

July 8, 2011

Lisa Sandoval, Asset Mgmt,
US CoE
915 Wilshire Blvd.,
Los Angeles, CA 90017

RE: Comments for EA11-10 - License for Pilot Non-Motorized Boating Program within the LA River, Sepulveda Basin

Dear Ms. Sandoval,

After reading the documents generated as a result of this proposal, and taking a brief tour of the area, this morning, I am submitting my comments and concerns.

RE: Comments for EA11-10 – License for Pilot Non-Motorized Boating Program within the Los Angeles River, Sepulveda

COMMENTS:

Requested Action/Project Description is inadequate and incomplete. As of this morning, the tour group led by LACC admitted that changes have already been made, and other changes may be made. Since these would be made after the close of the public comment period, the public and interested parties they should be made available for public comment. What has been presented does not include the following:

- Images and Descriptions of entry points, boating routes, exit points, and portage trails. As of this morning LACC said changes had been made, and they appeared uncertain about some issues that might change. What are these changes?
- Location and associated habitats – and the Definition/delineation of Riparian and Wetlands Habitats
- Age ranges and Limits for people participating
- Basis for Charges to Participants and Full Cost Recovery
- Guide training
- Participant training and education

Environmental Considerations and safety issues:

- No documentation of environmental considerations or references to CEQA have been provided for review or support of the notice or EA, or decision not to pursue and EIS.
- No references have been provided regarding mitigation, monitoring, and/or reporting program elements for the proposed activities, which could support impact assessments and minimization.
- Safety concerns regarding boating and portage accidents in the river. Having seen a couple of the portage areas, which are extremely rocky, and the banks covered with heavy vegetation, how will injured participants be transported? I find no documents or reports addressing this issue.

Alternatives and modifications have not been provided except for the mention of boating “modified time period” for water flow safety: “May-September”.

Wildlife:

- Not provided are reports or survey information regarding wildlife use and habitat quality and value, provisions or mitigation.
- No survey by the Proponent regarding wildlife needs for water, foraging and nesting in riparian and wetland habitats. These riparian and wetland habitats support many species of birds and mammals.
- No report or survey provided regarding noise and human activity, and the disturbance to nesting areas. These nesting areas are protected by Local, State and Federal ordinances, laws and regulations.
- On July 6th, a survey by a member of San Fernando Valley Audubon, and a member of the California Native Plant Society who is also the current rotating chair of the Sepulveda Basin Wildlife Areas Committee (SBWASC) identified 45 different species and 23 species that showed signs of nesting. Temporal use surveys are required for potential resulting from disturbance/destruction of Nests, nesting habitats, and foraging areas of Game and Protected Wildlife.
- No report provided on affects of noise and human activity on the riparian and marshland areas.
- No map or location description provided of the critical marshland near exit of boating tours and following discussion.

Requests:

- The Proponent must submit a full, adequately documented program and plan with all physical and temporal aspects of the proposal for assessment.
- The Proponent must submit a certified, complete, and adequate environmental consideration.
- Significant impacts are well-known from high levels of public recreational uses in “natural habitats” when adequate controls are not in place and enforced.

Please provide updates and notifications regarding this project to my email address.
Thank you for your consideration.

Sincerely,

Sharon Ford

Sierra Club, Angeles Chapter, San Fernando Valley Group- Conservation representative
Sepulveda Basin Wildlife Areas Steering Committee – Sierra Club representative.

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