues to treat the LA River as a flood channel, rather than treating it as a living river. Not only does the Plan not prioritize the health or ecology of the River, but it also affirmatively dismisses any prospects of a healthy river in its prebuttal (pg.22-27). This Plan doesn't celebrate how Angelenos already engage with the River and lacks solutions to make direct river access easier.

### *Greening Adjacent Communities*

We must repair the land we have harmed in the past century of industrialization. The Plan has identified contaminated areas along the River but has not prioritized them as opportunity sites. Not including contaminated sites as opportunity areas within this Plan is more than a missed opportunity. It demonstrates a clear disregard for the environmental contamination present throughout many communities along the River and the long-term impacts that contamination presents.

### *Tackling Governance*

The LA Watershed abides by geography, not governance. Recognizing that the River is part of a larger system, the Plan should consider more creative governance models to establish cohesive management over the watershed, as was done in the OurCounty Plan.

### **3. Ensure Meaningful Community Participation**

While applauding the County for bringing together a diverse group of experts as part of the LARMP Steering committee, the most glaring in absence was the lack of a representative from the Tongva. Diversity of Indigenous voices has not been included throughout the process but rather in concentrated and separated outreach efforts that have left few visible fingerprints on the Plan and its language. While there was one tribal representative on the Steering Committee, it is unacceptable that there was no Tongva representation.

**Closing/Next Steps**

In closing, we recognize the County for the effort that went into the planning process. However, the deficiencies in the process and Plan represent the loss of a once-in-a-generation opportunity to reshape the future of the River and adjacent communities to be healthier and more resilient.

As such, we stand with our allied partners to call for a substantially revised Master Plan or commitment to immediately embark on a more community-focused implementation plan that includes prioritization *of* and measurable outcomes *for*: community stabilization, climate resiliency, and community and ecosystem health.

Thank you for your consideration and the opportunity to provide comments. We look forward to future cooperation with the County.

Sincerely,

Marissa Christiansen  
President/CEO  
Friends of the Los Angeles River

Shelley Luce  
Executive Director  
Heal the Bay

Bruce Reznik  
Executive Director  
Los Angeles Waterkeeper

Shona Ganguly  
External Affairs Advisor  
The Nature Conservancy

Robin Mark  
Los Angeles Program Manager  
The Trust for Public Land

Alessandro Negrete  
Director of External Affairs  
East Yard Communities for EJ

Tori Kjer, PLA  
Executive Director  
Los Angeles Neighborhood Land Trust

Jack Eidt  
Co-Founder  
SoCal 350 Climate Action

Jessica Aldridge  
Founder/Executive Director  
Adventures in Waste

Lisa Hart  
Steering Board Member  
Neighborhood Council Sustainability Alliance -  
Steering Board

Julia Meltzer  
Executive Director  
Clockshop

Patricia Pérez  
Board Chair  
Los Angeles River State Park Partners

Philip Murphy  
Co-President  
Citizens Committee to Save Elysian Park

Mark Kenyon  
Executive Director  
North East Trees

Christine Louise Mills  
Director  
LA River Communities for Environmental Equity

Azucena Hernandez  
Co-Director for Community Transformation  
Promesa Boyle Heights

Jessica Carmichael  
Regional Director  
Biocitizen Los Angeles

Graham Hamilton  
Los Angeles Manager  
Surfrider Foundation

Dennis Loya  
Chapter Chair  
Sierra Club - Angeles Chapter

Elizabeth Reid-Wainscoat  
Urban Wildlands Campaigner  
Center for Biological Diversity

Cynthia Strathmann  
Executive Director  
Strategic Actions for a Just Economy

Susanne Browne  
Senior Attorney  
Legal Aid Foundation of Los Angeles

Jiyoung Carolyn Park  
At-Large Representative  
Silver Lake Neighborhood Council

Andy Hattala & Tara Barauskas  
Co-Chairs  
Los Angeles Chapter of Climate Reality

Bill Przylucki  
Executive Director  
Ground Game LA

Helene Schpak  
President  
Glassell Park Improvement Association

Scott Culbertson  
Executive Director  
Friends of Ballona Wetlands

Nina Suarez  
President  
East Hollywood Neighborhood Council

Claire Robinson  
Managing Director  
Amigos de los Rios

Elizabeth Lambe  
Executive Director  
Los Cerritos Wetlands Land Trust

James Suazo  
Executive Director  
Long Beach Forward

Martha Camacho Rodriguez  
Educator/Director  
Social Eco Education-LA

Scott Ammons  
SoCal Regional Experiences Manager  
REI Co-op

Diana Weynand  
Chapter Chair  
San Fernando Valley Climate Reality Chapter

Hilda Gaytan  
President/Co-Founder  
Puente Latino Association

Marcos Trinidad  
Center Director  
Audubon Center at Debs Park

Robert Jan van de Hoek  
President  
Ballona Institute

Belen Bernal  
Coordinator, OurWaterLA  
Executive Director, Nature for All

Tilly Hinton, PhD  
Founder and Curator  
LA River X/El Rio de Los Angeles X

Amy Valenzuela  
President  
Riverpark Coalition

Corliss Lee  
Eastside Voice  
President Eastside Voice

Rae Gabelich, Chair  
Joe Sopo, Vice Chair  
Neighborhoods First

Kenny Allen  
Hub Coordinator  
Sunrise Movement, Long Beach

Renee Lawler  
President  
Equestrian Trail Assn of So CA (HETASC)  
Equestrian Assn of Wrigley Heights

Steven Appleton  
Founder/Director  
LA River Kayak Safari  
Water Institute of Science Policy

CC:

Supervisor Hilda Solis  
Supervisor Holly Mitchell  
Supervisor Sheila Kuehl  
Supervisor Janice Hahn  
Supervisor Kathryn Barger  
Assembly Member Anthony Rendon  
Mark Pestrella, Director, Los Angeles County Public Works  
Dan Lafferty, Deputy Director of Water Resources, Los Angeles County Public Works  
Michael Affeldt, City of Los Angeles, Riverworks  
Brian Baldauf, Chief of Watershed Planning, Mountains Recreation and Conservation Authority  
Gary Gero, Chief Sustainability Officer, County of Los Angeles  
Alessandro Negrete & Jessica Prieto, East Yard Communities for Environmental Justice  
Shona Ganguly, The Nature Conservancy  
Shelley Luce, Heal the Bay  
Bruce Reznick, Los Angeles Waterkeeper  
Robin Mark, Trust for Public Land  
Tori Kjer, Los Angeles Neighborhood Land Trust  
Marissa Christiansen & Liliana Griego, Friends of the LA River

# Attachment B



# An Analysis of Community Engagement for the LARMP

---

S. Jawaid, Feb 2021

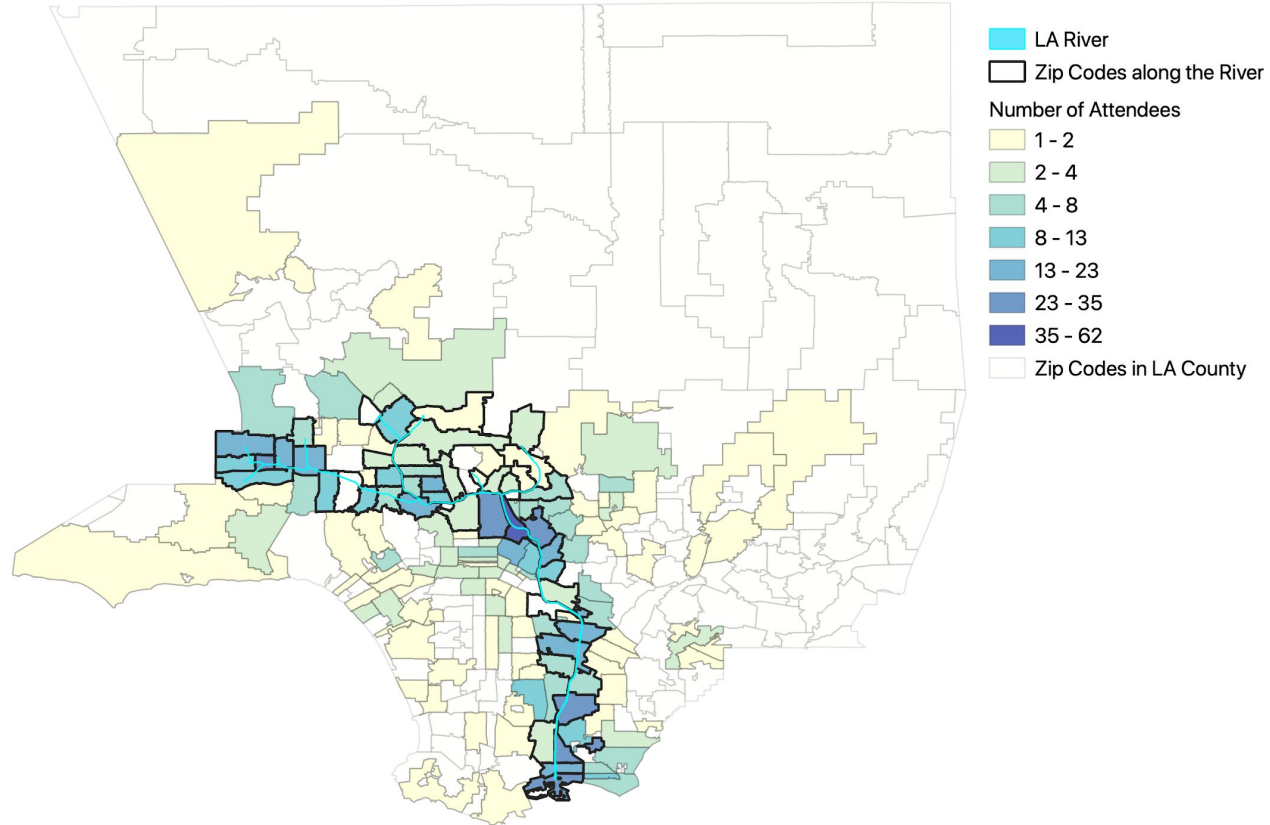
# Community Meetings

Meeting Location	Date
Canoga Park	7/25/2018
Cudahy	8/22/2018
Long Beach	10/24/2018
Friendship Auditorium (Griffith Park/Los Feliz)	11/13/2018
North Hollywood Studio City	12/13/2018
West Valley	02/13/2019
South Gate	3/28/2019
Compton	4/24/2019
Pacoima	5/5/2019
Glendale	06/12/2019
Canoga Park 2	10/15/2019
North Long Beach	10/16/2019
Central LA	10/17/2019

Total Meetings: 13

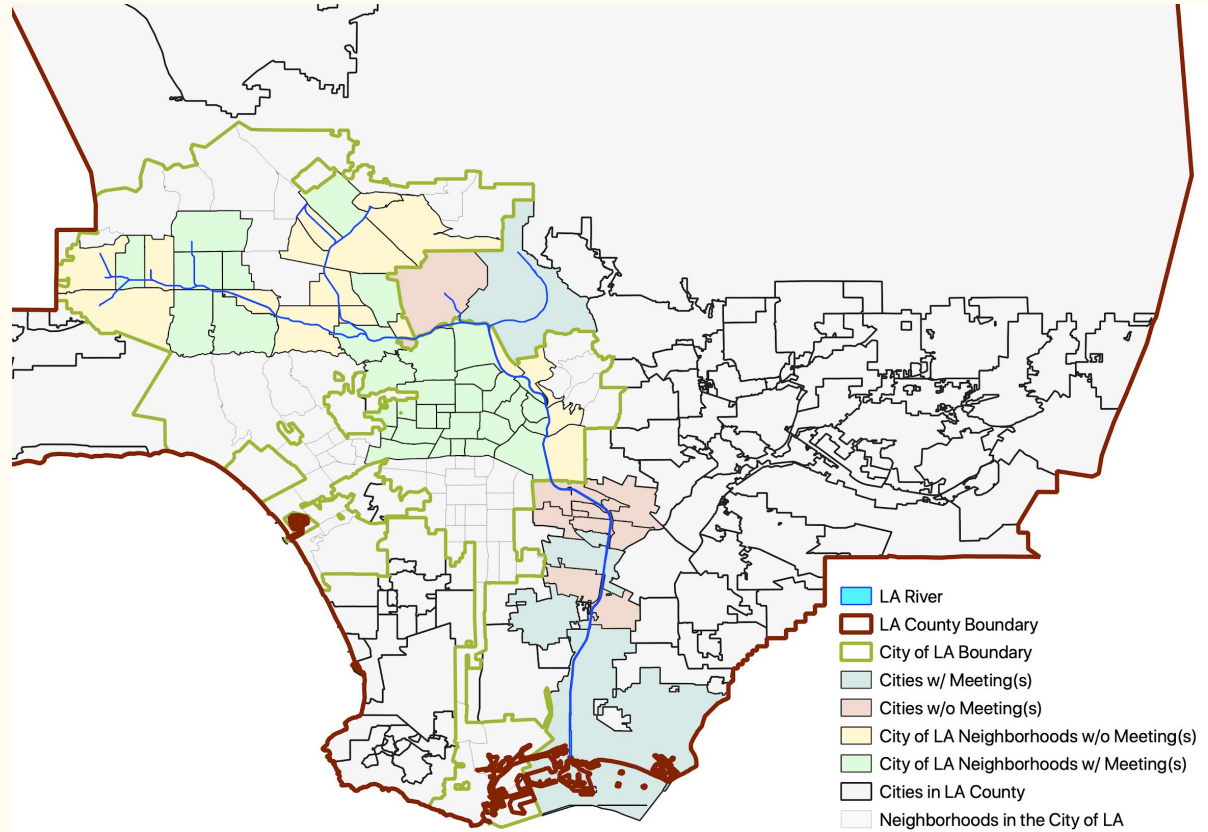
Total Attendees: 1,017

# Attendees by Zip Code



# Where did the meetings take place?

- Green represents neighborhoods in the City of LA that did have community meeting(s)
- Yellow represents neighborhoods in the City of LA that touch or border the LA River, but did not have a community meeting
- Blue represents cities in LA County (not including the City of Los Angeles) that did have community meeting(s)
- Red represents cities in LA County that touch or border the LA River, but did not have a community meeting
- Certain community meetings in the City of LA (e.g. West Valley, Central LA) covered multiple neighborhoods



# City of LA Neighborhoods with/without meetings

Neighborhoods Along the River			
Arleta	Encino	Reseda	Valley Glen
Atwater Village	Glassell Park	Sepulveda Basin	Valley Village
Boyle Heights	Griffith Park	Shadow Hills	West Hills
Canoga Park	Hansen Dam	Sherman Oaks	Winnetka
Chinatown	Hollywood Hills	Silver Lake	Woodland Hills
Cypress Park	Lincoln Heights	Studio City	Lake Balboa
Downtown	Northridge	Sun Valley	
Elysian Park	Pacoima	Tarzana	
Elysian Valley	Panorama City	Toluca Lake	

consulted

not consulted

Certain community meetings (e.g. West Valley, Central LA) covered multiple neighborhoods

# Cities along LAR with/without Meetings

Cities Along the River		
Bell	Glendale	Maywood
Bell Gardens	Huntington Park	Paramount
Burbank	Long Beach	South Gate
Commerce	Los Angeles	Unincorporated
Compton	Lynwood	Vernon
Cudahy		

consulted	not consulted
-----------	---------------

# **Specific Questions from the Community Surveys**

# Which of the following goals for the LA River are most important to you?

40.1% of respondents listed goals with an emphasis on the environment/nature

Response	n Responses	% Responses
Provide equitable, inclusive, and safe parks, open space, and trails.	757	17.7%
Support healthy, connected ecosystems	673	15.7%
Promote healthy, safe, clean water	541	12.7%
Provide protective and resilient flood management	496	11.6%
Improve local water supply reliability	428	10.0%
Embrace local arts and culture and strengthen communities	410	9.6%
Address potential adverse impacts to housing	333	7.8%
Enhance opportunities for equitable access to the river corridor	326	7.6%
Foster learning and opportunities for education	312	7.3%
Total	4276	100.0%

Lines highlighted in green represent environment related responses



# When it is not raining, there is still flow in the LA River. What do you think is a better use for this water instead of letting it flow to the ocean?

61.4% of respondents chose uses with an emphasis on the environment/nature

Response	n Responses	% Responses
Native Habitat	491	33.2%
Local water supply (groundwater recharge, recycled water)	417	28.2%
Recreation	173	11.7%
Direct irrigation of nearby landscapes	172	11.6%
Nothing. It should continue to flow to the ocean	123	8.3%
Fountains, streams, and water features	101	6.8%
Total	1477	100.0%

Lines highlighted in green represent environment related responses

# What do you think is most important for people to learn about the LA River?

59.1% of respondents were interested in learning about environment/nature

Response	n Responses	% Responses
How the river benefits and supports the environment	750	24.5%
Ecology, habitat, and vegetation	644	21.1%
Current hydrology, sources, and uses of the river	413	13.5%
Cultural history	375	12.3%
Current communities along the river	329	10.8%
Hydrologic history	314	10.3%
Flood history	230	7.5%
Total	3055	100.0%

Lines highlighted in green represent environment related responses

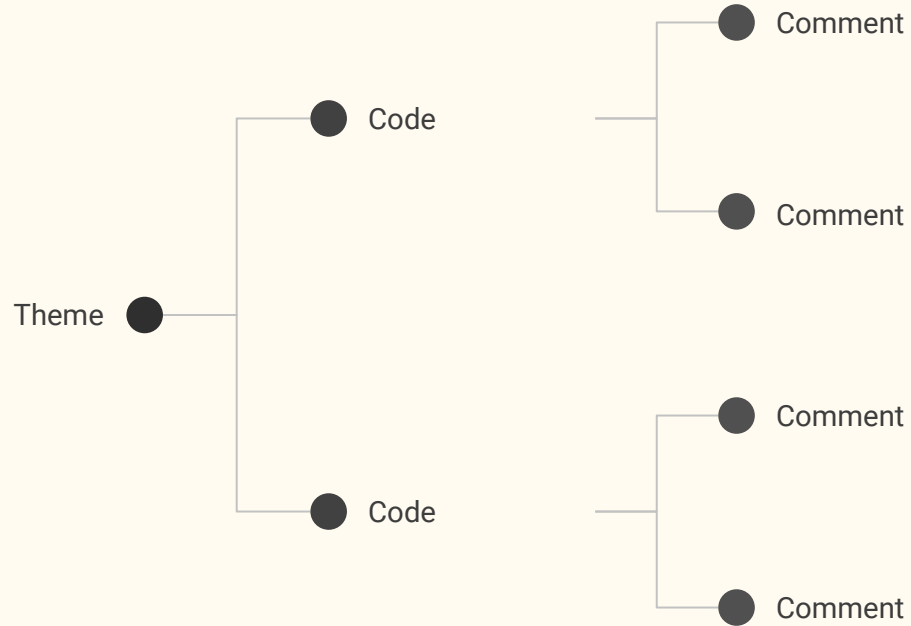
# **Text Analysis of Additional Comments from the Community Survey**

# Anything we missed?

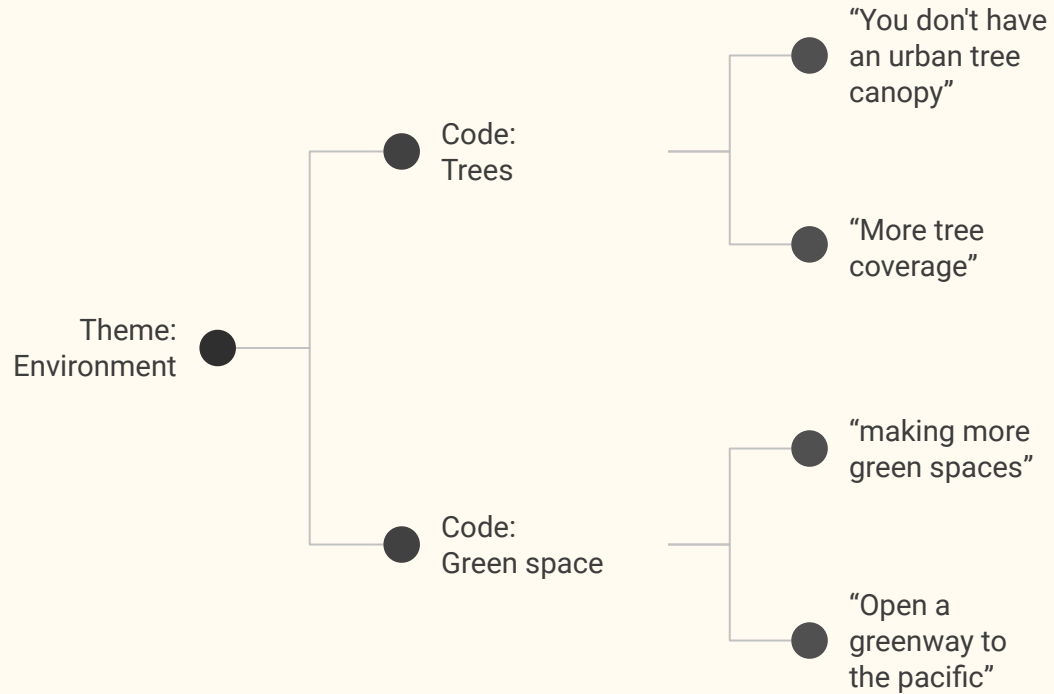
- From the 466 additional comments submitted, 25 distinct themes were identified via text mining
- Right: word cloud of top 13 themes weighted by frequency
- Top 4 Themes:
  1. environment (24.0%)
  2. access/connectivity (12.7%)
  3. homelessness (8.8%)
  4. diversity/equity/inclusion (8.2%)



# Text Analysis: Methodology

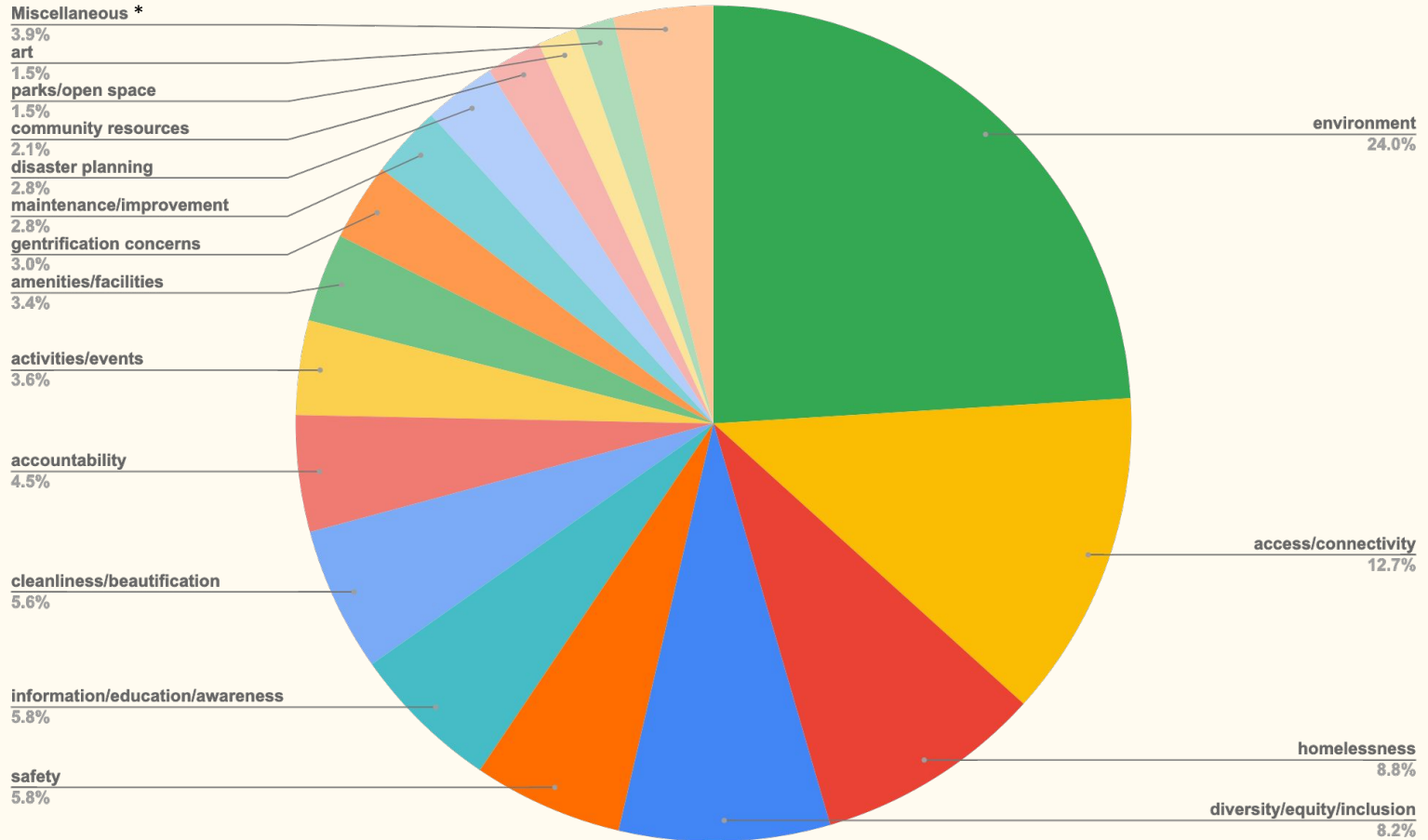


# Text Analysis: Example



## **Other Important Themes from the Additional Comments**

# Themes by % of comments



\*Any theme that had <=1% frequency was categorized as miscellaneous

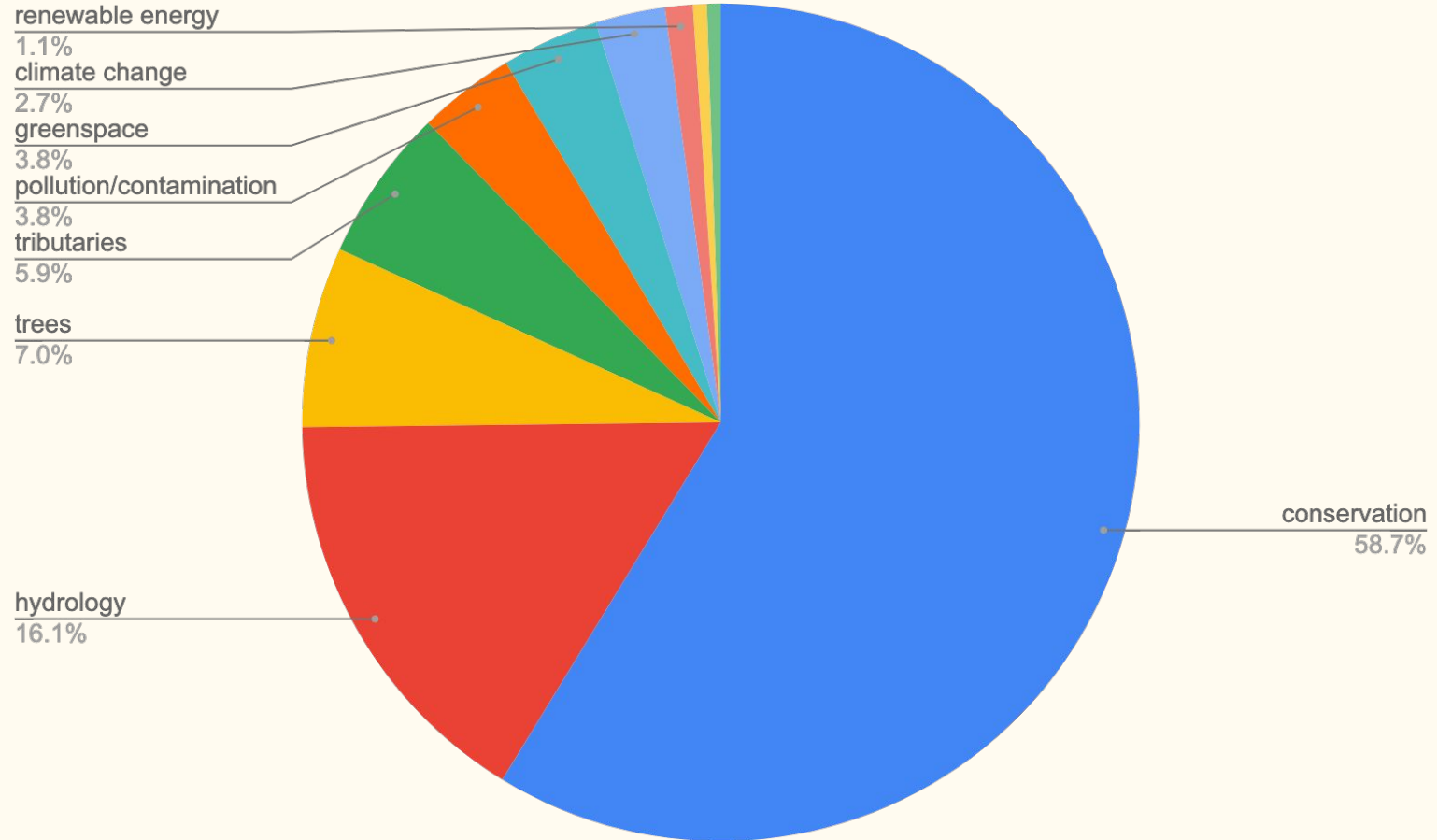


# Theme Frequency Table

Theme	n Comments	% Comments
environment	112	24.0%
access/connectivity	59	12.7%
homelessness	41	8.8%
diversity/equity/inclusion	38	8.2%
safety	27	5.8%
information/education/awareness	27	5.8%
cleanliness/beautification	26	5.6%
accountability	21	4.5%
activities/events	17	3.6%
amenities/facilities	16	3.4%
gentrification concerns	14	3.0%
maintenance/improvement	13	2.8%
disaster planning	13	2.8%
community resources	10	2.1%
parks/open space	7	1.5%
art	7	1.5%
miscellaneous	18	3.9%
<b>Total</b>	<b>466</b>	<b>100.0%</b>

## **Codes under the Environment Theme**

# Environment Codes by % of Comments



# All Codes under the Environment Theme

Environment Codes	n Comments	% Comments
conservation	66	58.7%
hydrology	18	16.1%
trees	8	7.0%
tributaries	7	5.9%
pollution/contamination	4	3.8%
greenspace	4	3.8%
climate change	3	2.7%
renewable energy	1	1.1%
public health	1	0.5%
CEQA	1	0.5%
<b>Total</b>	<b>112</b>	<b>100.0%</b>

# Environment code: Conservation

- Conservation included comments pertaining to protecting and maintaining nature, biodiversity, ecosystems, and wildlife
  - 58.7% of environment comments
  - 14.1% of total comments
- Notable comments:
  - “Environment should be #1 - we need more shade and trees - nature for the sake of nature”
  - “Use of projects to increase native biodiversity.”
  - “Need to address protection of established wildlife and habitat during transition periods for redevelopment and revitalization”
  - “Include also health of animals/wildlife (no destroying of wildlife habitat)”
  - “let it be "wild" wherever it can be wild and naturalized inside and alongside the channel”
  - “Native plants & trees everywhere. Have connected areas for native wildlife, insects, birds, fish, mammals”

# Environment code: Hydrology

- Hydrology included comments pertaining to water quality, watershed management, and water conservation
  - 16.1% of environment comments
  - 3.9% of total comments
- Notable comments:
  - “Focus on water quality!”
  - “Providing more soft bottom sediment areas for groundwater recharge in Los Angeles County”
  - “Use greywater (treated and reclaimed) to fill watershed for aquatic habitat connectivity”
  - “Collect water in aquifers”
  - “There is opportunity to capture and spread water in Verdugo Wash to increase relocation and recharge in the Verdugo Basin which two communities rely on”

## **Other Important Themes from the Additional Comments**

# Other themes: Access/Connectivity

- The access/connectivity theme contained codes pertaining to trails/paths (pedestrian, biking, equestrian), and accessibility to the river
  - 12.7% of total comments
- Notable comments:
  - “Continuous 51 mile bike path! (pls)”
  - “More contiguous bike paths”
  - “Pedestrian access/more obvious entrance to park”
  - “Equestrian access and safety”
  - “Hopefully there will be running trails along the way”
  - “Vital to have connected bike/walking paths - continuous and contiguous - long stretches”
  - “Accessibility for people of different needs/abilities”



# Other themes: Homelessness

- Homelessness was a major concern expressed in the additional comments
  - 8.8% of total comments
  - Homelessness is one of the most pressing issues in Los Angeles
- Notable comments:
  - “Integrate homeless folks, don't just push them out under guise of “clean up””
  - “funding to address homelessness and when funding river projects don't just kick out homeless population”
  - “Accommodation for the homeless, especially in west Long Beach. Nothing was mentioned about addressing the people who are homeless and living on the riverbed.”
  - ““Address homelessness” what does this mean? it should mean connecting to services + coordinating w/ other agencies, housing, mental health, substance use”
  - “Don't get rid of people who don't have homes, let's create solutions!”

# Other themes: Gentrification

- Gentrification and displacement of current residents was an important concern in the additional comments
  - 3.0% of total comments
  - Despite it being a not as frequent as other themes, this is important to note, considering LA's housing crisis
  - Lower-income, communities of color who may face the pressures of rising rents are often underrepresented at community meetings
- Notable comments:
  - “making sure existing communities along the LA River are not displaced or pushed out due to rising rent as a result of the revitalization/development of the river (maybe some sort of rent control is needed)”
  - “How will you prevent gentrification?”
  - “don't raise our rent”
  - “What can realistically be done to prevent skyrocketing property values and neighbors being able to remain in their homes?”

# Key Takeaways

1. There could have been greater effort for community outreach
  - a. Only 13 total meetings were held with a total of 1,017 attendees over the course of roughly 1.5 years
  - b. Key neighborhoods and cities along the river such as Atwater Village, Boyle Heights, Huntington Park, and Maywood should have had specific meetings for their communities
2. The environment was the overwhelming priority of the community
  - a. People hope to see the river return to a more natural state and improvements in water quality/capture
3. The community feedback on homelessness focused on finding solutions, not “just kicking out” the people experiencing homelessness
4. Gentrification fears must be taken into account in planning river restoration
  - a. Equitable development needs to be integrated into the master plan
5. The community wants easy and safe access to a network of connected trails/paths

# About

**Sul Jawaid** is deeply interested in issues of equity and environment. He is getting his master's degree in Urban Planning at CSU Northridge, and works at Binti - a mission-driven company building modern software for foster care agencies.

**Zaynab Jawaid** is a freshman at Diablo Valley College studying Environmental Science. She hopes to use her education in work that helps conserve California wildlife.

# Public Opinion on the Los Angeles River

StudyLA's 2021 Los Angeles River Survey

Summer 2021

---

Thomas and Dorothy Leavey Center for the Study of Los Angeles (StudyLA)  
Loyola Marymount University



**LMU**  
Loyola Marymount University

**StudyLA advocates for a better,  
more equitable Los Angeles**  
through research, student  
mentorship, and engagement  
with residents and leaders.

# About this Study

StudyLA conducted the 2021 Los Angeles River Survey to measure public opinion on various topics related to the LA River.

The survey involved 15-minute telephone sessions and online surveys with 600 adults living in Los Angeles County (124 respondents are in zip codes located within one mile of the Los Angeles River, indicated by the light blue area on the map). Data collection took place from July 7 to July 19, 2021. The survey was administered in English, Spanish, Mandarin, and Korean. The margin of error is +/- 4% for the entire sample. More on the methodology for this study can be found in the data brief, available [lmu.edu/studyLA](https://lmu.edu/studyLA).

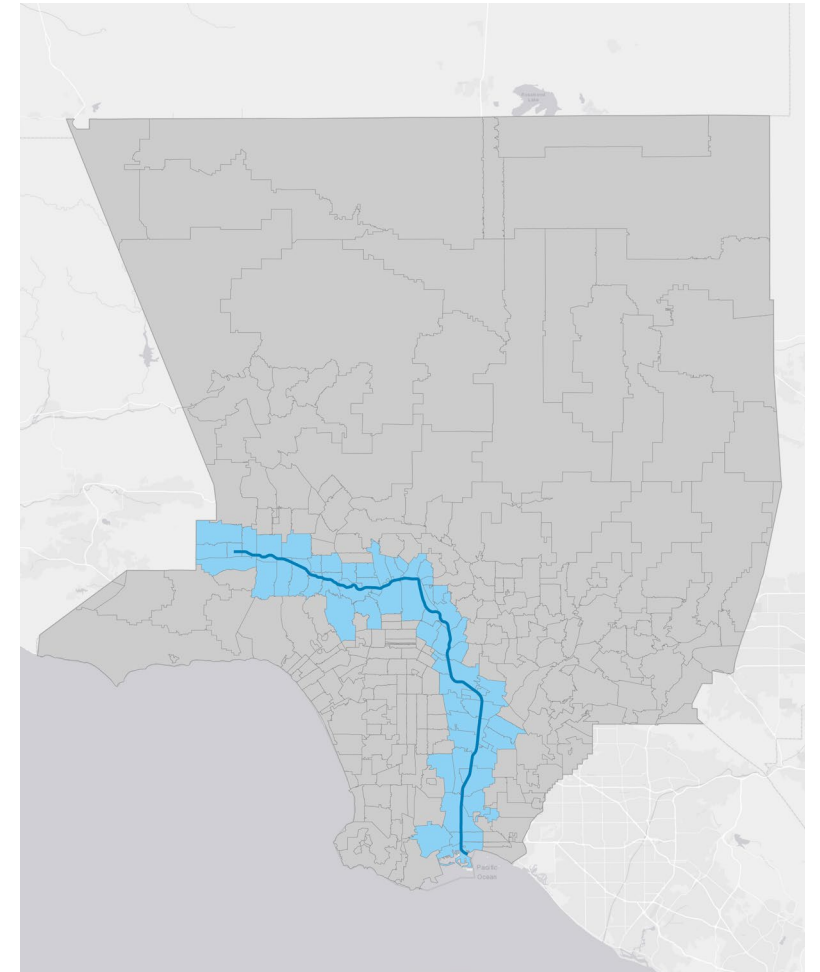
This report presents topline (total responses for each question) and crosstabs (all questions

crossed by major demographics) pertaining to substantive questions. All questions were asked of the entire sample except for the questions asking respondents if they had ever been to the Los Angeles River (asked only of those who said they were aware of it; n=505) and what activities they had done there (asked only of those who said they had been there; n=257). Numbers may not total 100% due to rounding.

For questions about this and other StudyLA research, please contact Brianne Gilbert, Managing Director, at [brianne.gilbert@lmu.edu](mailto:brianne.gilbert@lmu.edu).

## Recommended Citation

Thomas and Dorothy Leavey Center for the Study of Los Angeles (2021). *Public Opinion on the Los Angeles River: 2021 Los Angeles River Survey*. Loyola Marymount University, Los Angeles, California.



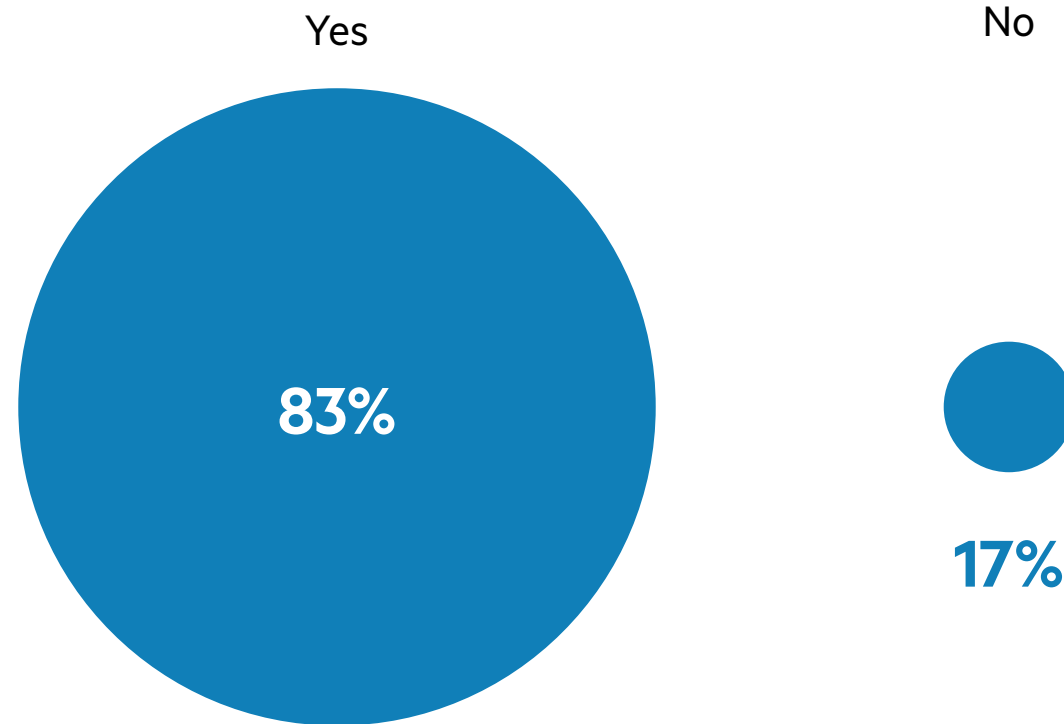
# Four in five residents are familiar with the Los Angeles River

Residents who have lived in Los Angeles for 26 years or more (91%) have more awareness of the Los Angeles River compared to residents who have lived here 16-25 years (78%), 6-15 years (75%), or 5 years or less (57%).

Similarly, residents ages 45 and older (88%) have more awareness of the Los Angeles River compared to residents ages 18 to 44 (78%).

Residents who live more than a mile from the river (82%) are as familiar with it as people who live within a mile from it (84%).

**Are you aware that there is a river called the Los Angeles River that runs from the San Fernando Valley, through Downtown LA, and empties out into the Pacific Ocean in Long Beach?**





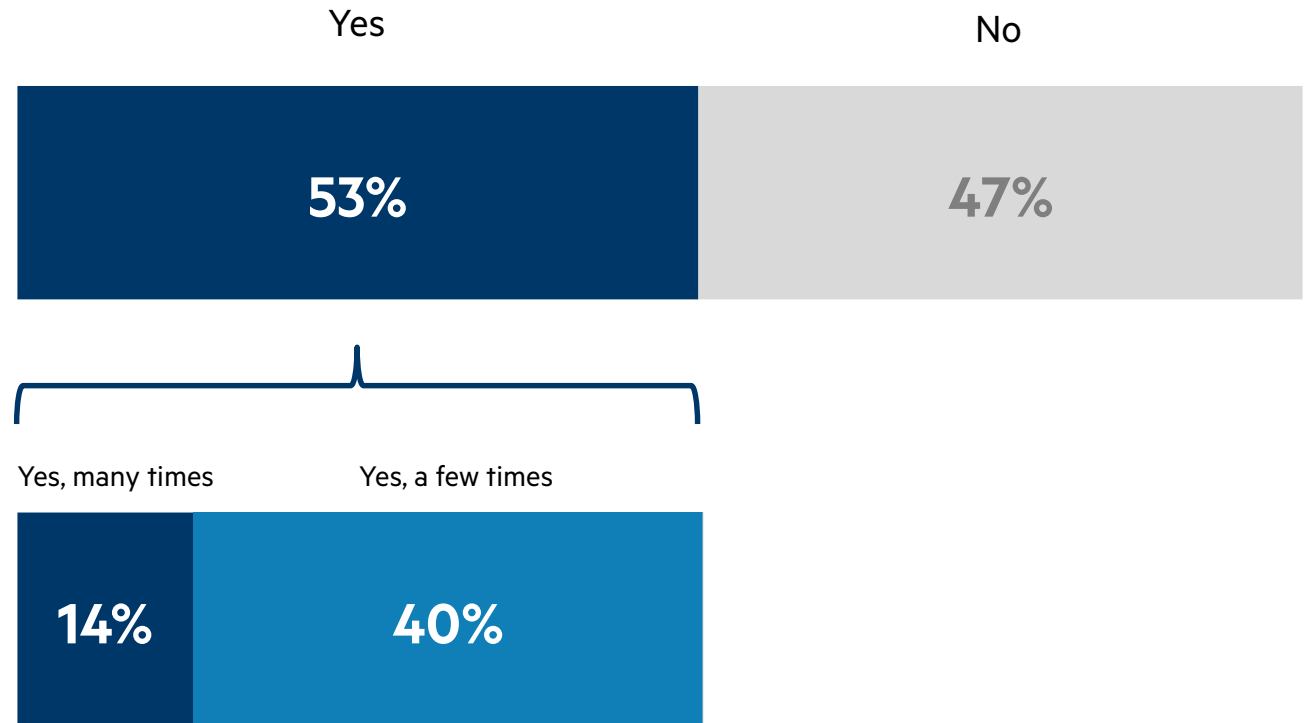
# Only half of residents who are aware of the Los Angeles River have been to it

Residents who have lived in Los Angeles for 5 years or less (47%) are less likely to have visited it compared to residents who have lived in the area longer.

By race and ethnicity, Asian residents (40%) are the least likely to have visited the river while White residents (60%) are the most likely to do so. Black and Latina/o residents are evenly split.

## Have you ever been to the Los Angeles River?

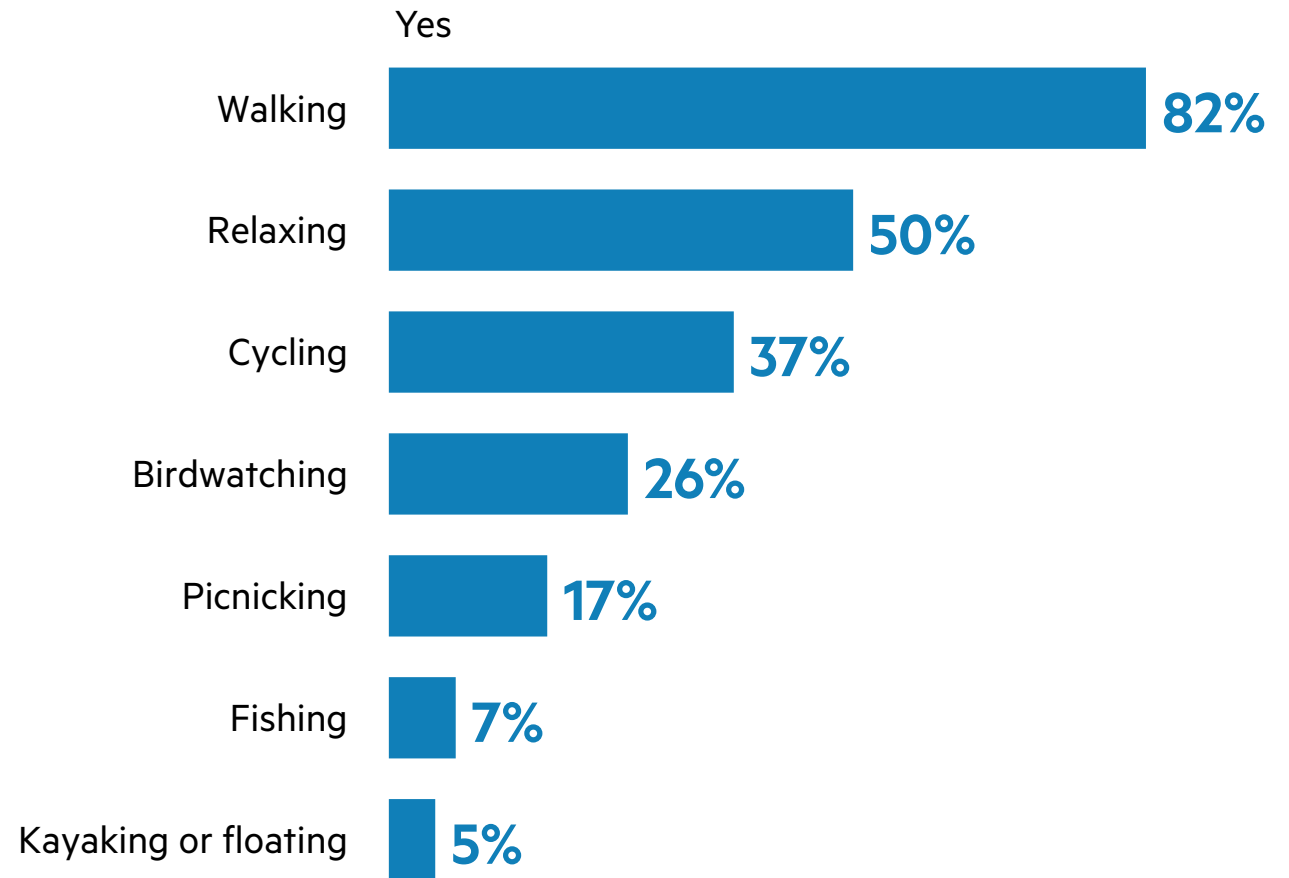
*Asked only of those who said they were aware of the river in the previous question*



# Most residents have visited the river for walking, and half have visited it for relaxing

Residents with children in their household are more likely to have done these activities than residents with no children in their household. Notably, 58% of residents with children in their household have visited the Los Angeles River for relaxing compared to 46% of residents with no children in their household. Further, 36% of residents with children in their household have visited for birdwatching compared to 22% of residents with no children in their household.

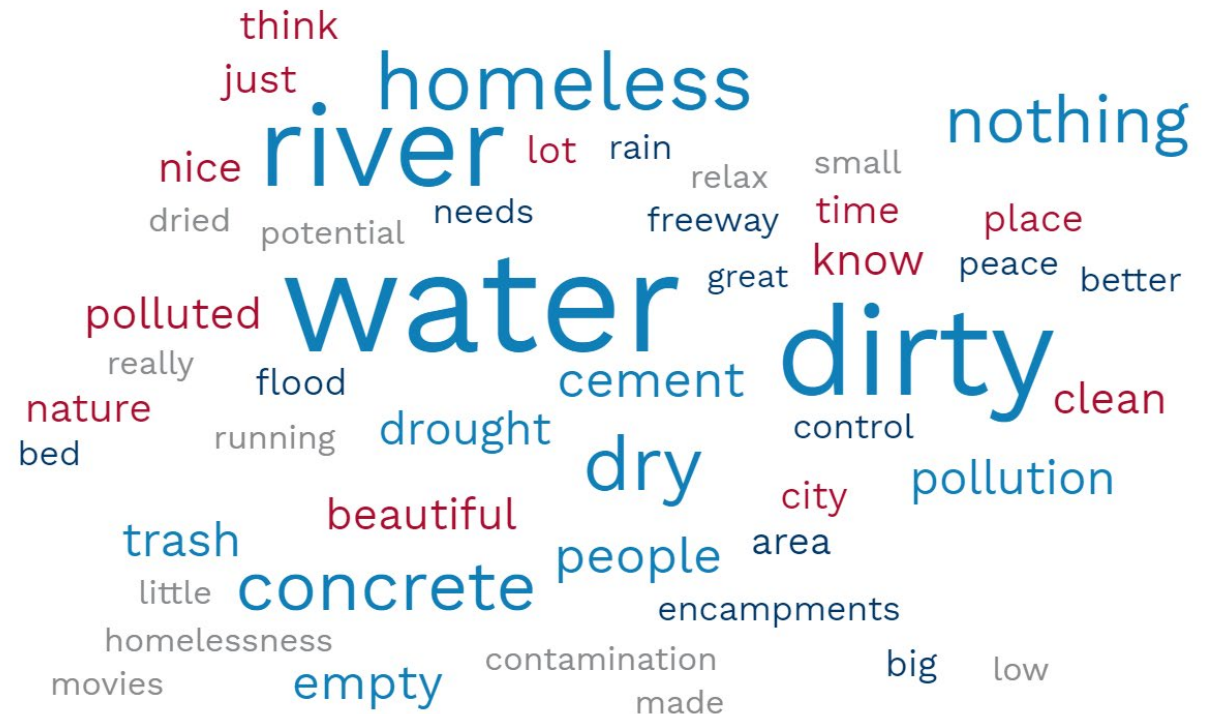
## Have you ever done the following at the Los Angeles River? *Asked only of those who said they had been to the river in the previous question*



# “Water,” “dirty,” and “concrete” are among the top words that come to mind when thinking about the Los Angeles River

This open-ended question was asked of all respondents. In the image to the right, the larger size indicates a higher frequency of mentions.

What comes to mind when you think of the Los Angeles River?

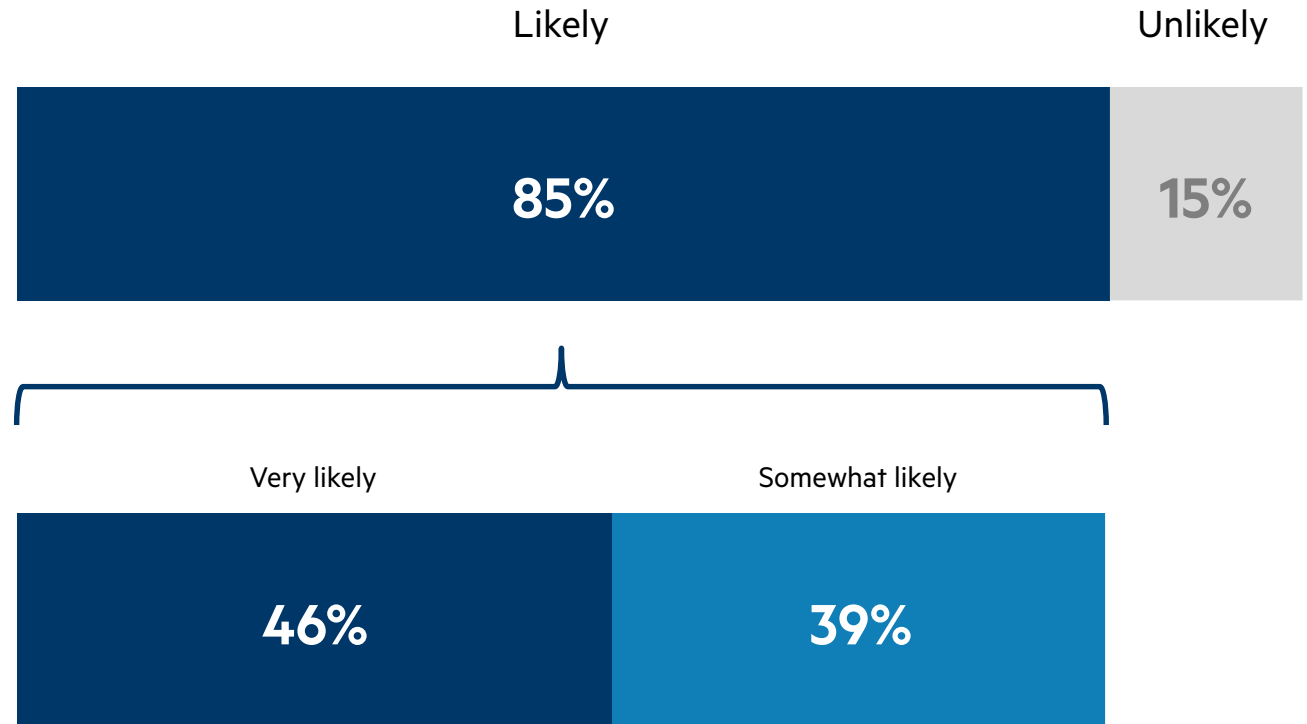


# Most residents would likely visit the river if it had more opportunities for recreational and cultural activities

Residents ages 18-29 (85%) would be more likely to visit compared to residents ages 65 and older (72%).

Residents with children in their households (94%) would be more likely to visit compared to residents with no children in their households (81%), though the likelihood of visits by both groups is high.

If the vision of a Los Angeles River with more parks, natural areas, access to paths, and recreational and cultural opportunities were achieved, how likely would you be to visit the river?

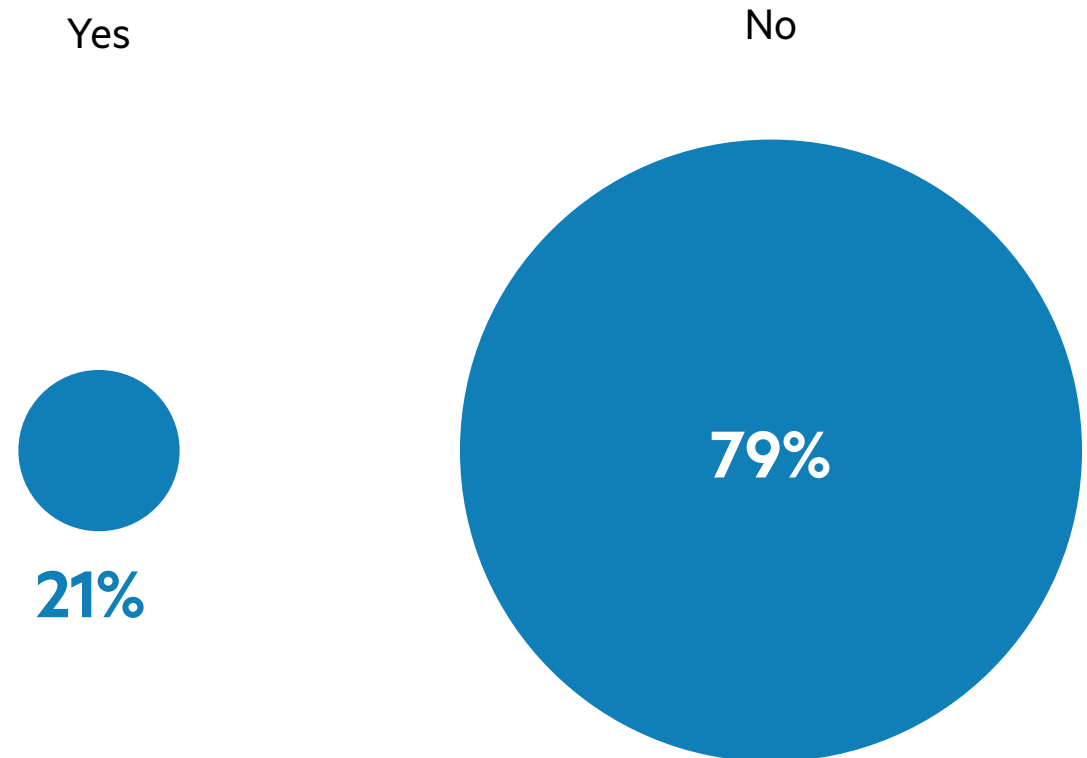


# Most residents are not aware of the new county master plan to revitalize the river

Latina/o residents (14%), renters (14%), Korean speakers (13%), residents with household incomes under \$40K (13%), Spanish speakers (10%), residents ages 18-29 (10%), and non-registered voters (8%) are among the least knowledgeable of the new master plan to revitalize the river.

By race and ethnicity, White residents (31%) are more likely to be aware of the new master plan compared to Asian (21%), Black (19%), and Latina/o (14%) residents.

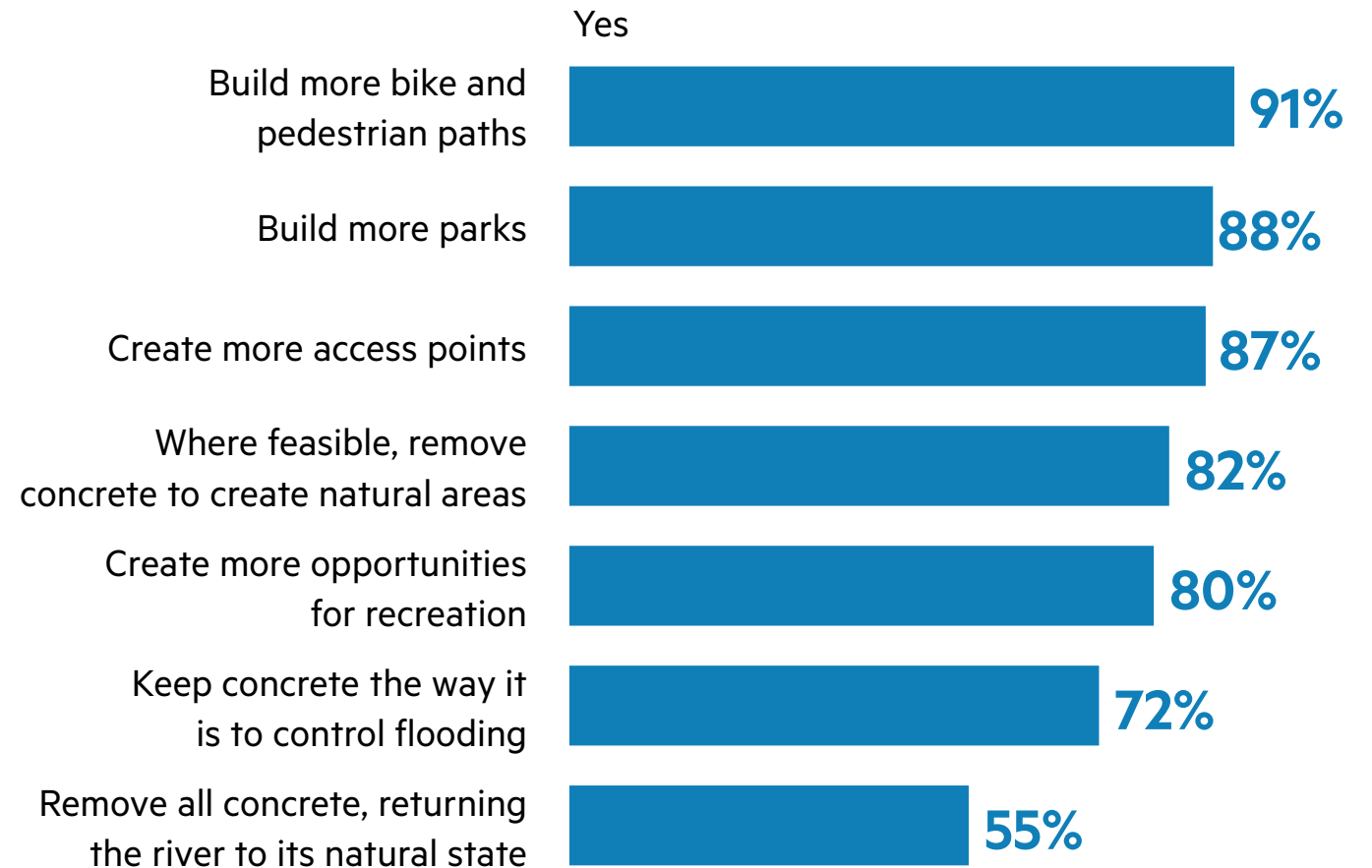
Are you aware that there is a new county master plan to revitalize the Los Angeles River, which was released earlier this year?



# Building more bike and pedestrian paths, building more parks, and creating more access points are highly desired proposals for river revitalization

Four in five residents are also in favor of removing concrete to create natural areas and creating more opportunities for recreation, such as kayaking and floating.

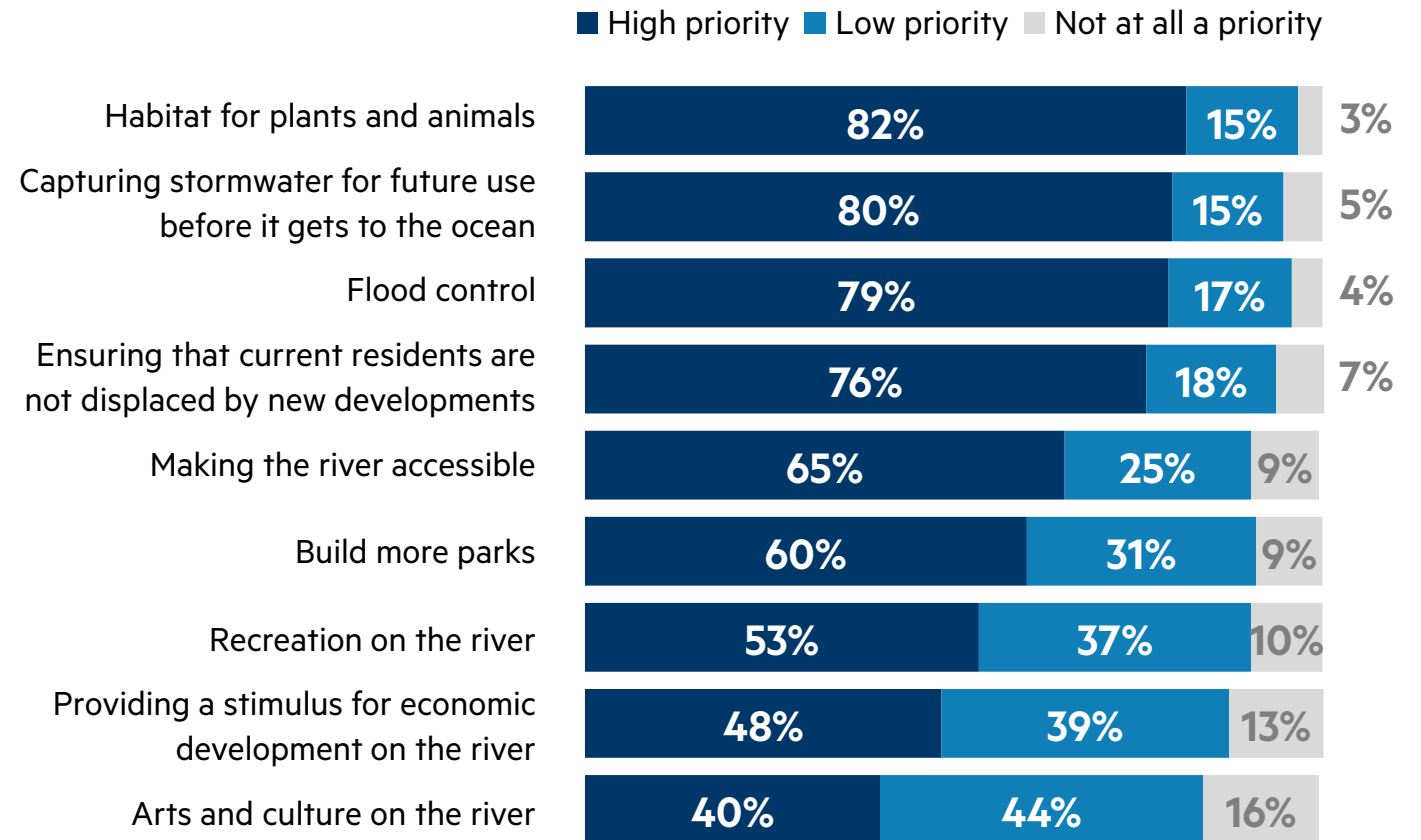
The master plan includes many proposals for river revitalization. Would you like to see the following happen on the Los Angeles River?



# Four in five residents believe creating a habitat for plants and animals, capturing stormwater for future use, and flood control should be high priorities for river revitalization

Three in four residents also believe ensuring that current residents are not displaced by new developments should be a high priority.

Should the following be a high priority, low priority, or not at all a priority for the revitalization of the Los Angeles River?

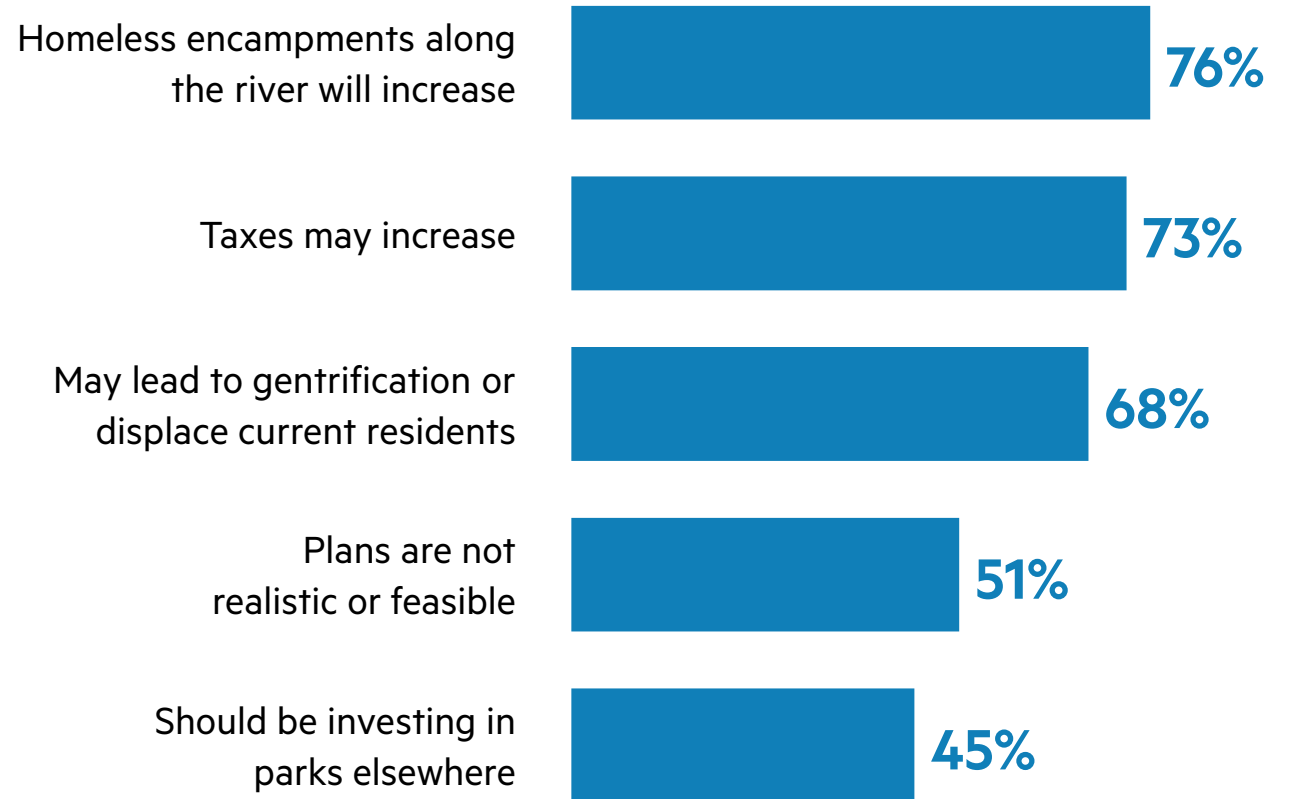


# Three in four residents are concerned that river revitalization may lead to an increase of homeless encampments

Two in three residents (68%) are concerned that river revitalization may lead to gentrification or displacement of current residents.

Residents with household incomes under \$40K are equally concerned about homeless encampments (78%) as they are gentrification or displacement (79%).

In the coming years, millions of dollars from local, state, and federal sources are slated to be spent revitalizing the Los Angeles River. Are the following a concern you have about efforts to revitalize the Los Angeles River?



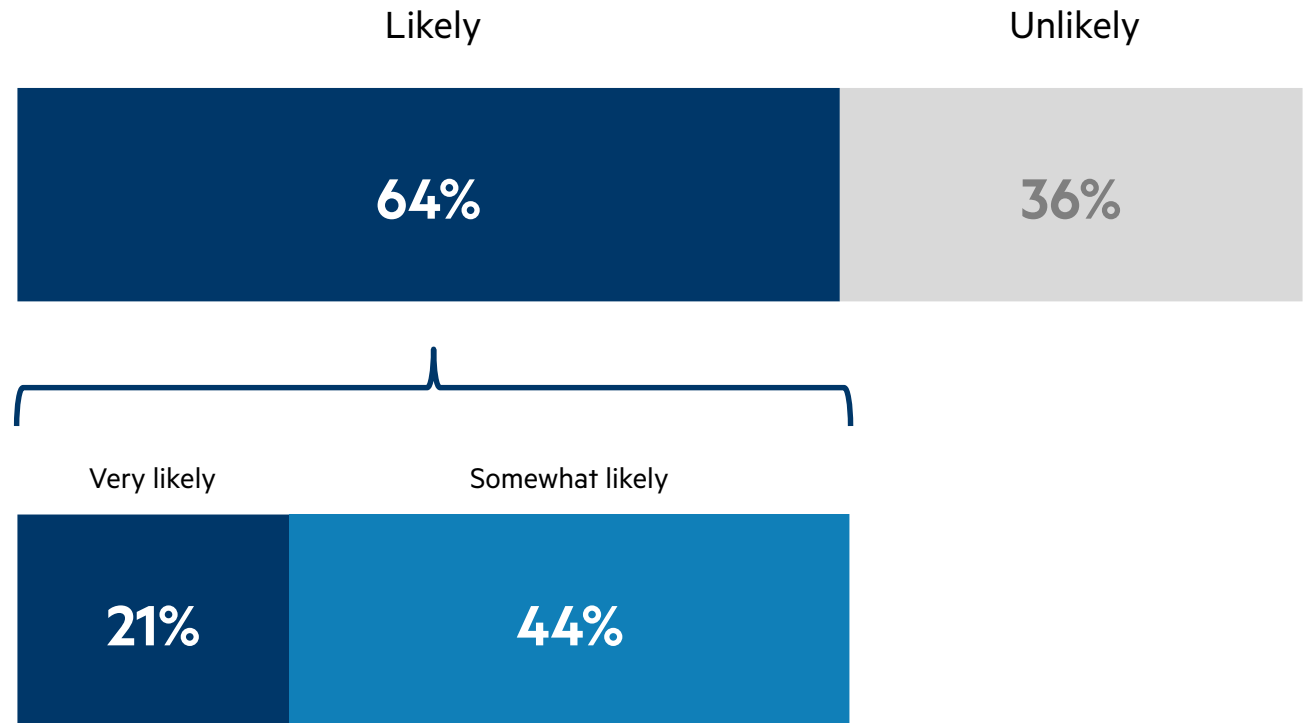


# Nearly two-thirds of residents think the river could become a world-class attraction

Residents ages 18-29 (70%) and 30-44 (69%) are more likely to think the river could become a world-class attraction compared to residents ages 45-64 (63%) and 65 and older (49%).

By race and ethnicity, Latina/o residents (76%) are much more hopeful in the river becoming a world-class attraction than other groups.

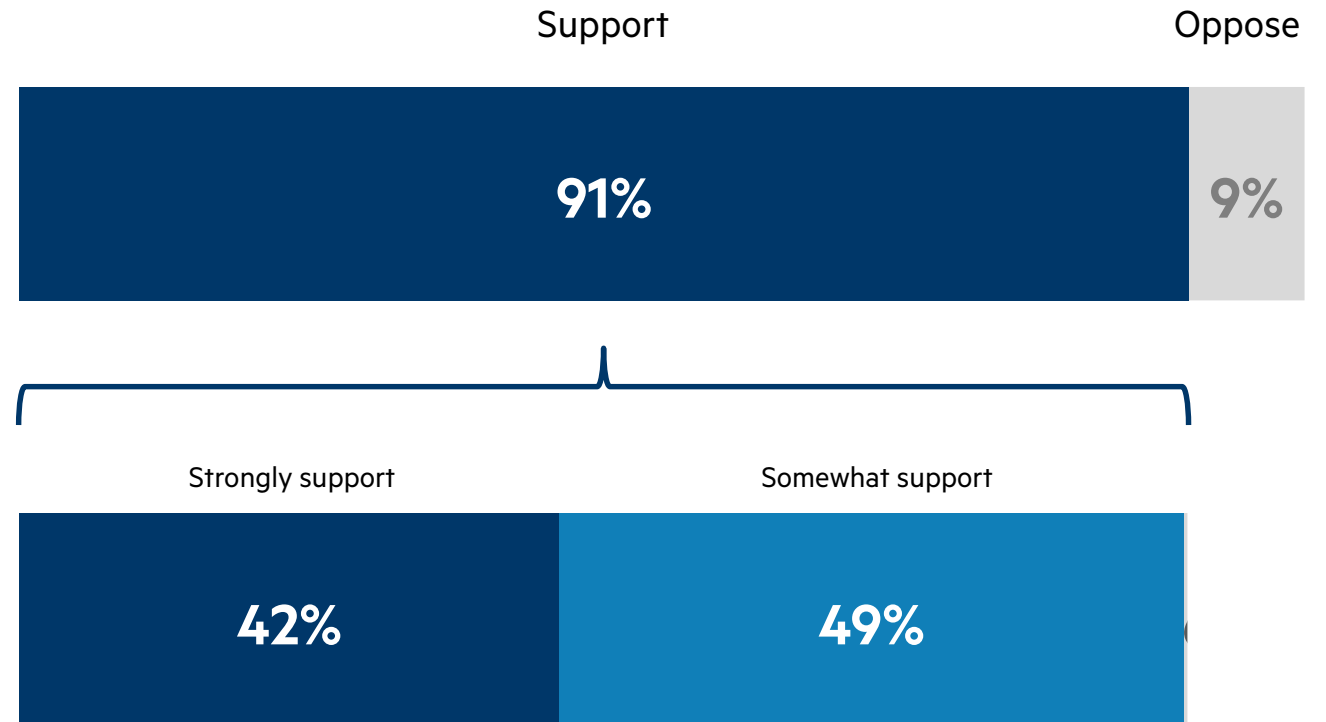
Many large cities have turned their once degraded urban rivers into world-class attractions. How likely do you think it is that the Los Angeles River could become a world-class attraction, like rivers in San Antonio, Texas; Seoul, Korea; and Madrid, Spain?



# An overwhelming number of residents support efforts to revitalize the river

Support for river revitalization is high — 82% or higher for all demographic groups.

Do you support or oppose efforts to revitalize the Los Angeles River?



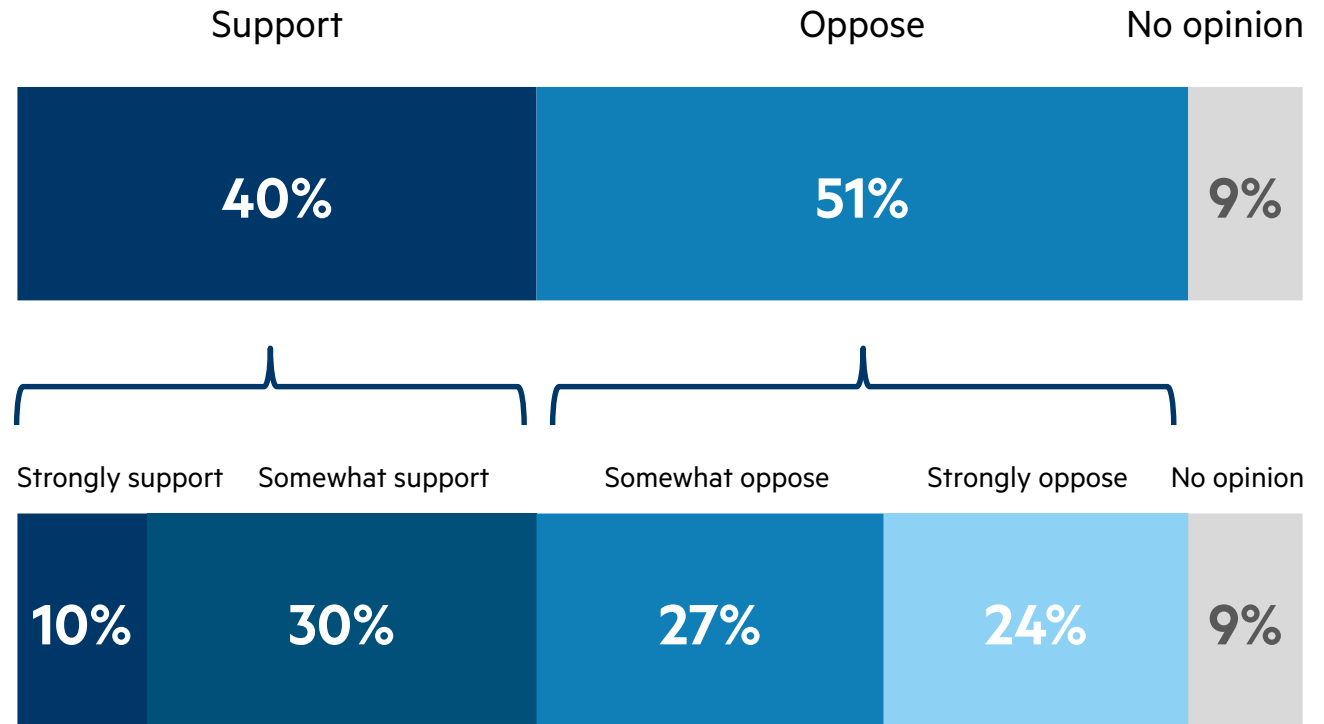
# Only four in ten residents supports a tax increase to revitalize the river

Latina/o residents (49%) are split on their support for a tax increase whereas Black, White, and Asian residents are all more likely to oppose it.

Residents who are in zip codes within one mile of the river show the same levels of support as residents who live further from it.

Residents who said they support river revitalization (see previous question) are split over a tax increase to do it: 48% would support a tax increase while 52% would oppose it.

Would you support or oppose a tax increase to revitalize the Los Angeles River?





Loyola Marymount  
University

[lmu.edu/studyLA](https://lmu.edu/studyLA)

For more information about this or other StudyLA research,  
please contact Managing Director Brianne Gilbert at [brianne.gilbert@lmu.edu](mailto:brianne.gilbert@lmu.edu).