



PASADENA AUDUBON SOCIETY

Founded April 1904

1750 N. Altadena Drive

Pasadena, CA 91107

WWW.PASADENAAUDUBON.ORG

May 30, 2012

To the Sediment Management Team:

Thank you for the opportunity to comment on the Sediment Management Strategic Plan. As the Conservation Chair of the Pasadena Audubon Society, I appreciate that the County is willing to work with stakeholders to maintain the safety of our residents while working to preserve habitat for flora and fauna. My comments begin below.

Scope

The scope of this project needs to expand. It works very hard to convince the reader that we need to maintain the status quo, which the County has admitted is unsustainable. It needs broader and bolder thinking to develop a “forever” plan that utilizes natural systems, replenishes beaches and rivers, and protects all the residents of Southern California, including fauna. Also we do not know how effective or even necessary every aspect of the current system is as it was implemented before environmental reviews were required. Every part of the system needs to be revisited and evaluated.

Regional Effort

Such a large project requires regional coordination. I would like to see the Los Angeles County Department of Public Works work with the United States Forest Service, the United States Army Corps of Engineers, United States Fish & Wildlife, California Fish & Game, the Integrated Regional Water Project, and the California Coastal Sediment Management Working Group. This is especially critical because the County repeatedly has said that they cannot utilize methods like FASTing because of regulatory restrictions. Rather than giving up on methods like FASTing, I would like to see the County work with these other agencies to resolve these issues. Also, these other groups might have strategies that the County can use to revamp its system. We should also be looking around the world for strategies to find ways to create a system that is sustainable and effective. Minimally, the plan should include the pilot plan discussed at our Working Group meetings.

Resources

I would like to see a plan that treats water and sediment like commercial and natural resources rather than waste products. We lose 600,000 acre feet of run-off a year; our beaches and rivers are starving for sand and sediment. Perhaps this is more evidence that we need to revisit the entire system.

Sustainability

The current system is unsustainable. We all know that, yet this plan works very hard to sustain it.



PASADENA AUDUBON SOCIETY

Founded April 1904

1750 N. Altadena Drive

Pasadena, CA 91107

WWW.PASADENAAUDUBON.ORG

Habitat

Most disturbing to me is the lack of understanding for biological resources. The plan needs to recognize that not all impacts are equal. For example, air quality is a temporary impact, while the loss of a canyon or woodlands is more permanent. Even if the County replants the lost woodland, it will take decades before it matures and it will never be like it was before. The County needs to understand that every debris basin, every dam, every part of its system IS habitat. Someone lives there. It might be degraded, but it is habitat. And it also needs to understand that all habitats have value. In our Working Group meetings, I have heard burned chaparral referred to as “only” burned chaparral. This tells me that some County employees do not understand biology or ecology. Burned chaparral is extremely valuable to many plants and animals called “fire followers” that only appear once the chaparral has been burned. Again, all habits have value.

The plan needs to describe the types of habitats and the type of impact.

I strongly urge the DPW to hire a biologist who can provide expert advice and information regarding the ecology of these areas and the problems created by the current system. We need to protect what fragments of biodiversity that we still have. My own observations lead me not to trust the current reports we have had. The current process is inadequate for protecting our flora and fauna. I have seen reports from the LA Co DPW that fail to list many species that I know to be in an area. One or two cursory visits do not tell the entire story. I would like to see ecologists and biologists on staff who can become familiar enough with the areas that they can explain their significance to the other county employees.

Comment Period

30 days is not enough time to process over 500 pages of documents. I ask that the comment period be extended. I know that I did not have time to read through it with my biology experts.

Again, thank you for this opportunity to submit comments regarding the Sediment Management Strategic Plan.

Sincerely,

Laura Garrett (signed)
Conservation Chair
Pasadena Audubon Society