



To preserve and enhance the unique village character of Laguna Beach

Eduardo T. De Mesa
Planning Division
U.S. Army Corps of Engineers, Los Angeles District
Attn: Deborah Lamb CESPL-PDR-L)
915 Wilshire Blvd., Suite 930
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November 28, 2017

Dear Mr. De Mesa,

The *Aliso Creek Mainstem Ecosystem Restoration Project Feasibility Report* lists as a key planning consideration “avoiding increase in manmade structures with visible construction elements (such as concrete) that would not be esthetically consistent with the natural setting of the Wilderness Park” (p. 6). Nevertheless, it doubles the number of manmade structures earlier proposed, in addition to grading five miles of the canyon, removing all of the vegetation, displacing or destroying wildlife, armoring the creekbanks, raising and altering the course of the creek, and dumping 300,000 cubic yards of dirt in the park.

In the letter we prepared for the scoping session in 2009 (which is included without comment as an appendix in the report), we asked for consideration of less destructive alternatives, quoting a 2007 technical review of the concept by Geosyntec and a 2009 review prepared for the City of Laguna Beach by Phillip Williams and Associates that recommended such alternatives. The majority of the public comments on the proposal also asked for less invasive alternatives. Even the County’s original concept for the project (the *Aliso Creek Concept Plan*, February 2006), despite depending on the construction of several dozen drop structures, envisioned “salvaging native vegetation such as willows and shrubs that are currently growing adjacent to the channel” where possible and investigating “opportunities to incorporate desirable stands of existing vegetation when developing the final alignment” (p. 28). According to the *Feasibility Report* (p. 3-46), the U.S. Fish and Wildlife Service’s 2015 proposal would “leave riparian areas along the creek relatively undisturbed,” but the proposal is dismissed as “possibly not cost-effective” (p. 11, Table ES-2) and the recommended alternatives of others are overlooked altogether.

It has been clear from the beginning that the “restoration” proposal is primarily about protecting the sewer pipes along the creek. We believe that a wilderness park is no place for sewer lines. The park’s resource management plan calls for “protecting and preserving the native habitat in the park for the benefit of its natural resources and providing outdoor education and low-impact recreation consistent with resource protection goals” and assessing proposed projects for their potential impacts to park resources. Certainly this means that removing the sewer pipes, rather than undertaking heroic measures to protect them, should be considered.

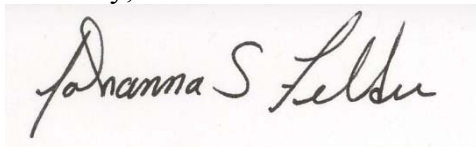
A project of this magnitude appears to commit the County to continuing to allow the dumping of millions of gallons a day of treated sewage into the ocean for the foreseeable future. In an era in which water is increasingly scarce, energy is costly, and open space is precious, our public agencies should not be perpetuating unsustainable practices. Increasing concern about the health of the ocean and its wildlife and the conservation of energy and water is producing new, integrated approaches to the handling of sewage. For example, when the South Orange County Wastewater Authority (SOCWA) received approval last year to replace its sludge force main with a new one in the same location, it was recognized that the “environmentally superior alternative” would have been processing the sludge on site. Twenty-first century approaches are increasingly becoming available, and their costs can often be managed with federal or state grants or public-private partnerships. The state’s Water Resources Board has set a goal of increasing the use of recycled water over 2002 levels by at least one million acre feet per year by 2020 and at least two million acre feet a year by 2030, and it is developing public health standards for the potable reuse of recycled wastewater. SOCWA is talking about increasing its own production of recycled water in the next five to ten years, and the time may not be far off when the neighboring agencies that join Laguna Beach in dumping their secondary-treated sewage into the ocean will no longer need to do so.

There is an opportunity here to take a step in the direction of enabling our wilderness park to be wilder. It would be tragic to gut and urbanize it for the sake of protecting the pipes that move sewage through it, the more so when the pipes themselves and the technology they reflect may soon be obsolete and alternatives are available. We believe that this plan should be abandoned and replaced with one that uses minimally invasive and natural methods to protect the utilities until they can be removed and the creek comes to its new equilibrium. What the report dismisses as “routine temporary emergency protective actions” (p. 4) and “band-aid solutions” (p. 16, Table ES-4) should be sufficient to allow the utility to catch up with the times.

The argument for no action or at least a different kind of action seems the stronger for the judgment of even the Army Corps’s own experts (pp. 3-48, 5-7, 5-43) that the creek is reaching a new equilibrium on its own. The comment letter you will be receiving from the City of Laguna Beach is expected to reaffirm this and point out that the removal of four million pounds of invasive arundo from a twenty-mile stretch of the creek is facilitating the rapid reestablishment of native riparian vegetation. We welcome the evidence that, with help from this \$6 million multiagency effort in the years since the data for this report were gathered, the creek is repairing itself. We wonder if further acquaintance with the results of this effort, which are given only brief mention (p. 5-50), might have modified the report’s conclusions.

Any eventual comprehensive plan for Aliso Canyon, which we hope would consider the input of all stakeholders, should include discussion of its likely effects on the Laguna Ocean Foundation’s just-completed plan for restoring the Aliso Creek estuary.

Sincerely,

A handwritten signature in black ink that reads "Johanna S. Felder". The signature is written in a cursive style with a large initial 'J'.

Johanna Felder
President