

# ***OPEN SPACE NOW***

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*695 South Catalina Avenue, Pasadena, California 91106 \* (626) 792-6463 \* Fax (626) 792-6547*

To: Sediment Management Team

May 31, 2012

From: Christle Balvin, Chair, Open Space Now

Re: Comments on LA County Sediment Management Strategic Plan

Like many other non-profit organizations that have been following the important work of the Sediment Management task force assembled by the Los Angeles Department of Public Works, we have had a very difficult time responding to the Sediment Management Strategic Plan within the 30-day time frame allotted. Not only was there no official announcement about when the plan would be released but many of us remain unclear about when it actually did come out. Yet the plan was clear that there would be only a 30-day comment period for the review of a 525-page document. That has put enormous pressure upon organizations like ours which are composed of volunteers with full-time outside jobs. Therefore, **we join those requesting an extension of the comment period by 90-days.**

**Because of the limited response time, we submit the following abbreviated comments:**

1. Neither water nor sediment is a waste product. Both have enormous value. But the DPW plan does not adequately consider how they might be conserved, sold or reused. The Department needs to do a more thorough assessment of their value and take advantage of this strategic planning process to look thoughtfully at how to innovatively manage sediment and storm water.
  - a. Sediment: Simply by going to a hardware store and exploring the cost of sand or other products made from sediment gives one an appreciation of its value. A quick call to the beach cities that are now purchasing sand for beach replenishment might also be enlightening. On the one hand, because of a lack of coordination between government agencies (that actually should be working together) the County may be preventing the flow of needed sediment to the beaches thereby requiring beach cities to pick up the tab for replenishment sand and gravel. We acknowledge that refining or other processing may be involved to create a usable commodity, but this should not exclude consideration of other sediment uses by DPW. With over 40-million-cubic-yards of sediment accumulating in the next 20-years behind dams and reservoirs, the Department has ample reason to examine reuse and possible sale of sediment.
  - b. Water: With six-hundred-thousand acre feet of storm water flowing into our oceans each year, new and better ways of recapturing this valuable freshwater resource need to be found. The DPW plan does not adequately address this. With water now being purchased by the City of San Francisco for \$6,000 an acre foot, water conservation needs to be the subject of a much more thorough planning effort.

2. Integrated regional water management is needed for future planning: No one will deny that DPW has an important mission of flood control. Lives have been saved and property protected because of the outstanding planning and implementation of a complex network of dams and water channels made possible by LA County engineers and DPW staff. But as the population has increased and the areas around streams, rivers, and flood channels have become multi-use centers for recreation, aquatic and riparian habitat and equestrian activities, DPW planning has lagged behind the realities of current land use scarcity and demand.

Therefore, it is our strong recommendation that DPW undertake a **long-term plan for sustainable sediment and water management that includes an implementation component and timetable beyond the current 20-year limit specified in the SMSP.** Time is of the essence. Habitat such as the bio-diverse native oak woodland and wildlife that were eradicated by the unconscionable demise of the Arcadia woodland (to make way for a sediment deposit site) is continuing to happen.

Open Space Now also recommends the appointment within the County of a high-level Environmental Specialist with the authority to review construction plans and advise of potential environmental consequences.

2. Because of the short-term nature of this strategic plan, we foresee that within a few years, sediment deposit sites will once again be full to capacity and more dams will again need to be dredged of sediment. Under the current flood control system, this cycle is literally endless. Instead, we recommend money be set aside for research and planning designed to provide long-term solutions that will actually reduce maintenance costs. This will lead to more comprehensive and integrated management of LA County's natural resources, a goal of growing importance. A research and planning group might also begin to implement pilot projects involved with the goals of more efficient sediment removal. Without expending millions of dollars on options that might not work, prototype projects can bring about meaningful results with minimum costs and time constraints.
3. Tim Brick and Laura Garrett were listed as participants in a DPW working group. Because they were mentioned in the report along with others, it implied that they were in agreement with most of the plan's recommendations. Though conversations with some of these individuals, we do not believe this to be the case. We therefore recommend that, before any further distribution of the LA County Sediment Management Strategic Plan, you check with task force and working group participants regarding the use of their names in so far as such use will be perceived as an endorsement.

Again, because of the short time frame provided for consideration of a 525-page document, we have been unable to devote the time we had hoped to invest in a full analysis. With that caveat in mind, we thank you for your consideration of our initial comments.