

Subj: **Comments on Bull Creek - TRP**
Date: 9/13/2005 7:12:40 PM Pacific Standard Time
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Here's the text of The River Project's comment letter:

September 13, 2005

Ms. Ruth B. Villalobos
Chief, Planning Division
U.S. Army Corps of Engineers
Attn: Dr. Nedenia C. Kennedy
Cc: Alex C. Watt
P.O. Box 532711
Los Angeles, CA 90053-2325

Dear Ms. Villalobos and Drs. Kennedy and Watt:

Thank you for the opportunity for The River Project (TRP) to comment on The Draft Detailed Project Report and Environmental Assessment/Mitigated Negative Declaration (DPR/EA/MND) for the Bull Creek Ecosystem Restoration Project.

We appreciate and encourage the Army Corps' efforts to enhance the habitat and ecosystem value of Bull Creek. The project certainly adds native vegetation and habitat for avifauna, yet it does not restore natural hydrologic function. Therefore, as Bull Creek itself is the core of the effort, the project as it currently stands constitutes an enhancement, not a restoration project. Furthermore, it would seem that the full range of project alternatives has not been considered or explored.

We would fully support a project that took a more holistic approach and pioneered biotechnical bank stabilization rather than one that persisted with the locally habitual interventions of check dams and bank armoring. A small scale project like this with such a low gradient, located within a flood control basin wholly owned and operated by the Corps is a tremendous opportunity to begin exploring this approach. We are chagrined by the missed opportunity for the Corps to model successful stream restoration at what is perhaps the safest, most logical site to pilot such a project in the region.

The use of gabions within a park setting do nothing to enhance visitor experience along the creek or improve the public's relationship and appreciation of our local ecosystems. Alternatively, incorporating biotechnical bankstabilization into the project would provide the public the unique opportunity to fully experience and appreciate our natural riparian heritage.

Integrating woody vegetation into engineering slope stabilization design provides more habitat and biodiversity. It also more fully supports aquatic habitat, improves water quality, and provides improved bank stability. In this region, we need to begin to take a more sustainable approach to managing our waterways that provides adequate flood

protection while balancing such critical needs as water supply and water quality.

Recently, the Los Angeles Regional Water Quality Control Board passed a resolution regarding hydromodification of streams (resolution number 2005-002) which states "Maintaining and restoring, where feasible, the physical, chemical and biological integrity of the Region's watercourses is one of the Regional Board's highest priorities." Guidance recommended therein when considering hydromodification projects include A Primer on Stream and River Protection for the Regulator and Program Manager, by Ann L. Riley and Stream Corridor Restoration: Principles, Processes, and Practices prepared by the Federal Interagency Stream Restoration Working Group (which included your own agency), 10/1998. These documents should be more fully considered before moving forward with the project.

We understand that a landscape firm who may lack experience in true stream restoration largely handled the project's engineering. We recommend that the project's engineering analysis be revisited and expanded to include the structure, function and dynamics of the system. At a minimum, channel sinuosity, bankfull conditions, and Rosgen's classifications should be taken into consideration.

We feel strongly that the DPR/EAM/MND should include an alternative that proposes biotechnical bank stabilization. To that end, we request that before proceeding with the project, the Corps consult with those experts within the Regional Water Quality Control Board and California Department of Fish and Game who can provide a more comprehensive analysis of the reach with the objective of accomplishing the first true stream restoration in the region.

Sincerely –

Melanie Winter
Director