bay restoration commission

STEWARDS OF SANTA MONICA BAY

santa monica bay restoration commission ✐ *320 west 4th street, ste 200; los angeles, california 90013*
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August 27, 2012

County of Los Angeles Department of Public Works
Watershed Management Division, 11th Floor
Attention: Marcela Benavides
P.O. Box 1460
Alhambra, CA 91802-1460

BY EMAIL

Re: Draft Sediment Management Strategic Plan 2012-2032, April 2012 Draft

Ms. Benavides:

Thank you for the opportunity to participate in the sediment management strategic planning process and the opportunity to comment on the Draft Sediment Management Strategic Plan 2012-2032 (draft Plan). The draft Plan deals with an urgent and region-wide issue and we commend the County for taking this significant step to address it strategically and collaboratively. We hope this will avoid a case-by-case approach in the future, which can unfortunately lead to environmental and financial damages, especially when there is a rush to action under emergency circumstances such as flooding.

The Santa Monica Bay Restoration Commission (SMBRC) is concerned with sediment management because the health of the Bay's coastal and upland habitats depends in part on sediment transport processes in the watershed, and transport of sediments up and down the coast. Our comments below reflect our concern and our interest in working with the County to find ways to use the sediment from the region's mountains as a resource for restoring and protecting watersheds and the nearshore coastal ocean.

Sediment as a Resource

We are pleased that the draft Plan reflects the County's commitment in principle to shift from dealing with sediment solely as a flooding risk, toward a balancing of the five objectives listed in the beginning of the draft Plan (flood control, water conservation, environmental stewardship, social impacts, and beneficial use of sediment). However, the plan does not go far enough in exploring possible alternatives and analyzing how they may benefit each of those objectives. For example, one objective is "identifying ways to use sediment as a resource," but landfill cover and gravel pits are the only two "reuse" alternatives deemed viable by the plan, and they were presented as placement alternatives, with no discussion of their relative values as resources.

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Placement of sediment as landfill cover or acceptance by the aggregate industry for use in cement production are valid uses of the sediment trapped behind dams and in debris basins. However these uses still keep the sediments out of the natural system where they are also needed. Sediment needs to be considered a resource for our waterways, floodplains, beaches and reefs, as well as for landfill cover and aggregate industry uses.

Cost-Benefit Analyses

An important step toward an integrated and resource-focused approach to sediment management is incorporation of additional environmental impacts and values into the cost-benefit analyses for the sediment management alternatives. Benefits may include protection of coastal areas from erosion and flooding, presently and in future sea-level rise scenarios; ecological and recreational benefits of replenished beaches; carbon sequestration, nutrient cycling, fish nursery, and bird feeding services provided by healthy wetlands with natural sediment deposition regimes; fish productivity and storm surge protection from nearshore rocky reefs formed by larger sediments moving downstream; carbon sequestration, recreation, and other habitat values in undeveloped canyons that may be used as SPSs; and health impacts and related costs to local communities of alternatives such as trucking, are all factors that should be included in cost-benefit analyses.

The beach nourishment alternative is an example of where the County could take a more integrated cost-benefit approach. The draft Plan discusses beach nourishment as a sediment placement alternative, then dismisses it by citing regulatory and operational hurdles and high costs. While the cost of this alternative may be high from Flood Control District's standpoint, the cost-benefit equation may shift if the economic benefits of replenishing beaches with natural material are taken into account. Similarly, regulatory and operational barriers may be reduced if other County departments and other agencies are included as partners.

Consideration of Climate Change Impacts

The County was did not consider the potential impacts of climate change in this 20-year draft Plan; rather, the sediment quantities were projected using the Flood Control District's historical records, assuming that future sediment accumulation rates will be similar to past rates. More rigorous studies for accurate and reliable projections were beyond the scope of this draft Plan. Climate change will likely alter storm patterns including volume, intensity, and frequency, and changing temperature and rainfall

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patterns may increase the range and frequency of wildfires. There should be a process to update the draft Plan with new data and information as the science develops.

Pilot Study: Flow-Assisted Sediment Transport (FAST)

One sediment management alternative that deserves more study is FAST, or other kinds of sluicing. The draft Plan should evaluate FAST as a mechanism for restoring some natural sediment transport through the system. Although we recognize it is challenging to overcome man-made barriers that prevent natural sediment transfer to the ocean, we believe that we can take steps toward this goal. The SMBRC would like to collaborate with the County to implement studies and pilot projects that work toward this goal.

In conclusion, we support the draft plan as a living document that can be revised to incorporate other sediment management alternatives in the future as conditions change. We request that the draft plan include a stronger commitment to meet the stated multiple objectives by specifying strategies (e.g. more inclusive cost-benefit analyses) and pilot studies to be implemented by the County. The SMBRC is willing to partner with the County to develop an initial pilot study to determine feasibility of restoring natural sediment transport processes and uses of natural sediments for habitat restoration, and we request the County's commitment to developing with us the studies and timeline to implement such a pilot.

We look forward to further participation in this strategic planning process and to working with the County to develop and implement a pilot project. Should you have further questions, please feel free to contact me at 310-216-9827 (sluce@santamonicabay.org), or Dr. Guangyu Wang at 213-576-6639 (gwang@waterboards.ca.gov).

Sincerely,

Shelley Luce, D.Env.
Executive Director