

APPENDIX F STAKEHOLDER COMMENTS AND RESPONSES

Commenter	Comment	Response
U.S. Army Corps of Engineers	<p>Flood Control District operations have the potential to impact the U.S. Army Corps of Engineers' dams and vice versa. Describe the comprehensive Los Angeles County Drainage Area project, recognize the existing partnership between the U.S. Army Corps and the Flood Control District, and state the need for the U.S. Army Corps major involvement in the Strategic Plan.</p>	<p>The relationship between the facilities maintained by the Flood Control District and the facilities maintained by the U.S. Army Corps of Engineers is now discussed in:</p> <ul style="list-style-type: none"> - The Executive Summary, under Coordination with Other Agencies - Section 1.3 - Section 2.2 <p>Furthermore, specific coordination with the U.S. Army Corps of Engineers is discussed in Sections 7, 8, and 11, where potential use of the U.S. Army Corps of Engineers' Santa Fe, Hansen, and Lopez Flood Control Basins as potential staging and temporary sediment storage areas is discussed.</p>
	<p>Describe the Los Angeles County Drainage Area project under "A Project on a Massive Scale" in the Executive Summary. Consider including a map that shows the U.S. Army Corps of Engineers dams in relation to the Flood Control District's facilities.</p>	<p>The Section of the Executive Summary mentioned refers to the effort to manage sediment from the 14 reservoirs and 162 debris basins maintained by the Flood Control District. The suggested map is now included in Section 1.2.</p>
	<p>The Executive Summary did not discuss beneficially using sediment in the construction industry.</p>	<p>The Executive Summary now lists Aggregate and Other Materials under Beneficial and Placement Alternatives. The discussion of Beneficial Uses under Next Steps has also been revised. Additionally, see Section 6.5.2 for a more detailed discussion.</p>
	<p>In Section 2.2, indicate the Flood Control District will coordinate with the U.S. Army Corps of Engineers to ensure that the U.S. Army Corps of Engineers are not impacted by the Strategic Plan.</p>	<p>Section 2.2 now says that "due to the relationship between the Army Corps of Engineers facilities and the Flood Control District's facilities, the two agencies coordinate operation of their facilities."</p>
	<p>Indicate that the Flood Control District will work with the Corps to explore the idea of developing a regionwide plan for a more comprehensive solution.</p>	<p>Among the next steps for the Flood Control District, the Executive Summary and Section 11 indicate the Flood Control District will work on a Long-Term Vision with the U.S. Army Corps of Engineers and local stakeholders.</p>
	<p>In Section 3.3.4, add a reference to the Regulatory Division of the Army Corps.</p>	<p>The reference has been added. See Section 3.3.4.</p>
	<p>Section 6.3.3.2 did not discuss impacts of sluicing to channels and dams downstream of the dam being sluiced.</p>	<p>Sluicing as a "sediment removal alternative" is discussed separately from sluicing as a "sediment transportation alternative." The impacts sluicing would have on downstream channels and dams are discussed in Section 6.4.1 - Sluicing (as a transportation alternative).</p>

Commenter	Comment	Response
U.S. Army Corps of Engineers / (California) Coastal Sediment Management Workgroup	Provide links to the (California) Coastal Sediment Management Workgroup and the California Coastal Regional Sediment Management Plans on the Flood Control District's sediment management website and vice versa.	As of the preparation of this summary, this was being coordinated with the requesting agency.
	Section 6.5.3 indicates there are sand reserves offshore of Southern California that can be used for beach nourishment. Were any specific sources of offshore sand and sediment for beach replenishment purposes determined as part of this Strategic Plan? Were any impacts and/or assessments associated with procurement and placement of offshore sand on beaches for beach nourishment purposes analyzed and are they similar to those associated with placing upland sand on the beach?	The section that discusses beach nourishment (now Section 6.5.1) now mentions a few previously used sources of sand for beach nourishment projects by agencies other than the Flood Control District. Determining specific sources of sand for beach replenishment purposes and analyzing the impacts of using offshore sand deposits for beach nourishment is beyond the scope of the Flood Control District's Sediment Management Strategic Plan and the mission of the Flood Control District.
	Discussion among the County of Los Angeles Department of Public Works, the County of Los Angeles Department of Beaches and Harbors, and the (California) Coastal Sediment Management Workgroup may provide the potential partners required to make the use of sediment from the Flood Control District's facilities for beach nourishment purposes possible. A potential demonstration project to monitor the benefits of placing this material would provide information for future long-term beneficial use projects.	As indicated in Section 6.5.1, the Flood Control District is open to meeting with agencies willing to share the additional costs of processing, permitting, transporting, and placing the material. The Flood Control District will analyze the beach nourishment alternative further; this is now indicated in Section 6.5.1.
	The amount of sediment captured at the two debris basins close enough to the coast to warrant consideration as a source for coastal restoration efforts (Cloudcroft and Sullivan Debris Basins) and the sand that would result from processing that sediment might discourage efforts to process the material, obtain permits, etc.	Per the Flood Control District's records, the total amount of sediment removed from Cloudcroft and Sullivan Debris Basins since the Flood Control District began maintaining the facilities in the early 1970s is approximately 14,000 and 180,000 cubic yards, respectively. It is agreed that the amount of sediment captured at these facilities and the amount of sand that could result might discourage efforts to process the material, obtain permits, etc so that the sediment could be used in coastal restoration projects.
	Maybe the sediment could be used for coastal wetland restoration activities.	Reference to potential use in wetland restoration activities is now discussed in Section 6.5.5.

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City of Los Angeles Department of Water and Power	Section 8.1.3.1 discusses the use of Hansen Flood Control Basin as a potential staging or temporary storage area for sediment that accumulates or passes through Big Tujunga Reservoir. The section indicates that if Hansen Flood Control Basin was to be used as a staging or temporary sediment storage area for sediment from Big Tujunga Reservoir, material at Hansen Flood Control Basin would likely need to be pre-excavated to create capacity for sediment from the reservoir. Where would preexcavated material from Hansen Flood Control Basin be placed? Could sediment from Big Tujunga Reservoir not be taken directly to a pit in Sun Valley?	Please see Section 8.1.7, which presents the combined sediment management alternatives for Big Tujunga Reservoir. The section includes information about the potential destination of material preexcavated from Hansen Flood Control Basin if said facility was to be used as a staging or temporary sediment storage area for sediment from Big Tujunga Reservoir. The Section also discusses alternatives that involve taking sediment directly from Big Tujunga Reservoir to a pit in Sun Valley.
	Are alternatives that would allow for water released from reservoirs prior to dry excavation or water used in dredging operations to be conserved by other means besides infiltration in the spreading grounds being studied?	The Strategic Plan did not explore water conservation alternatives. However, water conservation is part of the Flood Control District’s mission, so it will be considered outside of this Strategic Plan.
	Will sluicing flows be treated or screened as they flow downstream?	The Flood Control District does not anticipate treating or screening sluicing flows as they flow downstream. Treating flows as they flow downstream would have to meet its own set of regulations.
	How will sediment placement be incorporated into plans to use the pits in Sun Valley for groundwater infiltration when the properties are acquired from the current owners?	As of 2012, acquisition of Sheldon Pit and Calmat Pit is not being actively pursued by the Flood Control District for water conservation. The Flood Control District is moving forward with development of a facility at Strathern Pit to temporarily store storemwater until it can be diverted to adjacent groundwater recharge facilities.
	How are continued sediment inflows considered?	The planning quantity considers continued inflow and multiple cleanout projects during the 20-year planning period. See Section 11 or Sections 7 to 9.
	Do the forecasted volumes consider the effect of fires?	The approach used to develop the planning quantity considers fires and some variations in the weather, as those occurrences are captured in historical removal quantities. Actual sediment delivery will depend on the weather and watershed conditions. See Section 5.

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Coastal Conservancy & Santa Monica Mountains Conservancy	<p>The natural supply of sand to the coast has been diminished by upstream dams and other structures. Beaches have been shrinking and the county’s beaches are increasingly dependent on human intervention to maintain adequate beach widths.</p>	<p>Please see the draft Los Angeles County Coastal Regional Management Plan dated August 2012 (http://www.dbw.ca.gov/csmw/crsmp.aspx), which was prepared by the U.S. Army Corps of Engineers and the California Coastal Sediment Management Workgroup. The plan discusses how most of the beaches in the County of Los Angeles were never nourished by the Los Angeles, San Gabriel, or Santa Clara Rivers.</p> <p>Section 6.5.1 of the Flood Control District's Sediment Management Strategic Plan has been expanded to discuss the issue of beaches in more detail.</p> <p>In any case, the Flood Control District is open to partnering with other agencies interested in obtaining sediment from the Flood Control District's facilities to process it and obtain sand from it for beach nourishment projects.</p>
	<p>The draft Strategic Plan does not give enough attention to the beneficial uses to which the sediment could be put. The first and foremost beneficial use is beach nourishment.</p>	<p>Section 6 has been revised to more clearly present the beneficial uses discussed in the Strategic Plan. One of the revisions includes discussion of a proposed sediment processing contract (Section 6.5.2.3). The Flood Control District is pursuing contracts that could allow for private companies to receive sediment from the Flood Control District to 1) process the sediment and obtain aggregate or other materials from it or 2) use the sediment to reclaim their quarries. Regarding beach nourishment, see the response to the previous comment.</p>
	<p>The State Coastal Conservancy and the Santa Monica Mountains Conservancy would like to work with the County to identify ways to use the sediment as a resource rather than sending it to a landfill, gravel pit, or sediment placement site.</p>	<p>The Flood Control District is open to ideas and partnering with other agencies interesting in solving the region's sediment management issues.</p>
County of Los Angeles Department of Beaches and Harbors	<p>Please explain which offshore sand reserves are available in Southern California.</p>	<p>Identifying offshore sand reserves is beyond the scope of the Strategic Plan. However, revisions to Section 6.5.1 now discuss previously used sources of sand for beach nourishment projects conducted by agencies responsible for such projects.</p>
	<p>Please explain the types of environmental impacts associated with beach nourishment. Some environmental concerns, such as Snowy Plovers, Grunion runs, and water quality can easily be mitigated and monitored during sand placement.</p>	<p>The specified environmental concerns are now included in Section 6.5.1.3.</p>
	<p>Recreational use of beaches is only affected temporarily during beach placement. Noise and aesthetics are two temporary impacts that are outweighed by the long-term recreational benefits. The long-term recreation benefits beaches include wider beaches and enhancement of surfing conditions.</p>	<p>The temporary nature of the impacts specified is now discussed in Section 6.5.1.3. The long-term recreation benefits are now also included in the section.</p>

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Commenter	Comment	Response
Main San Gabriel Basin Watermaster	<p>Sluicing of materials from the three San Gabriel Canyon Reservoirs has the potential to reduce the ability to maximize conservation of storm runoff if not executed properly. If sediment that settles in the river during sluicing operations is not removed in a timely manner, there is the potential for prolonged adverse impacts to groundwater replenishment opportunities. Large scale sluicing could result in lost opportunities to replenish local and imported water supplies into the Main San Gabriel Basin. This could result in lower groundwater elevations that will impact the production rates of existing wells and overall supply.</p>	<p>Water sluiced from Cogswell Reservoir would be captured at San Gabriel Reservoir. As a result, sluicing sediment from Cogswell Reservoir should not adversely impact opportunities for recharging groundwater downstream.</p> <p>Because Morris Reservoir has a smaller capacity than San Gabriel Reservoir, all the water used to sluice sediment from San Gabriel Reservoir could potentially not be captured in Morris Reservoir. Therefore, sluicing San Gabriel Reservoir could possibly impact groundwater recharge opportunities. Sections 7.3 and 11.1.2 have been revised accordingly.</p> <p>With respect to sluicing of Morris Reservoir, it is agreed that if sediment deposits in the river as a result of the sluicing operations are not removed in a timely manner, there could be prolonged adverse impacts to groundwater recharge opportunities. Section 11 indicates that sluicing of Morris Reservoir could have some impact on groundwater recharge.</p>
	<p>The Strategic Plan states that there is "no impact" on groundwater recharge relative to all of the sediment management alternatives for both Cogswell and San Gabriel Reservoirs. We believe there may be indirect impacts to overall operations to consider before that statement can be made.</p>	<p>Since water released from Cogswell Reservoir would be captured at San Gabriel Reservoir, all the sediment management alternatives for Cogswell Reservoir are not expected to have adverse impacts on groundwater recharge. Revisions have been made in Sections 7.3 and 11.1.2 indicating the potential for the various sediment management alternatives at San Gabriel Reservoir to impact groundwater recharge.</p>
	<p>The Main San Gabriel Watermaster is reserving the option to comment in detail on proposed sediment removal methods, specifically, alternatives including "sluicing" until all options are further developed.</p>	<p>Comment noted.</p>
	<p>The Main San Gabriel Watermaster strongly supports project specific analysis in development of proper environmental documentation prior to any planned sediment removal that includes sluicing as a component.</p>	<p>Specific sediment management projects that will result in significant environmental impacts will be subject to environmental review under the California Environmental Quality Act, which will provide additional opportunities for public involvement during project evaluation.</p>
Sanitation Districts of Los Angeles County	<p>Scholl Canyon Landfill currently utilize approximately 300 cubic yards of sediment per day for cover, not 200 cubic yards as stated in the plan.</p>	<p>The correction has been made in Sections 6.5.5.3 and 10.4.2.</p>
	<p>Based on the current tonnage, the closure date for Scholl Canyon Landfill is scheduled for February 2032, not 2024 as stated in the plan.</p>	<p>The correction has been made in Section 6.5.5.3.</p>
	<p>In terms of dollars per cubic yard, the tipping fee at Scholl Canyon Landfill for clean dirt is approximately \$5.00 per cubic yard, not \$6.00 per cubic yard.</p>	<p>The correction has been made in Section 6.5.5.3 and 10.4.2. In Sections 8 and 9, where placement fee was addressed (for example, in Table 8.-25), the revision did not lead to any other changes.</p>

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Santa Monica Bay Restoration Commission	<p>The Strategic Plan does not go far enough in exploring possible alternatives and analyzing how they may benefit the Strategic Plan's five objectives. 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. Sediment needs to be considered as a resource for our waterways, floodplains, beaches and reefs, as well as for landfill cover and aggregate industry uses.</p>	<p>Section 6 of the Strategic Plan has been revised to more clearly discuss beneficial use of the sediment. Section 6.5 now discusses the use of sediment in beach nourishment, in the aggregate and other industries, as daily cover at solid waste landfills, as fill at pits, for wetland restoration, for replenishment of sediment-poor waterways, and for replenishment of reefs.</p>
	<p>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 analysis for the sediment management alternatives. The cost-benefit ratio of alternatives may shift by doing so.</p>	<p>Language was added to Section 6.1 to explain why the cost-benefit analysis for the alternatives does not include a monetary value for things such environmental and social impacts.</p>
	<p>Regarding the use of sediment for beach nourishment purposes, regulatory and operational barriers may be reduced if other County departments and other agencies are included as partners.</p>	<p>Additional discussion of the beach nourishment alternative is now included in Section 6.5.1. As stated in the Strategic Plan, the Flood Control District is open to meeting with agencies willing to share in the additional costs of processing, permitting, transporting, and placing the material.</p>
	<p>It is understood that rigorous studies for accurate and reliable sediment management projections with respect to climate change were beyond the scope of the Strategic Plan. There should be a process to update the Strategic Plan with new data and information as science develops.</p>	<p>The Long-Term Vision discussed in the Executive Summary and in Section 11 will consider climate change.</p>
	<p>Flow assisted sediment transport and sluicing deserve more study. The Strategic Plan should evaluate flow assisted sediment transport as a mechanism for restoring some natural sediment transport through the system.</p>	<p>To be consistent with nomenclature used by other agencies throughout the country and the world, the Flood Control District now refers to flow assisted sediment transport as sediment flushing. Revised Section 6.3.3 includes a discussion of sediment flushing, including recommendations for a pilot study.</p>

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The San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy	Lessening environmental impacts is critical to the protection of the region's rich biodiversity and watershed functions. The San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) supports the recommendations which have been identified to likely have the least environmental impacts, particularly with regards to habitat. It is commendable that alternatives have generally been weighted highly against environmental impacts.	The Flood Control District understands the desire to manage sediment by means that have a low impact on the environment. As specific reservoir sediment removal projects are planned, the alternatives will be analyzed in more detail and to the extent practical, an effort will be made to pursue those alternatives that have lower environmental and social impacts.
	The Flood Control District is encouraged to study and welcome input on opportunities for integrated and multi-benefit projects. Consider constructing trail running paths along conveyor routes, enhancing park amenities, or providing educational showcases of the sediment management process.	To the extent possible, the Flood Control District will try to incorporate multi-benefit components in its projects.
	The Flood Control District should take an active role in seeking out and developing partnerships with other parties to help cover the cost and allow the beneficial use of sediment along the coast.	Section 6.5.1, which discusses beach nourishment, mentions a few previously used sources of sand for beach nourishment projects by agencies other than the Flood Control District. The Flood Control District will analyze the beach nourishment alternative further; this is now indicated in Section 6.5.1.
	The natural process of sediment transportation from the San Gabriel Mountains to coastal regions has been interrupted by flood control structures. Seeking partnerships with agencies interested in beach nourishment projects will help conserve the beaches of the County of Los Angeles, which represent a significant economic and environmental asset to the region. The RMC would like to assist in identifying opportunities for partnerships that would allow for this beneficial use of the sediment.	Please see the Los Angeles County Coastal Regional Management Plan dated August 2012 (http://www.dbw.ca.gov/csmw/crsmp.aspx), which was prepared by the U.S. Army Corps of Engineers and the California Coastal Sediment Management Workgroup. The coastal plan discusses how most of the beaches in Los Angeles County were never nourished by the Los Angeles, San Gabriel, or Santa Clara Rivers. Section 6.5.1 of the Flood Control District's Sediment Management Strategic Plan has been expanded to discuss the issue of beaches in more detail. The Flood Control District is grateful and welcomes the RMC's help in identifying agencies willing to partner and share the cost of investigating and implementing the necessary processes to use the sediment that accumulates in the Flood Control District's facilities for beach nourishment purposes.
	Flood Control District and Public Works efforts to engage stakeholders and allow for their input to inform the planning process have been commendable. Continue to utilize and expand upon the stakeholder strategies used during the development of the Sediment Management Strategic Plan in other planning processes.	The Flood Control District intends to continue to use an expanded stakeholder outreach and involvement effort in other planning processes.
	Initiate work on the Long-Term Vision with the Army Corps as soon as it is reasonably possible, while public interest is high.	As of 2012, the Flood Control District is discussing with the Army Corps the various alternatives by which a Long-Term Vision can be completed.

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Arroyo Seco Foundation	The comment period should be extended for 90 days.	The Flood Control District granted the 90-day extension requested by several stakeholders. The comment period for the Strategic Plan was from April 23, 2012 to August 28, 2012.
	While the Strategic Plan presents a great deal of valuable detail about sediment issues throughout the County, it does not integrate that information into the larger goals of watershed management. The focus of the Strategic Plan is too narrow. The County needs to re-evaluate the entire flood control system. The Strategic Plan should incorporate opportunities for river restoration, the progress of the Los Angeles River Revitalization Movement, and other watershed management efforts. There are numerous river restoration programs in Los Angeles County that would benefit from a more comprehensive approach to sediment management. The Strategic Plan should incorporate findings from the U.S. Army Corps of Engineers Los Angeles River and Arroyo Seco Ecosystem Restoration Studies.	While the focus of the Sediment Management Strategic Plan is sediment management, the Strategic Plan discusses various components of watershed management, specifically water quality, groundwater recharge (which is associated with water supply), and habitat in terms of the impacts caused by the different sediment management alternatives discussed in the Strategic Plan. The Long-Term Vision discussed in the Executive Summary and Section 11, will have a broader focus. The Flood Control District intends to work collaboratively with the U.S. Army Corps of Engineers on that effort given that part of the flood control system in the region is owned and maintained by the U.S. Army Corps of Engineers.
	The Strategic Plan, which is intended to be a living document, should be formally reviewed by the County, the public and technical experts every three years.	The Flood Control District will review and revise the plan as conditions change.
	Sediment management should be seen as a critical element of the Integrated Regional Water Management Plan (IRWMP) program. Integrated Regional Water Management is the best approach to planning for issues such as sediment management.	The IRWMP program is a separate effort from this Strategic Plan. However, since the Flood Control District plays an integral role in the IRWMP program, the Flood Control District is able to provide the following information. Participants of the IRWMP program are currently working on an IRWMP Update, which includes sediment management as an element of the update. Information presented in the Strategic Plan is being incorporated into the IRWMP Update. The Flood Control District plans to work with the IRWMP program in the development of the Long-Term Vision.
	The Greater Los Angeles County IRWMP Leadership Committee and the five regional subgroups have not been provided with a presentation on the material contained in the Sediment Management Strategic Plan [as of May 30, 2012], which is vital to their work. The bodies should review the Strategic Plan and provide input.	A presentation about the Strategic Plan was given to the IRWMP Leadership Committee in February 2011. In June 2012, staff gave presentations about the Strategic Plan and encouraged review and input during meetings of the subregional steering committees. Various members of IRWMP, such as the Main San Gabriel Watermaster and the City of Los Angeles Department of Water and Power, and the Sanitation Districts of Los Angeles County are on the Strategic Plan Stakeholder Task Force email distribution list and thus were aware and attended some meetings of the Strategic Plan Stakeholder Task Force. The Advisory Working Group also included members of the IRWMP program.

Commenter	Comment	Response
Arroyo Seco Foundation	Sediment is not a waste product that should simply be disposed of, yet that is the approach taken by the Strategic Plan.	Section 6.5 has been revised to more clearly present the beneficial uses discussed in the Strategic Plan. Specifically, Section 6.5 discusses use of the sediment for beach nourishment, use in the aggregate industry and other industries, use as daily cover at solid waste landfills, use as fill at pits, and other potential beneficial uses.
	Stormwater is another neglected resource. Large volumes of stormwater flow through concrete channels to the ocean. This huge waste of clean water is unacceptable. One way is to restore river channels where possible, to develop more natural stream environments that will aid in replenishing groundwater.	<p>The Flood Control District plays a vital role in recharging the region’s groundwater aquifers. The reservoirs behind the dams store rainwater, runoff, and melted snow. When it is safe, controlled releases of water are conveyed through the channels. Water is either captured by water purveyors or allowed to flow downstream to 1 of the 27 Flood Control District spreading facilities to recharge the region’s groundwater aquifers. The Flood Control District recharges roughly 275,000 acre-feet of water annually, meeting the yearly needs of approximately 550,000 families of 4.</p> <p>It is important to note that the same groundwater recharge opportunities are not available in all the watersheds. Soil characteristics and existing development and available space play an important role in the creation of additional groundwater recharge opportunities. Similarly, river restoration may not be possible everywhere.</p>
	Rivers don't just transport water. Another key function is to transport sediment, a resource of great value, the least of which is monetary. It provides habitat for fish and aquatic species. It supports biodiverse riparian flora and fauna. It fills our valleys and the coastal plain. It nourishes the rivers and beaches in Southern California. It can be used for construction purposes.	Sediment flushing (previously referred to as flow assisted sediment transport) and sluicing, discussed in Sections 6.3.3, 6.3.4, and 6.4.1, discuss the rivers' ability to transport sediment. Section 6.3.3.2 now discusses the potential for sediment-laden flows to replenish sediment-poor washes and rivers, positively impacting habitat. However, it also mentions that sediment-laden flows could have an adverse effect on habitat by filling in seasonal pools or the streambed. Uncontrolled sediment-laden flows have the potential to fill our valleys and coastal plain. This is one of the reasons why the rivers were channelized. During the growth of Los Angeles basin in the early 1900s, that natural filling of valleys and the coastal plain collided with development and put people and infrastructure at risk. Now that the LA Basin is as developed as it is, there are no empty valleys or plains to fill with sediment. Some beaches could be nourished by the rivers, but it is important to note that a number of the beaches in California are man-made and that the rivers never nourished them (See Section 6.5.1). Use of sediment for construction purposes is now discussed in Section 6.5.2.
	The sediment video, website, and open house have all been good tools for education, but outreach has been insufficient. Outreach needs to be ongoing and linked to other campaigns about watershed and environmental awareness.	The Flood Control District is working on increasing outreach and education regarding sediment management and other activities by the Flood Control District.

Commenter	Comment	Response
Arroyo Seco Foundation	<p>The Strategic Plan includes favorable references to Flow Assisted Sediment Transport (FAST), a method also known as sediment pass-through, but eventually rejects it as "uncertain" and infeasible for current projects. The Arroyo Seco Foundation feels that FAST and the principles of sediment pass-through can be an effective and relative inexpensive technique for sediment management that merits considerable more thorough analysis and testing. It can also be used in conjunction with river restoration and watershed management programs to improve habitat and environmental conditions.</p>	<p>Revised Section 6.3.3 includes a discussion of sediment flushing (previously referred to as Flow assisted Sediment Transport), including recommendations for a pilot study.</p>
	<p>The United States Geological Survey has collected sediment transport data for the Los Angeles River in one location for only a few decades. The County of Los Angeles Department of Public Works should take on this responsibility in the future as part of the Sediment Management program.</p>	<p>The Flood Control District monitors sediment as needed to ensure the ability to operate the flood risk management and water conservation facilities.</p>
	<p>The lack of participation in the California Coastal Sediment Management Workgroup by the County of Los Angeles Department of Public Works is deeply troubling. The Department needs to participate in and learn from a program like the Coastal Sediment Management Workgroup and play an active role in the broader issue of sediment management.</p>	<p>During the development of the Strategic Plan, the Flood Control District communicated with staff from the U.S. Army Corps of Engineers Los Angeles District and the Los Angeles County Department of Beaches and Harbors regarding the development of the Coastal Regional Sediment Management Plans. Both agencies were always invited to the Strategic Plan Stakeholder Task Force meetings and staff from both agencies attended several meetings. However, the Flood Control District was not made aware of any public or multi-agency meetings for the Coastal Regional Sediment Management Plans. It is important to note that the focus of the Coastal Regional Sediment Management Plans is the coast. The revised Section 6.5.1 of the Strategic Plan incorporates information in the August 2012 draft of the Los Angeles County Coastal Regional Sediment Management Plan as well as other coastal plans.</p> <p>On a slightly separate note, the Flood Control District has been involved in the development of the Sediment Management Chapter of the Water Plan Update 2013 led by the California Department of Water Resources.</p>
	<p>Ongoing exchanges with scientists and academic experts and the study of best practices and new approaches emerging around our planet are key.</p>	<p>Members of academia were part of the Advisory Working Group and this Strategic Plan's Stakeholder Task Force. Additionally, the Flood Control District intends to involve academia in the effort to develop the Long-Term Vision mentioned in the Executive Summary and Section 11.</p>

Commenter	Comment	Response
Arroyo Seco Foundation	<p>Given the nature of variable sediment loads, projected sediment loads should come with appropriate likelihood estimates. The uncertainty of projections should drive the need for more scientific investigation into the relationship between discharge and sediment load.</p>	<p>The amount of sediment that reaches a facility any given year depends on the size of the watershed, the watershed’s vulnerability to erosion, watershed conditions (such as vegetated watershed versus burned watershed), and weather conditions (such as amount and intensity of rain). In addition to discussing this in Section 4, the variability of sediment deposition in the reservoir and debris basins is now also discussed in Section 5, which discusses the calculation of the planning quantities. Furthermore, due to the variability in rainfall, flood risk management purposes, water conservation purposes, and operational needs, the amount of water released and allowed to flow through the dams varies. In turn, all those factors influence how much sediment may be in the flows. The approach used to calculate the 20-year planning quantities offers a factor of safety over the average 20-year period, yet it is not conservative to the point of planning for the worse 20-year periods.</p>
	<p>The Strategic Plan identifies about 60 million cubic yards of active, near capacity, and potential sediment placement sites. The plan projects just less than 58 million cubic yards of accumulated sediment in need of removal from major reservoirs. Approximately 43 million of the 58 million cubic yards will be accumulated in the next 20 years. Continuing to convert woodlands and wild canyons into blighted sediment dumps is unsustainable.</p>	<p>The total planning quantity addressed by the Strategic Plan in 67.5 MCY, including not only the sediment that will reach the reservoirs, but also the numerous debris basins maintained by the Flood Control District. The objectives of the Strategic Plan included recognizing opportunities for increased environmental stewardship, reducing social impacts related to sediment management, and identifying ways to use sediment as a resource. Section 6 of the Strategic Plan has been revised to more clearly discuss beneficial use of the sediment. Section 6.5 now discusses use of the sediment in beach nourishment, in the aggregate and other industries, as daily cover at solid waste landfills, as fill at pits, for wetland restoration, for replenishment of sediment-poor waterways, and for replenishment of reefs. Sections 6 through 11 include a very limited number of alternatives that involve placement of sediment in a new sediment placement site. Sediment flushing (previously referred to as flow assisted sediment transport) and sluicing are also discussed in Sections 6.3.3, 6.3.4, and 6.4.1.</p>
	<p>An adaptive management strategy that actively considers alternatives besides trucking and tests their feasibility and implementation needs to be developed. Pilot projects should be implemented.</p>	<p>Section 6.4 discusses the various transportation alternatives that were identified. The alternatives are further analyzed for each reservoir or group of debris basins in Sections 7 through 10. Revised Section 6.3.3 includes a discussion of sediment flushing, including recommendations for a pilot study.</p>
California Native Plant Society	<p>It is disappointing that there is no greater push to find ways to use the sediment removed from the debris basins. That seemed to be a major theme during the meetings - put the sediment to use to cover landfills; to be used by companies like Vulcan that need sand, gravel, and rock; or to fill holes near freeways such as the 605. Instead, the main plan in this Strategic Plan seems to be business as usual - fill in existing sites with sediment. The sediment placement sites look a lot like open space that could be used for parks and recreation and habitat for native flora and fauna.</p>	<p>The Strategic Plan includes discussion of various use and placement alternatives for the sediment that reaches the reservoirs and debris basins maintained by the Flood Control District. Section 6 has been revised to more clearly discuss beneficial use of the sediment. Section 6.5 now discusses use of the sediment in beach nourishment, in the aggregate and other industries, as daily cover at solid waste landfills, as fill at pits, for wetland restoration, for replenishment of sediment-poor waterways, and for replenishment of reefs. Many of the alternatives for the various reservoirs and the debris basins include placement alternatives other than placement at sediment placement sites, where the Flood Control District has typically placed sediment. The Flood Control District asked stakeholders for ideas and researched and considered all suggestions.</p>

Commenter	Comment	Response
California Native Plant Society	Prime natural habitat should be designated as "hands-off", e.g. La Tuna Canyon.	Development of a sediment placement site at La Tuna Canyon is not an alternative that is included in the Strategic Plan. The Flood Control District is unable to commit to a complete hands-off position at this time because of unknown future circumstances. Section 6.5.5.2 indicates that while it is understood that there are environmental concerns associated with the development of new sediment placement sites, this alternative is still being considered because a new sediment placement site and transportation of sediment to it could have fewer impacts than placing and transporting sediment to another placement alternative that is farther away.
	Future sediment placement sites should be vetted by the environmental community to assure that areas of ecological significance are not destroyed.	As indicated in the Executive Summary of the Strategic Plan, during the development of specific sediment management projects opportunities to provide input will be given. Furthermore, specific sediment management projects that will result in significant environmental impacts will also be subject to environmental review under the California Environmental Quality Act, which will provide additional opportunities for public involvement during project evaluation.
	Air quality impacts, while not desirable, may be reduced through use of clean(er) trucks. Can we be assured that the trucks used for sediment removal will be clean air vehicles?	As indicated in Section 6.4.2.1, the Flood Control District will consider opportunities to employ low emission trucks.
Citizens Against Strip Mining in the San Fernando Valley	Citizens Against Strip Mining in the San Fernando Valley understands how the buildup of sediment in Pacoima Reservoir necessitates action and acknowledges the importance of conducting the project in a timely and efficient manner. However, the organization has a number of concerns.	The action described in the comment seems to refer to the upcoming Pacoima Reservoir Sediment Removal Project. This upcoming project is one of the specific sediment management projects alluded to in the Executive Summary of the Strategic Plan. The discussion of alternatives and impacts in Sections 6, 8, and 11 of the Strategic Plan relative to Pacoima Reservoir does not constitute the detailed analysis that will need to be completed for the Pacoima Reservoir Sediment Removal Project. Environmental documents will be prepared for the upcoming Pacoima Reservoir Sediment Removal Project in accordance with the requirements of the California Environmental Protection Act. The comments received specific to the Pacoima Reservoir Sediment Removal Project were forwarded to the appropriate team; the comments will be considered during the planning of the Pacoima Reservoir Sediment Removal Project. Additionally, the comments are included in this comment summary and addressed here relative to the Strategic Plan.

Commenter	Comment	Response
Citizens Against Strip Mining in the San Fernando Valley	<p>Given the impact that excavation, conveying sediment, and or sluicing would have on air quality, the environment, health, and the social atmosphere in the Sylmar community, Citizens Against Strip Mining in the San Fernando Valley would like information about California Environmental Quality Act process and scheduling for the upcoming Pacoima Reservoir Sediment Removal Project. In addition, we would like more details on whether the County of Los Angeles Department of Public Works plans on investigating what specific health risks may occur during the upcoming Pacoima Reservoir Sediment Removal Project. The neighborhood is densely populated with younger children and the elderly; according to large-scale scientific studies these groups remain at increased risk of respiratory illness from silicate and dust particles from similar types of construction projects in similar climates.</p>	<p>Notifications about meetings in relation to the California Environmental Quality Act process for the Pacoima Reservoir Sediment Removal Project will be sent out in advance of the meetings. Citizens Against Strip Mining in the San Fernando Valley is in the email distribution list for the project, thus the group will be notified of the meetings. Specifics regarding the studies that will be conducted as part of the California Environmental Quality Act process will be discussed when said process begins.</p>
	<p>Outdoor recreation is a vital component of the Sylmar community. Recreation areas within the community include Sylmar Recreation Center, El Cariso County Park, Veterans Memory County Park, and Los Angeles Mission College. Additionally, over the next 18 months, new facilities including several soccer fields will be built. Release of large amounts of particulates and other pollutants and loud construction noise would impact those that use the recreational facilities. However, these issues are not addressed in the sediment removal plan.</p>	<p>Section 6 discussed the impacts that the various sediment management alternatives considered during the development of the Strategic Plan could have on air quality, noise, and recreation among other impacts. Section 8.3 provided additional discussion of the impacts of the various sediment management alternatives analyzed for Pacoima Reservoir as part of the Strategic Plan. Specific impacts on recreational resources will be analyzed during review of specific sediment management projects.</p>
	<p>Based on the understanding of Citizens Against Strip Mining in the San Fernando Valley, silicate would be carried into the airspace directly above and behind our community during the sediment removal, transportation, and placement operations. Has the impact of high-wind driven silica been analyzed? Have health risks (namely silicosis) been identified and addressed?</p>	<p>Identification of specific health risks is beyond the scope of the Strategic Plan. The Strategic Plan is a planning-level document. Air quality concerns for the upcoming Pacoima Sediment Removal Project will be analyzed as required by the California Environmental Protection Act.</p>
	<p>The Strategic Plan does not include an analysis of the impacts to local businesses or economic interests. This makes the Citizens Against Strip Mining in the San Fernando Valley group questions the accuracy of the Sediment Management Alternative Summary. While a majority of the impacts to businesses likely stem from the disrupted flow of traffic, noise, and the presence of industrial vehicles, it is unknown if additional side effects should be taken into consideration. A disproportionately large number of businesses in the Sylmar community are minority-owned.</p>	<p>The comments will be considered during the planning of the upcoming Pacoima Sediment Removal Project and associated public outreach effort.</p>

Commenter	Comment	Response
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Citizens Against Strip Mining in the San Fernando Valley</p>	<p>It is understood build-up of sediment within Pacoima Reservoir needs to be removed. For decades this removal process occurred in a less visually and culturally obtrusive manner through the use of Little Tujunga Canyon Road behind the reservoir. Why is it so important now to create a new and more disruptive process disproportionately affecting thousands of middle and low income residents?</p>	<p>Sections 8.3.1.5 and 8.3.1.6 summarize the previous sediment removal projects at Pacoima Reservoir. All previous sediment removal projects involved sluicing, a method that employs water flow (see Sections 6.3.4 and 6.4.1 for additional information). Sluicing allows smaller-sized sediment (i.e., sands and silts) in a reservoir to be moved downstream through the waterway to a facility that is more accessible, but it leaves larger-sized sediment in the reservoir. Revisions to Section 8.3.1.6 explain how in 1983, during the most recent sediment removal project at Pacoima Reservoir, sediment from Pacoima Reservoir was sluiced from Pacoima Reservoir to Lopez Flood Control Basin; that is, sediment from Pacoima Reservoir was transported to Lopez Flood Control Basin through sediment-laden waters that flowed downstream along Pacoima Wash. The sediment was then removed from Lopez Flood Control Basin by truck and used to fill and grade the site of a new residential development. Little Tujunga Canyon Road has not been used in the past to transport sediment out of the reservoir. However, that may be a method that could be employed in the future to remove the larger-sized sediment in the reservoir. The Sediment Management Alternatives included in Section 8.3.7 present ways to deal with the total 7.2-MCY planning quantity for Pacoima Reservoir. This Strategic Plan was developed due to the diminishing capacity at existing sediment placement sites and the desire to pursue new alternatives that can reduce the environmental and social impacts of sediment management.</p>
	<p>Why was a community-wide notification about this project not made further in advance and with more recruitment of local residents? The group (Citizens Against Strip Mining in the San Fernando Valley) believes that persons that will be affected by the project were not involved. There was no proper canvassing or community recruitment.</p>	<p>The Strategic Plan is an overview of alternatives for managing sediment for the next 20 years. In early 2011, when development of the Strategic Plan began, members of approximately 50 agencies and organizations believed to be able to provide comprehensive and regional input for external stakeholders were invited to participate in the Strategic Plan Stakeholder Task Force. With time, the Stakeholder Task Force grew and its meetings were also attended by numerous members of the public, which were welcome to attend. In late April (2012), a press release went out notifying people of the open houses that were held in May for the draft Strategic Plan.</p> <p>If the question refers to the upcoming Pacoima Reservoir Sediment Removal project, the reason why no community-wide notification has been sent out about that project as of October 2012 is because the project is still in the planning phase. As explained in an earlier response, environmental documents under the California Environmental Quality Act will be prepared for the Pacoima Reservoir Sediment Removal Project. A public scoping meeting will be held in the future to request input from the public on the types of environmental issues, mitigation, and alternatives to consider in the environmental document to be prepared for the Pacoima Reservoir Sediment Removal Project. A community-wide notification will be sent out regarding the meeting when a date for it has been set. Additionally, people can email reservoircleanouts@dpw.lacounty.gov requesting to be added to the email distribution list for the Pacoima Reservoir Sediment Removal Project (or any of the other upcoming reservoir sediment removal projects; see www.lasedimentmanagement.com/projects.aspx).</p>

Commenter	Comment	Response
Citizens Against Strip Mining in the San Fernando Valley	Have suitable plans been identified to treat contaminated sediment removed from the reservoirs?	Since most of the reservoirs and debris basins maintained by the Flood Control District are located above developed areas, the sediment that reaches the facilities is mostly from undeveloped watersheds that contain naturally occurring materials. In 2010, the Flood Control District analyzed soil samples representative of the sediment removed from reservoirs and debris basins maintained by the Flood Control District and compared the results with threshold levels for all contaminants specified in the Amended Waste Discharge Requirement for Disposal and On-Site Use of Non-Hazardous Contaminated Soils and Related Wastes at Municipal Solid Waste Landfills. The analysis revealed that constituents in the soil samples were well below the all the threshold levels. If additional sediment analysis is required, it will be conducted during the planning of specific reservoir sediment removal projects and any environmental documents required under the California Environmental Protection Act.
	Where will sediment be taken? Our group, Citizens Against Strip Mining in the San Fernando Valley, is concerned that key decisions are being made concerning the location where the sediment will be placed without involving actual residents living near the selected site.	The Strategic Plan is an overview of alternatives for managing sediment for the next 20 years. At this time, no decisions have been made about which alternatives will be employed to manage the sediment at the various facilities. As discussed in the Executive Summary and Section 11, more analysis is needed prior to choosing specific alternatives.
	If contoured landscape mounds are created from the sediment, are those mounds stable?	Placement of sediment in sediment placement sites is performed in accordance with site-specific, engineered grading plans and an erosion and sediment control plan. This involves a comprehensive review of the sediment placement site, proper placement and compaction of material (often carried in several phases), installation of temporary and permanent drainage structures, and positioning of perimeter controls.
	Have possible contractors for sediment management operations been identified?	Contractors for specific sediment management projects will be identified once the specific sediment management projects are defined.
	Several residents in the Sylmar community have experienced adverse serious health consequences as a result of the existing May Sediment Placement Site. The proposed development of a sediment placement site in the neighboring Kagel Canyon places the Sylmar community in line to become the most densely populated area with sediment placement sites nearby.	At this time, no decisions have been made about which alternatives will be employed to manage the sediment at the various facilities, including Pacoima Reservoir. Alternatives and associated impacts for the upcoming Pacoima Reservoir Sediment Removal Project will be analyzed as required by the California Environmental Protection Act.
	It is very likely that the values of properties within sight or ability to hear sounds from operations related to sediment management at Pacoima Reservoir would decrease.	Aesthetics and noise impacts will be considered during the California Environmental Protection Act process for the upcoming Pacoima Reservoir Sediment Removal Project.

Commenter	Comment	Response
Citizens Against Strip Mining in the San Fernando Valley	<p>Citizens Against Strip Mining in the San Fernando Valley accepts that cost is an important component to consider in analyzing alternatives. However, it is not understood how some of the actual figures were generated and how costs such as fire and safety supervision, law enforcement, hospital admissions due to injury, medical assessment for respiratory illness, wildlife relocation cost, and viewshed loss apparently were not included.</p>	<p>As stated in Section 6.1, the costs included in the plan are order of magnitude costs and are based on historic sediment removal projects completed by the Flood Control District, discussion with industry, and additional research. Section 6.1 has been revised to explain why a monetary value for environmental and social impacts was not included as part of the cost estimates. Specific unit costs used in the Strategic Plan are detailed throughout Section 6. In order to calculate the order of magnitude cost of an alternative, the unit cost was multiplied by the number of such units that would be involved if such alternative was to be employed. For example, the cost of trucking 7.6 million cubic yards of sediment from the back of Pacoima Reservoir to the pits in Sun Valley was determined by multiplying the unit cost of transporting sediment on single dump trucks (\$0.65 per cubic yard per mile) by 32 miles, then by 7.6 million cubic yards. This resulted in a magnitude cost estimate of \$158 million (See Table 8-14 in Section 8).</p>
	<p>The Strategic Plan does not include an analysis of impacts to the quality of life of residents in terms of animal and plant habitat loss, viewshed loss, noise pollution, loss of open space, impacts on outdoor recreation, sports disruption, and other cultural and social features.</p>	<p>While the strategic plan did not discuss impact on habitat, viewsheds, noise, recreation in terms of the quality of life of residents, those concerns were discussed.</p>
	<p>Citizens Against Strip Mining in the San Fernando Valley understands that there is not yet an official final recommendation for Pacoima Reservoir; however, we question the statement in Section 11.3 that says "alternatives 1 and 3 should be considered only after all previous recommendations are deemed infeasible." This language implies that some determination and cost benefit analysis is already being applied to decision making concerning alternative choices; and without citizen participation or appropriate notification.</p>	<p>The Strategic Plan discusses the impacts of possible sediment management alternatives for each of the reservoirs and the debris basins. The research and discussions in the Strategic Plan will provide planners of future projects valuable information of impacts, including cost, so that project planners can focus on alternatives that are not cost prohibitive. The future planning of feasible projects will include community participation.</p>
Environmental Defense Fund	<p>The Environmental Defense Fund supports the use of low emission vehicles as outlined in the Strategic Plan, as diesel emissions have been identified as a significant contributor to air pollution. Investigation of all options for zero emission and low emission vehicles in establishing program requirements is encouraged.</p>	<p>The Flood Control District will consider opportunities to employ low emission trucks.</p>

Commenter	Comment	Response
Granada Hills North Neighborhood Council	<p>Sunshine Canyon Landfill has adequate space to stockpile sediment, but only on those areas of the landfill that are not exposed to the winds or adjacent to residential areas. The landfill is subjected to extremely high winds in excess of 100 mph. The community most certainly would vigorously oppose any additional truck trips generated by this material. Questions as to the amount of water contained in each load, and the potential for generating additional PM_{2.5} or PM₁₀ would have to be addressed. Further, the community would insist that the material would have to be tested by the County prior to its arrival and to certify that it contained no hazardous material before being accepted by the landfill for use as daily, interim, and/or final cover.</p>	<p>The Section that discusses the use of the sediment as daily cover at landfills (now Section 6.5.3) has been revised to include concerns regarding potential air quality impacts due to the stockpiling of sediment at the landfills, additional truck trips from delivery of sediment to the landfill, and the moisture content of sediment deliveries to the landfill. With respect to the potential for hazardous materials in the sediment, the sediment and debris that reach most of the reservoirs and debris basins maintained by the Flood Control District originates from largely undeveloped watersheds. In 2010, the Flood Control District analyzed soil samples representative of the sediment removed from reservoirs and debris basins maintained by the Flood Control District. The analysis revealed that constituents in the soil samples were well below threshold levels for all contaminants specified in the Amended Waste Discharge Requirement for Disposal and On-Site Use of Non-Hazardous Contaminated Soils and Related Wastes at Municipal Solid Waste Landfills.</p>
	<p>There are constraints within Sunshine Canyon Landfill's Conditional Use Permit (CUP) on the amount of tonnage that can be accepted daily by the landfill, including any materials put to a beneficial use."</p>	<p>The Flood Control District understands landfills have conditional use permits and other permits that they must abide by. Section 6.5.3 has been revised to indicate this.</p>
Open Space Now	<p>Going to a hardware store and exploring the cost of sand or other products made from sediment gives one an appreciation of its value.</p>	<p>The Flood Control District recognizes that sediment has values and is continuing to explore beneficial uses. Section 6 of the Strategic Plan has been revised to more clearly discuss beneficial use of the sediment. Section 6.5 now discusses use of the sediment in beach nourishment, in the aggregate and other industries, as daily cover at solid waste landfills, as fill at pits, for wetland restoration, for replenishment of sediment-poor waterways, and for replenishment of reefs.</p>
	<p>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, the County of Los Angeles Department of Public Works' planning has lagged behind the realities of current land use scarcity and demand.</p>	<p>The focus of the Sediment Management Strategic Plan is the management of sediment in relation to flood risk management and water conservation. For over ten years, the Flood Control District has pursued multi-benefit projects with the Los Angeles River and San Gabriel River Master Plans. The following are a few examples of multi-use benefits projects that are located within Flood Control District right of way and/or have been constructed or include(d) other major involvement by the Flood Control District and the County of Los Angeles Department of Public Works: Big Tujunga Wash Mitigation Area, Dominguez Channel Bike Trail, Dominguez Gap Wetlands, Los Angeles River Bike Trail, Rio Hondo Bicycle Trail, Rio Hondo Coastal Spreading Grounds, San Gabriel Coastal Spreading Grounds, San Gabriel River Bicycle Trail, Tujunga Wash Greenway and Stream Restoration, and equestrian trails along the rivers.</p>

Commenter	Comment	Response
Open Space Now	The Strategic Plan listed the members of the Sediment Management Advisory Working Group. Based on that, readers of the Strategic Plan may conclude that the members are in agreement with most of the Strategic Plan's recommendations when that may not be the case.	The Flood Control District did not intend to imply that the members of the Sediment Management Advisory Working Group were in agreement with the Strategic Plan's recommendations by listing their names. However, their input was valuable in the development of the Strategic Plan. A note has been added in Appendix A, where members of the Sediment Management Advisory Working Group are listed, to prevent readers from arriving at such a conclusion.
Pasadena Audubon Society	Such a large project requires regional coordination. The County of Los Angeles Department of Public Works and Flood Control District should work with the U.S. Forest Service, the U.S. Army Corps of Engineers, U.S. Fish and Wildlife, California Fish and Game, the Integrated Regional Water Management Plan, and the California Coastal Sediment Management Work Group. This is especially critical because it has been repeatedly stated that methods like flow assisted sediment transport cannot be utilized because of regulatory restrictions. Rather than giving up on such methods, the County of Los Angeles Department of Public Works and Flood Control District should work with these agencies to resolve these issues. We should be looking around the world for strategies to create a system that is sustainable and effective. Minimally, the plan should include the pilot plan discussed at the Advisory Working Group meetings.	<p>The Flood Control District works closely with the agencies and entities listed. Since the beginning, the Sediment Management Strategic Plan Stakeholder Task Force included members from all the agencies listed and more. During the second Stakeholder Task Force meeting in April 2011, staff from the California Department of Fish and Game and California Regional Water Quality Control Board gave presentations about their processes and roles with respect to sediment management projects. Members of the Integrated Regional Water Management Plan were on the distribution list of the Stakeholder Task Force and also part of the Sediment Management Advisory Working Group. The U.S. Army Corps of Engineers, which is a member of the California Coastal Sediment Management Work Group, was included in the Stakeholder Task Force.</p> <p>With respect to flow assisted sediment transport, to be consistent with nomenclature used by other agencies throughout the country and the world, the Flood Control District has made the determination to refer to flow assisted sediment transport as sediment flushing from now on. Revised Section 6.3.3 includes a discussion of sediment flushing, including recommendations for a pilot study.</p> <p>Re-creation of the flood risk management and water conservation system is beyond the scope of the Strategic Plan. The Long-Term Vision mentioned under Next Steps in the Executive Summary and in Section 11 will have a broader focus.</p>
	The lack of understanding of biological resources is disturbing. Every debris basin, every dam, every part of the system is habitat and has inhabitants. Burned chaparral is extremely valuable to many plants and animals called "fire followers" that only appear once the chaparral has been burned. All habitats have value. I have seen reports from the County of Los Angeles Department of Public Works that fail to list many species that I know to be in an area. The one or two cursory visits that biological consultants make to a site do not tell the entire story. I would like to see ecologists and biologists on staff that can become familiar enough with the areas and can explain their significance to the other county employees.	The Flood Control District hires consultant biologists to assist in project planning that will affect habitat. The Flood Control District is hopeful that increased outreach efforts for public input will bring issues like those in the comment even more into the project planning process.

Appendix F – Stakeholder Comments and Responses

Commenter	Comment	Response
Pasadena Audubon Society	<p>The Strategic Plan needs to recognize that not all impacts are equal. Impacts on air quality can be temporary, while the loss of a canyon or woodlands is more permanent. Even if lost woodland is replanted, it will take decades before it matures and it will never be like it was before. The Strategic Plan needs to describe the types of habitats and the type of impact.</p>	<p>It is agreed that not all impacts are equal. The beginning of Section 6 now states that due to the nature of the Strategic Plan, potential impacts were discussed in general terms and that some of the impacts are long-term, while others are temporary. During the planning of specific sediment management projects, the habitat that could potentially be affected by the specific project will be analyzed.</p>
Sylmar Hang Gliding Association	<p>The Sylmar Hang Gliding Association believes that all of the alternatives in the Strategic Plan for Pacoima Reservoir will negatively impact the community, our members, and the future of hang gliding in Los Angeles. We recognize the importance of sediment removal and seek to support an alternative that will cause the minimum negative effects to our powerless flight activities over, in, and adjacent to the Pacoima Wash. The Sylmar Hang Gliding Association looks forward to working closely with the County in an effort to identify the least harmful methods of removing the sediment in Pacoima Reservoir.</p>	<p>As indicated by the comment, there is no current concept without some negative impacts. The input provided helps the Flood Control District's efforts to understand all of the potential impacts. The Flood Control District appreciates the association's recognition of the importance of sediment removal operations and desire to work with the Flood Control District. There will be opportunities for public input as the upcoming Pacoima Reservoir Sediment Removal Project is planned. People can email reservoircleanouts@dpw.lacounty.gov to request to be added to the email distribution list for the Pacoima Reservoir Sediment Removal Project.</p>
	<p>The Pacoima Reservoir Sediment Removal Project may have significant effects on one of the world's most famous and historic foot launched, powerless, flying sites as well as on the enthusiasts and spectators of the sports of hang gliding and paragliding. Some of the County's six alternatives in the Strategic Plan will have more serious effects than others, so it is our desire that the County of Los Angeles Department of Public Works, through the process of the California Environmental Quality Act, adequately study, evaluate, and effectively minimize any negative effects that this project may have on these sports, the participants, and the businesses and communities that rely on them.</p>	<p>The Pacoima Reservoir Sediment Removal Project is one of the specific sediment management projects alluded to in the Executive Summary of the Strategic Plan. The discussion of alternatives and impacts in Sections 6, 8, and 11 of the Strategic Plan relative to Pacoima Reservoir does not constitute the detailed analysis that will need to be completed for the Pacoima Reservoir Sediment Removal Project. Environmental documents under the California Environmental Quality Act will be prepared for the Pacoima Reservoir Sediment Removal Project. The comments received specific to the Pacoima Reservoir Sediment Removal Project were forwarded to the appropriate team; the comments will be considered during the planning of the Pacoima Reservoir Sediment Removal Project. Additionally, the comments are included in this comment summary and addressed here relative to the Strategic Plan.</p>

Commenter	Comment	Response
Sylmar Hang Gliding Association	<p>Hang gliding enthusiasts have been granted permanent use of more than 20 acres within Pacoima Wash for hang gliding activities by the private landowner. It is common for hang gliders and paragliders to land in one area in Pacoima Wash, very near the south side of Pacoima Dam. This area is commonly referred to by the Sylmar Hang Gliding Association as an "emergency landing area." The Sylmar Hang Gliding Association is supportive of alternatives that would reduce possible deviation of Pacoima Wash. The highest potential for this problem is likely with the sluicing alternative. This could be mitigated by periodic river bed grading, using a significant amount of sediment fill to raise the level of the land adjacent to and west of the Pacoima Wash to prevent the wash from changing course, eroding the banks, and endangering homes and property southwest of the Gavina Street bridge. Rip rap could be another possible solution.</p>	<p>The concern over potential impacts to existing uses of the land near Pacoima Reservoir has been added to Section 8.3.5.1. As the upcoming Pacoima Reservoir Sediment Removal Project is planned, the sediment management alternatives for the reservoir will be analyzed in further detail and potential impacts and mitigation measures will be considered. Any mitigation efforts within private right of way would need to be coordinated with the property owner in addition to other requirements.</p>
	<p>In past years, there has been significant erosion to the west side of Pacoima Wash. In one case, the river came within a few feet of the fence lines of developed residential parcels. This damage was repaired by the government's importation of dirt, raising the elevation of the land, and providing a "buffer zone" that has prevented damage to developed property to date. Over the past 40 years, much of this "buffer zone" has been lost and it would benefit the community to have it returned. The loss of land due to erosion reduces the area of safe, stable, undeveloped land on which the Sylmar Hang Gliding Association operates. Both City of Los Angeles Councilmember Richard Alarcón and Pacoima Beautiful, a non-profit corporation, have proposed development of a park or trail adjacent to the west side of the Pacoima Creek, south of the Gavina Street bridge. The Sylmar Hang Gliding Association believes an opportunity exists for the county to deposit a significant portion of the sediment from the Pacoima Dam in a manner that will help protect property, provide cultural and recreational opportunities, and significantly reduce the cost of sediment transport. The possibility of a partnering with these projects might provide additional opportunities for this sediment project.</p>	<p>This could be explored further with the City. However, putting fill in the wash would impact its capacity and any approved proposal would need to ensure no increased flood risk.</p>
	<p>The Sylmar Hang Gliding Association is supportive of alternatives that would reduce truck traffic in the area between Pacoima Dam and Lopez Flood Control Basin.</p>	<p>The Flood Control District appreciates the input provided.</p>
	<p>The Pacoima Canyon is recognized as one of the highest winds areas in southern California. Historical wind data is recorded at nearby County of Los Angeles Fire Department Camp 9 and available through the Department of Water Resources. Studies of the historical number of days the winds in this area come from the northern hemisphere, or exceed 15 mph, are pertinent to the choice of alternative proposals. The Sylmar Hang Gliding Association is supportive of alternatives that would reduce airborne dust and particulates that would negatively impact local residents and those hang gliding and paragliding above the areas impacted by the sediment management project.</p>	<p>Alternatives and associated air quality impacts for the upcoming Pacoima Reservoir Sediment Removal Project will be analyzed as required by the California Environmental Protection Act.</p>
	<p>Temporary or permanent use of the Northern and Southern Canyons as sediment placement sites as discussed in Section 8.3 could negatively affect the quality of the soaring conditions due to changes in the natural contouring of the ridges and canyons in Pacoima Canyon.</p>	<p>This concern has been added to the potential impacts discussed in Sections 8.3.3.2 and 8.3.6.2, which discuss the canyon sites as potential staging and temporary sediment areas and potential new sediment placement sites, respectively.</p>

Appendix F – Stakeholder Comments and Responses

Commenter	Comment	Response
Sylmar Hang Gliding Association	<p>We feel that value of our local viewshed is immense. Traditional grading, filling, and re-vegetating would not do enough to minimize the damage to the natural, aesthetic qualities of the area. We would like the county to recognize the importance of retaining the natural beauty of these hills, by avoiding cutting or filling in the area. If this is not possible, we would ask the county to utilize the highest level of contour grading to retain the most natural look.</p>	<p>Section 8.3.6.2 now includes discussion of grading that resembles natural terrain as a method to reduce visual impacts.</p>
	<p>A popular hiking trail from Pacoima Wash to the top of Kagel Mountain and eastward along the rim has been used for decades by the local community and by members of the Sylmar Hang Gliding Association both as recreation as well as a means to retrieve our vehicles from the top of the mountains after flying. The Sylmar Hang Gliding Association is supportive of alternatives that would reduce negative impacts on the hiking trail.</p>	<p>The trail described appears to traverse private land and U.S. Government land. During the planning of the upcoming Pacoima Reservoir Sediment Removal Project, the Flood Control District may need to acquire land or an easement, but that has not been analyzed yet. Typically, when considering if recreational uses are to be allowed on properties owned by the Flood Control District, potential conflicts with the operations of the Flood Control District facilities are carefully evaluated.</p>
Theodore Payne Foundation	<p>Natural open space, whether it is oak woodland or chaparral, provides habitat, species preservation, watershed benefits, air quality benefits, and natural landscape character that are cause for preservation. Use of sediment placement sites is therefore seen as an alternative to be used only as a last resort.</p>	<p>Comment noted. As stated in the Strategic Plan, the Flood Control District is pursuing other sediment management alternatives.</p>
	<p>Destruction of habitat should be seen as a permanent impact, with full restoration not truly feasible. None the less, if habitat is destroyed, a credible effort at partial restoration should be included in any plans. When considering those alternatives, the cost of that restoration should include monitoring and maintenance costs.</p>	<p>Any necessary mitigation measures required due to sediment management operations will be determined during the planning phase of specific sediment management projects.</p>
	<p>The beneficial use of sediment, whether as cover for landfill or derivation of construction and other materials is preferable.</p>	<p>The Flood Control District will continue alternatives to beneficially use the sediment. Section 6.5.2.3 now discusses a proposed sediment processing contract that could allow for private companies to (1) process the sediment and obtain aggregate or other materials from it or (2) use the sediment to reclaim their quarries.</p>
	<p>Mitigation of air quality impacts from trucks could and should be mitigated by planting trees along the transport route, with particulate matter capture by leaves and carbon dioxide sequestration in the biomass of the trees.</p>	<p>During the development of specific sediment management projects, alternatives and associated details will be evaluated in greater detail than they were in the Strategic Plan. Mitigation alternatives of impacts such as these will be analyzed at that point.</p>

Commenter	Comment	Response
Theodore Payne Foundation	<p>Regarding the alternatives included in the Strategic Plan, the Theodore Payne Foundation offers the following opinions.</p> <ul style="list-style-type: none"> - Cogswell Reservoir: No desirable alternative. 1B, 1C, and 2B being the LEAST desirable. - Morris Reservoir: Alternative 1 appears preferable - Big Tujunga: Alternatives 2A and 2B seem preferable - Pacoima Reservoir: Alternatives 2A and 2B seem preferable - Puddingstone Reservoir: n/a - San Dimas Reservoir: Alternative 1 appears preferable - For Santa Anita, Big Dalton, Live Oak, Puddingstone, and Thompson Reservoirs the use of pits and landfill cover (alternative 1) is logical and desirable. 	<p>The Flood Control District appreciates the opinions provided. As specific sediment management projects are planned for the reservoirs, the alternatives will be analyzed in further detail. A number of factors are involved in selecting which alternatives are implemented.</p>
UCLA La Kretz Center for California Conservation Science	<p>The supply and transport of coarse sediments are fundamental geomorphic processes underlying the physical integrity and biological integrity of streams, as well as the health of beaches and nearshore habitats. Success of future stream restoration efforts planned within watershed impacted by dams and debris basins will be dependent upon the ability to receive adequate supplies of sediment from upstream in order to avoid excess erosion along naturalized reaches. A watershed-based assessment, considering current and future restoration efforts and coastal needs, should be undertaken in order to support the Draft Plan’s stated objectives of increased environmental stewardship and using sediment as a resource. Furthermore, such an assessment should clearly link to and support the many other related initiatives taking place County-wide, to fully integrate regional water resources planning.</p>	<p>The Long-Term Vision discussed in the Executive Summary and Section 11, will consider sediment management with respect to stream restoration.</p>
	<p>The Strategic Plan dismissed the feasibility of using accumulated sediment at beaches. A value of 20 percent is given as the amount of accumulated sediment that would be appropriate for beach placement (Section 6.5.3), but no references or data are provided to support this number. The Flood Control District should provide a more thoroughly documented discussion of opportunities and constraints for sediment use at beaches (in coordination with needs identified in the Coastal Regional Sediment Management Plans).</p>	<p>Beach nourishment as a beneficial use of the sediment that accumulates in the reservoirs and debris basins is now discussed in Section 6.5.1. The section now includes information provided in several coastal regional sediment management plans prepared by the California Coastal Sediment Management Workgroup. In Section 6.5.1.3, it is now indicated that based on the finding that approximately 25 percent of the deposits match the characteristics of washed sand, which has less stringent characteristics than beach sand, approximately less than 25 percent of the reservoir and debris basin sediment deposits would be appropriate for use in beach nourishment projects. However, the Flood Control District will analyze this alternative further.</p>

Commenter	Comment	Response
UCLA La Kretz Center for California Conservation Science	<p>The Strategic Plan leaves open the potential for new sediment placement sites (Section 6.5.5.2). The use of undisturbed habitat for sediment placement would be inconsistent with the Draft Plan’s objective of increased environmental stewardship and contrary to the need for preserving regional open spaces. The Draft Plan does not currently provide the level of detailed quantification of environmental impacts / tradeoffs of the various management options to support the use of new sediment placement sites. The Flood Control District should provide a rigorous quantification of environmental impacts before making any recommendation for the use of undisturbed areas for sediment placement.</p>	<p>The Flood Control District is aware that there are environmental concerns associated with the development of new sediment placement sites. The Strategic Plan includes a very limited number of alternatives involving new sediment placement sites. However, this alternative still remains because in some cases it could have fewer impacts than other alternatives. Due to the nature of the Strategic Plan, the plan does not provide detailed quantification of impacts. However, at this time, no decisions have been made about which alternatives will be employed to manage the sediment at the various facilities. As discussed in the Executive Summary and Section 11, more analysis is needed prior to choosing specific alternatives. Specific sediment management projects that will result in significant environmental impacts will be subject to environmental review and community input under the California Environmental Quality Act.</p>
	<p>Predicted climate change has the potential to result in sediment accumulation quantities significantly greater than historic rates, creating further urgency for developing sustainable long-term management approaches. The 20-year planning quantity calculation assumption that “future sediment accumulation in the reservoirs and debris basins will be similar to the sediment deposition of the past” (Section 5.1) should be reassessed. Regional climate change scenarios and predicted effects on wildfire do not support this assumption.</p>	<p>Section 5.1 now states that the effects of climate change were not considered in the calculation of the 20-year planning quantities. In Section 5.1.1, it is indicated that the impact of under-projections is that the Strategic Plan would last less than the 20-year planning period, which would require an updated Strategic Plan to be developed sooner than expected. The Strategic Plan is a living document that may be revised in the future as conditions change; such changes may include incorporating new information that become available about the impacts to sediment management due to climate change. The Long-Term Vision discussed in the Executive Summary and in Section 11 will consider climate change.</p>
	<p>The Strategic Plan should be revised to identify areas of coordination / integration with the Los Angeles County Coastal Regional Sediment Management Plan, the Los Angeles Basin Stormwater Conservation Study, and the Greater Los Angeles County Integrated Regional Water Management Plan.</p>	<p>It is anticipated that development of the Long-Term Vision discussed in the Executive Summary and in Section 11 will involve greater coordination between agencies and integration of related efforts.</p>
	<p>The Flood Control District should develop a prioritized approach and timeline for conducting watershed-based evaluations of sediment management options, incorporating a full assessment of watershed and channel opportunities and constraints along the entire waterway, from the reservoir/debris basin downstream to the coast.</p>	<p>This recommendation would be addressed by the Long-Term Vision discussed under Next Steps in the Executive Summary and Section 11.</p>
	<p>The Flood Control District should identify approaches to evaluating flow assisted sediment management (FAST) feasibility, possibly through a pilot study. Apply the most current hydrologic/hydraulic and sediment transport modeling approaches to determine engineering feasibility, within the context of a watershed-based assessment.</p>	<p>To be consistent with nomenclature used by other agencies throughout the country and the world, the Flood Control District now refers to flow assisted sediment transport as sediment flushing. Revised Section 6.3.3 includes a discussion of sediment flushing, including recommendations for a pilot study.</p>

Commenter	Comment	Response
West Pasadena Resident's Association	<p>As downstream residents of the Arroyo Seco, we recognize the importance of managing flood risk, but we also urge the County to expand their plan to include larger goals for comprehensive watershed management, where sediment is not solely thought of as a waste product to be trucked off and dumped at a different site. This practice is not sustainable beyond 20 years with the large volume of sediment that is predicted.</p>	<p>While the focus of the Sediment Management Strategic Plan is sediment management, the Strategic Plan discusses various components of watershed management, specifically water quality, groundwater recharge (which is associated with water supply), and habitat in terms of the impacts caused by the different sediment management alternatives discussed in the Strategic Plan. Section 6 discusses a number of sediment management alternatives that go beyond trucking the sediment and placing it at a different site; the Section has been revised to more clearly discuss beneficial use of the sediment. Section 6.5 now discusses of the sediment in beach nourishment, in the aggregate and other industries, as daily cover at solid waste landfills, as fill at pits, for wetland restoration, for replenishment of sediment-poor waterways, and for replenishment of reefs. While the focus of the Strategic Plan cannot be expanded at this point, the Long-Term Vision discussed in the Executive Summary and Section 11, will have a broader focus.</p>
	<p>Restoration of the Arroyo Seco would create a riparian habitat that can be enjoyed by people and the many wild creatures living in our Arroyo Seco.</p>	<p>The Flood Control District is currently working with the U.S. Army Corps of Engineers on an Ecosystem Restoration Study of the Arroyo Seco.</p>

Commenter	Comment	Response
Jerry Baker	<p>After reviewing the Strategic Plan and numerous technical publications and proceedings of various organizations and associations involving flood control and sediment management, it is my opinion that the County of Los Angeles Department of Public Works is actively and willfully resisting the implementation of modern innovative sediment management strategies and intentionally ignoring advancements and innovations that have been made in the field. While the body of agencies and organizations responsible for establishing and executing sediment management plans and projects are moving towards interagency planning and cooperation on a regional scale, and employing strategies that optimize sediment management across multiple projects and agencies, the Department continues to act as an insular agency moving forward with a long range Strategic Plan lacking even a rudimentary examination of potential innovative solutions to the environmental, social, and fiscal impacts of the current flood control system and its need for perpetual costly maintenance. Instead, we are offered a parochial list of debris basins and reservoirs where the Department’s lack of vision and innovation has led to yet another decade or more of sediment accumulation that must be addressed at great expense to the taxpayer and the environment. By failing to contemplate more sustainable and efficient sediment management practices such as Flow assisted Sediment Transport and beach deposition, by failing to make provisions for pilot projects and studies to identify new and innovative sediment management strategies, and by the Department’s apparent lack of coordination with other regional agencies, the Strategic Plan amounts to nothing more than a roadmap for repeating of the mistakes of the past and ensuring the continued destruction of wild places and massive expenditures of taxpayer dollars on future sediment removal projects.</p>	<p>In early 2011, when development of the Strategic Plan began, members of approximately 50 agencies and organizations believed to be able to provide comprehensive and regional input for external stakeholders were invited to participate in the Strategic Plan Stakeholder Task Force. A number of Federal, State, and local agencies were invited to participate and some of the agencies attended several meetings of the Stakeholder Task Force. The Stakeholder Task Force Invitee List and attendance to Stakeholder Task Force meetings are located in the Appendix of the Strategic Plan. Separate from the Stakeholder Task Force, the Flood Control District also works closely and meets regularly with a number of agencies on numerous issues.</p> <p>During development of the Strategic Plan, the Flood Control District asked stakeholders for ideas about how to manage sediment and researched and considered all suggestions. The Strategic Plan provides an overview of the alternatives.</p> <p>Revised Section 6.3.3 includes a discussion of sediment flushing (previously referred to as Flow assisted Sediment Transport), including recommendations for a pilot study.</p> <p>Section 6.5.1 contains a revised discussion on beach nourishment as a beneficial use for the sediment. The Flood Control District will analyze the beach nourishment alternative further.</p>
	<p>Consideration of FlowAssisted Sediment Transport (FAST) should be a critical element of any long range sediment management plan. The FAST terminology is somewhat unique to the County of Los Angeles Department of Public Works, being called “sediment pass-through” in the world of hydraulic engineering, but the principle is the same. In simple terms, the sediment management technique involves opening a dam’s flood gates at the onset of a flood event to allow sediment to pass through in its natural manner, and then closing the gates while there is sufficient water in the watershed to replenish the reservoir. Since major flood events are responsible for an extremely large portion of the total sediment transport in a watershed, the goal of this technique is to open the dam and let the flood event more or less take its natural course. Not only is sediment accumulation drastically reduced, but as sediment takes its natural course downstream it creates and maintains aquatic habitat and ultimately replenishes the sand on local beaches.</p>	<p>Revised Section 6.3.3 includes a discussion of sediment flushing (previously referred to as flow assisted sediment transport), including recommendations for a pilot study.</p>

Commenter	Comment	Response
<p style="text-align: center;">Jerry Baker</p>	<p>Throughout the Strategic Plan, temporary impacts such as air pollution, traffic, and noise are treated as equivalent to permanent habitat destruction. This perverse and misguided lack of prioritization frequently leads the County of Los Angeles Department of Public Works to choose obliterating rare habitat from the face of the Earth for all eternity as a temporary mitigation of traffic and/or noise.</p>	<p>A general statement in now included at the beginning of Section 6 regarding the long-term and temporary nature of some of the impacts.</p>
	<p>The County of Los Angeles Department of Public Works demonstrates a fundamental ignorance of the biological diversity and significance of California’s unique ecosystems, and maintains a cavalier attitude towards their destruction.</p> <p>In considering potential alternatives, the Department treats mitigation sites as functionally equivalent to having fully repaired the environmental destruction brought about by their projects. Department staff indicated that once work was completed at Santa Anita Sediment Placement Site, the location of the Arcadia Woodlands, habitat could be reestablished. A visit to the site shows how ludicrous in the notion that you can destroy habitat and then casually replace it or restore it. In describing the solution to the environmental disaster of filling in two canyons adjacent to Pacoima Wash – an area known to contain both the endangered Davidson’s bush mallow and Nevin’s barberry in addition to being a likely location for six other endangered or threatened plant species – the Department’s staff demonstrate their complete ignorance of the significance of the area and the complexity of the habitat they would be destroying by casually suggesting that, “once work is complete, habitat could be re-established on disturbed areas.”</p> <p>In addition to the erroneous beliefs concerning the efficacy of mitigation sites, the Department consistently understated the habitat they schedule for demolition. At the Arcadia Woodlands, the Department chose to characterize the destruction of a nearly pristine Coast Live Oak riparian woodland – one of the last on flat land remaining in all of the County of Los Angeles – as nothing more than the casual “removal of native vegetation.”</p> <p>The Department’s egregious behavior could be minimized if the Department were required to maintain an independent group permanently and adequately staffed with professional wildlife and fisheries biologists, botanists, and other relevant scientists with real power to influence the development and selection of project alternatives.</p>	<p>At this time, no decisions have been made about which alternatives will be employed to manage the sediment at Pacoima Reservoir or other facilities. As discussed in the Executive Summary and Section 11, more analysis is needed prior to choosing specific alternatives. The discussion of alternatives and impacts in Sections 6, 8, and 11 of the Strategic Plan relative to Pacoima Reservoir does not constitute the detailed analysis that will need to be completed for the Pacoima Reservoir Sediment Removal Project. Environmental documents will be prepared for the upcoming Pacoima Reservoir Sediment Removal Project in accordance with the requirements of the California Environmental Protection Act. Those environmental documents will consider in detail potential impacts on habitat as well as other impacts.</p> <p>The Flood Control District hires consultant biologists to assist in project planning that will affect habitat. The Flood Control District is hopeful that increased outreach efforts for public input will bring issues like those in the comment even more into the project planning process.</p>

Commenter	Comment	Response
<p style="text-align: center;">Jerry Baker</p>	<p>The County of Los Angeles Department of Public Works needs to get more involved with regional efforts to coordinate sediment management, and needs to pioneer efforts to identify innovative and effective sediment management strategies. A successful Sediment Management Strategic Plan must identify a specific plan for research and development of new sediment management techniques. The (California) Coastal Sediment Management Workgroup (CSMW) is a collaborative effort between various State and Federal agencies chaired by the Army Corps of Engineers. The CSMW is currently developing individually-tailored regional sediment management plans for individual littoral cells designed to coordinate the beneficial reuse of sediment resources in a regional context to help to restore natural processes and simultaneously address sediment imbalances. Unfortunately, the Sediment Management Strategic Plan makes no mention of the Los Angeles County Coastal Regional Sediment Management Plan being developed by the CSMW. Not only does the Sediment Management Strategic Plan feature no coordination with other regional agencies or the CSMWG’s regional sediment management plan, but it specifically and categorically rejects FAST and sediment placement at beaches, the only sediment management alternatives that have any potential to contribute solutions to the coastal sediment deficit that the CSMW is working to address.</p>	<p>During the development of the Strategic Plan, the Flood Control District communicated with staff from the U.S. Army Corps of Engineers Los Angeles District and the Los Angeles County Department of Beaches and regarding the development of the Coastal Regional Sediment Management Plans. Both agencies were always invited to the Strategic Plan Stakeholder Task Force meetings and staff from both agencies attended several meetings. However, the Flood Control District was not made aware of any public or multi-agency meetings for the Coastal Regional Sediment Management Plans. The Flood Control District has reviewed the coastal plans available at www.dbw.ca.gov/csmw/crsmp.aspx. The revised Section 6.5.1 of the Strategic Plan incorporates information in these coastal plans. As now indicated in Section 6.5.1, the Flood Control District will analyze the beach nourishment alternative further.</p> <p>On a slightly separate note, the Flood Control District has been involved in the development of the Sediment Management Chapter of the Water Plan Update 2013 led by the California Department of Water Resources.</p> <p>Revised Section 6.3.3 includes a discussion of sediment flushing (previously referred to as flow assisted sediment transport), including recommendations for a pilot study.</p> <p>Additionally, the Flood Control District is pursuing contracts that could allow for private companies to receive sediment from the Flood Control District to (1) process the sediment and obtain aggregate or other materials from it or (2) use the sediment to reclaim their quarries. This is now discussed in Section 6.5.2.3.</p>
	<p>The Sediment Management Strategic Plan rejects transporting sediment to beaches on the basis of cost, but does not deduct the potential offset from the cost of sand replenishment projects. This omission artificially inflates the cost of transporting sediments to local beaches and leads to the rejection of that alternative.</p>	<p>As indicated in the previous response, the Flood Control District will analyze the beach nourishment alternative further.</p>

Commenter	Comment	Response
Christle Balvin	<p>I would like to suggest that the County of Los Angeles Department of Public Works give serious thought to changing its mission and developing a new operational structure that is dedicated as much to water and habitat conservation as it is to flood control. Toward that end, the name of County Flood Control should change to the County Department of Flood Control and Water Conservation.</p>	<p>The Department of Public Works is a County of Los Angeles Department that provides numerous services to the unincorporated areas of the County (as well as cities that have contracted the Department of Public Works to do so). The services include designing and constructing County buildings, providing waste management, and more; see the Department’s website at www.dpw.lacounty.gov for more information. The Flood Control District is a special district that was created in 1915 by the Los Angeles County Flood Control Act to provide for the control and conservation of flood and storm waters. As such, the Flood Control District is responsible for flood control and water conservation. Since 1985, the Department of Public Works has been responsible to perform both the Department’s responsibilities and the Flood Control District’s responsibilities. However, the two agencies remain separate agencies.</p>
	<p>The entire system needs to be reexamined and new technologies developed and implemented not just to prevent flooding but to conserve water. In fact, the ongoing drought may make water conservation even more important in the long-run than flood protection.</p>	<p>As explained in the comment above, the Flood Control District currently plays a major role in water conservation. The existing system not only serves to manage the risk of floods but also to conserve flood and storm waters. The Long-Term Vision discussed in the Executive Summary and Section 11, will have a broader focus.</p>
	<p>The County of Los Angeles Department of Public Works needs to recognize that it has the important but difficult task of balancing competing interests wanting to use the often rural areas around its many dams and reservoirs. These areas are now enjoyed by hikers, equestrians, birders, Frisbee golf clubs, fishermen, bikers, campers ... and the list goes on. So aside from its own engineering activities, the Department should recognize, respect and work to balance the various needs and uses for these publically-owned lands over which it has stewardship.</p>	<p>The Flood Control District recognizes the need to balance competing interests. The general analysis of sediment management alternatives presented in the Strategic Plan includes discussion of social impacts associated with each sediment management alternative. The need to balance competing interests is one of the reasons why we invited so many stakeholders to participate in the development of this Strategic Plan and will outreach to the public in the future for specific projects.</p>
	<p>The DPW (Flood Control) budget should provide adequately for financing of long-range planning and research projects as well as the implementation of pilot projects on appropriate reservoirs. The most sustainable and efficient should be carefully studied and re-applied wherever appropriate.</p>	<p>Among the Flood Control District’s next steps discussed in the Executive Summary and Section 11 is developing Long-Term Vision with the U.S. Army Corps of Engineers and local stakeholders. Additionally, Section 6.3.3 includes a discussion of sediment flushing and recommendations for a pilot study.</p>
	<p>Sediment has value and should no longer be treated as a waste product. The current system of operating without much cooperation between the County of Los Angeles Department of Public Works and other agencies or businesses related to sediment (sand and gravel industry), has been costly enough for taxpayers. In this new age of reduced federal and county budgets, the idea of creating a profit from sediment and plowing the profit back into Department operations may be new but well worth exploring.</p>	<p>The Flood Control District has worked with businesses and other agencies in the past. Additionally, the Flood Control District is pursuing contracts that could allow for private companies to receive sediment from the Flood Control District to 1) process the sediment and obtain aggregate or other materials from it or 2) use the sediment to reclaim their quarries.</p>

Commenter	Comment	Response
Christie Balvin	<p>To make some of the sediment “beach ready,” the County might explore agreements with the sand and gravel industry to process and refine sand not only for beaches but for home gardens and the construction industry.</p>	<p>Section 6.5.2.3 discusses a proposed sediment processing contract that could allow for private companies to (1) process the sediment and obtain aggregate or other materials from it or (2) use the sediment to reclaim their quarries. The Flood Control District will analyze the beach nourishment alternative further.</p>
	<p>The draft Strategic Plan shows no consideration of working with other entities such as the U.S. Army Corps of Engineers or the Integrated Regional Water Management Plan (IRWMP) program, both of which are also seeking solutions to water and sediment problems. Nor does it propose working with some of the new environmental centers such as the one at Caltech where top scientist and researches are bringing new information, data, and potential solutions to the fore. DPW needs to establish working groups that involve universities, other related agencies, and representatives of the public with perspectives and knowledge of water, sediment, and bio-diversity issues (they do exist and have been in attendance at many of the Sediment Task Force meetings)</p>	<p>In early 2011, when development of the Strategic Plan began, members of approximately 50 agencies and organizations were invited to participate in the development of the Strategic Plan. The U.S. Army Corps of Engineers was among those agencies; staff from the agency attended several Stakeholder Task Force meetings. Agencies involved in the Integrated Regional Water Management Plan program were also invited to participate in the Stakeholder Task Force and the Sediment Management Advisory Working Group. People involved in agencies focused on the environment also participated in both groups. See the Appendix for additional information. The groups were created to gather input from external stakeholders. The Flood Control District intends to involve academia in the effort to develop the Long-Term Vision mentioned in the Executive Summary and Section 11.</p>
	<p>Devil’s Gate Dam, with ample wet-season water, should be considered a pilot project for the flow assisted sediment transport method. I understand that if uncontrolled, there are potential flood spots along the cement channel around Avenue 64 and sections of Highland Park. Let’s correct them so that this method can again be used to get sediment naturally out from behind Devils Gate dam and down toward the coast. Or let’s consider developing a sediment treatment or soil refinement plant near the Cornfields where sediment could be scooped up from the channel, processed, and taken by adjacent rail system to the Azusa sand and gravel yards. Let’s be innovative.</p>	<p>The Flood Control District actually already operates Devil’s Gate Reservoir in a manner that uses water flows to transport sediment through the dam. Section 3.3.3 now discusses that. Furthermore, the Flood Control District is looking at opportunities to use sediment beneficially.</p>

Commenter	Comment	Response
Joyce Dillard	<p>The numbers and/or illustrations do not match. Table 4-1 does not always match the listings in other tables. There appears to be flawed available capacity. [Attached to the comments was an analysis based on the information in Figure ES-1 and Tables 2-1, 2-3, and 4-1]</p>	<p>The Flood Control District has reviewed the specified figure and tables along with the analysis provided by the commenter.</p> <ul style="list-style-type: none"> • Figure ES-1 and Table 2-3: A note has been added to Figure ES-1 to explain that due to rounding, the Active SPS Remaining Capacities shown in the figure do not exactly match the values presented in Table 2-3. • Table 2-1: Columns in Table 2-1 have rearranged and brief explanations of the calculations are now provided below the table. • Table 4-1: The values in the table were revised as follows. The majority of the Total Historical Sediment Accumulation and Total Historical Sediment Removal values were rounded to the closest 0.1 million cubic yards (MCY). For values less than 0.1 MCY, the values were rounded to one significant figure. The table now shows the quantity of sediment.
	<p>There is no reference to atmospheric river analysis for flood planning, current and any historical data.</p>	<p>The focus of the Sediment Management Strategic Plan is sediment management, not flood planning. The study of the movement of water vapor in the atmosphere, including through atmospheric rivers, is beyond the scope of the Strategic Plan. Therefore, atmospheric rivers are not mentioned in the Strategic Plan.</p>
	<p>There is no air quality analysis or odor analysis.</p>	<p>Sections 6 to 10 include discussion of the impacts the alternatives would have on air quality. The potential for odors is mentioned for several alternatives discussed in Sections 6 to 8.</p>
	<p>Why was there no outreach to the Sunshine Canyon Landfill oversight groups?</p>	<p>In early 2011, when development of the Strategic Plan began, members of approximately 50 agencies and organizations believed to be able to provide comprehensive and regional input for external stakeholders were invited to participate in the Strategic Plan Stakeholder Task Force. At that time, the Flood Control District was not aware of the Sunshine Canyon Landfill oversight groups, but the Flood Control District consulted with the landfill itself. In the future, as specific sediment management projects are planned, there will opportunities for additional stakeholder involvement. If plans for one of the specific projects ends up involving sediment deliveries to Sunshine Canyon Landfill, the Flood Control District will outreach to Sunshine Canyon Landfill and other stakeholders will have the opportunity to comment then.</p>
	<p>Beneficial uses are not clear.</p>	<p>Section 6 has been revised to more clearly present the beneficial uses discussed in the Strategic Plan. Section 6.5 now discusses the use of sediment in beach nourishment, in the aggregate and other industries, as daily cover at solid waste landfills, as fill at pits, for wetland restoration, for replenishment of sediment-poor waterways, and for replenishment of reefs.</p>
	<p>Since the infrastructure is aging, what capital improvements or capacity expansion is needed?</p>	<p>Determination of capital improvement projects that would expand the capacity of the Flood Control District’s facilities is beyond the scope of the Strategic Plan. The need for capital improvement projects is evaluated through separate efforts.</p>
	<p>The Strategic Plan does not consider the impact of overweight trucks on road conditions, broken sewers and water mains, heavy traffic, and diesel fuel on air quality.</p>	<p>Selection of trucking routes would consider any vehicle weight restrictions on streets. Adhering with weight restrictions should prevent broken sewers and water mains due to overweight vehicles. Sections 6 to 10 discuss the impact trucks would have on traffic and air quality.</p>

Commenter	Comment	Response
Joyce Dillard	<p>Section 5.1.2 states that “While the number of debris basins maintained by the Flood Control District may increase as a result of development during the 20-year planning period, this is expected to only have minimal impact on the quantity of sediment needing to be managed because new development will likely only occur in areas of low debris potential. Therefore, the 20-year planning quantities were not prorated to reflect a potential increase due to future development.” How can this be assumed when density is part of the Southern California Association of Governments and municipal process, even in hillside/mountain areas? There needs to be some backup to this statement.</p>	<p>As indicated in the statement, the assumption that development will only have a minimal impact on the quantity of sediment needing to be managed is based on the expectation that new development will likely occur in areas of low debris potential. This goes back to information provided in Section 2.1, which discussed the Flood Control District’s three flood maintenance areas and the potential for construction of new debris basins within each area. In the case that such assumptions are wrong, the impact of such error is not significant. If the new debris basins resulted in a 10 percent increase in the amount of sediment needing to be managed from the debris basins, that would mean approximately 10.6 million cubic yards of sediment would need to be managed in relation to the debris basins, as opposed the Strategic Plan’s 9.6 million cubic yards. If the new debris basins resulted in a 25 percent increase, it would mean 12 million cubic yards as opposed 9.6 million cubic yards. Adding 1 million cubic yards or 2.4 million cubic yards to the 67.5 million cubic yard planning quantity would not have a great impact on the discussion of alternatives in the Strategic Plan.</p>
	<p>How will the alluvial fan research at the California State University, San Bernardino be addressed by the Strategic Plan?</p>	<p>The Flood Control District is an on-going partner in the Alluvial Fan Task Force led by Department of Water Resources and the California State University, San Bernardino. While both the Alluvial Fan Task Force and this Sediment Management Strategic Plan are concerned with the risk presented by floods, their goals are different. The Alluvial Fan Task Force was mostly concerned with the planning of new developments on alluvial fans. The Sediment Management Strategic Plan is concerned with the maintenance of existing facilities that help manage flood risk for existing communities downstream of those facilities.</p>
	<p>Effects on habitat are underplayed in this document.</p>	<p>The Strategic Plan discusses potential impacts on habitat in a general sense under each alternative’s Environmental Impacts discussion. More detailed analysis of habitat impacts will be conducted during the planning of specific sediment management projects.</p>
	<p>What is the projected budget for this Strategic Plan? Is there sufficient funding available or is more needed?</p>	<p>The Strategic Plan consists of an overview of alternatives for managing sediment for the next 20 years. While Section 11 presents a number of sediment management alternatives along with each alternative’s order of magnitude estimated cost, at this time, no decisions have been made about which alternatives will be employed to manage the sediment at the various facilities. As discussed in the Executive Summary and Section 11, more analysis is needed prior to choosing specific alternatives. Considering all the alternatives provided in Section 11, just at the reservoirs, managing sediment between 2012 to 2032 could cost \$500 million to \$1 billion.</p>

Commenter	Comment	Response
Joyce Dillard	<p>The Strategic Plan is just a sediment removal plan, heavy on trucking, lean in flood management planning, and way too expensive to be taxpayer financed and realized.</p>	<p>The focus of the Sediment Management Strategic Plan is sediment management, which is preformed to maintain the proper functionality of the reservoirs and debris basins maintained by the Flood Control District. Reservoirs and debris basins play a major role in the management of flood risk. Therefore, this Strategic Plan is directly connected with flood risk management. Additionally, the reservoirs play a major role in our region’s ability to capture and use storm runoff to recharge local groundwater aquifers. The Strategic Plan provides an overview of alternatives for managing sediment for the next 20 years. A number of sediment transport alternatives are discussed in Sections 6 to 11. In addition to trucking, the sediment management alternatives presented in Section 11 include transport alternatives such as sluicing, conveyor belts, and slurry pipelines. The costs presented in the Strategic Plan are order of magnitude 20-year cost estimates. Sediment management is indeed a high cost necessity for the region. However, if the sediment that erodes from the highly-erosive San Gabriel Mountains and other mountains/hills in the regions is not managed, the quality of life in the region would be jeopardized. Flood risk would not be able to be managed as it has been for the last 75 years or so. Furthermore, the region’s ability to capture and use stormwater would be diminished.</p>
	<p>The Strategic Plan considers the feasibility of alternatives under perfect conditions. It does not consider major weather events or fires.</p>	<p>Section 4 summarizes historical sediment deposition at the reservoirs and debris basins and removal from the facilities. The historical records include the effects of heavy rains and fires, since both were experienced during the period covered by the records. Section 5 discusses the calculation of the planning quantities. Because the calculation of the planning quantities employed the historical records, the planning quantities consider major weather events or fires, at least to the extent they occurred during the period covered by the records.</p>
	<p>Transporting sediment by rail would have air quality impacts similar to transporting it by diesel trucks.</p>	<p>Section 6.4.5 indicates transporting sediment by rail was determined to be an infeasible sediment transport alternative given the limited implementability and performance along with other factors.</p>
	<p>The Strategic Plan does not address relocation of wildlife, quarantine periods, permitting, nesting patterns, and plants. This aspect is part of overall watershed health and should not be ignored.</p>	<p>Due to the planning-level nature of the Strategic Plan, impacts on habitat are discussed in general terms in Sections 6 through 10. Environmental regulatory permits are mentioned under the discussion of implementability. More detailed analysis will be conducted during the planning of specific sediment management projects.</p>
	<p>Water conservation measures are absent from the Strategic Plan, yet the focus for the Integrated Regional Water Management Planning is for water conservation for water supply as well as water quality.</p>	<p>This Strategic Plan is an effort that is separate from the Integrated Regional Water Management Plan program. However, due to the relationship between sediment accumulation and capacity for water storage in reservoirs, the sediment management alternatives presented in Strategic Plan are indeed associated with water conservation. The impacts the various sediment management alternatives would have on water quality are discussed in general terms in Sections 6 to 10.</p>
	<p>Monitoring is not discussed.</p>	<p>Due to the unique aspects of each site, each sediment management project will require different monitoring. The Flood Control District will provide the appropriate and necessary monitoring including monitoring needed to comply with requirements established by the regulators in connections with permits.</p>

Commenter	Comment	Response
Joyce Dillard	<p>There is no consideration of the capacity or lifetime of landfills, other than the limitations of Scholl Canyon Landfill. There is no analysis of landfill projections based on density development, with an emphasis on sports stadiums and hotels.</p>	<p>Section 6.5.1 explains that some solid waste landfills employ dirt to cover daily solid waste deposits. The use of sediment at landfills for daily cover purposes would not take away capacity reserved for solid waste, but rather substitute or augment the source(s) where dirt is obtained for daily cover purposes. Therefore, the Strategic Plan is only concerned with the years during which that opportunity is available. Section 6.5.1.2 has been revised to indicate that per the Sunshine Canyon Landfill’s website, the landfill is anticipated to remain open until 2037, given current disposal rates. Based on information provided by Scholl Canyon Landfill’s operator, Section 6.5.1.3 now indicates closure of Scholl Canyon Landfill is scheduled for 2032. Therefore, the alternative to beneficially use sediment for daily cover purposes at Sunshine Canyon and Scholl Canyon Landfills appears to be an available opportunity for the entire period covered by the Strategic Plan, that is, 2012 to 2032. Evaluating the capacity remaining at landfills is outside the authorities of the Flood Control District. As a result, the estimated closure years were obtained from the landfill operators, either through the landfill website or communication with the operator.</p>
	<p>What should be anticipated as to the near-term and long-term need?</p>	<p>As indicated in the Executive Summary, the Strategic Plan’s total 20-year planning quantity amounts to 67.5 million cubic yards. Section 5 details how the planning quantity was calculated and indicates that the total planning quantity includes the projected 20-year sediment accumulation at all the reservoirs and debris basins as well as sediment already in storage at Big Tujunga, Cogswell, Devil’s Gate, and Pacoima Reservoirs planned for removal during the next few years. No near-term quantities of sediment to be removed from the debris basins can be given. As discussed in Section 4, sediment is removed from debris basins when a certain threshold is met. The time it takes for sediment in a debris basin to reach that threshold depends upon natural and unpredictable occurrences associated with weather and fires .</p>
	<p>Toxic sediment will be transported out of state. Please explain your strategy.</p>	<p>The Strategic Plan does not make such a statement nor address toxics. No toxics are anticipated. However, if determined to be present, the Flood Control District will follow applicable disposal requirements.</p>
	<p>It does not appear you have incorporated the LA Regional Dredged Material Management Plan by the US Army Corps of Engineers and its impact on your plan.</p>	<p>The Los Angeles County Regional Dredged Material Management Plan prepared by the U.S. Army Corps of Engineers Los Angeles District relates to the management of contaminated sediment that has been dredged, not the management of sediment from largely natural watershed, which is the type of sediment that reaches the Flood Control District’s reservoirs and debris basins and is the focus of this Strategic Plan.</p>
	<p>The Strategic Plan does not explore wetlands mitigation banking.</p>	<p>Wetlands mitigation banking and any other forms of mitigation are issues that will be considered during the development of specific sediment management projects if necessary.</p>

Appendix F – Stakeholder Comments and Responses

Commenter	Comment	Response
Rick Grubb	<p>Between 1940 and 1969, “sluicing” was the only method used to remove sediment from Big Tujunga Reservoir. Arroyo Toads flourished here during that period. Thanks to changes to the dam and operational methods, Arroyo Toads have since been (nearly) extirpated from Sunland due to the habitat loss of sandy rills and sand bars they need within the river channels to survive. The high water flows from Big Tujunga Dam have scoured the habitat in the river bed. Removal of sediment via truck/other means is depriving the river of the material needed to naturally replenish the riverbed. Please explain how the sediment removal 20 year plan overall, and the sediment plans for the Big Tujunga Wash in particular, will address the recovery of Arroyo Toads to Sunland and other riverbeds similarly impacted by LACFCD dam high flows and subsequent sediment removal activity over the next 20 year period.</p>	<p>Once the upcoming Big Tujunga Reservoir Sediment Removal Project is completed, the Flood Control District hopes to operate Big Tujunga Reservoir to pass some sediment flows through the dam and to the downstream river reaches when possible. Natural high flows from the canyon will still occasionally scour the wash as they would if the dam had never been constructed.</p>
John Holmes	<p>Any alternative that exposes sediment to the atmosphere is unconscionable. The only humane sediment removal project from Pacoima Reservoir is to move sediment to Lopez Flood Control Basin through an enclosed pipe, then from there remove the sediment immediate via truck to the Sun Valley Pits. Transporting sediment via an open conveyor from Pacoima Reservoir to the canyons downstream of the dam or to Lopez Flood Control Basin will expose sediment to the air and so will the creation of a new sediment placement site. Updraft air will bring incredible amounts of sediment fine particles high into the air. Air will spread the airborne particles through the San Fernando Valley and into the City of Los Angeles.</p>	<p>Alternatives for the upcoming Pacoima Reservoir Sediment Removal project will be analyzed in detail as the specific project is planned.</p>
Susette Horspool	<p>The County of Los Angeles Apollo Community Regional Park consists of 26 acres of 3 reclamation ponds stocked with fish and islands that attract waterfowl. Around the periphery is a path with grassy areas and small playgrounds for young children. All of it is man-made. It is entirely possible to build such an environment in Hahamongna Park north of Devil’s Gate Dam. I suggest that you use the sediment from Devil's Gate Dam to build wildlife islands in the center of the floodplain. The resulting lake could be used for water reclamation and/or as a detention basin stocked with grasses and fish. Benefits include the following: (1) Saved transportation costs and neighborhood disruption. (2) Utilization of the sediment as the valuable resource it is. With each year of sediment removal the island/s could be expanded or heightened. (3) Enhancement of a recharge point for the aquifer and possibly a reclamation location for sewage - the rich water would further the growth of water plants and the introduction of native fish and frogs. (4) Creation of a unique city park that helps reduce crime - The US Forest Service found that creating nature areas with trees seems to help deter crime. The “Man-Made Islands Create Habitat” article at http://news.minnesota.publicradio.org addresses an end-result situation similar to Hahamongna, with a solution that we could easily and cost effectively implement - using sediment to build wildlife islands.</p>	<p>On September 2011, the Flood Control District issued a Notice of Preparation of the Environmental Impact Report (EIR) for the Devil’s Gate Reservoir Sediment Removal and Management Project. The EIR for the subject project will evaluate several options for removing sediment from the reservoir. The draft EIR is expected to be completed in March 2013.</p>

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Commenter	Comment	Response
Ann Job	Stakeholders pay taxes that provide the budget monies for Sediment Removal Projects. Why should stakeholders' monies be used to negatively impact their lives?! The decision on which alternative (or combination of alternatives) the LA County Department of Public Works will employ should not be based on cost alone. In fact, stakeholders would argue that the financial cost should be far less important than the cost of the stakeholders' air quality, health issues, viewshed, home values and quality of life.	People living within the boundaries of the Flood Control District pay a flood control assessment to provide for the management of flood risk and water conservation. The Flood Control District has an obligation to spend the money as efficiently as possible. As indicated in the Executive Summary of the Strategic Plan, during the development of specific sediment management projects, opportunities to provide input will be given. Furthermore, specific sediment management projects that will result in significant environmental impacts will also be subject to environmental review under the California Environmental Quality Act, which will provide additional opportunities for public involvement during project evaluation.
Roger Klemm	It is time to realize that dumps are by nature finite, sediment flow is for all intents infinite, and we need to move beyond a finite planning horizon. Summarily rejecting from serious consideration those alternatives which offer the capacity to handle non-ending sediment flows just because they are logistically challenging is short-sighted. Please reconsider ways to convey sediment to the beaches - ultimately we will all benefit! And releasing a little sediment here and there can help habitat in some watersheds, too!	The Flood Control District will analyze the beach nourishment alternative further; this is now indicated in Section 6.5.1. Sediment flushing (previously referred to as flow assisted sediment transport) and sluicing, two methods that involve the release of sediment-laden flows, are discussed in Sections 6.3.3, 6.3.4, and 6.4.1. Section 6.3.3 recommends conducting a sediment flushing pilot study.
C. McDougald	Does the County have any insurance that would cover health or property values impacts due to having dump sites located so close to homes? Have potential lawsuits been factored into your cost analysis so you can better determine which method is most cost effective? We shall fight this action and drag this through the courts if needed. Have you factored in lower values and less revenue to the county from property taxes as a result of dump sites in local neighborhoods?	Sediment unavoidably accumulates within the reservoirs and debris basins maintained by the Flood Control District. If this material is not periodically removed, downstream residents and property would be at risk for flooding and debris flows at potentially catastrophic costs. While no method of managing the sediment is without impacts, this Strategic Plan is part of the Flood Control District's efforts minimize impacts by exploring new ideas and incorporating lessons that have been learned from past projects.
Orville Magoon	The Strategic Plan appears to have failed to consider the impact of structures and other works on the supply of sediments to coasts and / shores. As you know, loss of sediment to coasts and / or shores may result in serious erosion and may further result in litigation. I suggest that you consider these impacts.	Please see the Los Angeles County Coastal Regional Management Plan dated August 2012 (http://www.dbw.ca.gov/csmw/crsmp.aspx), which was prepared by the U.S. Army Corps of Engineers and the California Coastal Sediment Management Workgroup. The coastal plan discusses how most of the beaches in Los Angeles County were never nourished by the Los Angeles, San Gabriel, or Santa Clara Rivers. Section 6.5.1 of the Flood Control District's Sediment Management Strategic Plan has been expanded to discuss the issue of beaches in more detail. In any case, the Flood Control District will analyze the beach nourishment alternative further.

Commenter	Comment	Response
Lori Paul	<p>The Strategic Plan is so far-reaching in scope and so greatly affects parkland and natural resources of this region as well as flood safety and water supply, that a substantially greater outreach effort is necessary to experts in several fields and academic disciplines than has occurred thus far in the process. There are many outside of the usual participants to date who would be able to provide valuable input and viable alternatives for innovative sediment and flood control management. During the extended review period, please work to extend outreach re: the current DRAFT SMSP. Greater outreach is not something those of us who volunteer our personal time can assure by ourselves. It requires active County participation and open-minded support.</p>	<p>In early 2011, when development of the Strategic Plan began, members of approximately 50 agencies and organizations believed to be able to provide comprehensive and regional input for external stakeholders were invited to participate in the Strategic Plan Stakeholder Task Force. Additionally, with time, the Stakeholder Task Force grew and its meetings were also attended by numerous members of the public, which were welcome to attend. The Stakeholder Task Force Invitee List and attendance to Stakeholder Task Force meetings are located in the Appendix of the Strategic Plan. In late April (2012), a press release went out notifying people of the open houses that were held in May for the draft Strategic Plan. In June 2012, staff gave presentations about the draft plan to the five Integrated Regional Water Management Plan (IRWMP) Subregional Steering Committees, the IRWMP Leadership Committee, and the Upper San Gabriel Valley Municipal Water District.</p>
	<p>Greater commitment is needed on the part of the County of Los Angeles Department of Public Works to implement a plan that will not require the ongoing, unsustainable destruction of local canyons and remnant natural habitat, such as the lost Arcadia Oak Woodland and in the remaining chaparral and oaks in the upper zone of the Maple Canyon sediment fill. The best way to accomplish this is to simply take these imperiled places off the table. Period. Once canyons and other natural sites are no longer available for destruction, the sediment management problem can be put in proper perspective. It becomes clear that sediment management and associated flood control extends well beyond the 20 years currently targeted by the draft Strategic Plan.</p>	<p>Section 6.5.5.2 indicates that while it is understood that there are environmental concerns associated with the development of new sediment placement sites, this alternative is still being considered because a new sediment placement site and transportation of sediment to it could have fewer impacts than placing and transporting sediment to another placement alternative that is farther away. Nevertheless, Sections 6 through 11 include a very limited number of alternatives that involve placement of sediment in a new sediment placement site. The Long-Term Vision discussed in the Executive Summary and Section 11, will consider a planning period greater than the 20-year planning period of the Strategic Plan.</p>
	<p>If current methods prevail, we will not only lose more wildlands, critical habitat, and recreational parkland adjacent to towns and cities, we will indeed run out of physical places to dump sediments, unless one wishes to do so on top of local neighborhoods. The mountains surrounding us are never going to stop releasing flood waters, sediment and rock into historic water courses and flood plains. Therefore, the classification of such ongoing, ceaseless sediment accumulation as "waste" must change.</p>	<p>The Strategic Plan discusses various beneficial uses for the sediment. Section 6 has been revised to more clearly present that discussion. Section 6.5 now discusses the use of sediment in beach nourishment, in the aggregate and other industries, as daily cover at solid waste landfills, as fill at pits, for wetland restoration, for replenishment of sediment-poor waterways, and for replenishment of reefs.</p>

Commenter	Comment	Response
Lori Paul	<p>For the record, I am disappointed that the Sediment Management Strategic Plan Team is no longer working in close partnership with the U.S. Forest Service, particularly in the vicinity of Big Tujunga Reservoir where there is great concern regarding the endangered Santa Ana sucker fish (<i>Catostomus santaanae</i>) in Big Tujunga Creek, riparian habitat and recreational lands. Close cooperation with this federal agency is essential to the success of any sediment removal project that impacts the National Forest.</p>	<p>The Flood Control District does work closely with the U.S. Forest Service. The fact that the U.S. Forest Service did not conduct the public scoping required for the project by the National Environmental Protection during a Flood Control District meeting for the Strategic Plan was not because the Flood Control District had stopped working with the U.S. Forest Service. Both agencies agreed that the proper procedure was for the U.S. Forest Service to conduct a meeting focused entirely on public scoping for the Big Tujunga Reservoir Removal Project. The Flood Control District attended the public scoping meeting held by the U.S. Forest Service in July 2012. The Flood Control District continues to work closely with the U.S. Forest Service on that project as well as other projects.</p>
Johnathan Perisho	<p>While one of the objectives of the Strategic Plan is to identify ways to us sediment as a resource, the Strategic Plan treats sediment as a waste product. The Strategic Plan is essentially concerned with doing what has always been done. Looking for new places to dump sediment is not new strategy. Dumping sediment in a landfill is not radically different from dumping sediment on a pristine location. Any landfill in question would have once been pristine and new landfills will also cover over what was at some time pristine.</p>	<p>Various beneficial use and placement alternatives are discussed in the Strategic Plan. Section 6 has been revised to more clearly present the beneficial uses discussed in the Strategic Plan. Section 6.5 now discusses the use of sediment in beach nourishment, in the aggregate and other industries, as daily cover at solid waste landfills, as fill at pits, for wetland restoration, for replenishment of sediment-poor waterways, and for replenishment of reefs. The alternative involving the landfills consists of using the sediment to substitute or augment the source(s) where dirt is obtained from for daily cover purposes. Section 6.5.2.3 discusses a proposed sediment processing contract that could allow for private companies to 1) process the sediment and obtain aggregate or other materials from it or 2) use the sediment to reclaim their quarries.</p>
	<p>Beneficial use of sediment in the current system means manually scouring, transporting, and dumping the sediment somewhere. Although every positive impact helps, the potential for beneficial use is likely insignificant relative to the 67.5-million-cubic-yard planning quantity.</p>	<p>As discussed in the response to the previous comment, the Strategic Plan discusses various beneficial use alternatives. The Flood Control District will continue to look into the feasibility of beneficially using the sediment.</p>
	<p>Riparian habitats dependent on fluvial process are not functioning; they are threatened with abatement and decline even with heavy civic expenditures. The existing system fundamentally maintains ongoing loss of key riparian habitat both at debris points and downstream habitats unable to sustain themselves without flood regimes and sedimentation. The existing system also results in a need to manage invasive species. Where natural systems function, adapted habitat self maintains.</p>	<p>The Long-Term Vision discussed in the Executive Summary and Section 11, will consider stream restoration.</p>
	<p>At what point does creating easements for water flows to carry sediment to the ocean become as expensive as trucking all of the sediment away with all of those associated costs?</p>	<p>Regional cooperation would be needed in order for existing commercial and residential properties along the channels to be acquired, vacated, and demolished to create the wider channels so that the channels could carry water flows with significant amounts of sediment.</p>

Commenter	Comment	Response
Johnathan Perisho	<p>The lack of lasting solutions for ongoing problems must be recognized. We need a long-term plan that goes well beyond 20 years. Different questions can be considered by models for 100-year periods and longer. What is the potential, what are the benefits, and what are the costs of daylighting streams and of buyback programs to increase the easements on which the rivers and other water ways flow? How much land would be necessary to replicate largely self-maintaining fluvial processes in key channels? How could these systems be implemented in phases that will be fiscally responsible beyond a 20-year plan? What can slow the need for sediment management interventions? Could smaller debris basins be emptied as shallow layers in large dedicated conveyance channels allowed to naturally scour by floods? Could this reduce costs of sediment management? Please broaden the scope of study and commit to making comprehensive long-term models, assessments, and plans.</p>	<p>The Long-Term Vision discussed in the Executive Summary and in Section 11 will have a broader focus and will consider issues on a time-scale longer than the 20-year planning period of the Strategic Plan. Questions such as the ones specified in the comment could be analyzed during the Long-Term Vision.</p>
	<p>Beaches are eroding. The existing system leads to maintenance of the beaches to address erosion.</p>	<p>Please see the Los Angeles County Coastal Regional Management Plan dated August 2012 (http://www.dbw.ca.gov/csmw/crsmp.aspx), which was prepared by the U.S. Army Corps of Engineers and the California Coastal Sediment Management Workgroup. The plan discusses how most of the beaches in Los Angeles County were created with fill rather than by the Los Angeles, San Gabriel, or Santa Clara Rivers.</p> <p>Section 6.5.1 of the Flood Control District's Sediment Management Strategic Plan has been expanded to discuss the issue of beaches in more detail. The Flood Control District will analyze the beach nourishment alternative further.</p>
	<p>Extreme events, such as wildfires, can overload the system over very short intervals.</p>	<p>The reservoirs and debris basins are designed to accommodate conditions greater than those present under normal conditions. For example, the majority of the reservoirs were designed with a capacity great enough to allow the capture of twice the great amount of sediment that would be produced by the specific watershed given all the following two conditions had been met: (1) the watershed had been burned four years before, and (2) the watershed was fully saturated when it experienced 24 hours of the type of rain that would be experienced during a 50-year rain event.</p>

Appendix F – Stakeholder Comments and Responses

Commenter	Comment	Response
Stan Smith	The Pacoima Reservoir Sediment Removal Project will affect the local community of Sylmar dramatically. Are estimates being calculated measuring the adverse business, social, and environmental effects that may accompany the Pacoima Reservoir Sediment Removal Project?	The upcoming Pacoima Reservoir Sediment Removal Project is one of the specific sediment management projects alluded to in the Executive Summary of the Strategic Plan. The comments received specific to the Pacoima Reservoir Sediment Removal Project were forwarded to the appropriate team; the comments will be considered during the planning of the Pacoima Reservoir Sediment Removal Project. Analysis and determination of business impacts is beyond the scope of the Strategic Plan. Environmental and social impacts resulting from the sediment management alternatives considered for Pacoima Reservoir as part of the Strategic Plan are discussed in Section 8.3.
	It has come to light that a small number of landholders with property directly behind Pacoima Reservoir may hold sway over which alternative is most economically feasible. Has this issue been brought to light in any of the literature presented on the sediment removal plan?	Most of the land directly behind Pacoima Reservoir is owned by the U.S. Government. The U.S. Government’s ownership of the land does not influence the economic feasibility of the sediment management alternatives that would involve accessing the reservoir or the sediment in it from Little Tujunga Canyon Road, the major road located at the back of the reservoir. The impacts associated with those alternatives and all alternatives considered in the Strategic Plan for Pacoima Reservoir are discussed in Section 8.3.
	For Pacoima Reservoir, the costs of constructing and operating a conveyor belt system and slurry pipeline may appear to be significantly less than the road construction and trucking expenses detailed in Pacoima Reservoir’s Sediment Management Alternative 1 (Sections 8.3.7.1 and 11.3). However, have safety and risk concerns associated with each alternative also been included in the Strategic Plan’s cost estimates?	As stated in Section 6.1, the costs included in the plan are order of magnitude costs and are based on historic sediment removal projects completed by the Flood Control District, discussion with industry, and additional research. The discussion of alternatives and impacts in Sections 6, 8, and 11 of the Strategic Plan relative to Pacoima Reservoir does not constitute the detailed analysis that will need to be completed for the Pacoima Reservoir Sediment Removal Project. Said detailed analysis will include a more detailed analysis of cost.

Commenter	Comment	Response
Stan Smith	In Section 11.2.2, the cost estimates for the various sediment management alternatives for Pacoima Reservoir suggest that the cost of alternative 1 (trucking all the sediment to the pits in Sun Valley) is nearly 2.5 times greater than any of the other alternatives. Interestingly, the cost estimates do not consider the costs associated with loss of commerce, cultural values, etc. I am moved to ask the following questions: Is 150 million the price of the lifestyle of a few thousand mostly working class residents in Sylmar? What do you think would happen if a project of this type, and with the accompanying alternatives to choose from, was proposed to occur in the middle of a community like La Cañada Flintridge or La Crescenta (neighboring communities to Sylmar)?	Please see the response to the previous comment.
Leona "Nobody" Swan	The ‘best’ method to manage sediment at Big Tujunga Reservoir is to release the sand and debris buildup around the dam and let it travel downstream as if there was no dam! The proposed plan does not consider the best method to address the sediment impediment problem. The Sunland Arroyo toads need persistent sandy rills and sandbars for continued survival. Drastic actions and “emergency” procedures are costly and do not provide a best solution. Ask “What would Nature do?” Then try to do the Nature thing. The beaches would also benefit from the release of sediment.	See the response above. For more information about the region’s beaches, see Section 6.5.1.

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Commenter	Comment	Response
Various*	It is understood that the upcoming Pacoima Reservoir Sediment Removal Project must be completed in order to manage the risk of floods and to provide for water conservation for the region. The community near Pacoima Reservoir is highly residential and includes the elderly and children. Please do the project in a way that will have less impact and won't disrupt our daily lives.	The upcoming Pacoima Reservoir Sediment Removal Project is one of the specific sediment management projects alluded to in the Executive Summary of the Strategic Plan. The discussion of alternatives and impacts in Sections 6, 8, and 11 of the Strategic Plan relative to Pacoima Reservoir does not constitute the detailed analysis that will need to be completed for the Pacoima Reservoir Sediment Removal Project. The comments received specific to the Pacoima Reservoir Sediment Removal Project were forwarded to the appropriate team within the Flood Control District; the comments will be considered during the planning of the Pacoima Reservoir Sediment Removal Project. Alternatives for the upcoming project and associated potential impacts will be analyzed in more detail in accordance with the requirements of the California Environmental Protection Act. As required by the act, an environmental document that will be prepared for the upcoming Pacoima Reservoir Sediment Removal Project. Stakeholders will have opportunities to provide input through the California Environmental Protection Act process for the upcoming project. Notifications about meetings in relation to the California Environmental Quality Act process for the Pacoima Reservoir Sediment Removal Project will be sent out in advance of the meetings.
	The Department of Public Works needs to consider all the issues associated with sediment management operations at Pacoima Reservoir and make decisions based on the input of the stakeholders as their needs and lives should be the most important consideration.	
	People in the community near Pacoima Reservoir suffer from allergies and asthma. Pets have been affected too. We are afraid sediment management operations related to Pacoima Reservoir could make air quality conditions worse. Do not employ methods that will introduce dust into the air or that will impact air quality.	
	Pacoima Canyon experiences very high winds. Unhealthy air blowing into the San Fernando Valley for 25 years is not a great plan.	
	Do not use the Lopez Flood Control Basin for sediment storage. It will affect air quality and noise levels.	
	Don't use Maclay Street or Foothill Boulevard. That would impact traffic, noise, and pollution levels. Traffic is already bad.	
	Use the Strategic Plan's Sediment Management Alternatives 1 for Pacoima Reservoir / Use Little Tujunga Canyon Road for transporting/trucking the sediment. Using Little Tujunga Canyon Road has less impact on pollution, noise, neighborhoods, health, habitat, and water quality.	
	No more dirt dump sites in Sylmar - Sylmar already has May Sediment Placement Site, which is an environmental nightmare and a disaster for the many families who live near that dirt dump site. People have allergies and other respiratory problems. Very fine inert dust has built up on lawns, killing the grass. A dirt dump below Kagel Mountain will negatively affect the view and the natural beauty of the mountains will forever be impacted.	
	Find a less urban and more deserted location than Sylmar to dump sediment. We do not need more pollution and unsightly piles of rubble to deal with.	
	There is a big concern about impacts to home values as a result of the upcoming Pacoima Reservoir Sediment Removal Project.	
Why was such little notice given about all these plans for the upcoming Pacoima Reservoir Sediment Removal Project? Very little people seem to not know about this project. Why aren't more meetings being held? Please provide information about what actions to take to stop this decision.		

* **Commenters include:** Marat Akopian, Evelyn Alejo, Dionne Y. Ash, Jeff Bigman, Judy Hsieh Bigman, David A. Boysen, Emelinem19, Floree Evangelista, Carol Graham-Henke, Marty Guerrero, Ann Job, Denise Kaji, Orlando Lepe, Michael Lubliner, Lisa McDonald, C. McDougald, Elizabeth Mendez, Marilyn Narvaez, Ethel Carolina Ortez-Salazar, Armen Pashkam, Dennis M. Pikop, Cynthia Ramirez, Roberto Walter Salazar, Lanny Sandak, Kevin Tan, Cristy Torres, Dennis Urie, M. Carmen Maldonado Urie, Lourdes Uy, Marcelito Uy, and Darrell Vivian.

Commenter	Comment	Response
Various*	There are a lot of homes near Lopez Flood Control Basin. Why is it being considered as a storage area for sediment from Pacoima Reservoir?	<p>Because Lopez Flood Control Basin is downstream of Pacoima Reservoir, water and sediment-laden flows released from Pacoima Reservoir end up at Lopez Flood Control Basin. Downstream of Lopez Flood Control Basin, flows travel along the concrete-lined Pacoima Wash Channel. Sending sediment-laden flow waters down the concrete channel would create a number of issues, including scouring of the channel (which would in turn lead to additional maintenance) and impacts to groundwater recharge (due to losses in the infiltration rates of spreading facilities downstream). Lopez Flood Control Basin has the potential to provide sufficient capacity to capture sediment-laden flows from Pacoima Reservoir so that the sediment in the flows can be separated from the water, and thus prevent the previously mentioned issues. Additionally, Lopez Flood Control Basin is more accessible than the back of Pacoima Reservoir. For these reasons, Lopez Flood Control Basin is considered as a potential sediment storage location for sediment sluiced from the reservoir.</p> <p>Because of its capacity and accessibility, Lopez Flood Control Basin is also considered as a potential storage area for sediment dredged from the reservoir and transported via slurry pipeline to the basin and also for sediment excavated from the reservoir and transported by a conveyor belt to the basin.</p>
	Are there alternative plans or other areas besides Lopez Flood Control Basin that can be used for storing the sediment from Pacoima Reservoir?	Section 8.3 discusses the various alternatives that were considered for Pacoima Reservoir as part of this Strategic Plan. At this time no decisions have been made regarding which alternative will be employed to manage sediment at Pacoima Reservoir. Alternatives for the upcoming Pacoima Reservoir Sediment Removal Project will be analyzed in more detail as that specific project is planned.
	Is there alternative access from and to Pacoima Reservoir to spare Maclay Street from traffic/chaos resulting for a Pacoima Reservoir Sediment Removal project?	Currently, there is no access to the back of Pacoima Reservoir from Little Tujunga Canyon Road. However, Section 8.3.1.2 discusses the possibility of establishing access from Little Tujunga Canyon Road to the back of Pacoima Reservoir.
	Approximately when will work on the Pacoima Reservoir Sediment Removal Project start?	The Flood Control District intends to begin preparing an Environmental Impact Report (EIR) for the Pacoima Reservoir Sediment Removal Project in January 2013. The EIR process will better determine the actual start date of the project originally scheduled for summer of 2014. Additional Information about the project is available at dpw.lacounty.gov/lacfd/sediment/prj.aspx?prj=2 or by emailing reservoircleanouts@dpw.lacounty.gov .

* **Commenters include:** Marat Akopian, Evelyn Alejo, Dionne Y. Ash, Jeff Bigman, Judy Hsieh Bigman, David A. Boysen, Emelinem19, Floree Evangelista, Carol Graham-Henke, Marty Guerrero, Ann Job, Denise Kaji, Orlando Lepe, Michael Lubliner, Lisa McDonald, C. McDougald, Elizabeth Mendez, Marilyn Narvaez, Ethel Carolina Ortez-Salazar, Armen Pashkam, Dennis M. Pikop, Cynthia Ramirez, Roberto Walter Salazar, Lanny Sandak, Kevin Tan, Cristy Torres, Dennis Urie, M. Carmen Maldonado Urie, Lourdes Uy, Marcelito Uy, and Darrell Vivian.

Commenter	Comment	Response
Chris Ziegler	I have arrived at the conclusion that the overall cost to the taxpayer would be optimized via a partial renaturalization of the flood control channels. Keep debris basins, but restore water ways soft bottoms. Sluice sediment to the ocean. The dredging of shipping lanes is considerably lower impact than the current situation.	Sections 6.3.4 and 6.4.1 discuss sluicing in general terms. Sections 7 and 8 discuss sluicing in terms of specific larger-sized reservoirs. Among the impacts discussed are negative impacts to groundwater recharge and potential impacts on habitat. While sluicing is a component of several of the sediment management alternatives included in Section 11, more analysis is needed prior to choosing a specific alternative for the larger, more complicated reservoirs. The Long-Term Vision will look at opportunities to restore channels.
	Material from debris basins should be utilized to widen the multi-use paths adjacent the flood channels. The current 10 foot wide paths fall very short of being sufficient for bicyclist moving at 20+ miles per hour and pedestrians. I suspect that we need to widen paths to 25 feet at a minimum, leaving roughly 8 feet unpaved for runners that need a soft surface.	Flood Control District right of way is limited and may not be able to accommodate the multi-use path width specified in the comment. Additionally, some of the existing multi-use paths are located along flood channels consists of the channels levees of limited width.