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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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January 6, 2011

TO: Each Supervisor

FROM: Gail Farber *Gail Farber*
Director of Public Works

BOARD MOTION OF DECEMBER 7, 2010, AGENDA ITEM 57-B SANTA ANITA DAM RISER MODIFICATION AND RESERVOIR SEDIMENT REMOVAL PROJECT

As directed, please find attached the report on the environmental options explored for the Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project. We believe the filing of this report fulfills the requirements of your motion of December 7, 2010.

Construction of the approved project will commence on January 12, 2011.

If you have any questions regarding the report, please contact Mark Pestrella, Assistant Director, at (626) 458-4001.

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Attach.

cc: Chief Executive Office (Rita Robinson)
County Counsel
Executive Office

Board Office Executive Summary

Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project

As directed by the Board of Supervisors (Board) on December 7, 2010, the Los Angeles County Flood Control District (District) postponed for 30 days the start date of the Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project to report back to your Board on the environmental options explored for the project in order to meet sediment placement needs while minimizing impacts. The previously explored options are detailed in the certified Final Environmental Impact Report (EIR). A copy of the Executive Summary of the Certified EIR is included in this report as Attachment A.

The EIR was prepared and distributed according to the requirements of the California Environmental Quality Act and its implementing guidelines during an extensive two-year process including a formal public comment period. Throughout the process, the project and its alternatives were presented thoroughly, openly, and with considerable input from the local community. Comments from the community and others were reviewed and addressed during the EIR process. Your Board adopted the EIR and the environmentally superior alternative on June 9, 2009.

As you are aware, the approved project will remove accumulated sediment from behind the dam to avoid plugging and damaging the dam's valves, which are critical for safety, flood control, and water conservation. In fact, the project is so critical to the continued safe and effective operation of the dam that the State Department of Water Resources' Division of Safety of Dams (DSOD) has directed the Department of Public Works to "proceed without further delay" following several extensions granted while the EIR was completed and regulatory permits acquired. A copy of the DSOD letter is included in this report as Attachment B. A summary of the project purpose is included as Attachment C.

Any further delays to the approved project will result in increased risks to thousands of homes, businesses, and schools in the communities protected by the dam. Delays will

also severely impact water conservation efforts and the community water supply for the Cities of Sierra Madre and Arcadia. The District has received many letters from its water agency partners supporting the project and its ongoing efforts to maintain adequate capacities at its dams to ensure local sustainable water supplies. These letters are included in this report as Attachment D. A more detailed discussion of the risks and impacts of delay to the project is included as Attachment E.

The Santa Anita Sediment Placement Site (SPS) was purchased in the 1950s specifically for sediment disposal. For more than 50 years, it has served this function for the Santa Anita Dam and seven other flood control debris facilities in the vicinity. The site has a remaining ultimate sediment capacity of approximately 2.5 million cubic yards; however, the majority of the capacity requires native vegetation removal before it can be fully utilized. The annual use of the SPS is dependent upon the amount of sediment produced as a result of seasonal fires and storm intensities. The approved project will ensure continued adequate useable storage capacity at the site.

Subsequent to your Board directive to postpone the project's start and in recognition of the project's sensitivity, the District coordinated a public tour of the site and held a community meeting on December 16, 2010, to educate residents about the project and provide them with an opportunity to voice their concerns. A summary of those concerns together with suggestions and concerns transmitted in letters to Mayor Michael D. Antonovich and the Department of Public Works, along with District responses to them is included in this report as Attachment F.

It is our recommendation that the approved project, as noted in the certified EIR, represents the Environmentally Superior Alternative to address concerns for safety due to the dam's seismic deficiencies and to restore the reservoir's flood control and water conservation capacity while minimizing environmental impacts.

ES EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This Environmental Impact Report (EIR) has been prepared by the Los Angeles County Department of Public Works (LACDPW) to evaluate potential environmental effects that may result from the proposed Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project (proposed project). This EIR has been prepared in accordance with the California Environmental Quality Act of 1970 (CEQA), as amended (Cal. Pub. Res. Code, § 21000 *et seq.*), and implementing State CEQA Guidelines (Cal. Code Regs., Title 14, § 15000 *et seq.*).

The proposed project is subject to Section 404 of the Federal Water Pollution Control Act (Clean Water Act) for sediment removal and placement activities under the jurisdiction of the U.S. Army Corps of Engineers. As the federal lead agency, the U.S. Army Corps of Engineers is preparing an Environmental Assessment (EA) for this project under the National Environmental Policy Act (NEPA). The NEPA and CEQA processes are being undertaken concurrently for this project in separate environmental documents.

ES.2 PROJECT BACKGROUND

Construction of the Santa Anita Reservoir and Santa Anita Dam was completed in 1927. LACDPW owns and manages the dam, the reservoir, and the associated land south of the dam. The last complete drawdown of the reservoir occurred during the 1992-1993 storm season, when LACDPW performed a FAST (Flow-Assisted Sediment Transport) operation to minimize sediment accumulation behind the dam. The sediment deposited in the reservoir is from erosion that occurs from the mountainous areas above the reservoir. The purpose of the proposed project is to remove the sediment that has accumulated behind the dam since the last clean out and to construct a new riser on the low-level outlet of the dam.

The California Department of Water Resources, Division of Safety of Dams (DSOD), currently restricts long-term water storage in the reservoir behind Santa Anita Dam to ensure the facility's compliance with the agency's seismic stability requirements. Currently, the restriction limits the maximum reservoir pool to an elevation of 1,258 feet. A recent seismic analysis of Santa Anita Dam showed the safe long-term maximum reservoir level is at an elevation of 1,230 feet (El. 1,230 feet), or 28 feet below the current restricted reservoir level. Due to concerns regarding the dam's compliance with DSOD's seismic stability standards, DSOD has mandated a lower long-term maximum reservoir level of El. 1,230 feet, effective May 2009. In May 2009, DSOD will require that the dam's outlet works freely drain the reservoir to this elevation.

Currently, the sediment level in Santa Anita Reservoir is nearing El. 1,212 feet, which is hindering valve operation at the dam and will hinder the facility's ability to comply with DSOD's requirements for drawing down the reservoir to the restricted level after storms and during an emergency. Approximately

500,000 cubic yards of sediment removal from the reservoir is needed to minimize impacts to the valves and to ensure DSOD's requirements are met. LACDPW proposes to start the removal of the sediment in the summer of 2009.

Concurrent with the sediment removal activities, LACDPW also proposes modifying the riser on the dam's lowest outlet gate to allow water above El. 1,230 feet to freely pass through the dam, thus ensuring that DSOD's seismic requirements are met. To make use of the impounded water below El. 1,230 feet, when conditions allow, LACDPW may install additional slide gates on the existing risers for the valves.

An Initial Study was prepared for this project in June 2007. The Initial Study concluded that there was substantial evidence that the project may have a significant impact on the environment in the areas of aesthetics, air quality, biological resources, cultural resources, geology/soils, hydrology/water quality, noise, recreation, and transportation/traffic (see Appendix A). Based on the Initial Study, LACDPW determined that an Environmental Impact Report ("EIR") would be required for the project.

ES.3 PROPOSED PROJECT LOCATION AND SETTING

The proposed project is located on the border of the City of Arcadia, in the western San Gabriel Valley in Los Angeles County, approximately 15 miles northeast of downtown Los Angeles. The project area is located on both the City of Arcadia and U.S. Forest Service land, approximately 2.5 miles north of the 210 Foothill Freeway. Land uses adjacent to the project area include the Angeles National Forest to the north, the City of Arcadia Wilderness Park on the north, single-family residential uses to the west and south, and the City of Monrovia open space to the east. The Wilderness Park is a 120-acre nature preserve located below Big Santa Anita Canyon, which is owned and managed by the City of Arcadia. The Wilderness Park consists of a passive recreation area on 8.5 acres and the balance of the preserve remains in its natural state.

The project area includes the Santa Anita Reservoir, the Santa Anita Dam, the tunnel from the reservoir to the downstream access road along the streambed, and Santa Anita Headworks, Santa Anita debris basin, and the Santa Anita Sediment Placement Site (SPS). The Santa Anita Reservoir, the streamside access road, and the Headworks are located in the Angeles National Forest above the City of Arcadia. The Wilderness Park, debris basin, and SPS are all located below the reservoir in the City of Arcadia.

The Santa Anita SPS is comprised of three sections (the Upper, Middle, and Lower SPS areas). The Upper SPS area, located in the northerly end of the SPS, is an already disturbed area, but does not have sufficient capacity for the anticipated sediment to be removed from the reservoir. The Middle SPS area has always been planned for sediment storage use; apart from existing access roads it is relatively undisturbed and characterized by native vegetation because it has not been used for previous sediment storage activities. The Lower SPS area, located in the southerly end of the SPS areas, is a previously disturbed area that contains sediment from prior cleanouts of the reservoir, debris basin and other local

flood protection facilities; it also does not have sufficient capacity to accommodate the expected volume of sediment from the reservoir.

ES.4 PROPOSED PROJECT SUMMARY

The proposed project consists of draining the Santa Anita Reservoir, removing sediment and debris from the reservoir by dry excavation, transporting the sediment from the reservoir via conveyor belt system, and placing it in the Santa Anita SPS. The sediment transport route extends approximately 1.5 miles from the reservoir on the north to the sediment placement site on the south. At the completion of the proposed project, no standard maintenance changes would occur at any of the areas that are used during the construction activities of the project, except at the Lower SPS, which would be closed out to future sediment placement activities after the project.

DAM OUTLET MODIFICATION

The proposed project includes improvements to the Santa Anita Dam, which would involve modifications to the dam's inlet/outlet works, including the construction of a new riser. In order to comply with DSOD's seismic stability standards, the riser modification would be done concurrently with the sediment removal project. The bottom elevation at the entrance to the low-level outlet is 1,179.5 feet. There is no existing riser on this outlet. Soundings revealed that the sediment elevation at the face of the dam is at approximately 1,212 feet.

The dam outlet modification component consists of constructing a concrete riser on the lowest outlet gate of the dam to El. 1,230 feet. The existing trash rack in front of this gate would be moved to the outside of the new riser and the existing gate would remain in place. An additional gate would be installed on the outside of the new riser. Additional slide gates may be installed on the new riser and/or the existing risers for Valve Nos. 2, 3, and 4, to allow for water releases below the new restricted reservoir level. Installation of the new riser would allow water above El. 1,230 feet to freely pass through the dam, thus meeting DSOD's seismic safety requirements.

DRY EXCAVATION

The proposed project would remove approximately 500,000 cubic yards of sediment from Santa Anita Reservoir. Prior to sediment removal, the reservoir would be drained and a dry-out period, which could last several weeks, would be required. Sediment would be removed from the reservoir and transported on the conveyor belt system described below. All sediment removal activities would occur below the El. 1,300 feet.

SEDIMENT CONVEYANCE

The proposed project would transport sediment from the reservoir to the proposed SPS areas using an electric conveyor belt system. The conveyor belt system would extend from the reservoir through an existing tunnel that connects the reservoir to an access road located below the dam on the east side of the streambed, continuing along the access road, past the Headworks, over the Wilderness Park parking lot, south on the fire access roads, past the upper portion of the debris basin, and would terminate at the upper portion of the Lower SPS. The conveyor belt system would be raised over portions of the parking lot and access roads and would not obstruct traffic and emergency vehicles.

The approximate dimensions of the electric conveyance system would be approximately 5 feet wide and up to 15 feet high. The conveyor belt system would be connected to the main electricity grid. The existing access road north of the Headworks is about 12 to 15 feet wide, which would allow for maintenance and emergency vehicle access throughout the conveyance route. South of the Headworks, the haul route would follow the existing dirt maintenance road and LACDPW access road to the SPS areas. Within the City of Arcadia, the conveyor belt would operate from 7:00 a.m. to 7:00 p.m.

Inflows to the dam would hinder construction activities at the dam, so modification of the riser would require the dam's outlet to be completely dry. As such, reservoir inflows will be bypassed through the construction areas to the downstream area.

SEDIMENT PLACEMENT

Approximately 250,000 cubic yards of sediment would be placed in the approximately 5-acre already disturbed Lower SPS first. The Lower SPS would then be closed out to future sediment placement; the remainder of the excavated sediment, approximately 250,000 cubic yards, would be placed at the 13-acre area in the Middle SPS, located east of the Santa Anita Wash, south of the existing Upper SPS.

The base of the 13-acre Middle SPS area can be tiered in order to accommodate up to 710,000 cubic yards of material. The proposed ultimate height of the Middle SPS would be 60 feet from the lowest elevation at the southern end of the SPS. The proposed project would place approximately 250,000 cubic yards of sediment at the Middle SPS, increasing the height from the existing ground up to approximately 30 feet. The western edge of the SPS would be landscaped in a following project to create a visual buffer for the residences to the west.

The proposed project would require the removal of approximately 0.5 acres of vegetation in the Lower SPS. The current elevation of the Lower SPS ranges from approximately 630 feet to 650 feet. The proposed sediment height at the Lower SPS would increase approximately 30 feet from existing elevations.

The proposed project would require the removal of approximately 11 acres of native vegetation in the undeveloped Middle SPS. The remaining two acres of the sediment placement footprint is comprised of existing access roads. Approximately 250,000 cubic yards of sediment would be conveyed to the already disturbed Lower SPS and approximately 250,000 cubic yards of sediment would be conveyed to the Middle SPS. The remaining sediment capacity in the 13-acre footprint, approximately 500,000 cubic yards, would be used for future routine and emergency sediment removal activities of facilities, including Santa Anita Dam, served by the Santa Anita SPS. This is necessary since the Lower SPS, which currently serves this purpose, would be closed out for future sediment placement. However, future clean-out activities are outside of the scope of this project and would be subject to additional environmental review and analysis.

ES.5 AREAS OF CONTROVERSY

A public scoping meeting was held on July 11, 2007 for the proposed project. The scoping meeting introduced the proposed project and alternatives, outlined the environmental review process, and invited public comment on the scope and content of the environmental review. Approximately 10 citizens attended the meeting, most of whom expressed their concerns regarding the potential environmental effects of the proposed project. Issues and concerns raised by the public at the scoping meeting included dam safety, reservoir capacity, haul routes, noise impacts, air quality impacts, the appearance of the SPS after the project, and other details of the project description. Several commenters requested additional justification regarding the need for the proposed project. The key issues and areas of controversy are detailed in Chapter 1.

In addition to the comments provided at the scoping meeting, several comments were received in response to the Notice of Preparation/Initial Study for this EIR. Copies of the comment letters are provided in Appendix A. The primary areas of controversy identified by the public and agencies include impacts to the Wilderness Park, dust control, noise impacts, oak tree removal, and other biological impacts.

ES.6 SUMMARY OF ENVIRONMENTAL IMPACTS

Table ES-1 provides a summary of the significant environmental impacts that would result during construction and operation of the proposed project, mitigation measures that would lessen the significant environmental impacts, and the level of significance of the environmental impacts that would remain after implementation of the proposed mitigation. Detailed analysis of environmental impacts is presented in Chapter 3 of this EIR.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

This section is prepared in accordance with Section 15126.2(b) of the *CEQA Guidelines*, which requires the discussion of any significant environmental effects that cannot be avoided if a project is implemented.

These include impacts that can be mitigated but cannot be reduced to a less than significant level. An analysis of environmental impacts caused by the proposed project has been conducted and is contained in this EIR. Nine issue areas were analyzed in detail in Chapter 3. Two issues have been found to result in significant unavoidable adverse impacts – construction-related noise and global climate change. Short-term noise impacts would exceed the acceptable noise threshold for sensitive noise receptors in the City of Arcadia. The residences located closest to the project site, approximately 300 feet west of the Middle SPS and approximately 200 feet south of the Lower SPS would be subject to intermittent construction equipment noise that cannot be mitigated below the level of significance.

EFFECTS FOUND NOT TO BE SIGNIFICANT

Sections 15128 and 15143 of the *CEQA Guidelines* require the identification of impacts of a project that were determined not to be significant and that were not discussed in detail in the impact section of the EIR. For this project, it was determined that significant impacts would not occur in the following resource categories: Agricultural Resources, Hazards and Hazardous Materials, Land Use, Mineral Resources, Population and Housing, Public Services, and Utilities and Service Systems. An Initial Study (Appendix A) was prepared which outlines the reasons why these effects were found to be not significant.

CUMULATIVE IMPACTS

According to Section 15130 (b)(1)(A) of the *CEQA Guidelines*, a list of past, present, and probable future projects producing related or cumulative impacts may be used as the basis of the cumulative impacts analysis. The “list” approach was used for the cumulative impacts discussion in this EIR. The related projects within one mile of the project area used for the cumulative project list are based on information provided by the cities of Arcadia, Sierra Madre, and Monrovia. A radius of one mile was selected, since the cumulative impacts would primarily be limited to construction effects and the surrounding uses are mainly residential in the vicinity of the project site, aside from the adjacent open space and Angeles National Forest. As discussed in this EIR, the project would not result in operational impacts after the dam riser modification and sediment excavation and conveyance activities are complete. However, cumulative air quality impacts related to Greenhouse Gas (GHG) emissions from construction of the project and other cumulative projects in the area would be significant and unavoidable. The related projects, when combined with the proposed project, would not contribute to any other cumulative impacts.

ES.7 ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6 of the *CEQA Guidelines* requires consideration and discussion of alternatives to the proposed project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Four alternatives, including alternative sediment conveyance methods and an alternate truck route, were considered but rejected from

consideration in this EIR as infeasible. Four alternatives, including the No Project Alternative, are reviewed in Chapter 5 of this document and briefly summarized here.

ALTERNATIVE 1 – NO PROJECT

According to the *CEQA Guidelines* (Section 15126.6(e)(3)(b)), the No Project Alternative is defined as the “circumstance under which the project does not proceed.” The impacts of the No Project Alternative shall be analyzed “by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” The purpose of describing and analyzing the No Project Alternative is “to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Under the No Project Alternative, the proposed dam riser modification would not be constructed and sediment would not be removed from the Santa Anita Reservoir. The environmental characteristics would generally be the same as those described in the environmental setting sections of Chapter 3.0.

The No Project Alternative assumes that the Santa Anita Dam and the Santa Anita Reservoir would remain non-compliant with DSOD dam safety requirements for emergency drawdowns. The sediment level in the reservoir would continue to increase and exceed that deemed by DSOD as adequate for dam stability. The LACDPW facility may become inoperable/structurally unstable in the future due to no construction, and the outlet would eventually silt up, making the dam inoperable. Additional consequences of Alternative 1 would be the potential loss of water supply, continued decrease in water storage capacity, and further reduction in flood control capabilities to protect downstream residents.

ALTERNATIVE 2 – CONVEY TO WILDERNESS PARK, TRUCK TO SPS

Alternative 2, like the proposed project, would remove up to 500,000 cubic yards of sediment from Santa Anita Reservoir. Alternative 2 would convey the sediment directly to the Wilderness Park area via conveyor belt system, then the sediment would be transported by truck to the Lower and Middle SPS areas. The conveyance system would be approximately 5 feet wide and up to 15 feet high. Public access to the park would be maintained during sediment conveyance activities. All other project characteristics of Alternative 2 would be the same as the proposed project. Impacts associated with Alternative 2 would be similar to the proposed project for aesthetics, biological resources, cultural resources, geology and soils, hydrology and water quality, recreation, and transportation and circulation. However, some impacts would be greater than the proposed project including air quality and noise would result in a significant unavoidable impact (see Table ES-2). These additional impacts are associated with the use of trucks for hauling sediment from the Wilderness Park to the SPS areas.

ALTERNATIVE 3 – CONVEY TO THE CLEARING OF THE NORTH SPS, TRUCK OFF SITE

Alternative 3, like the proposed project, would remove up to 500,000 cubic yards of sediment from Santa Anita Reservoir. Alternative 3 would convey the sediment to a staging area above the Upper SPS area, where it would be loaded onto trucks and hauled to an off site disposal location in Irwindale (Manning Pit SPS). Trucks would exit the Santa Anita SPS via Elkins Avenue, turn left on Santa Anita Avenue, enter the 210 Freeway, exit at Irwindale Avenue, turn left into Gladstone Street, and turn right into Vincent Avenue to enter Manning Pit SPS, in the City of Irwindale. All other characteristics of Alternative 3 would be the same as the proposed project. It is estimated that approximately 20 trucks would be used at one time to transport sediment and that approximately 160 truck trips would occur per eight-hour day. Impacts associated with Alternative 3 would be similar to the proposed project for cultural resources, geology and soils, hydrology and water quality, and recreation. However, some impacts would be greater than the proposed project including air quality, noise, and transportation and circulation (see Table ES-2). These additional impacts are associated with the use of trucks for hauling sediment off site to the Manning Pit SPS. Alternative 3 would result in reduced impacts to aesthetics and biological resources compared to the proposed project.

ALTERNATIVE 4 – CONVEY TO WILDERNESS PARK, TRUCK OFF SITE

Alternative 4, like the proposed project, would remove up to 500,000 cubic yards of sediment from Santa Anita Reservoir. Alternative 4 would convey the sediment to the Wilderness Park staging area by a conveyor belt system, located above and within part of the park's western parking lot, truck the sediment along the existing maintenance road, truck the sediment to Irwindale, and place the sediment in the Manning Pit SPS. All other characteristics of Alternative 4 would remain the same as the proposed project. Trucks would exit Santa Anita SPS via Elkins Avenue, turn left on Santa Anita Avenue, enter the 210 Freeway, exit at Irwindale Avenue, turn left into Gladstone Street, and turn right into Vincent Avenue to enter Manning Pit SPS in the City of Irwindale. Alternative 4 would require clearing, grubbing, and grading at various locations along the existing maintenance road below Santa Anita Dam. It is estimated that about 20 trucks would be used at one time to transport sediment and that approximately 160 truck trips would occur per eight-hour day. Impacts associated with Alternative 4 would be similar to the proposed project for cultural resources, geology and soils, hydrology and water quality, and recreation. However, some impacts would be greater than the proposed project including air quality, noise, and transportation and circulation (see Table ES-2). These additional impacts are associated with the use of trucks for hauling sediment off site to the Manning Pit SPS. Alternative 4 would result in reduced impacts to aesthetics and biological resources compared to the proposed project.

TABLE ES-1 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
AIR QUALITY			
<p>AIR-1 Short-term construction emissions of the proposed project would exceed the SCAQMD emissions threshold for NOx and would potentially contribute substantially to an existing or projected air quality violation.</p>	<p>Significant</p>	<p>AIR-A The construction contractor shall provide a NOx reduction plan, for LACDPW approval, demonstrating that construction equipment shall not exceed the 100 lbs/day NOx threshold for the duration of the project. The plan shall provide a detailed equipment list for the overlap and non-overlap construction periods using the construction equipment emissions from URBEMIS 2007, which will be provided by LACDPW, or an equivalent verifiable source approved by CARB or SCAQMD. Measures to reduce emissions may include the use of oxygenated catalysts or Tier 2 or Tier 3 engines.</p>	<p>Less than Significant</p>
BIOLOGICAL RESOURCES			
<p>BIO-1 Tree removal in the Lower and Middle SPS areas during construction of the proposed project would disturb nesting birds, including raptors.</p> <p>The project site and areas immediately adjacent to the project site contain potential habitat for coast (San Diego) horned lizard and two-striped garter snake. Both the coast (San Diego) horned lizard and the two-striped garter snake are CDFG Species of Special Concern. To ensure no injury or damage to sensitive reptile species, mitigation measure BIO-B will be required.</p>	<p>Significant</p>	<p>BIO-A Prior to commencement of project construction, a rare plant survey shall be completed within the Santa Anita Reservoir, the Middle SPS and anywhere else project ground-disturbing activities would affect vegetated areas to determine the presence or absence of sensitive plant species with potential to occur within this project site. Surveys within the Middle SPS will focus on Plummer's mariposa lily, slender-horned spinesflower, mesa horkelia, and Robinson's pepper-grass where suitable habitat for these species</p>	<p>Less than Significant</p>

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Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>occurs. However, all sensitive plant species that have potential to occur in the project area based on the presence of suitable habitat or the known presence of the species in neighboring areas will be searched for during their blooming periods to confirm presence or absence. In addition, all other biological requirements of the U.S. Forest Service shall be implemented to minimize impacts to federal species. Surveys shall be conducted in accordance with the following CNPS guidelines:</p> <ul style="list-style-type: none"> • A qualified biologist shall conduct field surveys in a manner that will locate any rare, threatened or endangered species that may be present. The Rare Plant survey shall be conducted using systematic field techniques in all habitats of the site to ensure thorough coverage of potential impact areas. • If a state, U.S. Forest Service, or federally listed plant species is detected (e.g., slender-horned spinyflower or San Diego ambrosia), then consultation with USFWS and/or, U.S. Forest Service, and/or CDFG must occur to document the finding and determine appropriate mitigation requirements to ensure that impacts to the listed plant species would be less than significant. • Rare plants listed as CNPS List 1B, protected by the California Endangered Species Act, shall be flagged and avoided. If avoidance is not possible, the project proponents shall notify the CDFG 10 days prior to commencement of project 	

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>activities to allow for salvage of the plants.</p> <p>BIO-B Should tree and vegetation removal in the Santa Anita Reservoir or Middle SPS or commencement of other construction activities in the project site occur during the breeding season for migratory non-game native bird species (February 1 - August 31), weekly bird surveys shall be performed to detect any protected native birds in the trees to be removed and other suitable nesting habitat within 300 feet of the construction work area (500 feet for raptors). The surveys shall be conducted 30 days prior to the disturbance of suitable nesting habitat by a qualified biologist with experience in conducting nesting bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work. If a protected native bird is found, LACDPW shall halt all clearance/construction disturbance activities in suitable nesting habitat or within 300 feet of nesting habitat (within 500 feet for raptor nesting habitat) until August 31 or continue the surveys in order to locate any nests. If an active nest is located during the survey, clearing and construction with 300 feet of the nest (within 500 feet for raptor nests) shall be postponed until the nest is naturally vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest should be established in the field with flagging and stakes or construction fencing. Construction personnel shall be instructed on the</p>	

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>sensitivity of the area. The results of this measure shall be recorded to document compliance with applicable State and Federal laws pertaining to the protection of native birds.</p> <p>A pre-construction survey for roosting bats shall be performed by a qualified biologist within 30 days prior to removal of trees or structures on the site. If no active roosts are found, then no further action will be warranted. If either a maternity roost or hibernacula (structures used by bats for hibernation) is present, the following measures shall be implemented:</p> <ul style="list-style-type: none"> • If an active maternity roost is located and the project cannot be redesigned to avoid removal of the occupied tree or structure, demolition shall commence before maternity colonies form (i.e., prior to March 1) or after young are volant (flying) (i.e., after July 31). Disturbance-free buffer zones as determined by a qualified biologist in consultation with CDFG shall be observed during the maternity roost season (March 1 - July 31). • If a non-breeding bat hibernacula is found in a structure or tree scheduled for removal, the individuals shall be safely evicted, under the direction of a qualified biologist (as determined by a Memorandum of Understanding with CDFG), by opening the roosting area to allow airflow through the cavity. Demolition shall then follow at least one night after initial disturbance for airflow. This action shall allow bats to leave during 	

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>darkness, thus increasing their chance of finding new roosts with a minimum of potential predation during daylight. Structures or trees with roosts that need to be removed will first be disturbed at dusk, just prior to removal that same evening, to allow bats to escape during the darker hours.</p> <ul style="list-style-type: none"> • If special-status bats are found roosting within trees or structures onsite that require removal, appropriate replacement roosts shall be created at a suitable location onsite or offsite in coordination with a qualified biologist, the CDFG, and the LACDPW. <p>BIO-C In order to reduce impacts to sensitive reptiles potentially occurring in the Santa Anita Reservoir, the Middle SPS, and along the access road adjacent to the debris basin LACDPW shall implement the following measures:</p> <ul style="list-style-type: none"> • Grading and other habitat disturbing activities shall be limited to the footprint of the SPS areas. • To prevent injury or damage to coast (San Diego) horned lizard, two-striped garter snake, and other reptiles, an animal exclusion fence shall be placed along the boundary of the Middle SPS area and along the portion of the access road adjacent to the debris basin. The fence shall be a minimum of 4 feet in height with ¼ inch mesh hardware cloth attached to wooden posts or studded "T" steel posts. Fence material should also be 	

Executive Summary

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>buried a minimum of 12 inches below the ground surface.</p> <ul style="list-style-type: none"> • Prior to construction, a qualified biologist shall conduct a pre-construction survey for the coast (San Diego) horned lizard and two-striped garter snake and other reptiles within the exclusion fenced area. If any reptiles are found within the exclusion fenced area, the biologist shall safely relocate these species to a suitable area outside of the fenced area. • Drift nets or other exclusionary fencing shall be placed around excavations to reduce the potential for individuals entering excavated areas. If excavations with the potential for entrapment are to remain open for more than 12 hours they must include some means for small mammals, reptiles, and amphibians to escape. This can be accomplished by placement of a ramp that reasonably allows trapped individuals to crawl or walk out of the excavation. Before an excavation is backfilled, it must be checked to ensure that there are no live individuals inside. Backfilling shall not occur until the excavation is clear of all live individuals. • Personnel involved in project implementation shall receive a briefing from a qualified biologist to identify and describe sensitive resources that may be encountered in the project area. Wildlife of any kind that is encountered during the course of project implementation shall either be moved or provided the opportunity to vacate the site. 	

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
<p>BIO-2 Construction of the proposed project would impact approximately 6.7 acres of coast live oak woodland in the Middle SPS. Coast live oak woodland has high habitat value.</p> <p>The proposed project would impact approximately 3.8 acres of Riversidean alluvial fan sage scrub and 0.08 acre of disturbed Riversidean alluvial fan sage scrub in the Middle SPS. Riversidean alluvial fan sage scrub is considered to be of high priority for inventory by the CNDDB because of its significance and rarity</p> <p>The proposed project would impact 0.15 acre waters under jurisdiction of CDFG in the Middle SPS.</p>	<p>Significant</p>	<ul style="list-style-type: none"> Personnel shall be reminded that harassment, handling, or removal of wildlife from the project site shall not be permitted. <p>BIO-D LACDPW shall mitigate for impacts to 6.7 acres of coast live oak woodlands through a combination of on-site creation of coast live oak woodland and/or by permanently protecting comparable habitat in the watershed or by establishing a conservation easement at the Big Tujunga Mitigation Bank. The combined total of onsite creation and/or permanent protection at the Big Tujunga Mitigation Bank shall be a minimum of 6.7 acres.</p> <p>Oak woodland restoration shall occur within the Lower SPS, which includes approximately 8 acres available for such restoration activities.</p> <p>Establishment of a conservation easement shall permanently protect comparable habitat at the Big Tujunga Mitigation Bank, which includes land purchased by the LACDPW</p> <p>The final size of a conservation easement and the number of trees planted for mitigation shall be determined through consultation with CDFG. City of Arcadia will be consulted regarding restoration activities on the Lower SPS.</p> <p>Mitigation for impacts to coast live oak individuals shall be negotiated in</p>	<p>Less than Significant</p>

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>conjunction with mitigation for impacts to coast live oak woodland. A conceptual restoration plan shall be provided once mitigation ratios are negotiated. The restoration plan shall include detailed methodology for how the site will be prepared, planted, and maintained and quantitative performance criteria such as minimum percent cover by native species, maximum percent cover by non-native species, and minimum species diversity levels.</p> <p>Details of planting for mitigation shall be described in both a conceptual restoration plan and a mitigation and monitoring plan for oak woodland, which shall be submitted and approved by CDFG prior to implementation of the project.</p> <p>BIO-E Mitigation for impacts to 3.8 acres of Riversidean alluvial fan sage scrub and 0.08 acre of disturbed Riversidean alluvial fan sage scrub will be accomplished through a combination of restoration of a suitable area on-site and/or by permanently protecting at least 3.88 acres of comparable habitat by establishing a conservation easement at the Big Tujunga Mitigation Bank. The combined total of onsite restoration and/or permanent protection at the Big Tujunga Mitigation Bank shall be a minimum of 3.88 acres.</p> <p>The Lower SPS includes approximately 8 acres available for restoration. Mitigation for impacts to Riversidean alluvial fan sage scrub shall be negotiated with CDFG. A conceptual restoration plan shall be provided once mitigation ratios are</p>	

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
<p>CULTURAL RESOURCES</p>		<p>The restoration plan shall include detailed methodology for how the site will be prepared, planted, and maintained and quantitative performance criteria such as minimum percent cover by native species, maximum percent cover by non-native species, and minimum species diversity levels. Details of planting for mitigation shall be described in a mitigation and monitoring plan approved by CDFG.</p> <p>Establishment of a conservation easement shall permanently protect comparable habitat at the Big Tujunga Mitigation Bank, which includes land purchased by the LACDPW</p> <p>BIO-F Clean Water Act Section 404 (b)(1) guidelines shall be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with the USACE and negotiations with CDFG under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal and the impacted ephemeral wash and riparian habitat in the excavation area of the reservoir and Middle SPS. Compensatory mitigation of permanently protecting a minimum of 0.15 acres of comparable habitat shall occur at the Big Tujunga Mitigation Bank or through restoration and permanent protection on Mountains Recreation Conservation Authority (MRCA) land.</p>	

Executive Summary

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
<p>CUL-1 Because the project involves grubbing and ground disturbing activities, it is possible that surface artifacts obscured by surface vegetation or subsurface artifacts may be encountered by these construction activities.</p>	<p>Significant</p>	<p>CUL-A If archaeological materials are encountered during ground disturbing activities, work in the vicinity shall be immediately halted. The resource shall be assessed by a qualified archaeologist and the appropriate treatment determined in accordance with state law and standard archaeological practices consistent with those outlined by the California Office of Historic Preservation prior to the resumption of construction.</p>	<p>Less than Significant</p>
<p>CUL-3 Grading activities would potentially disturb human remains.</p>	<p>Significant</p>	<p>CUL-B If human remains are encountered on the property during ground disturbing activities, the Los Angeles County Coroner's Office shall be contacted and all activities in the vicinity of the discovery shall cease until appropriate disposition of the remains is determined by the Coroner's Office, who will follow their standard protocols.</p>	<p>Less than Significant</p>
<p>NOISE</p>			
<p>NOISE-1 Construction of the proposed project would create a substantial temporary or periodic increase in ambient noise level near sensitive receptors in the vicinity of the Lower and Middle SPS areas. The construction equipment used for sediment placement and transport activities would increase periodic noise level during the 8-month construction period and would exceed City noise standards.</p>	<p>Significant</p>	<p>NOISE-A At all areas except the reservoir-dam area, construction equipment shall be fitted with noise shielding and muffling devices to reduce noise levels to the maximum extent feasible. Where available, these devices shall be better than manufacturer's standard equipment.</p> <p>NOISE-B Stationary sources, such as message boards for traffic control, that will be located within 500 feet of residences shall be solar or battery powered, or connected to the local power grid, i.e., not powered by an</p>	<p>Significant and Unavoidable</p>

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>internal combustion engine.</p> <p>NOISE-C At the SPS areas, equipment maintenance and staging areas shall be located within the project area.</p> <p>NOISE-D At the Lower SPS, construction of a noise barrier on the west and southwest sides will be feasible. Therefore, at the commencement of sediment placement in the Lower SPS, LACDPW shall construct a barrier that shall be at least one foot higher than the line of sight between the exhaust pipes of the construction equipment and receptors that are located 5 feet above the ground on the residential properties immediately to the west and southwest. The necessary height of the barrier will vary with the elevation of the SPS as it is built up. The barrier may be made of plywood, and if so, the wood should be at least ¾ inch thick to prevent noise transmission through the barrier. Alternatively, the most efficient and economical barrier may be built by depositing the initial sediment along the affected boundaries of the site and building an earth berm as a barrier, always keeping the remainder of the working area behind the earth berm relative to the receptors.</p> <p>NOISE-E At the commencement of sediment placement in the Middle SPS, the LACDPW shall construct a barrier that shall be at least one foot higher than the line of sight between the exhaust pipes of the construction equipment and receptors that are located 5 feet above the ground on the residential properties immediately to the west. The necessary height of the barrier</p>	

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
<p>NOISE-3 Noise levels associated with sediment transfer and placement in the SPSs would exceed the standards of the City of Arcadia Noise Element of the General Plan and noise ordinance of the Municipal Code.</p> <p>TRANSPORTATION</p> <p>TRANS-2 It is not anticipated that the proposed project would create any significant parking impacts within the Wilderness Park parking lot or surrounding neighborhood. However, to ensure construction workers do not park in the Wilderness Park or other public areas, including local streets, implementation of mitigation measure TRANS-A will be required.</p>		<p>will vary with the elevation of the SPS as it is built up. The barrier may be made of plywood, and if so, the wood should be at least ¾ inch thick to prevent noise transmission through the barrier. Alternatively, a barrier may be built by depositing the initial sediment along the western boundary of the site and building an earth berm as a barrier, always keeping the remainder of the working area behind the earth berm relative to the receptors</p> <p>NOISE-F The LACDPW shall establish a noise complaint and response procedure that includes a 24-hour toll free or local telephone number for complaints, and a procedure where a field engineer/construction manager will respond to within 48 hours as practicable, investigate the complaints, and take corrective action if necessary. Complaints after normal working hours may be received by voice mail.</p>	
<p>NOISE-3 Noise levels associated with sediment transfer and placement in the SPSs would exceed the standards of the City of Arcadia Noise Element of the General Plan and noise ordinance of the Municipal Code.</p> <p>TRANSPORTATION</p> <p>TRANS-2 It is not anticipated that the proposed project would create any significant parking impacts within the Wilderness Park parking lot or surrounding neighborhood. However, to ensure construction workers do not park in the Wilderness Park or other public areas, including local streets, implementation of mitigation measure TRANS-A will be required.</p>	Significant	See NOISE-A through NOISE-F	Significant and Unavoidable
<p>TRANS-2 It is not anticipated that the proposed project would create any significant parking impacts within the Wilderness Park parking lot or surrounding neighborhood. However, to ensure construction workers do not park in the Wilderness Park or other public areas, including local streets, implementation of mitigation measure TRANS-A will be required.</p>	Significant	<p>TRANS-A Prior to construction, a parking plan shall be prepared by the contractor for review and approval by LACDPW. The parking plan shall illustrate the parking locations for workers on the project site in areas that are not accessible by the public and clearly indicate that construction worker or equipment parking for non-maintenance and construction activities is prohibited in the Wilderness Park and on public roads. A</p>	Less than Significant

Executive Summary

Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		parking map shall be provided to all construction workers prior to construction activities each year. LACDPW shall monitor parking compliance on a monthly basis throughout the construction period.	

TABLE ES-2 COMPARISON OF IMPACTS FOR THE PROPOSED PROJECT AND THE ALTERNATIVES

Impact Area	Proposed Project	Alternative 1: No Project	Alternative 2: Convey to Wilderness Park, Truck to SPS	Alternative 3: Convey to Clearing of the North SPS, Truck Off Site	Alternative 4: Convey to Wilderness Park, Truck Off Site
Aesthetics	III	IV (Less)	III (Similar)	IV (Less)	IV (Less)
Air Quality	II	IV (Less)	I (Greater)	I (Greater)	I (Greater)
Biological Resources	II	IV (Less)	II (Similar)	IV (Less)	IV (Less)
Cultural Resources	II	IV (Less)	II (Similar)	II (Similar)	II (Similar)
Geology and Soils	III	IV (Less)	III (Similar)	III (Similar)	III (Similar)
Hydrology and Water Quality	III	IV (Less)	III (Similar)	III (Similar)	III (Similar)
Noise	I	IV (Less)	I (Greater)	I (Greater)	I (Greater)
Recreation	II	IV (Less)	II (Similar)	II (Similar)	II (Similar)
Transportation and Circulation	II	IV (Less)	II (Similar)	II (Greater)	II (Greater)

Notes.

- I: Significant Unavoidable Impact
 - II: Significant Impact Unless Mitigated
 - III: Less Than Significant Impact
 - IV: No Impact
- Less: Impact is lower in magnitude than impacts of the proposed project
 Similar: Impact is similar in magnitude to impacts of the proposed project
 Greater: Impact is greater in magnitude than impacts of the proposed project

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791



DEC 17 2010

Ms Gail Farber, Director
Department of Public Works
County of Los Angeles
Post Office Box 1460
Alhambra, California 91802-1460

Attention Christopher Stone, Assistant Deputy Director
Water Resources Division

Big Santa Anita Dam, No 32-2
Los Angeles County

Dear Ms Farber:

This is in reply to Christopher Stone's December 15, 2010 letter requesting a variance for the maximum reservoir storage elevation at Big Santa Anita Dam. Continued storage to Elevation 1,258 feet was requested due to possible reservoir sedimentation impacts to the outlet valves. Draining the reservoir will reportedly begin in March 2011 and it is anticipated that the reservoir will be fully drained by April 2011.

As stated in our September 21, 2009 and October 19, 2009 letters, storage above Elevation 1,230 feet is not desirable due to seismic and hydraulic deficiencies at this dam. However, recognizing the difficulties associated with the higher than expected sediment accumulation, we will approve a short term extension of the variance until April 2011. During this period, a plan must be in-place to monitor and operate the dam and appurtenances to ensure their safe operation. By January 1, 2011, please submit a monitoring and response plan for our review and approval.

It is our understanding that there has been a temporary suspension of the construction work associated with the Riser Modification and Sediment Removal Project. This work is one of the critical components required to remediate the long standing seismic and hydraulic deficiencies of this high hazard dam. Therefore, **YOU ARE HEREBY DIRECTED** to proceed without further delay to ensure timely completion of the project.

If you have any questions or need additional information, you may contact Area Engineer Richard Draeger at (916) 227-4755 or Regional Engineer Shawn Jones at (916) 227-4600.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Gutierrez".

David A. Gutierrez, Chief
Division of Safety of Dams

Project Purpose

The Santa Anita Dam is a 225-foot-high concrete arch dam that provides flood protection, sediment flow protection, and capture of storm flows for water conservation for the downstream communities. On average, 473 acre feet (154 million gallons) of water from the dam is conserved for the City of Arcadia annually with the highest one-year volume of 1,641 acre feet. For the City of Sierra Madre, 1,500 acre feet (489 million gallons) is conserved annually with the highest one-year volume of 5,003 acre feet. These volumes represent significant portions of these cities' total water supply.

The dam, completed in 1927, does not meet current seismic standards for dam construction. As such, the State Department of Water Resources Division of Safety of Dams (DSOD) restricted the height of water that can be stored in the reservoir. Additional water would impose additional forces on the dam structure during an earthquake and would increase the volume of water released in the unlikely event of a dam failure. We are currently able to safely operate the dam by releasing water through the dam valves to keep the reservoir at the restricted height; however, to mitigate the dam seismic safety concerns, DSOD has required that we implement a permanent solution that does not rely on valve operations. With each storm, additional sediment from the watershed deposits in the reservoir. The sediment level in the reservoir has risen to a height that affects the operation of the dam's valves. Consequently, we have had to remove these valves twice in recent years to clear sediment that had rendered them inoperable. As the sediment level behind the dam continues to rise, the risk increases of completely plugging the outlet valves, rendering them inoperable for flood control, water conservation, or for draining the reservoir during a dam safety emergency.

The approved Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project was developed in response to flood control, water conservation, and safety concerns with the dam. The approved project includes removing the accumulated sediment that is threatening the valves and installing a new free-flowing riser connected to the dam's low level outlet (now buried in over 30 feet of sediment).

The decision of where to put the sediment removed from the dam and how to transport it was an important consideration during development of the approved project. Historically, sediment removed from the dam has been placed in the Santa Anita Sediment Placement Site (SPS), which was purchased in the 1950s specifically for sediment placement. For over 50 years, the site has been serving as the sediment placement site for the dam, as well as several other facilities, namely, Santa Anita Debris Basin, Sierra Madre Dam, Bailey Debris Basin, Auburn Debris Basin, Carter Debris Basin, Sturtevant Debris Basin, and Lannan Debris Basin. Since its purchase, approximately 2.6 million cubic yards of sediment has been placed in two areas within the SPS referred to as the lower SPS and the upper SPS. The remaining areas within the site include roads, drainage facilities, and undisturbed native vegetation

in the Middle SPS area. Utilizing the entire remaining area of the Middle SPS area will provide approximately 2.5 million cubic yards of additional capacity. However, the use of this area will require the removal of native vegetation.

Sediment Placement Site



The existing disturbed area of the Lower SPS does not have sufficient capacity to accommodate the expected volume of sediment from the reservoir cleanout. Similarly, the Upper SPS does not have sufficient capacity to accommodate the volume of sediment from the reservoir cleanout. Exhausting both the Upper and Lower SPS capacities and not utilizing the available storage within the Middle SPS would create an operational issue during storm events, delay and increase the cost of cleanouts, and impact planned routine sediment management activities. In short, we would not be able to quickly respond to the sediment management needs of debris control facilities in the area served by the SPS, placing these communities at risk of flooding. The Middle SPS has a large capacity that will allow us to continue performing timely flood control

responses to protect residents for years to come. Based on the discussion above, the project objectives as stated in the EIR are:

1. Remove accumulated sediment from the reservoir in a timely manner to avoid plugging and damage to the dam's valves.
2. Construct a riser on the dam to ensure that State DSOD water level restrictions and seismic safety requirements are met.
3. Ensure adequate storage capacity at the SPS for future routine and emergency cleanout activities.

P:\wrd\DAMS\A-MEMOS\Amemo 3507 Attachment C-project purpose.docx



**RAYMOND BASIN
MANAGEMENT
BOARD**

ATTACHMENT D

December 14, 2010

City of Alhambra

City of Arcadia

California-American
Water Company

East Pasadena
Water Company

H.E. Huntington Library
and Art Gallery

Kinneloa Irrigation
District

La Cañada Irrigation
District

Las Flores Water
Company

Lincoln Avenue
Water Company

Pasadena Cemetery
Association

City of Pasadena

Rubio Cañon Land and
Water Association

San Gabriel County
Water District

City of Sierra Madre

Sunny Slope
Water Company

Valley Water Company

Mr. Michael D. Antonovich
Los Angeles County Supervisor, Fifth District
500 West Temple Street, Room 869
Los Angeles, CA 90012

Subject Support for the Santa Anita Dam Sediment Removal and Riser
Modification Project

Dear Mr. Antonovich.

The Raymond Basin Management Board (the Board) was formed by the Los Angeles County Superior Court when it adjudicated the Raymond Groundwater Basin. The Court has charged the Board with the powers and responsibilities to protect the long-term quantity and quality of the groundwater supply. The Board is presently composed of members from the City of Arcadia, the City of Sierra Madre, the City of Pasadena, the City of Alhambra, the Lincoln Avenue Mutual Water Company, Rubio Canon Land and Water, California-American Water, Kinneloa Irrigation District, San Gabriel County Water District and Sunny Slope Water Company.

As you are well aware, cities within Los Angeles County, that supply domestic water, are facing a supply crisis. Due to a combination of drought, fire, and environmental concerns, future ability to meet demands becomes more uncertain every day. The County is currently participating with Arcadia, Sierra Madre, Raymond Basin and other agencies to enhance groundwater replenishment and groundwater quality in the San Gabriel Valley through various collaborative efforts. One specific project is the Santa Anita Dam Sediment Removal and Riser Modification Project. The City of Arcadia and the City of Sierra Madre both draw groundwater from the eastern portion of the Raymond Basin and have been experiencing reduced groundwater production capacity for over ten years. Last year groundwater levels in this area of the Basin dropped 16 feet in a single twelve month period. The ability to capture storm flows behind the Santa Anita Dam and make controlled releases to the downstream spreading facilities is critical to the local conservation strategy. Sediment deposits at the Santa Anita Dam are currently at a level that will soon impact the ability to operate the valve at the Dam, thus making conservation releases impossible. The integrity of the Eastern Raymond Basin depends on this project moving forward with little or no delay.



Main San Gabriel Basin
WATERMASTER

December 17, 2010

The Honorable Michael D. Antonovich
Los Angeles County Supervisor, Fifth District
500 West Temple Street, Room 869
Los Angeles, CA 90012

RE: Support for the Santa Anita Dam Sediment Removal and Riser Modification Project

Dear Supervisor Antonovich:

The Main San Gabriel Basin Watermaster is a nine-person board appointed by the Superior Court of Los Angeles County to administer water rights and manage the water quality and supply of the Main San Gabriel Groundwater Basin. Watermaster was created in 1973 pursuant to Judgment No. 924128, which adjudicated Basin water rights and established the framework for Basin management.

Los Angeles County is currently participating with our agency, at several levels, to enhance groundwater replenishment and water conservation in the San Gabriel Valley through various collaborative efforts. One specific project is the Santa Anita Dam Sediment Removal and Riser Modification Project. The City of Arcadia and the City of Sierra Madre are parties to our Judgment and also draw groundwater from the Eastern portion of the Raymond Basin to meet customer demands. The ability to capture storm flows behind the Santa Anita Dam and make controlled releases to the downstream spreading facilities is critical to the local water conservation and supply strategy. Any constraints placed on the ability of these agencies to produce groundwater from the Raymond Basin will, by default, increase production from the Main San Gabriel Basin and add an additional burden to already unreliable imported water supplies. Sediment deposits at the Santa Anita Dam are currently at a level that will soon impact the ability to operate the Dam's main valve, thus making conservation releases impossible and flood control less reliable.

Moving ahead with sediment removal from behind Santa Anita Dam in combination with the Riser Modification Project is critical to local resource management and flood control operations. Any delays experienced due to further review of sediment placement relocation could have long-term negative impacts on this valuable local resource.

Please contact me at (626) 815-1300 if you have any questions.

Sincerely,

Carol Williams
Executive Officer



DIRECTORS

SERGIO CALDERON, PRESIDENT
WILLARD H. MURRAY, JR., VICE PRESIDENT
ROBERT KATHERMAN, SECRETARY
ALBERT ROBLES, TREASURER
LILLIAN KAWASAKI, DIRECTOR
ROBB WHITAKER, P.E., GENERAL MANAGER

December 20, 2010

Ms. Gail Farber, District Engineer
Los Angeles County Flood Control District
County of Los Angeles Department of Public Works
P.O. Box 1460
Alhambra, CA 91803-1460

**RE: LOS ANGELES COUNTY FLOOD CONTROL DISTRICT DAM AND RESERVOIR
SEDIMENT MANAGEMENT**

Dear Ms. Farber:


The local water supply captured by dams and reservoirs operated and maintained by the Los Angeles County Flood Control District (LACFCD) is a critical component to preserving the supply of groundwater for the residents and businesses of the Los Angeles region. The Water Replenishment District of Southern California (WRD) relies heavily on such stormwater capture to replenish and protect the groundwater basins it manages.

Because of the importance of stormwater capture and conservation, WRD supports the LACFCD's ongoing efforts to manage debris and sediment built up behind its dams and in its reservoirs.

Given the characteristics of local geology and an annual flood/fire cycle, WRD recognizes LACFCD's need to continually address the buildup of sediment and debris in LACFCD reservoirs. LACFCD's current Santa Anita Dam and Reservoir Sediment Removal and Placement Project is one such project that will remove approximately 500,000 cubic yards of sediment and debris. Water from the Santa Anita Dam can flow into the Rio Hondo spreading to replenish the groundwater in the Central Basin. Without efforts such as this, the LACFCD would be unable to store stormwater in its various reservoirs and manage its distribution to spreading grounds for groundwater recharge and subsequent pumping for potable use.

The Los Angeles region continues to face critical challenges to its local water supply. The ability of the LACFCD to regularly and thoroughly remove sediment to maintain reservoir storage behind its dams is a crucial step in managing and further developing our local water supplies. For these reasons, WRD supports the LACFCD's sediment removal efforts. Please call me if you have any questions.

Sincerely,



Robb Whitaker
General Manager



Department of Water and Power



the City of Los Angeles

ANTONIO R. VILLARAIGOSA
Mayor

Commission
LEE KANON ALPERT, *President*
THOMAS S. SAYLES, *Vice-President*
ERIC HOLOMAN
CHRISTINA E. NOONAN
JONATHAN PARFREY
BARBARA E. MOSCHOS, *Secretary*

AUSTIN BEUTNER
General Manager
RAMAN RAJ
Chief Operating Officer

December 10, 2010

Ms. Gail Farber, District Engineer
Los Angeles County Flood Control District
County of Los Angeles Department of Public Works
P. O. Box 1460
Alhambra, CA 91803-1460

Dear Ms. Farber

Re: Los Angeles County Flood Control District, Dam and Reservoir Sediment Management

I am writing on behalf of the Los Angeles Department of Water and Power (LADWP) in support of the Los Angeles County Flood Control District's (LACFCD) ongoing efforts to manage debris and sediment built up behind its dams and in its reservoirs.

The Los Angeles region is facing critical challenges to its ongoing effort to assure a reliable, plentiful, and safe water supply. The City of Los Angeles is far too dependent on imported water supplies and is working to develop more reliable and sustainable local supplies. LADWP recognizes the significant contribution to local water supply reliability provided by the dams and reservoirs operated and maintained by LACFCD. We value our relationship with your agency on shared projects to enhance these vital facilities.

Given the characteristics of local geology and an annual flood/fire cycle, we understand LACFCD's need to continually address the buildup of sediment and debris in its reservoirs. Without projects to remove and manage this sediment and debris, LACFCD would inevitably be unable to store stormwater in its reservoirs and manage this stormwater's distribution to spreading grounds for groundwater recharge and subsequent pumping for potable use.

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December 21, 2010

Ms. Gail Farber, District Engineer
Los Angeles County Flood Control District
County of Los Angeles Department of Public Works
P.O. Box 1460
Alhambra, CA 91803-1460

Dear Ms. Farber:

**LOS ANGELES COUNTY FLOOD CONTROL DISTRICT
DAM AND RESERVOIR SEDIMENT MANAGEMENT**

I am writing on behalf of West Basin Municipal Water District (West Basin) in support of the Los Angeles County Flood Control District's (LACFCD) ongoing efforts to manage debris and sediment built up behind its dams and in its reservoirs.

Due to an ongoing Statewide water crisis stemming largely from limitations that have been imposed on imported supplies, the Los Angeles region is facing critical challenges to assuring a reliable, plentiful, and safe water supply. Therefore, West Basin recognizes the significant contribution to the local water supply provided by the dams and reservoirs operated and maintained by the LACFCD. The ability of the LACFCD to regularly and thoroughly remove sediment to maintain reservoir storage behind its dams is a crucial step in managing and further developing our local water supplies. For this reason West Basin supports the LACFCD's sediment management efforts.

If you have any questions, please contact me at (310) 660-6210.

Sincerely,


Rich Nagel
General Manager

cc: Los Angeles County Flood Control District



FOOTHILL MUNICIPAL WATER DISTRICT

ALTADENA • La CAÑADA FLINTRIDGE • La CRESCENTA

December 14, 2010

Ms. Gail Farber, District Engineer
Los Angeles County Flood Control District
County of Los Angeles Department of Public Works
P O Box 1460
Alhambra, CA 91803-1460

Dear Ms. Farber:

LOS ANGELES COUNTY FLOOD CONTROL DISTRICT DAM AND RESERVOIR SEDIMENT MANAGEMENT

I am writing on behalf of Foothill Municipal Water District in support of the Los Angeles County Flood Control District's (LACFCD) ongoing efforts to manage debris and sediment built up behind its dams, reservoirs and debris basins.

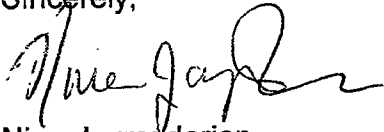
Due to an ongoing Statewide water crisis stemming largely from limitations that have been imposed on imported supplies, the Los Angeles region is facing critical challenges to assuring a reliable, plentiful, and safe water supply. Foothill Municipal Water District values the significant contribution to the regional water supply provided by the dams and reservoirs operated and maintained by the LACFCD. The ability of the LACFCD to regularly and thoroughly remove sediment to maintain reservoir storage behind its dams is a crucial step in managing and further developing our local water supplies.

We also appreciate the work that has been done to remove the sediment from the debris basins in the City of La Canada Flintridge and unincorporated areas of Los Angeles County due to the Station Fire, thus protecting the homes and businesses of our retail customers. Given the characteristics of local geology and an annual flood/fire cycle, we recognize LACFCD's need to continually address the buildup of sediment and debris in LACFCD reservoirs and debris basins.

Ms. Gail Farber
December 9, 2010
Page 2

If you have any questions, please contact me at (818) 790-4036

Sincerely,

A handwritten signature in black ink, appearing to read "Nina Jazmadarian", written in a cursive style.

Nina Jazmadarian
General Manager

GAJ:sw

cc: Los Angeles County Flood Control District

SIX BASINS WATERMASTER
1021 E. Miramar Avenue
Claremont, CA 91711-2052
(909) 621 5568 *phone*
(909) 625-5470 *fax*

December 28, 2010

Ms. Gail Farber, District Engineer
Los Angeles County Flood Control District
County of Los Angeles Department of Public Works
P.O. Box 1460
Alhambra, CA 91803-1460

Dear Ms. Farber:

**LOS ANGELES COUNTY FLOOD CONTROL DISTRICT
DAM AND RESERVOIR SEDIMENT MANAGEMENT**

I am writing on behalf of Six Basins Watermaster in support of the Los Angeles County Flood Control District's (LACFCD) ongoing efforts to manage debris and sediment built up behind its dams and in its reservoirs.

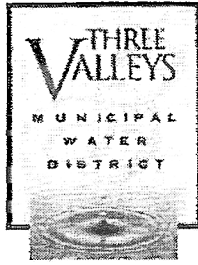
Due to an ongoing Statewide water crisis stemming largely from limitations that have been imposed on import supplies, the Los Angeles region is facing critical challenges to assuring a reliable, plentiful, and safe water supply. Therefore, the Six Basins Watermaster recognizes the significant contribution to the local water supply provided by the dams and reservoirs operated and maintained by the LACFCD. The ability of the LACFCD to regularly and thoroughly remove sediment to maintain reservoir storage behind its dams is a crucial step in managing and further developing our local water supplies and allows for significant groundwater recharge. For this reason, the Six Basins Watermaster supports the LACFCD's sediment management efforts.

If you have any questions, please contact Mike Sovich at 909.621.5568.

Sincerely,



Richard W. Hansen, P.E.
Chief of Watermaster Services



BOARD OF DIRECTORS

Brian Bowcock
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John Mendoza
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GENERAL MANAGER/CHIEF ENGINEER

Richard W. Hansen, P.E.

December 28, 2010

Ms. Gail Farber, District Engineer
Los Angeles County Flood Control District
County of Los Angeles Department of Public Works
P.O. Box 1460
Alhambra, CA 91803-1460

Dear Ms. Farber:

**LOS ANGELES COUNTY FLOOD CONTROL DISTRICT
DAM AND RESERVOIR SEDIMENT MANAGEMENT**

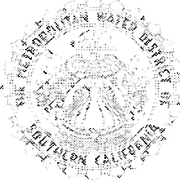
I am writing on behalf of Six Basins Watermaster in support of the Los Angeles County Flood Control District's (LACFCD) ongoing efforts to manage debris and sediment built up behind its dams and in its reservoirs.

Due to an ongoing Statewide water crisis stemming largely from limitations that have been imposed on import supplies, the Los Angeles region is facing critical challenges to assuring a reliable, plentiful, and safe water supply. Therefore, the Six Basins Watermaster recognizes the significant contribution to the local water supply provided by the dams and reservoirs operated and maintained by the LACFCD. The ability of the LACFCD to regularly and thoroughly remove sediment to maintain reservoir storage behind its dams is a crucial step in managing and further developing our local water supplies, and allows for significant groundwater recharge. For this reason, the Six Basins Watermaster supports the LACFCD's sediment management efforts.

If you have any questions, please contact Mike Sovich at 909.621.5568.

Sincerely,

Richard Hansen, P.E.
General Manager



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

December 21, 2010

Ms. Gail Farber
District Engineer
Los Angeles County Flood Control District
County of Los Angeles Department of Public Works
P.O. Box 1460
Alhambra, CA 91803-1460

Dear Ms. Farber:

Los Angeles County Flood Control District Dam and Reservoir Sediment

I am writing on behalf of Metropolitan Water District of Southern California (Metropolitan) in support of the Los Angeles County Flood Control District's (LACFCD) ongoing efforts to manage debris and sediment built up behind its dams and in its reservoirs.

Due to an ongoing Statewide water crisis stemming largely from pumping limitations that have been imposed on the State Water Project, the Los Angeles region is facing critical challenges to assuring a reliable and safe water supply. The dams and reservoirs operated and maintained by the LACFCD provide significant benefits to local water supplies and groundwater basin managers. The ability of the LACFCD to regularly remove sediment to maintain reservoir storage behind its dams is a crucial step in managing and further developing our local water supplies. For this reason Metropolitan supports the LACFCD's sediment management efforts.

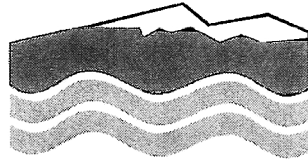
If you have any questions, please contact me at (213) 217-6762.

Sincerely,

A handwritten signature in cursive script that reads "Debra C. Man".

Debra C. Man
Assistant General Manager and Chief Operating Officer

GLC:jc
o:\a\slc\2010\GLC_sediment management.doc



UPPER SAN GABRIEL VALLEY
MUNICIPAL WATER DISTRICT

December 23, 2010

Ms. Gail Farber, District Engineer
Los Angeles County Flood Control District
County of Los Angeles Department of Public Works
P.O. Box 1460
Alhambra, CA 91803-1460

**RE: LOS ANGELES COUNTY FLOOD CONTROL DISTRICT
DAM AND RESERVOIR SEDIMENT MANAGEMENT**

Dear Ms. Farber:

I am writing on behalf of Upper San Gabriel Valley Municipal Water District (Upper District) in support of the Los Angeles County Flood Control District's (LACFCD) ongoing efforts to manage debris and sediment built up behind its dams and in its reservoirs.

Due to an ongoing Statewide water crisis stemming largely from limitations that have been imposed on import supplies, the Los Angeles region is facing critical challenges to assuring a reliable, plentiful, and safe water supply. Therefore, the Upper District especially values the significant contribution to the local water supply provided by the dams and reservoirs operated and maintained by the LACFCD. Given the characteristics of local geology and an annual flood/fire cycle, we recognize LACFCD's need to continually address the buildup of sediment and debris in LACFCD reservoirs.

One such example is LACFCD's current Santa Anita Dam and Reservoir Sediment Removal and Placement Project, which will remove approximately 500,000 cubic yards of sediment and debris. Without projects such as this, the LACFCD would be unable to store stormwater in its various reservoirs and manage its distribution to spreading grounds for groundwater recharge and subsequent pumping for potable use.

11310 VALLEY BOULEVARD • EL MONTE, CALIFORNIA 91731
PHONE: (626) 443-2297 • FAX: (626) 443-0617
www.usgvmwd.org

Ms. Gail Farber
December 23, 2010
Page 2

The ability of the LACFCD to regularly and thoroughly remove sediment to maintain reservoir storage behind its dams is a crucial step in managing and further developing our local water supplies. For these reasons the Upper District supports the LACFCD's efforts.

If you have any questions, please contact me at (626) 443-2297

Sincerely,

A handwritten signature in black ink, appearing to read "Shane Chapman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Shane O. Chapman
General Manager

From the desk of Ralph Bicker
101 White Oak Dr. Arcadia CA.91006
engineeralph@verizon.net Phone (626) 355-1773

TO: County Supervisor Michael Antonovich
Subject: Arcadia's Santa Anita Dam Cleanout and sediment placement and the oak tree problem.

I'm writing to you as a more than 40 year resident of the Arcadia Highlands. Also, by way of background I am, and have for the past more than 25 years, been a member of the "Highlands Homeowner's Association (HOA) Board of Directors" and for most of those years I have also served as the volunteer Chairman of the HOA's Architectural Review Board. Prior to my retirement I was employed as a staff engineer in the Pasadena City Engineers office from 1949 until I retired in 1986. For a number of years while with City of Pasadena I worked on the design of many of the major storm drain projects funded by the "1952 L. A. Co. Flood Control District Bond Issue", so I have a background and appreciation for the problem at hand. Also for the record I do appreciate and have respect the many mature trees in our foothill communities of Arcadia, Pasadena, Sierra Madre and the other surrounding foothill communities.

Over the past 2-3 years, as a volunteer for our Highlands HOA, I have been meeting with representatives of the L.A. County Engineers staff to study and consider the various options available to accomplish the necessary removal of the sediment from behind the dam. I have also discussed these options and the need for the project with many of the other members of our HOA Board of Directors as well as many of the residents of the area. After discussing the project with these members of the community, the vast majority of them agreed that the best and only practical solution is the one that is now proposed by the County Engineers staff.

Because of the existing steep narrow single lane road up from behind the dam to the Chantry Flats Road, the only way to get the sediment out of the dam is to use a conveyor to move the material off-road, down through the back country either to Wilderness Park or to a point on the County owned property down near the east end of Elkins Ave. From either of those points, to get the material to a placement site, the only options are either; (1) to truck it out of the city, down to the gravel pits in Irwindale or some other similar suitable distant location, or; (2) to use an extension of the conveyor system, as presently proposed by the County Engineers, to move it down to the placement site on the County owned flood control property.

To truck the estimated half million cubic yards of sediment that needs to be removed from behind the dam to any location other than the placement site now proposed by the County would result in the need for at least 100,000 huge dirt hauling truck trips, (50,000 inbound empty and 50,000 outbound loaded,) using Elkins Ave, Santa Anita Ave and possibly a portion of Highland Oaks Dr. These streets which have 2 public schools nearby (an elementary and a middle school) now experience gridlock traffic conditions in both the morning and afternoon hours. From a traffic safety standpoint any project or proposal that would add this kind of truck traffic through the area would create a serious hazardous situation and would be **totally unacceptable**.

Experience over the past several years, has shown that whenever the county has been having sediment hauled into this same placement site, by trucks traveling over the public streets from other nearby catchment locations, even when the trucks have their loads covered, there is still a significant amount of fine dirt that escapes, and dirt is also carried onto the streets by the truck tires. That makes it necessary for street sweepers and water trucks to constantly patrol up and down the streets. The fumes from all the trucks and other equipment would not be good for either the school children or the residents of the area. Those are just a few of the factors that compound the traffic problems.

Regarding removal of some of the oak trees from the placement site, I am sure that you have already heard enough about those trees. At this point I would just point out that the area where the trees are located has been closed to public entry for I believe at least the past 50 or more years. No one other than County flood control personnel or the owners of the homes on the east side of Highland Oaks Dr. immediately abutting the flood control property can see, or even get within several hundred feet of any of the trees in question without illegally trespassing on the County's or the abutting owner's properties. This area is, and unquestionably will continue to be closed to the public for security reasons because of the high fire hazard and lack of any access through the area for either Police or Fire Department personnel or equipment. From reading most of the "save these trees" articles that I have seen and read in the media and on the internet, it is obvious that most if not all of this out cry is coming from people outside of the area and most of them have never even seen any of the trees or even the surrounding properties.

I hope that the above information will help those that will have to make the decision on this matter.



Ralph Bicker

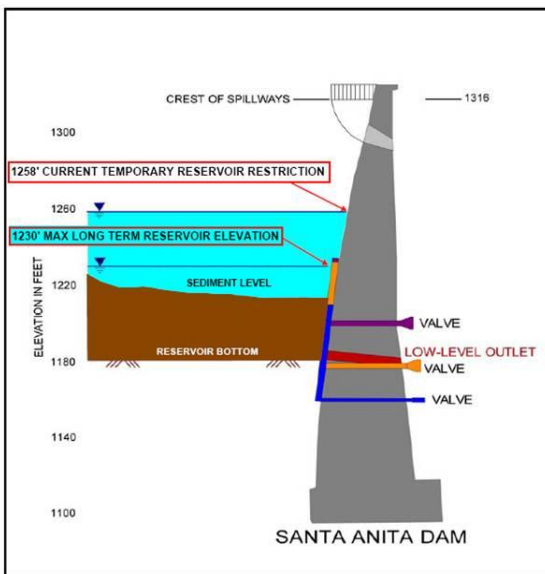
Risks and Impacts of Delaying the Approved Project

Dam Safety Risks

There is an urgent need to remediate the seismic deficiencies of the dam. The sediment level in the reservoir has risen to a height that affects the operation of the dam's valves. Every storm season, sediment levels rise with a risk of completely plugging the pipes that connect to the outlet valves. Consequently, we have had to remove valves twice in recent years to clear sediment that rendered them inoperable.

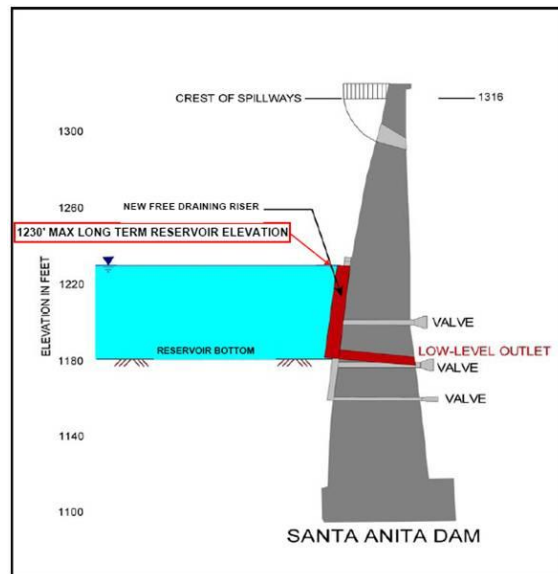
Nonfunctioning valves prevent us from maintaining the water level in the reservoir at the State Division of Safety of Dams' (DSOD) restricted elevation or to empty the dam during a dam safety emergency. As shown on the inundation map (Figure 3), the dam protects an inundation area with thousands of homes, hundreds of businesses, and many schools.

In 2006, DSOD approved the riser concept to address the seismic deficiency with the dam. The riser concept (to be constructed as part of the current project) would maintain the reservoir water level in the dam at a restricted level. Because the high sediment level was threatening the valves, DSOD approved our request to maintain a somewhat higher reservoir water level, which causes sediment to settle out, away from the dam valves. DSOD approved this modified reservoir restriction through May 2008 with the expectation that construction would occur immediately thereafter for two dry seasons resulting in project completion by December 2010.



CURRENT CONDITIONS

Figure 1



POST PROJECT CONDITIONS

Figure 2

In 2008, work on the EIR for the approved project was progressing, and DSOD granted an extension to May 2009.

In September 2009, the EIR was certified but regulatory permits for the approved project were still being pursued. DSOD granted another extension through 2010, which stated that "...remediation measures are critical to the seismic performance of the dam."

In December 2010, DSOD was informed that the approved project had been awarded for construction, but an additional extension of the modified reservoir restriction for one more storm season was needed, through April 2011. DSOD responded on December 17, 2010, and accommodated the request (copy included as Attachment B) with the caveat that a monitoring and response program be developed to ensure the safe operation of the dam during this period. DSOD regards the approved project as critical to remediating the long-standing seismic deficiencies of the dam and stated: "Therefore, YOU ARE HEREBY DIRECTED to proceed without further delay to ensure timely completion of the project."

Any delay to constructing the riser on the dam during the dry season of 2011 (between April 15, 2011, and October 15, 2011) would violate DSOD's directive. It should be noted that removal of sediment from the reservoir is required to construct the riser and connect it to the existing outlet tunnel at the base of the dam (currently under more than 30 feet of sediment).

Flood Control and Water Conservation Impacts

As stated above, the sediment levels rise with a risk of completely plugging the pipes that connect to the outlet valves every storm season. This would render the valves inoperable for flood control and water conservation. As a result, storm flows would cause the water level of the reservoir to raise until it reached the spillway where it would spill uncontrolled, likely washing out the bridge/culvert to Arcadia's Wilderness Park and the Santa Anita Diversion structure, which distributes water to the Sierra Madre and Santa Anita Spreading Grounds. Additionally, increases in the sediment level, even without plugging the valves, would greatly affect water conservation efforts. Sediment carried by the water would affect the quality such that it may be unsuitable to spread in the spreading grounds. Loss of the diversion structure and inability of the valves to make water conservation releases, or impacts to the quality of the water, would eliminate the ability to conserve water for Sierra Madre and Arcadia resulting in average annual losses of 1,682 acre feet and 473 acre feet, respectively, for the cities; and as much as 5,000 acre feet and 1,300 acre feet, respectively, in an extremely wet year. These volumes represent significant portions of these cities' total water supply.

Recognizing that the operation of the dam is critical to the local water conservation and supply strategy, the Main San Gabriel Basin Watermaster sent a letter of support stating that: "Any delays experienced due to further review of sediment placement relocation could have a long-term negative impact on this valuable local resource." Additionally, the Raymond Basin Management Board that manages the groundwater basin most

directly impacted by the project stated in its support letter that: “The integrity of the Eastern Raymond Basin depends on this project moving forward with little or no delay.”

These letters, as well as additional letters of support from Metropolitan Water District of Southern California, Upper San Gabriel Valley Municipal Water District, Water Replenishment District of Southern California, City of Los Angeles Department of Water and Power, West Basin Municipal Water District, Foothill Municipal Water District, Six Basins Watermaster, and Three Valleys Municipal Water District, are included in Attachment D.

Project Construction Contract Impacts

The approved project was awarded for construction on May 27, 2010. The critical path for the approved project requires that vegetation removal occur outside of bird nesting season in conformance with the regulatory permits. This requires the removal of vegetation be completed prior to the start of bird nesting season in February or after the bird nesting season, which ends September 30. Because sediment removal can only occur outside of storm season (April 15 through October 15), any additional delays beyond the current 30-day delay would result in an additional year to the project schedule (i.e. vegetation removal in fall 2011 and sediment removal in spring/summer 2012). Such a delay would have the associated risks and impacts as discussed above under Dam Safety Risks and Flood Control and Water Conservation Impact.

Additionally, all costs incurred by the contractor due to the project delays will be passed on to the Flood Control District. The contractor purchased specialized equipment for the approved project and has an aggressive schedule that may enable him to complete the work over one “dry season” (spring 2011 through October 2011). If the valves become plugged and the reservoir cannot be emptied in spring 2011, the contractor will be required to pump the water out of the reservoir, resulting in direct costs as well as a potential to lose time, which could extend the contract an additional year (through 2013) at significant additional cost. A one year delay is expected to incur construction costs of approximately \$4.0 million.

Construction cost increases to date as a result of the 30 day delay are estimated at \$200,000.

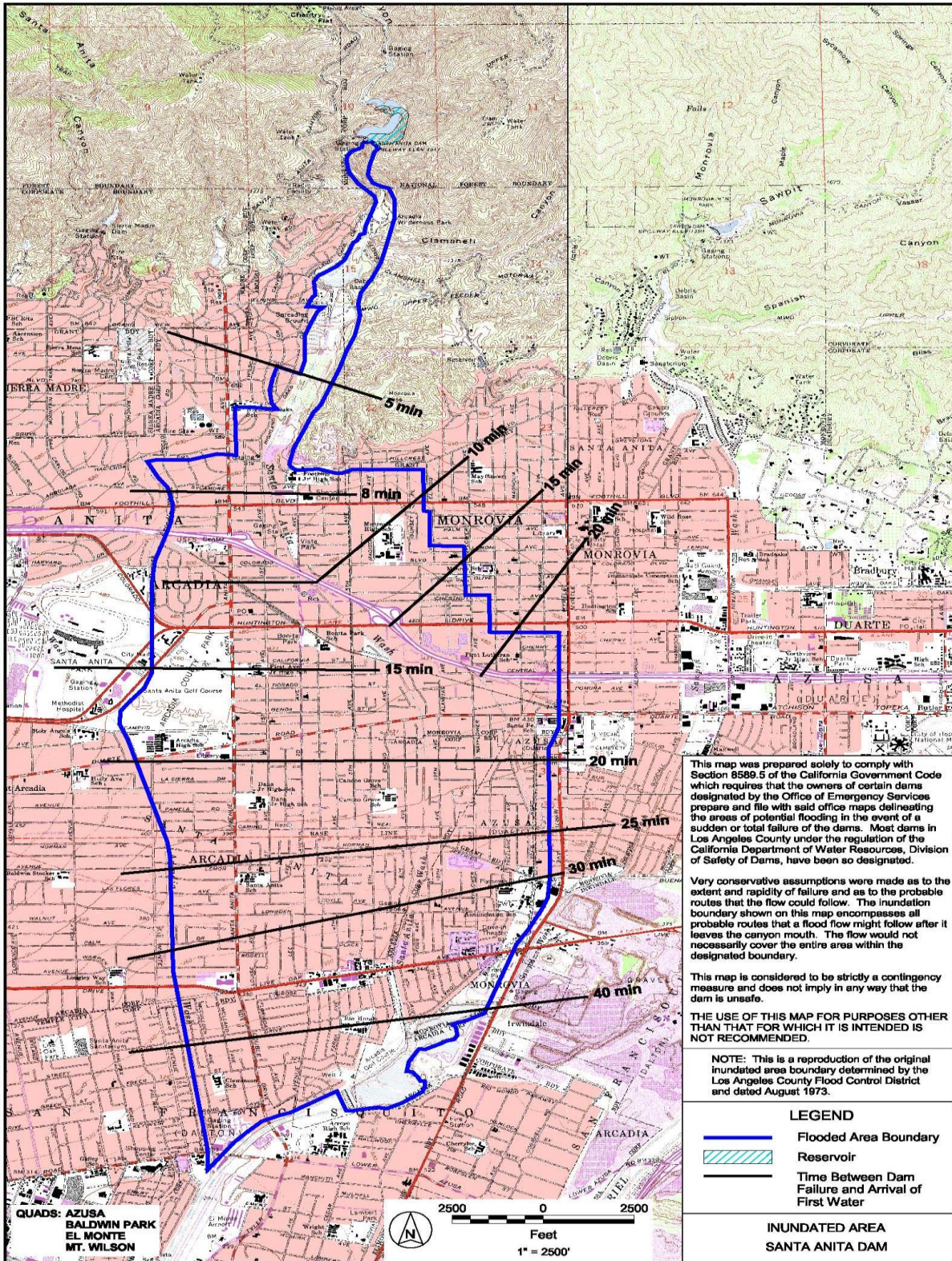


Figure 3

Community Concerns and Suggestions

This section of the report summarizes the recent input received from the community through letters and e-mail correspondence, as well as during the December 16, 2010, community meeting held at Arcadia's Highland Oaks Elementary School, which was facilitated by our Consultant, Mr. Ed Means of Malcolm Pirnie, Inc. Mr. Means' summary of the specific comments made during the meeting, as well as copies of letters from the public reiterating the concerns/suggestions expressed in the meeting, follow this discussion.

Following is a general summary of the primary comments received from the public opposing the removal of oak woodland and their suggestions for project modifications to avoid such removal. Our response follows each general comment.

GENERAL COMMENT 1

Many expressed strong interest for saving the oak woodland, which they said was unique due to its maturity and being close to urban areas and on fairly flat terrain. Although they all generally agreed with the need for the sediment removal portion of the approved project, they felt that removing a portion of the woodland was not an appropriate option due to the quality of the oak woodland and native vegetation. A few indicated that the quality of the vegetation and habitat was not addressed adequately in the Certified EIR and that proposed mitigation is inadequate.

RESPONSE 1

The quality of the native vegetation to be removed was understood and properly described in the Certified EIR. Extensive biological assessments and monitoring took place throughout the project development process. Appendix C within the Certified EIR contains the Biological Technical Report (November 2007), which assessed the important biological resources in the area associated with the approved project, including species of concern and rare and sensitive species. That report, in addition to follow-up surveys conducted by the consulting biologist, EDAW in 2008 and the Biological Assessment/Biological Evaluation in March 2009, analyzed the potential impacts to those resources from project implementation, determined the level of significance of those impacts, and recommended mitigation measures to reduce the level of significance of potential impacts.

Sensitive biological resources, including plant and animal species considered sensitive by Federal, State, or local conservation agencies and organizations, or unique habitat areas that are of relatively limited distribution, were actively sought during the surveys. In fact, the March 2009 Biological Assessment/Biological Evaluation identified a total of 90 threatened, endangered, and sensitive species potentially occurring in the area, which were all evaluated. Additional surveys were conducted based on the Biological Technical Report and care was taken to

ensure that Focus Protocol Surveys followed United States Fish and Wildlife Service (USFWS) guidelines and were conducted during blooming periods or active periods for the sensitive plants and animals to determine if they were indeed on-site and may be impacted.

Additionally, due to the vegetation quality, extensive efforts and coordination with California Department of Fish and Game (DFG) were required to develop appropriate mitigation measures to be included in the finalized permit (1601 Agreement) for the impacts to the oak woodland and native vegetation. The impacts included removal from the Middle SPS of 0.3 acres of Coastal Sage Scrub, 3.8 acres of Riversidean Alluvial Fan Sage Scrub, 0.08 acres of disturbed Riversidean Alluvial Fan Sage Scrub, and 6.7 acres of Coast Live Oak Woodland. This represents a total of 10.88 acres of native vegetation over a total of 12.78 acres within the Middle SPS, which also includes 1.9 acres of bare ground/access roads. The map of the vegetation types is included on Figure 3.3-1 of the EIR. The EIR acknowledged that this area also included numerous sycamore trees and shrubs. Multiple-year rare plant surveys were conducted because the initial reports identified the potential for Brauton's milk-vetch, Robinson's peppergrass, and Plummer's mariposa lily to occur within the project area. The additional surveys were conducted to determine if they were within the 12.78 acres. They were not found either year that the surveys were conducted.

The Mitigation Measures include the following:

- a. Purchase and permanently preserve 4.9 acres of mature oak woodland habitat in the watershed immediately tributary to the project site. This site has been purchased by the District, and it contains fully mature native vegetation. We are currently working with DFG to place a conservation easement on the property that would forever protect it.
- b. Permanently protect 6.9 acres of high-quality, mature sycamore woodland alluvial scrub habitat at the Big Tujunga Mitigation Site. These acres have been allocated within the 200-acre site, which was previously purchased and is being monitored and maintained on an annual basis. The site is relatively flat and includes designated hiking and equestrian trails open to the public.
- c. On-site creation of oak woodland habitat on 8 acres of the site that will no longer have sediment capacity after the project. An extensive revegetation program was developed for the site, which is to be planted with a mix of oak trees and other appropriate oak woodland species. The mitigation measures will require extensive biological monitoring and oversight as well as stringent success criteria.

This results in a total of 19.8 acres of mitigation, 11.8 of which already contains mature, high-quality habitat.

GENERAL COMMENT 2

Many indicated that there are deficiencies with the EIR, including the following: a) community outreach was inadequate since environmental groups were not notified directly; b) remaining capacity of the SPS was not disclosed, is misleading, or contained conflicting information; c) interest in maintaining capacity for future needs was not disclosed; d) options evaluated in the EIR were inadequate, providing no options that saved the oak woodlands; and e) the EIR is outdated.

RESPONSE 2

The EIR was prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes and implementing guidelines. The final EIR, along with the Findings of Facts and the Statement of Overriding Considerations, and the Mitigation Monitoring and Reporting Program, was approved by the Board at the June 9, 2009, public meeting. The Notice of Determination was filed with the County Clerk and State Clearinghouse on June 10, 2009. No challenges to the document were received during the legal challenge period, which ended on July 9, 2009. A copy of the EIR Executive Summary is included as Attachment A.

a. Public Outreach

Copies of the Notice of Preparation, Notice of Availability (NOA) of the Draft EIR, and Notice of Completion of the Final EIR were distributed according to CEQA guidelines and may not have been sent directly to all of the environmental groups. However, oak tree and native vegetation removal from the Middle SPS, was considered a primary area of controversy and concern since the initial public scoping meeting held on July 11, 2007 (see pages 1-5 and 1-6 and 1-7 of the EIR). As such, full consideration of this issue was included throughout the environmental and project development process.

During the CEQA process, the following public meetings were noticed and held: an Initial Public Scoping meeting (July 11, 2007) at the 1st Avenue Elementary School; an informational community meeting (August 30, 2007) at Arcadia City Council Chambers; an informational Highland Oaks Homeowners Association Community meeting (May 7, 2008) at the Highland Oaks Elementary School; and a Draft EIR public meeting (June 4, 2008) at the Arcadia City Council Chambers. The NOA of the Draft EIR was published within the Arcadia Weekly.

The NOA was also distributed to over 1,100 interested parties and adjacent property owners and residents, which informed them of where they could view the document and how to comment. Locations to view the document included the Department of Public Works Headquarters, Department of Public Works Website, City of Arcadia Library, and City of Sierra Madre Library.

The documents and all notices were provided to the California Office of Planning and Research, State Clearing House, who, in turn, distributed the documents to the following State agencies: DFG, Office of Historic Preservation, Department of Parks and Recreation, Department of Water Resources, Caltrans, DHS, State Water Resources Control Board, Regional Water Quality Control Board, Department of Toxic Substances Control, Native American Heritage Commission, State Lands Commission, and San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy. Public Works separately sent a copy of the documents to the City of Arcadia, City of Sierra Madre, City of Monrovia, South Coast Air Quality Management District, Los Angeles County Department of Regional Planning, County of Los Angeles Fire Department, Los Angeles Regional Water Quality Control Board, Caltrans, County Sanitation Districts of Los Angeles County, United States Army Corps of Engineers, USFWS, California Environmental Protection Agency, United States Forest Service, Gabrieleno/Tongva Tribal Council, and San Gabriel Basin Water Quality Authority.

During the community meetings the project purpose, scope, and impacts were clearly discussed, including the impacts to the native vegetation. Comments received during the initial scoping meeting, in response to the draft EIR, and during information meetings for the public demonstrate that the purpose, scope, and impacts of the project were clearly and openly described/discussed.

Pursuant to CEQA, the draft EIR was circulated for public comment from May 15, 2008 through June 19, 2008. Comments were received from individuals and also from public entities. Responses to comments were prepared and included in the final EIR pursuant to CEQA. Comments received during the initial scoping meeting, in response to the draft EIR, and during information meetings for the public demonstrate that the purpose, scope, and impacts of the project were, clearly and openly described/discussed.

b. Remaining Capacity of SPS

The EIR project description includes sections pertaining to Project Location and Setting, Purpose of and Need for the Proposed Project, Project Objectives, and Sediment Placement. The language of all of these sections is consistent with the Approved EIR executive summary, which states the following:

Page ES-2 of Approved EIR

“The Santa Anita SPS is comprised of three sections (the Upper, Middle, and Lower SPS areas). The Upper SPS area, located in the northerly end of SPS, is an already disturbed area, but does not have sufficient capacity for the anticipated sediment to be removed from the reservoir. The Middle SPS area has always been planned for sediment storage use: apart from existing access roads it is relatively undisturbed and characterized by native vegetation

because it has not been used for previous sediment storage activities. The Lower SPS area, located in the southerly end of the SPS areas, is a previously disturbed area that contains sediment from prior cleanouts of the reservoir, debris basin, and other local flood protection facilities; it also does not have sufficient capacity to accommodate the expected volume of sediment from the reservoir.”

Page ES-4 ...

“Approximately 250,000 cubic yards of sediment would be placed on the approximately 5-acre already disturbed Lower SPS first. The Lower SPS would then be closed out to future sediment placement; the remainder of the excavated sediment, approximately 250,000 cubic yards, would be placed at the 13-acre area in the Middle SPS, located east of the Santa Anita Wash, south of the existing Upper SPS.”

Page ES-5 ...

“...The remaining sediment capacity in the 13-acre footprint, approximately 500,000 cubic yards, would be used for future routine and emergency sediment removal activities of facilities, including Santa Anita Dam, served by the Santa Anita SPS.”

It is noted that these descriptions do not provide the capacity of the Upper SPS other than stating that it does not have sufficient capacity for the anticipated sediment to be removed from the reservoir, which is 500,000 cubic yards. The Upper SPS is not proposed to be used for this project. Its capacity needs to remain available to address the sediment management needs of the local area served by the SPS. This is discussed in more detail in Attachment C, Project Purpose.

Several letters have been submitted suggesting that all of the sediment from the project can be placed without impacting the native vegetation by using the combined capacities of the Upper and Lower SPS. Many of those letters reference a report by a licensed Civil Engineer. The report states that the Lower SPS has a capacity of approximately 270,000 cubic yards, and the Upper SPS has a capacity of 250,000 cubic yards for a total of 520,000 cubic yards. The report further states that an additional 500,000 cubic yards of capacity could be made available by acquiring additional property from the City of Monrovia.

The Civil Engineer who prepared the report provided a brief description of his methodology and contour map used to develop the capacity of the Upper SPS as discussed in his report. We noted the following issues: The maximum allowed height of the ultimate fill is 770 feet and is graded to allow drainage. The contours suggested do not address necessary drainage for the plateau or

adjacent area. The calculations are based on a maximum elevation of 780 feet (10 feet higher than allowed), but the fill contours at this elevation do not match those of adjacent areas in some locations resulting in unacceptable slopes or the requirement to place stabilizing fill outside of the property boundary. Additionally, in order to fill in the areas identified by the report in the Upper SPS, native vegetation, including mature oak trees, would have to be removed.

Following is our analysis of the capacity of the Upper SPS. It should be noted that several factors affect the final configurations (ultimate fill plan) of sediment placement sites, including accommodating the project sediment placement needs, optimizing the sites' ability to be re-vegetated, respecting neighboring property views, and maintaining the ongoing maintenance and emergency operations of the District.

To date, approximately 1,740,000 cubic yards of material have been placed in the Upper SPS. The available remaining capacity, without removing any native vegetation or oak trees, is 150,000 cubic yards. The available remaining capacity of the Upper SPS, including removing native vegetation within District property (ultimate fill plan), is 230,000 cubic yards.

We agree that the available capacity in the Lower SPS is approximately 270,000 cubic yards.

A response to the suggestion of using both the Upper and Lower SPS for placement of the sediment from the approved project is included in Reponse 3, below.

Related to the report's assertion that an additional 500,000 yards of capacity can be gained by expanding into the City of Monrovia, we have evaluated the contour map and determined that 5 acres of native vegetation, including mature oak trees in the City of Monrovia, would have to be removed to gain this capacity. The report states: "We would recommend agreements be made between the District and the Cities of Monrovia and Arcadia to allow this future expansion...." Please note that the City of Monrovia has informed us that use of land within their proposed Hillside Wilderness Preserve and Hillside Recreation Area for sediment placement purposes is inconsistent with its planned use.

c. Interest to Maintain Capacity at SPS

In order to meet the flood control needs of area's storm facilities, maintaining sufficient capacity at the Santa Anita SPS is necessary. This is discussed in more detail in Attachment C, Project Purpose. The EIR states, on Page 2-7, that one of the primary project objectives is to "*Provide additional sediment storage capacity for future routine and emergency cleanout activities for facilities served by the Santa Anita SPS.*"

A comment was made that the intent of this additional capacity is to allow for trucking material into the SPS from outside of the area. Please note the SPS has been serving several facilities from the surrounding area for decades. In addition to Santa Anita Dam and Santa Anita Debris Basin, other local facilities utilizing Santa Anita SPS for sediment disposal include Auburn Debris Basin, Bailey Debris Basin, Carter Debris Basin, Sturtevant Debris Basin, Sierra Madre Dam, and Lannan Debris Basin. Sediment from these other local facilities is typically placed at the Upper SPS. Most recently, in 2010, approximately 24,000 cubic yards of sediment from Sierra Madre Dam was placed on the Upper SPS after sediment in the reservoir reached the maximum level permitted by State DSOD. Its availability for such necessary sediment management actions is one of several reasons as to why the Upper SPS was not considered for placement of material from the approved project. For comparison purposes, the following volumes of sediment were deposited during major storm events. In 1969, 684,300 cubic yards deposited in Santa Anita Dam and Santa Anita Debris Basin, whereas 157,550 cubic yards deposited in all of the other local facilities. In 1978, 270,800 yards deposited in Santa Anita Dam and Santa Anita Debris Basin, whereas 34,160 cubic yards deposited in all other local facilities. In 1983, 556,700 cubic yards of sediment deposited in Santa Anita Dam and Santa Anita Debris Basin, whereas 11,770 cubic yards deposited in all other local facilities.

d. Options Evaluated in the EIR

In addition to the approved project, five alternatives were evaluated but determined infeasible, and four alternatives were carried forward for detailed analysis. Of the four alternatives carried forward, it should be noted that Alternative 1, the no-project alternative, as well as Alternatives 2 and 3, would not impact the oak woodland and native vegetation of the Middle SPS.

In addition to four alternatives, the Final EIR reviewed the proposed project, which consists of removing approximately 11 acres of native trees and vegetation from the Middle SPS, draining the Santa Anita Reservoir, removing sediment and debris from the reservoir by dry excavation, transporting the sediment from the reservoir via conveyor belt system, and placing it in the Santa Anita SPS within the Middle SPS and Lower SPS. The proposed project includes improvements to the Santa Anita Dam, which would involve

modifications to the dam's inlet/outlet works, including the construction of a new riser on the upstream face of the dam.

The Final EIR reviewed the following five alternatives that were rejected due to infeasibility.

- A Sluicing/Flow-Assisted Sediment Transport (FAST) operation consists of draining the reservoir and utilizing inflow to wash the accumulated sediment out of the reservoir through the lowest gate of the dam to the stream below. This operation is dependent upon storm runoff, post-storm inflows and groundwater levels and cannot reliably remove the required volume of debris. There is significant habitat within the debris basin that would be impacted, and regulatory agencies and other stakeholders have objected and prevented this operation at other facilities.
- The use of dredging or a slurry pipeline was rejected because the reservoir is narrow and small and limits the size of the barge and removal capacity that would be available. This operation requires more reservoir water than may be available and requires a dewatering area to treat sediment laden slurry. The only potential dewatering areas are the Wilderness Park and debris basin. This operation would have significant impacts for a small capacity of sediment removal.
- Trucking along Santa Anita Canyon Road was also rejected because the dam access road along Santa Anita Canyon Road is structurally inadequate for major, sustained trucking operations.
- The construction of a full buttress, which would meet the State DSOD directive, was rejected because this option requires additional years for design and permitting. This alternative is a potential future project; however, to meet the immediate need of the State DSOD directive, this alternative would not fit the timeline.
- And finally, a conveyor belt system in Santa Anita Wash was rejected due to concerns with impacts to the flood control capacity of the wash during storm events, which could occur even during typical dry months of the year. Additionally, the lack of adequate staging areas downstream for transferring the material to trucks for transport to the final disposal destination is severely limited.

The Final EIR carried forward four alternatives for detailed analysis in addition to the proposed project because they were feasible to achieve most of the basic objectives for the proposed project and would avoid or substantially lessen significant environmental impacts.

- The first alternative was the “no-project” alternative, which is required to be evaluated under CEQA. Under this alternative, the Dam and Reservoir would remain filled with sediment and would be noncompliant with DSOD’s directive. The facility would become inoperable/structurally unstable in the future, and there would be a loss of water supply, continued decrease in water storage capacity, and further reduction in flood control capabilities to protect downstream residents. This alternative would not have any impacts associated with the approved project; however, it would not provide an adequate flood control or water conservation facility for the project area and cannot be done.
- Alternative number two analyzed conveying the sediment to the Wilderness Park and then trucking the material from the Wilderness Park along the service road to be deposited at Lower SPS and Middle SPS. This alternative would have added air quality and noise impacts that are associated with trucking. This alternative received significant opposition from local residents who objected to the trucking even though it remained off public roads.
- Alternative number three analyzed conveying the sediment to a clearing north of the SPS and then trucking the material offsite to a disposal site in Irwindale. This alternative would incur approximately 160 truck trips per eight-hour day for the duration of the project (one truck every three minutes, 8 hours per day, 5 days per week, 31 weeks per year for two years). There would be added air quality, noise, and transportation and circulation impacts. This alternative would reduce impacts to aesthetics and biological resources; however, it would result in significant unavoidable impacts to air quality, impacts to transportation and circulation, and noise impacts to the surrounding neighborhood greater than the proposed project. Additionally, this option had significant community opposition due to high volume of trucking on public roads.
- Alternative number four analyzed conveyance of sediment via conveyor to Wilderness Park and then trucking the material offsite. This alternative, like alternative number three, would have approximately 160 truck trips per eight-hour day for the duration of the project (one truck every three minutes, 8 hours per day, 5 days per week, 31 weeks per year for two years). Like alternative three, there would be added air quality, noise, and transportation and circulation impacts. The benefit would again be reduced impacts to aesthetics and biological resources, but the increased impacts to air quality, transportation and circulation, and noise on the surrounding neighborhood would be greater than the proposed project and greater than alternative three. Additionally, this option had significant community opposition.

e. The EIR is Outdated

The Certified EIR remains valid. Some members of the public have expressed that the EIR is outdated due to effects of the Station Fire or other events, such as passage of Assembly Bill 1881, a water-efficient landscape ordinance, and recent efforts to develop a County oak woodland ordinance. We have determined that there have been no changes to the project or to the circumstance under which the project will be undertaken that necessitate further environmental review. These events do not require re-evaluation of issues already considered in the certified EIR, and no further approvals by your Board are anticipated for the project.

It should be noted that presence/absence surveys for special State plant and wildlife species were conducted in 2010 and will be conducted again no more than two weeks prior to construction activities. Similar protocol surveys were conducted in 2007 and 2008.

GENERAL COMMENT 3

Several comments suggested project modifications or alternatives, including suggestions such as: a) “send the sediment to the beach,” “fill in the pits in Irwindale,” “aggregate companies will buy it,” “put it on a conveyor to their facility,” or “send a little bit at a time annually rather than one big project;” b) others referenced an independent engineer’s letter report that indicates the material can fit onto the existing disturbed areas of the SPS; and c) a few provided more detailed suggestions such as placing half or two-thirds on the existing disturbed areas and trucking the remainder out of the area.

RESPONSE 3

- a. The public’s suggestions such as “send the sediment to the beach,” “fill in the pits in Irwindale,” “aggregate companies will buy it,” or “just put it on a conveyor to their facility,” etc., all require the sediment to be transported to another location. These suggestions would all require trucking, conveying, or use of reservoir releases to flush or sluice material downstream, all of which were addressed in the EIR. These suggestions would, at a minimum, likely entail the same or similar impacts and obstacles as options discussed in the EIR but not selected due to their impacts. The suggestion to remove smaller amounts more frequently can reduce impacts and is an appropriate measure to reduce the frequency of larger projects such as the approved project; however, it can not address the immediate need of implementing the approved project. In the future, new technologies for conveyors, or less polluting and quieter trucks may be available that remove technical obstacles or impacts associated with transporting sediment in this manner or to these locations. It should be noted that even if these obstacles and impacts are eliminated/reduced and trucking/conveying take place in the future, operational capacity will still be required at the SPS. Examples of potential needs for operational capacity

include the following: a sediment drying area on the SPS would be required prior to placing sediment on a conveyor or trucking if the sediment in the debris basin needs immediate removal during the storm season; a staging area would be needed for transferring/stockpiling sediment removed from the dam before transferring to trucks for hauling out. Even if conveyed out of the area, the different rates of sediment removal from the dam/debris basin compared to the end use or transfer site would likely require a substantial stockpile area, and an area for generators or motors powering the conveyor would also be required. If the material is found to be useful for commercial purposes, a staging area for grading/sorting may be required to segregate the marketable material from that not wanted.

- b. Many of the public have commented that the oaks could be saved if we simply place all of the sediment from behind the dam on the existing disturbed areas of the SPS (Upper and Lower SPS). A letter report from a civil engineer was referenced or was included in a few letters, which stated there is sufficient capacity on these disturbed areas for the estimated 500,000 yards of sediment behind Santa Anita Dam. While there were some deficiencies in the referenced letter report as discussed in RESPONSE 2.b, above, we acknowledge that much of the sediment from behind Santa Anita Dam could fit on the combined disturbed areas of the Upper and Lower SPS. This approach, however, was never considered as an option because it does not address the flood control needs of the District nor does it meet the project objectives. As stated in the Certified EIR, Section 2.3, one of the Project Objectives is to provide additional sediment storage capacity for future routine and emergency cleanout activities for facilities served by the Santa Anita SPS.

Using both the Upper and Lower SPS areas are not feasible due to the District's obligation to maintain capacity for both placement and operations so we can quickly respond to sediment management needs of area facilities served by the SPS. The SPS serves Santa Anita Dam, as well as several other flood-related facilities that provide vital flood protection to communities within the Cities of Arcadia and Sierra Madre. These facilities are: Santa Anita Debris Basin, Sierra Madre Dam, Bailey Debris Basin, Auburn Debris Basin, Carter Debris Basin, Sturtevant Debris Basin, and Lannan Debris Basin. Without adequate capacity at the SPS, any planned or emergency efforts for removal of sediment could take years due to the lengthy environmental and permit process associated with acquiring new placement locations. Such delays would place the communities at increased risk. Additionally, using all of the existing capacity would not be consistent with the project's objectives as stated in the EIR.

The Engineers Report, previously mentioned, indicated the use of both the Upper and Lower SPS could be accomplished without disturbing the oak woodland. It should be noted that the existing approved conveyor alignment runs diagonally through the Middle SPS and some trees and vegetation would

have to be removed to accommodate the conveyor alignment. The conveyor was specially manufactured and fabricated for the project, and replacing it with a segmented conveyor that could be realigned to stay on existing access roads would likely delay the project one year and have additional direct costs of approximately \$1.5 million in addition to the costs of delay and the risks and impacts discussed in Attachment E.

- c. There were also suggestions for a hybrid of trucking the material offsite along with filling the Upper and Lower SPS. One such suggestion, referred to by the author as "Alternative 5", recommends to fill the Lower SPS with 250,000 yards of sediment, place 125,000 yards on the Upper SPS, and truck the remaining 125,000 yards of sediment offsite through Sycamore Avenue and Santa Anita Avenue.

While this suggestion may be technically feasible, there are a number of issues in addition to the need for additional environmental review, with this approach that make it less desirable than the approved project. "Alternative 5" would leave only 25,000 cubic yards of capacity in the Upper SPS (see RESPONSE 2.b). An additional capacity of 80,000 cubic yards (a total of 105,000 cubic yards) could be attained by clearing mature oaks and native vegetation along the hillside adjacent to the currently disturbed areas of the Upper SPS; however, this would still be inadequate to meet anticipated future needs for the facilities served by the SPS. For example, during wet storm years, such as 1969, 1978, and 1983, Santa Anita Debris Basin alone had 132,300 cubic yards, 154,800 cubic yards, and 171,200 cubic yards of sediment, respectively, that required removal to ensure the continued safe operation of the debris basin and protection of residents. Of the three storm seasons listed, only in 1983 was a portion of the watershed recently burned by wildfire.

Of additional concern are the impacts associated with the trucking of 125,000 yards of sediment. While less than the volume of sediment trucked under Options 2 and 3 of the EIR, appropriate environmental analysis would likely be required before we could move forward. Significant opposition from the City and residents along the haul route would also be expected, including the City and residents where the material would be taken. Delays associated with resolving these issues could be significant. In the interim, a location to stockpile the material would be required; however, none would be present. Environmental assessments and permits might also be required due to impacts associated with a new stockpile location. The risks, impacts, and delay costs would be significant as discussed above and in Attachment D.

Also, similar to the option as discussed in the engineers report, it should be noted that the existing approved conveyor alignment goes diagonally through the Middle SPS and some trees and vegetation would have to be removed to accommodate the conveyor alignment. The conveyor was specially manufactured at a cost of approximately \$1.3 million and fabricated for the

project and replacing it with segmented conveyor that could be realigned to stay on existing access roads would likely delay the project one year and have additional direct costs of approximately \$1.5 million in addition to the costs of delay and the risks and impacts discussed in Attachment D.

P:\wrd\DAMS\A-MEMOS\Amemo 3507 Attachment F - community concerns and suggestions.doc



DRAFT

Date: December 17, 2010

To: Steve Sheridan

From: Ed Means
Vice President

Subject: Meeting Summary - Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project Public Meeting - December 16, 2010

The workshop was held in Arcadia, CA at the Highland Oaks Elementary School, 10 Virginia Road Arcadia, CA. There were approximately 100 attendees.

Introductory comments were made by the Facilitator Ed Means and included the following points:

- Welcome – appreciate your coming
- The Facilitator is neutral without a stake in the outcome beyond creating an environment for a successful and productive meeting
- The meeting is in response to public concerns regarding the Project, Mayor Antonovich introduced a motion approved by the Board on Dec. 7, 2010 to:
 - a) Postpone the start date of construction for the Santa Anita Dam sediment removal project for a minimum of 30 days; and
 - b) Report back to the Board w/in 30 days advising on the environmental options explored for this project in order to meet sediment placement needs while minimizing impacts.
- Purpose of the meeting:
 - To inform the community of the regional need and purpose of the project
 - To describe the environmental process, and timeline including public meetings and alternatives which were considered
 - To listen to community concerns
- The final EIR has been certified and it is not the County's intent to reopen the environmental process.
- The results of the workshop (attendee's concerns) will be shared with the Board of Supervisors along with the benefits of the project.
- Attendees were encouraged to sign in and prepare speaker cards if they wished to speak (comments were taken from individuals that had not presented cards).
- Location of coffee and restrooms was identified.
- The County wants to hear from everyone – comments were encouraged to be as concise as possible without repeating in detail similar concerns that others have made.
- Notes will be captured on the flip chart and by hand by note takers.
- Questions need be held until the introductory presentation is finished.
- One speaker at time – parallel conversations were discouraged.



The workshop then proceeded with a presentation from Keith Lilley, Sr Civil Engineer with the LADPW
The project presentation lasted from 7:08 – 7:47 p.m.

The workshop then proceeded with public comments. Speaker's cards were read in order and participants shared their concerns.

The comments fell into several broad categories:

- Most speakers were sympathetic to the County's need for sediment disposal sites. Many were complimentary of Mr Lilley. In general, they felt that destroying the trees was not appropriate.
- Most speakers felt truck traffic is undesirable with the Homeowners Association President strongly expressing that sentiment.
- Most speakers expressed a desire to have "other alternatives" examined. Many speakers expressed the problem as a "regional problem" not a "local problem"
- Several speakers expressed the need to consider the long term sediment disposal needs of the County in a comprehensive plan.
- Some speakers cited the need to consider that the baseline biological survey was conducted before the Station Fire and conditions have changed
- Many speakers indicated they were not aware of the project and felt that more outreach was needed.

The specific comments are summarized below and are in chronologic order:

Glen Owens - Questions on the EIR it says Upper sediment placement site (SPS) is filled to capacity. He says it's deceptive – no indication of size of the upper site. How many yards are trucked in and out from the area? Indicated that Flood Control is good on creeks but not on public opinion management. Has an independent civil engineer that states there is plenty of room for sediment on existing site. He asks if County has worked with cities of Monrovia and Arcadia to see if they can use areas for the future. EIR lacking on trucking. Claims Monrovia trucked through the wash area historically. No one against what has to be done for the dam. Emotional about the trees, very close to nature. Landform grading was suggested. Said everyone there was 100% for the project, 100% to not take trees. One person in the audience said no. Refer to Response No. 2b, 3b

Ross Heckmann, Arcadia resident, 1214 Valencia Way. Trucking through the city will impact residents. Habitat loss is permanent but impacts to the residents are temporary. Greater notice to the people about the loss of woodland needed. Testimonial - No Response Needed

Laura Garrett, Pasadena Audubon Society. Because its legal its not moral, ethical or wise. Problem with landfills. Short term solution to long term problem. Devils Gate in Hahamonga has 50 acres to be cleared. We will run out of areas to put material. John Muir Quote. Testimonial - No Response Needed

Terry Owens - Thanked for the opportunity to come together. Doesn't like to hear it called an SPS. Steep areas are not able to be accessed by everyone. Testimonial - No Response Needed



Jim McKellar, 2000 Oaks place, Arcadia - Acknowledged need of the County for safety of dam. Need a different way to put sediment. County employees work for us. [Refer to Response No. 3a](#)

Chris Ziegler - Agree with all speakers so far Lack of notice. Bigger picture view of whole situation is needed. Potential for public / private venture. Sluicing might be feasible to get material to an area to get a downstream company that wants it.

Cosmo Bua, Santa Monica "Tree Savers" - Core of all this is love for wilderness. Trees need rights. Trees know what is happening to them. Speaks for nature. [Testimonial - No Response Needed](#)

Tim Martinez, Pasadena – One more voice to preserve the trees. Land is balanced (oak woodland) and needs to be saved. Native trees are drought and fire resistant Love to hike, my spirituality Not a sediment dump. [Testimonial - No Response Needed](#)

Kathy Sturdevant, Pasadena It's a beautiful area. Short term solution, it needs to be handled annually, not as an emergency project. [Testimonial - No Response Needed](#)

Roger Klemm, Sunland - Encourage FCD to take a different look at SPS. Annually done, a little at a time, sustainable way to use it, at the beaches. [Refer to Response No. 3a](#)

Dave Czamanske, Sierra Club What is the purpose of meeting? Hope that Public Works doesn't go back to Board to say no way to do anything else. Opposed to oak tree removal. Contract can be changed. Viable alternatives are available. AT Board it will be challenged. Trucking to the site, it is illogical to bring stuff in from other places. He is a lawyer Vulcan uses sediment from Pacoima and County gets equivalent capacity at its pit. Vulcan wants to expand and that will be opposed. Why to take mining from pits, should take the material from the dam. Commercial opportunities. Long range planning in now in Watershed Management Division due to the Station Fire. Piece meal approach to sediment removal doesn't make sense. Require Contractors to use quiet, low emission for vehicles, impacts to neighborhoods will be reduced. Need conveyor belt to take material to the lower SPS, urged an alternative to taking the oaks. Project doesn't mention oak tree bonuses on Air quality EIR deficient on that. Asked for public to report to the Board by Jan 6th [Refer to Response No. 3](#)

Ralph Bicker - How many live in the area. There was no HOA notice. He learned about it a week ago in the newspapers. Concerned about trucking past his house. Trees are not visible, area is non-trespassing. Fill won't hurt anyone. [Testimonial - No Response Needed](#)

Jerry Baker, employee of an agency Is revegetation budgeted? Chris Stone states not budgeted. Keith Lilley added we have contract with State. Was asked what are repercussions if we don't revegetate? Keith answered no other permits would be granted the County [Response provided at meeting](#)

Lara Larramendi, Monrovia Wants handouts. No right to remove oaks trees. Not fully thought out. There was little notification and appears to be some deception. [Testimonial - No Response Needed](#)



Bob Ginn, Arcadia – According to Glen there is another way to do the work but not take the trees. It should be preserved.

Refer to Response No. 3

Camron Stone, 120 Elkins Ave. (on truck route) - Recent project 3 wks of Sierra Madre cleanout. How many cubic yards (CY)? Keith replied 24000 CY Need alternative ideas. – holes in Irwindale that need to be refilled. Need other haul routes – on Sycamore Ave. There is capacity on the site that doesn't need to take the trees. Need long term solution now

Refer to Response No. 3

Judy Hermann - Paper copy of 1st community meeting, it has a different date. Not mentioned that SPS wasn't only for Santa Anita Dam. Feels betrayed.

Testimonial - No Response Needed

Christle Balvin, Out of town – Worked with FCD, something went awry in this EIR. Upper portion can accommodate more sediment. County is not talking to each other Villaraigosa wants to plant trees but FCD is taking them.

Refer to Response No. 2b, 3

Tim Callahan - Residents would be fined for cutting oaks. Station Fire happened but we are cutting down more trees. Find a way to get debris moved without taking down oaks.

Testimonial - No Response Needed

Lori Paul - Small creatures can't be mitigated for the duration that it takes the oaks to grow Permits are reluctantly given by CDFG. Mitigation areas on slopes is not accessible, but SPS is. Surviving birds from the fire will be homeless if county takes the trees. Incalculable loss if oaks are taken. Her organization wasn't notified. EIR before the fire – CEQA says EIR needs to be revisited if major event changes things. Process wasn't followed properly Outreach needs to be better

Refer to Response No. 2

Steven Coucher, Entomologist and Arcadia resident - Area is a pathway for wildlife. New ways to transporting things is available. No alternatives to where to put the material in the EIR. Good area for horseback riding, flat for nature and accessibility

Testimonial - No Response Needed

Laurie Gould, East Pasadena Scout leader - Need to change way of thinking. Need to protect environment.

Testimonial - No Response Needed

Caroline Brown - Appreciate it as a high quality habitat. Interest in the environment in California is international. One fragment of oak woodland that is surviving. Station Fire has taken so much. We have a carbon factor that wasn't looked at. Fire adapted woodlands are being reviewed internationally Need a blended outcome and oaks need to be preserved. Oaks will act as a reserve, because San Diego oaks have a borer that is spreading.

Testimonial - No Response Needed

Doug Lerner, Arcadia – Question to the County: is the EIR on website? Yes. 1 million truck loads of sediment was in the paper due to the Station Fire. Long term planning is needed now

Response provided at meeting

Dorothy Kelty, Highland Place, Monrovia - Regional Problem. County has access to foothill blvd – that's how it was done 40 years ago. Beaches are crying for sand, put it where it belongs. City of Long Beach will come to get it. Area is gnatcatcher habitat.

Refer to Response No. 3a



Rebecca Latta – Need for regional planning – oak woodland habitat preservation. Timing of project didn't allow it to be come a part of that program. It needs to be looked at it again.

Testimonial - No Response Needed

Gabi McLean, Covina, California Native Plant Society Oak woodland is unique because of it's accessibility Mitigation in Tujunga is too far, to different and not enough. Spend money for mitigation on equipment to lower emissions and hybrids. Need to preserve habitat for animals and people. Taking it away permanently from us.

Testimonial - No Response Needed

Orchid Black, CNPS/ LA County Woodland Alliance – not speaking for either group tonight. Craft a plan to preserve oak woodland. County is not talking to itself. Not even 1 1 mitigation with this project. Won't be successful for mitigation. EIR process was not enough. Gold spotted oak bore is destroying oak trees.

Testimonial - No Response

Beverly McKenzie - Appreciate public works people. This is not a neighborhood problem-it is a regional problem. Thanked everyone for coming out.

Testimonial - No Response Needed

Doren Przybila - Public Works has to be a better job of community outreach. Spoke about removal of trees in Tujunga area. Chris Stone talked about the exotic tree removal for the mitigation bank.

Testimonial - No Response Needed

Dave Czamanske, Sierra Club – Stated Keith was listed on the 1st community meeting handout. The 20 page Powerpoint presentation was too vague and not an accurate representation of what was at stake. Poor outreach to public on what was to be involved. "What is to be done between now and Jan 7th meeting?" Urge to send letters to Antonovich.

Testimonial - No Response Needed

Phil Cogisino, HOA President He acknowledged he got a late notice – will oppose trucks running past the schools. If it is children's safety(truck traffic) versus trees, the kids win.

Testimonial - No Response Needed

Gabi McLean - States San Gabriel Valley California Native Plants Society did not receive the EIR. Wants to be on list to get future EIRs.

Testimonial - No Response Needed

Cosmo Bua - What is elevation of riser? Keith showed him the presentation graphic.

Response provided at meeting

Mark Heltsley, Highland Oaks resident - Help keep his front yard (i.e. the oak trees).

Testimonial - No Response Needed

??? - (spoke quickly and could not catch his name), Sherman Oaks resident – Loss of part of our yard is not acceptable. Most beautiful thing on the planet is the oak woodlands.

Testimonial - No Response Needed

Closing Remarks

Chris Stone – We weren't required to have this community meeting but we wanted to hear what you have to say Sediment Management is a Regional Problem. We have to all work together

Participants were directed to the project website for CEQA documentation. The presentation will be posted to the website by Monday, December 20, 2010.

The comments will be provided to the Board of Supervisors in January





The meeting adjourned at 9:30 p.m.

A handwritten signature in cursive script that reads "Ed Means".

Edward G. Means
Vice President
Malcolm Pirnie



December 22, 2010

Refer to Responses: 2d, 3b, and 3c

Mr. Christopher Stone
Assistant Deputy Director, Water Resources Division
900 South Freemont Avenue, 2nd Floor
Alhambra, CA 91803-1331

Subject: Santa Anita Dam Riser Modification and Sediment Removal Project
Proposed Alternative # 5: Allowing Woodlands to Be Saved

Dear Mr. Stone:

Thank you for hosting a public outreach forum regarding the above referenced Project on the evening of December 16, 2010. As you experienced during the course of the meeting, there is considerable public opposition to the Project's current plan to clear 13 acres of pristine native oak and sycamore woodland to make space for the disposal of sediment from this Project. It is understood that one of the main goals of the Project is to also open up additional space for sediment disposal to satisfy the future needs for debris basin cleanouts well into the future.

After careful study of both the EIR and the "Findings of Fact," I realized that, of the four alternatives considered, none of them offered a solution that would not destroy the Woodlands and would not put 100,000 trucks on the streets of Arcadia. I therefore set about researching and defining a fifth alternative, called "Alternative #5," that would satisfy the Project goals (with minimum impact) of the Department of Public Works (DPW), minimize the impact of the Project on local homeowners and eliminate the objections of environmental groups and concerned local citizens who want to preserve the Arcadia Woodlands for future generations.

I have therefore attached a document entitled "Proposed Alternative #5" that details a fifth alternative that should be acceptable to most, if not all, of the stakeholders surrounding this Project. I would sincerely appreciate your careful consideration of this alternative and the scheduling of a meeting with myself and others supporting this alternative, to discuss and negotiate a way forward that can be embraced by all parties concerned.

I look forward to hearing from you soon.

Sincerely,



Camron Stone
626-476-7324
camstone@altrionet.com

Proposed Alternative #5

To The
Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project

Findings of Fact and Statement of Overriding Considerations

By
Camron Stone
December 21, 2010

1. Overview

The Los Angeles County Department of Public Works (DPW), after several years of study, has embarked on a Project to excavate the excess sediment behind the Santa Anita Dam above the cities of Arcadia and Monrovia ("The Project"). The conclusion of the above referenced "Findings of Fact" is that the best alternative for placement of the 500,000 cubic yards of excavated sediment is to erect a conveyor system to transport the sediment to the currently operating Sediment Placement Site (SPS) in Northeast Arcadia. The approved "Project" would place 250,000 yards of the sediment on the existing Lower SPS Area, filling it to its designed capacity at which time it will be sculpted and planted with native vegetation and oaks.

The remaining 250,000 yards would be placed on what is called, in the "Findings of Fact", the "Middle SPS Area." The Middle SPS Area is a misnomer. It is, in actuality, a pristine fragment of native oak and sycamore wilderness woodland comprising approximately 26 acres. It is the only surviving untouched example of the flatland woodlands that once thrived within the alluvial fans exiting the San Gabriel Mountain Range. This small wilderness has now been named "The Arcadia Woodlands."

The approved Project calls for the eradication and removal of 179 Coast Live Oaks and approximately 70 Sycamores and its associated native under-story habitat on 13 acres of this pristine and historic woodland. After the eradication of this woodland, 250,000 yards of sediment will be placed on this site extending the Upper SPS southward about 450 feet.

In recent weeks, there has been significant public objection to the portion of the Project that will destroy the Arcadia Woodlands. The EIR and "Findings of Fact" had previously slipped through the limelight of public scrutiny precisely because the public has been prohibited from entry into the Arcadia Woodlands for the last 60 years. Every gated entrance to the area has a sign posted saying that trespassing will result in a \$1000 fine and/or six months in prison. In short, very few people, other than LA County employees, were aware of the existence of the Arcadia Woodlands. This fact alone allowed the EIR, "Findings

of Fact” and final project approval to slip through with very little, if any, public scrutiny

On December 4, 2010, after several newspaper reports finally informed the public about the real scope of the sediment removal Project and the resulting destruction of the Woodlands, the first public walk-through of the area in over 60 years took place. This event was well attended by LA County DPW personnel. The public saw and experienced what the EIR and “Findings of Fact” could not possibly describe in thousands of typewritten pages. The Arcadia Woodlands is a fully functioning and pristine example of the native oak woodlands that once stretched across the San Gabriel Valley

It is very interesting to note here that not a single photograph, taken within the Woodlands, is included in either the EIR or Findings of Fact for this Project. The only photographs included in the reports are from satellites or from very far away. In summary, the public was never fully informed by the County of the true environmental impact of the Project. The true wilderness beauty of this site, named “The Middle SPS” in the reports, has been hidden from public view for over 60 years and it was hidden from the public throughout the EIR process. The public has now been fully informed – they have seen and experienced the Woodlands in person and hundreds of beautiful photographs of this magical place are now circulating on the internet.

The LA County DPW as well as the City of Arcadia now have a serious public relations problem. This report: “Alternative # 5” details an alternative plan for the sediment removal Project that not only has a minimum impact on the existing approved and contracted plan but also eliminates the need to destroy the woodlands and provides a precedent for the future of the DPW’s sediment placement needs. This alternative has been circulated to the public and interested organizations that object to the Project as it now stands and has received their approval and support.

2. Omissions, Inconsistencies and Untruths within the EIR and Statement of Fact

Both the EIR and Statement of Fact have serious flaws that have inevitably led to the approval of the Project as it now stands. These flaws also produced the four “Alternatives” discussed and rejected within the documents. No alternatives, other than “Alternative #1 No Project,” were put forward that would save the Arcadia Woodlands from destruction.

The LA County DPW admits that one of the core objectives of this Project is to open the Middle Sediment Placement Site (SPS) for deliveries of truckloads of sediment from other locations around the County not related to the Santa Anita Dam Sediment Removal Project according to the Final EIR.

It is easy to see why the County rejected any alternative that did not include cutting down the oaks. It was this mission to prepare the Santa Anita SPS as a receptacle for sediment from other sites that steered the County into rejecting alternatives that preserved the woodlands, not any concern over cost or the impacts of truck traffic on residents. *In effect, this Project is more about staking claim to additional sediment dumping areas for future truck traffic into the site from debris basins outside the area than the actual sediment removal from behind the Santa Anita Dam.* The EIR and Statement of Fact make scant mention of the real goal of this Project and are in fact deceptive in regards to this goal.

This section identifies the flaws and omissions within the EIR and Statement of Fact that allowed the DPW to eliminate any alternative that did not raze the Woodlands and make way for a longer future of truck traffic through Arcadia's neighborhoods and into the Santa Anita SPS:

2.1. Upper SPS Capacity

The EIR has the following statements regarding the Upper SPS:

"The Upper SPS area, located in the northerly end of the SPS, is an already disturbed area, but does not have sufficient capacity for the anticipated sediment to be removed from the reservoir." (Final EIR, Page ES-2)

"The Upper SPS is a previously disturbed area that is *filled to capacity* with sediment from earlier cleanouts of the reservoir, debris basin, and other local flood protection facilities." (Final EIR, Page 3.1-2)

"[The Upper SPS] has a remaining capacity of 250,000 cubic yards, but would not be used for sediment placement for this Project." – (Final EIR Appendices, Biological Assessment and Biological Evaluation, page 23.)

The EIR has a confusing array of information regarding the actual remaining capacity of the Upper SPS. It seems that this is a closely guarded secret of the LA County DPW. Due to the inability to obtain accurate information, an independent soils engineer, G. Bart Stryker, has been hired by Glen Owens to evaluate the Upper SPS. Mr. Stryker performed all of the soils engineering for both phases of the Whispering Pines Development immediately above the Woodlands, so his familiarity with the area is excellent. His report (attached) states that the Upper SPS has a current capacity of 250,000 cubic yards, which would raise its current elevation by eight feet. This estimated capacity is constrained by the fact that the Upper SPS abuts property owned by the City of

Monrovia. If the Upper SPS were allowed a relatively small encroachment on to this property, an additional 500,000 to 1,000,000 cubic yards of sediment capacity would be opened up for future disposal. During the study and EIR phase of this Project, the DPW (to our knowledge) never contacted the City of Monrovia to assess this possibility

Even without the additional capacity to be had by encroachment, the combined capacity of the Upper SPS and the Lower SPS is over 500,000 cubic yards making the above statements in the EIR misleading at best.

In addition, there is a bowl shaped area of approximately 6 acres located about 100 yards Northeast of the Santa Anita Debris Basin spillway that could also be used for sediment placement in the future. This area is mostly within the city limits of Monrovia so an easement or encroachment would have to be negotiated with the city for its use. This area is also what the DPW calls "undisturbed," but it is mostly chaparral with just a few Oaks.

2.2. Inadequate Public Notification and Outreach

The California Environmental Quality Act (CEQA) recommends that a lead agency consult directly with any person or organization that might be concerned with the environmental impact of the Project. The language of the law itself recommends these notices to prevent exactly what's happening to the DPW's Project now – fierce opposition when it's discovered by a wider public. As evidenced by the lack of any responses from such an organization in the Final EIR, and the fact that the DWP did not describe any such notifications in the "Findings of Fact," it is safe to assume that the DPW elected not to alert any potentially interested organizations to the Project. Instead, the Project was concealed from groups with an obvious interest - groups like the California Native Plant Society, the Sierra Club, the Los Angeles and San Gabriel Rivers Watershed Council, the Audubon Society, the San Gabriel Mountains Regional Conservancy, and Heal the Bay.

Not only did the DPW elect to keep news of this Project from any of those organizations, but it appears they even kept it from neighboring cities with a real interest in the Project. There are no responses in the Final EIR from the City of Monrovia which has the Monrovia Hillside Wilderness Preserve a few yards from the Middle SPS. There are no responses in the Final EIR from the City of Sierra Madre, through which the truck traffic would have traveled under some of the Project's alternatives.

As mentioned in the overview, The DPW made no effort to inform the public and the local homeowners association of the pristine nature of the Woodlands. The DPW, in all the documentation, calls this area "The Middle SPS" and describes it as "Undisturbed" and "A Significant Biological Area" It is documented that the DPW, in its first meeting with local homeowners, gave the City of Arcadia only two choices: Its own and current vision of the Project or they would put 100,000 trucks on the streets of Arcadia. Given that very limited choice, the Highland Home Owners Association (HHOA) and the City of Arcadia chose the former alternative.

No offer was made to take the public and/or City and HHOA officials into the Project area. As noted earlier, no photographs of the woodland were included in any of the DPW documents including the EIR. The DPW knew that if the public ever found out about and saw what they wanted to destroy, their plans would be invalidated.

To the casual observer, it might appear as though the DPW was trying to manipulate the local residents into supporting the preferred alternative by linking it with the safety of the Santa Anita Dam and the significant impacts of truck traffic. It might appear that the DPW then published public notice in an obscure paper to reduce the Project's exposure to the public as much as possible, while publishing it with only 28 days left in the comment period to further reduce the potential for contentious comments. A casual observer might also assume that the DPW decided not to notify any civic or environmental organizations of the Project in an effort to keep opposition to the Project at a minimum. It might even appear that neighboring cities were kept in the dark because they might have objected to the Project.

3. Alternative #5: A Way Forward

The purpose of this report is to put forward into the public and DPW discourse a Fifth Alternative that was not included in the EIR or the "Statement of Fact." Both documents outlined only four alternatives to the current Project including the "No Project" alternative (#1). For the purpose of clarity, these alternatives are summarized below:

Alternative #2: Convey to Wilderness Park, Truck to SPS

This alternative has no effect on the destruction of the Arcadia Woodlands and the Project as it now stands.

Alternative #3: Convey to the Clearing of the North SPS Site, Truck Off Site

This alternative would have saved the Woodlands but is designed to be an "All or nothing choice." This is one of the two choices given to the HHOA. It can be summarized as "We'll put 100,000 trucks on the streets of Arcadia." All of the sediment in this alternative would be trucked to the Manning Pit SPS, which is one of the giant quarry holes located in Irwindale.

Alternative #4: Convey to Wilderness Park, Truck Off Site

This is essentially the same as Alternative #3 except that the truck route would be extended by one half mile

Each of these alternatives in the EIR were designed by the DPW to be untenable to the uniformed general public and to the City of Arcadia. The public and organizations that object to the current Project and the EIR as it now stands believes that there are additional alternatives that, if offered, would be acceptable to most of the public, the DPW and the County as a whole:

Alternative #5: Convey to the Upper and Lower SPS Sites, Truck Remainder of Sediment Off Site via the Sycamore Ave. Gate

This Alternative is structured to specifically address the present and future concerns of the DPW, the HHOA, local environmental organizations and residents living near the Santa Anita SPS. Most importantly, it saves the Arcadia Woodlands from immediate destruction so that the future of this wilderness can be discussed in public forums with input from all sides.

Alternative #5 has also been designed to have minimum impact to the existing Project now underway, the DPW and its (so far) unidentified Contractor for the Project.

The main aspects and explanations of Alternative #5 are listed below:

3.1. Convey 250,000 Cubic Yards of Sediment to the Lower SPS, Close this Site, Sculpt and Replant with Native Vegetation

This provision of Alternative #5 is exactly the same as in the current Project with the proviso that the sculpting and replanting of the Lower SPS with native plants is currently UNFUNDED by the County. This fact, verified by the DPW, leaves open the possibility that the topped off Lower SPS will remain a denuded eyesore for many years into the future.

The DPW has stated that the Project Contractor has already ordered the conveyor system and that the system is currently in transport to the site. Alternative #5 (A#5) uses the soon to be delivered conveyor system "as is" with only a slight modification: The current system is designed to take sediment all the way from the Santa Anita Dam to the Lower SPS with a small spur conveyor to take sediment to the "Middle SPS" as well. A#5 would move this spur northward to take some of the sediment to the Upper SPS.

It should be noted here that the EIR approves the conveyor system track to follow the access road immediately to the East of the Santa Anita Channel with a possible alternative route that follows the easternmost existing road within the Woodlands. However, on-site evidence within the Woodlands shows survey markers for placement of the conveyor system placed within the "undisturbed" portion of the Woodlands in direct conflict with the approved EIR.

This provision of A#5 has minimal, if any, impact on the currently approved Project and disposes of half of the 500,000 cubic yards as planned.

3.2. Convey 125,000 Cubic Yards of Sediment to the Lower Area within the Upper SPS Site

The Upper SPS Site is currently divided into two areas by an elevation change. The upper part of the site (approximately 5 acres) is on the northern side of the Upper SPS. The lower part is approximately three acres, the top of which is at an elevation approximately 25 feet below the mesa formed by the upper area. This lower part of the Upper SPS, if filled to the existing level of the upper part, will hold approximately 125,000 cubic yards of sediment.

Once filled, this 125,000 cubic yard placement would leave approximately eight flat acres on the top of the Upper SPS for future deliveries of sediment from nearby debris basins. The elevation of the Upper SPS could be raised another eight feet (or 125,000 cubic yards) without encroaching on City of Monrovia property. As stated earlier, a small easement into the Monrovia property could increase the future capacity of the Upper SPS by another 500,000 cubic yards.

3. Truck the Remaining 125,000 Cubic Yards of Sediment Off Site Though the Sycamore Avenue Gate

It has now been established that one of the main (unstated) objectives of the DPW for this Project is to expand future sediment capacity at the Santa Anita SPS. The DPW's solution for this objective is to destroy a

highly unique wilderness resource. This solution, however, only delays the inevitable fact that at sometime in the future (20 years?), the Santa Anita SPS will be filled to capacity and nearby sediments will have to be trucked off site – more than likely to the Irwindale gravel pits.

The DPW is also well aware that local opposition to putting tens of thousands of trucks on neighborhood streets (i.e. Elkins and Santa Anita Avenue) is high and will probably increase in the future.

The DPW therefore needs to set an acceptable precedent for the trucking of sediment out of the Santa Anita SPS facility. The next time the Santa Anita Reservoir fills with sediment, the DPW will have no other option but to truck that sediment off site. Both the EIR and the Statement of Fact make no mention of using the Sycamore Gate at the extreme southern end of the Santa Anita SPS. The use of this gate for the trucking of sediment into and out of the SPS is highly preferable to the currently used Elkins Gate with the proviso that the Sycamore Gate be used only in the summer months when the nearby Foothills Middle School is not in session.

The use of the Sycamore Avenue Gate for the remaining 125,000 cubic yards of sediment has several advantages:

- The distance, on city streets, from the Sycamore Gate to the 210 Freeway onramp at Santa Anita Avenue is slightly less than one half mile with less than half of that distance passing by residences.
- The distance, on city streets, from the Elkins Gate to the 210 Freeway onramp is 2.0 miles. Almost the entire route passes by residences.
- The cost of street cleaning along this shorter trucking route would be significantly reduced.
- The chances of an accident along the shorter route would be significantly reduced.
- Successful implementation of sediment removal using the Sycamore Gate creates a precedent for future movement of sediment through this gate.
- All of the 125,000 cubic yards of sediment to be trucked off site can first be conveyed all the way to the Lower SPS. The Lower SPS can then be used as a staging area for the loading of trucks with the sediment.

There are some possible disadvantages to the use of this trucking route:

- The trucks would have to travel along the access road adjacent to the flood control channel. This road would probably have to be

graded and/or additional roadbed might have to be added to handle the truck traffic. Fortunately the equipment and material for this purpose will be readily available during the course of the Project.

- About ¼ mile of the channel access road passes near the backyards of residences on Oakglen Ave. These residences are separated from the access road by fencing or walls.
- Dust mitigation water trucks would have to be used on the access road from the Lower SPS to the Sycamore Gate – a distance of approximately one half mile.

It should also be noted here that during the construction of the 210 Freeway in the early 1970's, 400,000 cubic yards of fill dirt was quarried from the hills above the Whispering Pines development and trucked out to the construction sites through the Sycamore Avenue Gate.

4. Alternative #5 Summary

This Alternative to the Santa Anita Dam Riser Modification and Sediment Removal Project is presented to the LA County Department of Public Works in the hope that it will be seriously evaluated in light of the strong and growing public opposition to the Project as it now stands. The opposition to the current Project stems primarily from the current plan to destroy the pristine native oak and sycamore woodlands located in what the DPW calls the "Middle SPS" to make way for future sediment disposal.

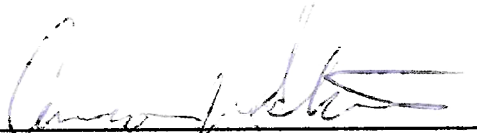
The salient features of Alternative #5 are as follows:

- **Saves the Arcadia Woodlands** from destruction eliminating most, if not all, of the public opposition to the current Project plan. The high risk of possible future litigation in the courts would also be eliminated.
- **Leaves the current plan's erection of a conveyor system all the way to the Lower SPS in place** with no impact.
- **Preserves the current plan to place 250,000 cubic yards of sediment on the Lower SPS** bringing the site to its maximum capacity. Sculpting and planting with native vegetation (currently unfunded) will continue as planned.
- **Places 125,000 cubic yards of sediment on the Upper SPS** immediately adjacent to the "Middle SPS" Woodlands, bringing this three acre area up to the same elevation as the rest of the Upper SPS. The spur off the main conveyor trunk currently planned to bring

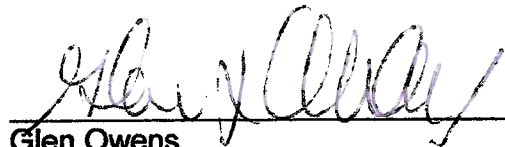
sediment to the Middle SPS would instead be moved 20-100 yards to the north to convey the sediment to the south end of the Upper SPS.

- **The remaining 125,000 cubic yards of sediment would be trucked off site** to the Manning Pit SPS in Irwindale through the Sycamore Avenue Gate. This will provide the DPW with a precedent for acceptable future trucking of sediment out of the Santa Anita SPS.
- **The Upper SPS would be left with 125,000 CY of capacity - enough to handle anticipated needs for the next 2 – 5 years.** This timeframe should be enough for the DPW to negotiate with the City of Monrovia and come to agreement allowing the county to encroach on City owned property. This could potentially increase the capacity of the Upper SPS by 500,000 to 1,000,000 cubic yards.

Alternative #5 offers the DPW a way forward and a way out of its current public relations problem with minimal impact to both cost and schedule. We urge the County of Los Angeles, The Department of Public works, the City of Arcadia and the City of Monrovia to seriously consider this proposed alternative and work together to save a precious natural treasure from being decimated. Future generations of LA County residents will remember and respect your decision to alter the Project to preserve The Arcadia Woodlands for the enjoyment of the people, trees, plants, animals and birds that use this area, both now and into the future.



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December 16, 2010

Big Santa Anita Historical Society
7 North Fifth Avenue
Arcadia, California 91006

Attention: Glen Owens

Subject: Santa Anita Sediment Placement Sites – Arcadia, CA

In accordance with your request we have evaluated the remaining capacity of the upper sediment placement site, the northerly limits of which is located approximately 700 feet south of the north spillway into the Santa Anita Flood Control Channel and extends to its southerly limits approximately an additional 1350 feet. This upper site consists of an upper area approximately 1050 feet long and a lower area approximately 300 feet long. The total capacity of the upper site raised to elevation 775 is approximately 250,000 CY. The designed remaining capacity of the lower sediment placement site, located at the overall site's southerly terminus is approximately 270,000 CY. The combined capacity of these two sites is approximately 520,000 CY all contained within the Flood Control property in the City of Arcadia. We understand that the District desires to have approximately 500,000 CY available capacity for future disposal. By using the upper site described above, adequate capacity is available without having to disturb the 8 Acre Oak Tree grove lying between the upper and lower sediment placement sites. If more capacity is desired there is at least another 500,000 CY available in the upper site if allowed to spread into the adjacent City of Monrovia property. We would recommend agreements be made between the District and the Cities of Monrovia and Arcadia to allow this future expansion, thereby negating the need to fill over the existing 8 Acre Oak Grove described above. In addition we recommend planting the slopes with vegetation and trees as the fill proceeds. We utilized existing Los Angeles Department of Public Works Plans, Santa Anita Sediment Placement Site showing existing contours dated July 11, 2007 for this evaluation.

Respectfully submitted,

G. Bart Stryker
G. Bart Stryker



California Native Plant Society Gabriel Mountains Chapter
1750 N. Altadena Dr., Pasadena, CA 91107

December 23, 2010

Refer to Responses: 1, 2, 3a, and 3b

Michael D. Antonovich
Supervisor, 5th District
Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

Re: Halt the Destruction of Oak Woodland in Arcadia and Find Alternate Placement Sites for Sediment from Santa Anita Reservoir and Other Reservoirs in the Area.

Dear Supervisor Antonovich.

Thank you for requesting the 30-day moratorium on the destruction of the prime habitat oak woodland in Arcadia. The California Native Plant Society, San Gabriel Mountains chapter, and its members wish to preserve this beautiful piece of land in its original state for the benefit of our local population and to retain natural and water resources. Even though it appears late in the legal process, we feel there is compelling reason to rethink the issue and explore further alternatives. While the original EIR "Santa Anita Dam Riser Modification and Sediment Removal Project" was certified in June 2009, it is our opinion that the certification of the EIR is not valid for the following reasons (summary)

- Requirements of appropriate notification of stakeholders have not been met.
- Presentation of the Statement of Facts to the residents was incomplete and misleading.
- The EIR in its entirety is significantly flawed, making the Statement of Overriding Conditions invalid.
- The EIR is outdated as there have been significant events since its certification that affect impacts, including the Station Fire of last year.

We implore you to press the Department of Public Works to reconsider all the alternatives in the EIR as well as additional alternatives presented at the public meeting on December 16, 2010. We also propose that any other alternatives, or modifications to already presented alternatives, be considered. We would hope that if the various experts in the affected areas come together and brainstorm, they will be able to come up with a solution that is workable for everyone. We support a solution that would keep the residents from suffering under relentless diesel truck traffic and keep the oak woodland habitat intact.

We assume that the initial 30-day moratorium is not enough time to thoroughly explore alternate solutions to the sediment placement problem. We therefore support an extension of the moratorium or any action that is needed to find an alternate solution. We only support a solution that would preserve the oak woodland habitat and that does not expose the residents to diesel truck traffic. Even under the current plan, there is diesel truck traffic bringing in sediment from other locations. This poses a significant health risk to local residents, especially to the children attending the schools on the truck traffic routes.

The attachment contains detailed information and arguments for each of the four points presented above.

We were encouraged by your action in promoting the 30-day moratorium and sincerely hope that you will continue to work on a solution that the residents in your district want and deserve.

Thank you for your consideration and wishing you a safe and peaceful holiday.

Gabi McLean
President

Attachments: (I) Reasons the Certification of the EIR is Not Valid (Detailed Analysis)
(II) Additional Alternatives – Proposed Solutions

cc. Christopher Stone and Keith Lilley, Los Angeles County Department of Public Works

(I) Reasons the Certification of the EIR is Not Valid (Detailed Analysis)

Our review of the EIR led us to the conclusion that its environmental analyses are incomplete, the recommended mitigation actions are insufficient, and the Statement of Overriding Conditions is invalid.

1) Requirements of appropriate notification of stakeholders have not been met.

- The notification of environmental groups like the Sierra Club, Audubon Society, and California Native Plant Society did not occur. The EIR states that environmental groups were notified but it does not list them individually which is generally done.
- The notification of surrounding and affected municipalities like the cities of Sierra Madre and Monrovia did not occur. Sierra Madre for example would be impacted by diesel truck traffic to transport sediment from their reservoir to the Santa Anita sediment placement site (SPS). Monrovia is affected since the SDS borders immediately at their wilderness preserve and nearby residents.

2) Presentation of the Statement of Facts to the residents was incomplete and misleading.

The notification of residents and the discussion of the project were in fact misleading as

- the intended use of the middle sediment placement site (SPS) was not revealed to be receiving sediment from locations other than Santa Anita dam – like Sierra Madre Reservoir and other debris basins within the foothills of the San Gabriel valley;
- the destruction of a mature and undisturbed oak woodland, sycamore and riparian woodland providing prime habitat for birds and other native animals, and possibly rare and endangered species, were not included in the statement of facts presented to the residents;
- only two of the four alternatives listed in the EIR were presented;
- the upper portion of the SPS was presented as being filled to capacity. According to an independent assessment of a soil engineer (as presented at the public meeting on December 16, 2010), this portion can still receive significant amounts of sediment.

Due to the lack of notification of the stakeholders, and the withholding of significant objectives of the project from the residents, the residents and stakeholders were not afforded the opportunity to submit comments and present their critique and reservations to this project before the certification of the EIR.

3) The EIR in its entirety is significantly flawed.

Here are a number of comments that support our opinion that the EIR is flawed. These comments are not deemed to be complete or comprehensive. We feel that the 30 days were not enough time to review the EIR thoroughly enough and we apologize if our research is falling somewhat short of our usual standards.

- The area of the designated middle SPS includes a hiking trail that runs from the base of the mountains to the south of Arcadia. This trail had been marked in a planning map and could be used by hikers and bikers, and in particular persons of limited physical abilities, as it is an ideal path on a flat dirt road without an incline, passing through undisturbed habitats. Thus the long-term **recreational opportunities** would be affected by eliminating the woodland and the trail.
- The **visual effects** of the middle SPS have been deemed insignificant. As support were presented two photos of two locations from before the project, and the simulated view after the project would be completed. There is barely a difference noticeable. It occurs to the sensible reader, that a 60-foot-high pile of sediment, accommodating up to 750,000 cubic yards of material (500,000 cubic yards from this project alone), rising from an otherwise flat area would certainly be visible to the residents to the west, as well as to the east. Tree plantings certainly would not hide this pile of sediment. Homes are located on hilltops to the east of the project as well. The area is also clearly visible from the historic and very popular Mt. Wilson hiking trail. The destruction of the woodland and substituting it with a pile of sediment (graded or not) will definitely have a negative impact on the view of the valley from the historic hiking trail that has been featured in several books and magazines. It will be an additional eye sore, beside the existing two SPS. Only the lower SPS and the oak woodland are visible from the trail that starts in Sierra Madre and leads to Mt. Wilson. It was built in 1856 and has been recognized as an historic route. In the mitigation section, the plan speaks of planting oaks and other

vegetation. Replanting could not occur until the site reaches its maximum capacity, which could take 20 years and then another 150 years to create an oak woodland. So the mitigation planting have no value to the current residents, nor would it provide habitat to the animals that live in the current woodlands.

- The EIR speaks of “removing native vegetation, including mature oaks” It does not mention that the native vegetation constitutes an **oak woodland** and provides **habitat** for birds and other native animals, as well as several sensitive species. Oak trees are protected in L.A. County and owners get fines for cutting down a coast live oak tree that is on their property Why would the DPW be exempt of L A. county ordinances? In addition, the county is currently working with several stakeholders on an ordinance to protect oak woodlands - while the Department of Public Works is trying to cut down 12 acres of oak woodland This is incomprehensible. The reason for the protection is that the woodland has real value, to people, animals, the environment, and even for increasing the availability of ground water No artificial man-made system can compete with the effectiveness of a functioning oak woodland for natural water recycling, including filtering, and for filtering air and improving air quality
- The EIR does not recognize that the site contains or potentially contains several **sensitive species**. It misidentified *Quercus dumosa*. *Quercus dumosa* does not exist in this area. The correct name for this species of scrub oak is *Quercus durata* var. *gabrielensis*, **San Gabriel Mountains leather oak**. It is endemic to south-facing granitic hill slopes in the San Gabriel Mountains and grows nowhere else. It is included in the CNPS Inventory of Rare and Endangered Plants on list 4.2 (limited distribution).

Another rare species identified as occurring but not recognized as being a rare and endangered plant is *Quercus engelmannii*, **Engelmann oak**. It is included in the CNPS Inventory of Rare and Endangered Plants on list 4.2 (limited distribution).

- The following rare plants, although known to grow in the general area, were not found and not mentioned as being **potentially present**:
 - Astragalus brauntonii*, Braunton’s milkvetch, CNPS List 1B.1 and Federally Endangered;
 - Calochortus plummerae*, Plummer’s mariposa lily, CNPS List 1B.2;
 - Lepidium virginicum* var *robinsoni*, Robinson’s peppergrass, CNPS List 1B.2

These plants are fire-induced, meaning they bloom profusely after burns. Their seeds remain in the soil for many years. So the soil must stay in place to preserve the sandbank. Plummer's mariposa lily does not bloom every year You have to check for it over a period of time (several seasons) but that was not done. We have personally observed abundant Plummer's mariposa lilies and Robinson's peppergrass after burns in local canyons.

The result of these omissions is that the Significant Findings section of the EIR is wrong. There are potential sensitive species in the area which have not been considered in the final evaluation of the EIR.

- The plant survey was **conducted at the wrong time**. In one instance, the writer refers to the dormant coastal sage scrub and alluvial scrub as being “dead” at the time of the survey This indicates two significant issues: (1) the writer is not familiar with the local Mediterranean climate where plants go dormant during summer and fall; those plants are NOT DEAD! Neither are the plant communities nor the animals that live in these habitats. They are adapted to the hot, dry summers and will not be visible. (2) The survey was obviously conducted during the wrong season, while most of the plants were dormant and when all the annuals had already completed their life cycle and disbursed their seeds and no evidence of them would have been visible to the human observer Even many perennials are difficult to detect in the dry season. Based on feedback received, another survey was conducted in April and June. Even though no sensitive species were found, it was wrongly concluded that they are not there. The years **2007 through 2009 were severe drought years** and many rare plants do not grow in every season. So the conclusion was hasty and incorrect.
- The habitats section is confusing because the terminology used is inconsistent. This section says “Cover types in the survey area included coastal sage scrub, Riversidian alluvial fan sage scrub, disturbed Riversidian alluvial fan sage scrub, coast live oak woodland, and bare dirt roads” In another place it says, “Riversidean Alluvial Fan Sage Scrub, Southern Coast Live Oak Riparian Forest, Southern Sycamore-Alder Riparian Woodland and Open Engelmann Oak Woodland”, still referring to the same area.

The EIR denies that any of the latter four **sensitive habitats** are found there. The riparian area is now a concrete channel, but the trees were there before it was built and are still classified as riparian. The area definitely is a coast live oak woodland and deserves protection. There is no question about it. There are areas of coastal sage scrub as well. Coastal sage scrub is also a sensitive plant community, which is rapidly disappearing. The whole area slated for destruction is a diverse botanical ecosystem, a mosaic of alluvial scrub, chaparral and oak-sycamore woodlands, and needs to be protected.

- We are taking issue with the quote: “The LACDPW has exercised independent judgment in accordance with Public Resources Code Section 21082.1(c) in retaining its own environmental consultant directing the consultant in preparation of the EIR as well as reviewing, analyzing, and revising material prepared by the consultant ” Since the county used their own in-house consultant to prepare the EIR, we suggest a new EIR be done by an **independent contractor**
- **Mitigation actions are insufficient**

While the EIR found significant impact on the quality of the environment, the mitigation actions are insufficient in three areas: location, size, and type.

Location. The mitigation effort is concentrated in Tujunga canyon, more than 20 miles from the area impacted, and the residents suffering the elimination of a wildlife habitat/oak woodland would not be able to take advantage of the area in Tujunga. Mitigation areas are supposed to be within the same watershed (Rio Hondo). Tujunga canyon is obviously a different watershed (Tujunga watershed). The significant damage in the Santa Anita area should never be mitigated so far away

Size: The mitigated areas are less than equal in size to the woodland to be destroyed. Usually mitigated areas are at least twice the size of the negatively impacted area. The planting of the southern SPS areas, is in our opinion, a very poor mitigation action since it will take a very long time. The DFG required a revegetation plan to be approved before the start of the project. We have seen no evidence that such a plan has been submitted and approved by the Department of Fish and Game.

Type: The mitigation consists of planting oaks. Oaks alone don't make an oak woodland. Oaks take time to grow What are people and animals supposed to do while the oaks are growing to mature trees, in let's say 100 years? Go play in the sediment? Starve? Have children withdraw to video games because they are suffering from nature deficit disorder? The area that the DPW wants to destroy is ideal for children, the infirm and the elderly to access, a well preserved quiet piece of nature that can help make us whole again after a rough day It is a mental health resource for people of all ages and abilities please do not take it away!

Planting oaks in Big Tujunga Canyon is not an acceptable alternative.

In summary, the negative impact in the biological section of the EIR was understated and therefore not adequately considered at the time of evaluation mitigation proposals and the issuance of the Statement of Overriding Conditions which is necessary for the certification of the EIR.

4) The EIR is outdated as there have been significant events since its certification that affect impacts.

- In the fall of 2009, Los Angeles County experienced its **largest wildfire ever** Over 160,000 acres burned in the Angeles National Forest. The fire started not many miles from the project site and affected the foothills of the San Gabriel Mountains as well. Animals who were able to escape sought refuge in the unburned areas, and there has been a definite impact on the scarce natural resources. For man to destroy what the fire has spared seems a senseless act. We demand more creativity and dedication to the preservation of priceless natural resources that this project plan contains.
- Beside the fire, other political and social developments have occurred. People are more aware of the value of a natural environment, the benefit to children and adults. The county is in the process of finalizing the **oak woodland ordinance** and we should treat this project with the same sense and understanding that has brought

together so many different agents within the County that are working on this ordinance for the benefit of all of us.

- Just recently, County Regional Planning was advised on the **Significant Ecological Areas** and the conclusion was reached that there is a need to be encompassing even more whole watersheds, like extending the Altadena Foothills SEA to include Arcadia.

County Public Works should be expected to utilize its relatively new Watershed Management Division to apply ecological thinking to projects like these. The decision to replace a dense, mature stand of woodlands and shrubs with sediment is out of the 1950s. It does not reflect the new and rapidly growing environmental thinking being applied by most Government agencies and citizens.

Resources used:

http://dpw.lacounty.gov/wrd/Reservoir/Santa_Anita_FEIR_APPENDICES.pdf, pages 21, 22+, 139, 155

<http://sandiego.sierraclub.org/rareplants/204.html>

http://www.calflora.org/cgi-bin/species_query.cgi?where-calrecnum=6995

http://www.calflora.org/cgi-bin/species_query.cgi?where-calrecnum=6994

http://www.centerforplantconservation.org/collection/cpc_viewprofile.asp?CPCNum=374

<http://www.dfg.ca.gov/biogeodata/cwhr/pdfs/COW.pdf>

<http://danr.ucop.edu/ihrmp/county/LOSANGELES.pdf>

http://dpw.lacounty.gov/wrd/Reservoir/Santa_Anita_Findings_SOC.pdf

<http://www.water.ca.gov/drought/docs/timeline-present.pdf>

(II) Additional Alternatives – Proposed Solutions:

Please reconsider all the alternatives in the EIR, even the ones that were rejected. The evaluation of the negative impacts from the destruction of natural habitat has been grossly underestimated. Sensitive species have been overlooked, and there has been not enough attention to further alternatives.

For example:

- Mitigate the impact of diesel truck traffic; use environmentally safe equipment that is quieter, and does not pollute the air
- Don't let the trucks drive through the residential areas. Use the most southern gate; from there it is only a short distance to the freeway
- Extend the conveyor all the way to the southern gate, or at least to the southern SPS, residents would be much less impacted
- Deposit the sediment from Santa Anita Dam on the upper and lower SPS until they are up to capacity. The upper SPS has a higher capacity than represented in the EIR. If more space is needed, truck to Irwindale.
- Use the sediment for commercial purposes; put out an RFP if someone would take it for commercial use. Potential takers are construction companies, gravel and sand mining companies, landscape companies, etc. Go with the concept of "reuse"
- Let the sediment go with the water to the ocean in the existing channels. This alternative was rejected in the original EIR. However, if some attention were given to the necessary adjustments to the current methods and if investments were made, we could find a long-term solution. The natural cycle is that the sand and gravel is carried by the water out of the mountains, over the plains and valleys to the ocean, and deposited there to rebuild the sandy beaches. We need to emulate nature, not fight it.

We are sure there are other solutions out there. We just need to commit ourselves to finding a solution that makes sense and preserves our health. The people of Arcadia and the San Gabriel Valley deserve it.



Refer to Responses: 1, 2a, 2b, 2c, 3b, and 3c

Pasadena Group

December 22, 2010

Christopher Stone
Assistant Deputy Director, Water Resources Division
Los Angeles County Department of Public Works
900 S Fremont Avenue
Alhambra, CA 91803

RE. Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project

Dear Mr Stone:

The Pasadena Group of Sierra Club, representing our members in the western San Gabriel Valley, and the Angeles Chapter of Sierra Club, representing Club members throughout Los Angeles and Orange Counties, have adopted the following resolution regarding this project.

Resolved, that the Sierra Club opposes the destruction by clear cutting of 11.3 acres of native oak woodland habitat along the east side of Santa Anita Wash in the City of Arcadia, as planned by the Los Angeles County Department of Public Works (DPW), in order to create a disposal site for sediment to be removed behind Santa Anita Dam in order to permit improvements to the dam's operating structure, and urges the DPW to find an alternate disposal site.

This letter summarizes some of the most significant questions and concerns regarding this project resulting from our review of project information provided to date, as well as the opinions and concerns expressed at the public meeting held at Highland Oaks Elementary School on December 16, 2010. It also requests further action by the Department of Public Works.

We are aware that project planning and environmental review for this project have been underway for at least three years, that the environmental impact report for the project was completed in May 2009 and certified by the Board of Supervisors in June 2009, and that a contract was signed in June 2010 with an Arizona contractor to perform the work required to accomplish the project.

However we respectfully request that completed project planning and environmental review be supplemented at this point in time by (a) additional and more thorough evaluation of the value of the existing sycamore/oak woodland habitat in the proposed Middle Sediment Disposal Site and the project's environmental impacts on this habitat, and (b) a comprehensive

and forward-looking consideration and evaluation of alternative disposal sites for the sediment to be removed from behind of Santa Anita Dam.

We make this request for the following reasons.

A. There was insufficient public notice and outreach regarding the project.

Major deficiencies in the Project Planning and Environmental Review Process: As was documented by a member of the audience at the December 16 public meeting, the initial meeting conducted by DPW regarding this project on August 30, 2007, was focused on describing the need for the sediment removal project and presenting two conceptual alternatives. transporting sediment to local sediment placement sites by conveyor belts, or trucking the sediment to off-site disposal sites. The PowerPoint slides presented that evening make no reference whatsoever to possible destruction of a vibrant sycamore/oak woodland, and residents who attended that meeting recall no verbal discussion of this possibility

It appears from the record that there was a major deficiency throughout the process of providing adequate notice to the environmental community and other interested citizens of the proposed project and its environmental impact on the unique sycamore/oak woodland habitat. Notice of the few public meetings held regarding it were limited to local residents and representatives of the Highland Home Owners Association.

A major contributing factor to lack of awareness of the impacts of this project has been the scant mention of the sycamore/oak woodland habitat in the environmental documents prepared for this project. (text to be developed to document this statement.)

B. The Environmental Impact Statement contains numerous major ambiguities which render it useless as a public information document.

1. Conflicting references to capacity of the Upper Sediment Placement Site:

“The Upper SPS is a previously disturbed area that is filled to capacity with sediment from earlier cleanouts of the reservoir, debris basin, and other flood control facilities” – (Final EIR, p 3.1-2)

“The Upper SPS area, located in the northerly end of the SPS, is an already disturbed area, but does not have sufficient capacity for the anticipated sediment to be removed from the reservoir ” - (Final EIR, p ES-2)

“[The Upper SPS] has a remaining capacity of 250,000 cubic yards, but would not be used for sediment placement for this Project.” - (Final EIR, Appendix re Biological Assessment and Biological Evaluation, p 23)

In addition, at a non-publicized all-day Regional Sediment Management and Water Supply Workshop held at the Department of Public Works headquarters on July 14, 2010, for invited stakeholders, Christopher Stone presented the following information regarding placement of sediment at the Upper Sediment Placement Site 25,800 CY of sediment were removed from Sierra Madre/Arcadia debris basins and placed at the site during the 2009-10 Storm Season, anticipated sediment volumes from these debris basins for the next 4 storm seasons (through 2013-14) total 58,000 CY, the “currently used upper area of Santa Anita SPS will have approx. 32,000 CY of remaining capacity by Fall 2014 ” (PowerPoint slides available online at http://dpw.lacounty.gov/wmd/sediment_management.) If the assumption is made that this information is accurate, the Upper Sediment Placement Site had a capacity of 125,000 cubic yards when the EIR was completed in 2009, and presently has a capacity of 100,000 cubic yards.

2. Conflicting references to capacity of the Middle Sediment Placement Site

"The base of the 13-acre Middle SPS area can be tiered in order to accommodate up to 710,000 cubic yards of material. The proposed ultimate height of the Middle SPS would be 60 feet from the lowest elevation at the southern end of the SPS. The proposed project would place approximately 250,000 cubic yards of sediment at the Middle SPS, increasing the height from the existing ground up to approximately 30 feet." – (Final EIR, pp ES-4)

[Question. If placement of 250,000 cubic yards of sediment on the lower portion of this proposed site would increase the height by 30 feet, how could it accommodate an additional 460,000 cubic yards and yet result in a height of only 60 feet, given that the placement site would have sloping sides?]

". . . approximately 250,000 cubic yards of sediment would be conveyed to the Middle SPS. The remaining sediment capacity in the 13-acre footprint, approximately 500,000 cubic yards, would be used for future routine and emergency sediment removal activities of facilities, including Santa Anita Dam, served by the Santa Anita SPS." – (Final EIR, pp. ES-5)

"The remaining sediment capacity in the 13-acre footprint [of the Middle SPS], up to 250,000 cubic yards depending on contour grading, will be used for future routine and emergency sediment removal activities of other facilities served by the Santa Anita SPS." – (Final EIR Appendices, Biological Technical Report, page 3, Final EIR Appendices, Rare Plant Survey Report, page 3, Final EIR Appendices, Biological Assessment And Biological Evaluation, page 5);

3. Failure to accurately describe to the public the subsidiary objectives of the project

As presented to the public in public meetings and informal conversations, the purpose of this project has been stated as removal and placement of 500,000 cubic yards of sediment from

the reservoir behind Santa Anita Dam and modification of the dam's riser. Local residents were presented with two alternatives to accomplish the project's purpose: trucking half the sediment to be removed from behind the dam through residential neighborhoods for disposal off-site, or conveying it to a to-be-created Middle Sediment Placement Site. However examination of the EIR and its appendices contain the following statements:

"Alternatives 3 and 4 will not meet one of the project's objectives, which is to prepare the Middle SPS for future and emergency cleanouts." – (Final EIR, pp 7-23)

"The Upper and Middle SPS areas would remain open for future sediment storage for routine and emergency cleanout activities, which is one of the primary project objectives." – (Final EIR, pp. 7-31)

. . . approximately 250,000 cubic yards of sediment would be conveyed to the Middle SPS. The remaining sediment capacity in the 13-acre footprint, approximately 500,000 cubic yards, would be used for future routine and emergency sediment removal activities of facilities, including Santa Anita Dam, served by the Santa Anita SPS." – (Final EIR, pp. ES-5)

"The remaining sediment capacity in the 13-acre footprint [of the Middle SPS], up to 250,000 cubic yards depending on contour grading, will be used for future routine and emergency sediment removal activities of other facilities served by the Santa Anita SPS " – (Final EIR Appendices, Biological Technical Report, page 3, Final EIR Appendices, Rare Plant Survey Report, page 3, Final EIR Appendices, Biological Assessment And Biological Evaluation, page 5);

C. The value of the existing sycamore/oak woodland habitat, and impacts of the proposed project on this woodland habitat, were not properly evaluated in the environmental review process.

The community of oak trees in the rich alluvium flatland which would become the Middle Sediment Placement Site includes magnificent large trees, many a hundred years or more in age. This woodland, which includes California bay, elderberry, toyon, sugar bush and many other native plant species, provides habitat for deer, bear, owl hawk, and other bird and wildlife species. This intact and dynamic ecosystem provides regenerating functions of groundwater storage, shade, nutrient cycling, wind/noise/dust abatement, and carbon sequestration.

The carbon dioxide sequestering function that these trees provide cannot be easily duplicated. It is estimated that one large oak tree withdraws from the atmosphere up to 10,000 lbs of carbon dioxide per year (Oxygen from this withdrawal process is released back into the atmosphere, while the carbon is stored in the tree as it grows. Once cut down, however, that carbon is released back into the atmosphere as carbon dioxide when the tree is burned or rots.)

Nor can the habitat they provide for associated plant and animal life be duplicated by the mitigation measures offered by the County. Although the County has included several mitigation measures to compensate for destruction of the sycamore/oak woodlands, including (a) purchase and permanent protection of nearly 5 acres of oak tree habitat on a steep hillside in nearby Monrovia, (b) planting oak tree seedlings on top when sediment placement is completed at the Lower Sediment Placement Site, and (c) establishing a conservation easement to permanently protect sage scrub habitat at the Big Tujunga Mitigation Bank, concerned citizens knowledgeable about oak woodland habitat find these mitigation measures inadequate.

Furthermore, the EIR makes no reference to any efforts at consultation with the planning process underway during the last three years by the Los Angeles County Oak Woodland Habitat Conservation Strategic Alliance, a group of tree and biological professionals working under the auspices of the County's Regional Planning Department, to develop countywide oak woodland preservation and enhancement policies to meet requirements of the California Oak Woodlands Conservation Act (SB 1334). Development of the Los Angeles County Oak Tree Woodland Habitat Conservation Plan being developed by the Alliance was initiated with the support of Supervisors Antonovich and Yaroslavsky and is partially funded by Los Angeles County.

D. The full range of alternative disposal sites for the sediment generated by this project was not fully evaluated

There are several viable alternatives not fully evaluated in the planning process that warrant further detailed consideration. These alternatives are based on DPW's stated needs for disposing of an estimated 500,000 cubic yards of sediment to be removed from behind Santa Anita Dam to meet the project objective.

Alternate A: Maximize available capacity at the Upper Sediment Placement Site.

Convey and place 250,000 cubic yards of sediment at the Lower Sediment Placement Site as planned. Convey and place the remaining 250,000 cubic yards at the Upper Sediment Placement Site, as suggested in the December 16 letter prepared by consulting civil engineer Bart Stryker. This letter, which states that there is capacity to place an additional 270,000 cubic yards at the Upper Sediment Placement Site, was presented to DPW at the recent public meeting. Although there may be some disagreement about the exact remaining capacity, there can be no dispute that there is significant remaining capacity at this site.

It is our understanding that DPW has reserved this additional capacity for disposal of sediment and debris removed from nearby debris basins on a routine basis, and of sediment from various locations in emergencies (which might be caused by such things as major sediment accumulations in debris basins during the rainy season that require immediate disposal in order to minimize property damage in those locations).

As suggested during the recent public meeting, it strikes many of us who are concerned about the adverse impacts of this project on the sycamore/oak woodland habitat, that it would be more logical to transport this latter sediment and debris by truck for disposal in other locations, such as in Manning Pit or one of the other gravel pits in the San Gabriel Valley, or at the aggregate processing facilities of Vulcan Materials Company or another processor

Environmental Benefits of Alternative A. This alternative has the environmental benefits of both preserving the sycamore/oak woodland and of avoiding use of Elkins Drive as a haul-in route, thereby sparing the residents of that part of Arcadia the noise and air pollution impacts associated with haul-in trucking.

Alternative B: Truck half of the sediment off-site from the Lower Sediment Placement Site. Convey and place 250,000 cubic yards at the Lower Sediment Placement Site as planned. Convey the remaining 250,000 cubic yards to the Lower Sediment Placement Site, transfer the sediment to trucks, and truck this sediment, during the time period when Foothills Middle School is not in session, to other locations, such as Manning Pit or one of the other gravel pits in the San Gabriel Valley, for disposal, or to the facilities of Vulcan Materials Company or another aggregate processor

Environmental Benefits of Alternative B. This alternative has the environmental benefits of both preserving the sycamore/oak woodland and of avoiding use of Elkins Dr as a haul route for trucking out the remaining 250,000 cubic yards of sediment. It retains the capacity of the Upper Site for future use. By limiting trucking to the time period when Foothills Middle School is not in session, congestion impacts on local traffic are minimized, as are health impacts to children who walk or bike to this school.

(It is our understanding, from comments made by members of the public at the recent public meeting, that large quantities of fill were transported by truck from a site northeast of the Upper Disposal Placement Site for construction of elevated portions of the 210 Freeway in the 1970s via a similar haul road [without use a conveyor belt] along the east side of the Santa Anita Flood Control Channel.)

Alternative C: Place part of the sediment at the Lower Sediment Placement Site and truck part off-site from that location. Convey and place 250,000 cubic yards at the Lower Sediment Placement Site as planned. Convey and place part of remaining 250,000 cubic yards at the Upper Sediment Placement Site. Convey the remaining part of the 250,000 cubic yards to the Lower Sediment Placement Site, transfer the sediment to trucks, and truck this sediment, during the time period when Highlands Middle School is not in session, to other locations, such as Manning Pit or one of the other gravel pits in the San Gabriel Valley, for disposal, or to Vulcan Materials Company or another aggregate processor

Environmental Benefits of Alternative C. This alternative also has the environmental benefits of both preserving the sycamore/oak woodland and of avoiding use of Elkins DR as a

haul route for trucking out the remaining 250,000 cubic yards of sediment. It retains some of the capacity of the Upper Site for future use. By limiting trucking to the time period when Foothills Middle School is not in session, congestion impacts on local traffic are minimized, as are health impacts to children who walk or bike to this school

E. Evaluation of the additional alternatives requested in this letter will not cause a significant delay or impediment to completing a more environmentally responsible plan for disposing of the sediment behind Santa Anita Dam

Placement and use of the planned conveyor belt system will not be adversely affected by any of the above alternatives. It is our understanding that the conveyor belts and mounting equipment to be used for the project may have been or may be specially manufactured for use in this and similar projects, and that this equipment may be or about to be in transit to the project location. During the site visit to the sycamore/oak woodland on December 4, several orange-colored stakes were evident along the dirt road through the woodland. Keith Lilley of your staff indicated that these stakes had been placed to indicate the route where the conveyor belt would be constructed to the Lower Sediment Placement Site. Since all of the alternatives discussed above assume conveyance and placement of 250,000 cubic yards of sediment at that site, there is no need to alter the planned installation of the conveyor belt to that location.

With the possible exception of the southernmost section of the conveyor belt, the belt could remain in place to implement Alternative B. It could also remain in place to implement the trucking portion of Alternative C. Implementing the other portion of Alternative C (placement of part of the sediment in the Upper Sediment Placement Site, and implementing Alternative A, would require only a minor decoupling of a portion of the belt and redirecting the terminus of the shortened belt to that site.

Alternative A and a portion of Alternative C would lessen space available for disposal of routine and emergency sediment and debris from nearby debris basins. However the Department of Public Works has the capability within the framework of the current long-term planning process to plan for future disposal locations for that sediment. Development of a Long-Term Sediment Management Plan for the time period 2012 through 2032, begun in July 2010, is currently underway and is expected, to be completed by July 2012. (The initial workshop for this plan was held July 14, 2010 – see website link on page 3 of this letter)

The alternatives suggested in this letter would not cause any significant changes in the costs associated with the contract signed on June 10, 2010, with Quest Civil Constructors, Inc., to perform work on this project. Section 13 permits the County to terminate the contract at any time, at the convenience of the County, when it determines it is in the County's best interests to do so. The proposed alternatives would not cause the County to terminate the contract, the only modification necessary would be that the County would need to issue a change order regarding a minor relocation of a portion of the conveyor belt if Alternative A were implemented.

F. Conclusion.

There have been major inadequacies in the planning an environmental review processes for this project including (a) failure to provide adequate notice to the public and all relevant public entities, including the city of Sierra Madre, (b) failure to adequately inform the public of the purposes of this project, which evidently include not only removal and placement of sediment removed from behind Santa Anita Dam but also creation of new sediment disposal capacity at a to-be-created Middle Sediment Placement Site for sediment not only from the dam but also for sediment trucked in from numerous nearby debris basins, (c) failure to adequately describe and evaluate the habitat values of the sycamore/oak woodlands where the Middle Sediment Placement Site would be created, and (d) failure to identify and evaluate viable alternatives to the proposed project that would preserve the woodlands.

We therefore ask that the Department of Public Works carefully evaluate the alternatives presented in this letter, as well as other alternatives to this project that may occur to you or be presented to you by others, and select an alternative that preserves the woodland.

In the meantime, we request an opportunity to meet with you and relevant staff before the end of the year to discuss in more detail our concerns regarding this project and alternatives to it, and your plans to address those concerns and alternative proposals.

Thank you for your consideration of this request.

Sincerely,



David Czamanske, Vice Chair, Pasadena Group of Sierra Club

Mailing address: PO Box 3572, South Pasadena, CA 91031 Phone (626) 458-8646

cc. Gale Farber, Director, LA County Department of Public Works
Mark Pestrella, Assistant Director, LA County Department of Public Works
Keith Lilley, Project Manager, LA County Department of Public Works
Supervisor Michael Antonovich, Attention. Ebel Vizcarra

Department of Public Works Mailing address:
PO Box 1460
Alhambra, CA 91802-1460

Sierra Madre Mountain Conservancy

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December 27, 2010

Michael D Antonovich
Supervisor, 5th District
Kenneth Hahn Hall of Administration
500 W Temple Street
Los Angeles, CA 90012

Dear Supervisor Antonovich;

We support your response to new information regarding the vast resource of the Arcadia Oak/Sycamore/Coastal Sage Scrub Woodland that had been designated as a debris repository site. It was important that you called for a moratorium to seek a better solution for storage of the debris from Big Santa Anita Dam and other Southern California debris basins.

You may need to extend the moratorium to complete the study of alternatives. With the recent rainstorms it would appear that waiting to drain the Santa Anita Dam would help to replenish the water table after our long period of drought.

There is no disagreement that debris clean out, disposition and riser repair in Big Santa Anita Dam is necessary. The destruction of the woodland is what needs to be avoided as the Department of Public Works Water Resources Division moves forward with the project for this and other debris basins in the district.

One alternative being proposed for your consideration, Alternative 5, outlines a combination of approaches that will lessen the impact on the surrounding community, keep intact the current contractual obligations for the conveyor belt usage, place some of the current debris removal in existing cleared sites and above all, not require the destruction of the 11.3 acres of an important remnant oak woodland that once was so prevalent throughout the southland

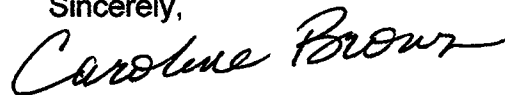
Representatives of The Sierra Club, The Audubon Society and The California Native Plant Society have written you with information to help you with your decisions on how to go forward without destroying this valuable resource.

Without repeating all that has been written we would just like to reiterate briefly now you have additional important considerations that were not in place when the EIR for the project was certified in 2009, that of the important roll of trees in Carbon Sequestration, the passage of AB 1881—the Water Conservation and Landscaping Act; the lost of vegetative coverage from the neighboring mountains and loss of wildlife support in the Station Fire and the current development of the Los Angeles County Oak Woodland Ordinance—all coming together at a time when the plan to remove the 11.3 acres of 179 oaks and 70 sycamores was about to take place. It is apparent that the lost of this woodland would now be all the more tragic.

The vibrant population of Los Angeles uses the Angeles National Forest and the trails that enter from our foothills, the Mt. Wilson Trail leaving from Sierra Madre being one, for their recreational needs. Parks and open spaces for all to use are important amenities for the population. While this is Los Angeles County property, it is in the back yard of Arcadia, Monrovia and Sierra Madre, communities that provide open space opportunities for their residents. This woodland resource could also benefit the county and these communities as open space for passive recreation.

We encourage you to lead the Los Angeles County Board of Supervisors to find another solution to the placement of the debris removed from catchment basins by the Department of Public Works Santa Anita Dam improvement project that will not necessitate the removal of this valuable natural resource.

Sincerely,



Caroline Brown, President

Cc.

Christopher Stone
Assistant Deputy Director, Water Resources Division
Los Angeles County Department of Public Works
900 S Fremont Avenue
Alhambra, CA 91803

Supervisors Don Kanabe, Gloria Molina, Mark Ridley-Thomas, Zev Yaroslavsky

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California Oaks

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e-mail: Oakstaff@Californiaoaks.org
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December 28, 2010

Michael D Antonovich
Supervisor, 5th District
Kenneth Hahn Hall of Administration
500 W Temple Street
Los Angeles, CA 90012

Dear Supervisor Antonovich,

In a letter to you, dated December 1, 2010, Executive Officer, Janet Cobb wrote to encourage your review of the process for the Santa Anita Canyon Dam debris clean out in order to preserve one of Los Angeles County's last oak woodland

As stated in the conclusion of this earlier letter " . It is clear that the accumulated debris needs to be removed to increase capacity for the run off for the next several winters " but now other alternatives have been brought to your attention.

I have shared with Ms Cobb the process by which the County is reviewing the EIR and gathering public input. She thanks you for calling for a moratorium to study alternatives. She has authorized me on behalf of California Oaks to ask you to pursue a combined approach to the project as has been outlined in Alternative 5, authored by Cameron Stone and Glen Owens as well as suggestions and information coming from The Sierra Club and The California Native Plant Society

The California Oak Foundation's (COF) mission for 20 years was to inform Californians about the importance of protecting and perpetuating the state's native oak woodlands, wildlife habitats and watersheds.

That was accomplished by Publishing curriculum, *Investigating the Oak Community*, which COF donated to most libraries and middle schools throughout the state.

California Oaks issues a free monthly newsletter, the *Oak Report*, explaining carbon sequestration, citing [California law](#), giving pointers on how citizens can educate themselves about the law, and many other topics.

Two important publications, *Oaks 2040, The Status and Future of Oaks In California*, and *Oaks 2040, Carbon Resources in California Oak Woodlands* were written so that Californians can recognize the value of these important resources.

As a preeminent organization in the discussion of preservation of oak woodland habitats in California there is a question as to how the project was advanced through the Environmental Review Process without notification to California Oaks.

The mission of California Oaks is parallel to that of the Los Angeles County Board of Supervisors as you pursue the Los Angeles County Oak Woodland Ordinance. Oak Woodlands are important resources that deserve your full support for protection to benefit future generations.

It is with this information and that from others who have communicated with the Los Angeles County Board of Supervisors and the Director and Staff members of the Los Angeles Department of Public Works that California Oaks asks you to pursue a plan to do debris removal and storage in a way that does not destroy this Oak Woodland and the integrated plant communities of Sycamore and Coastal Sage Scrub. It is without doubt that this is a high value resource as called out in the EIR.

Sincerely,



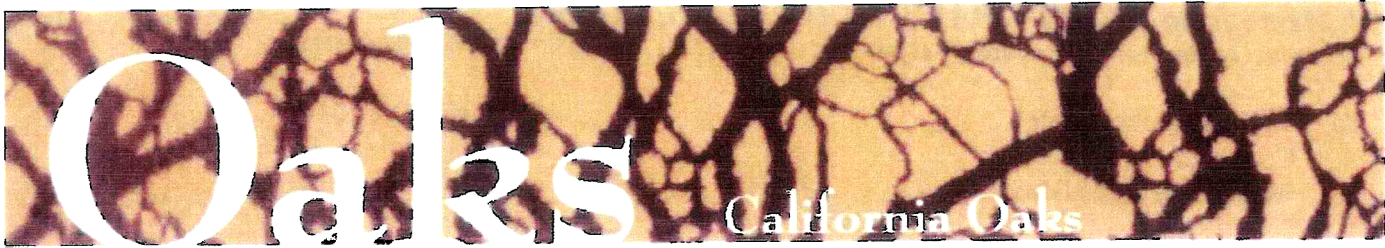
Caroline Brown
680 Alta Vista Dr
Sierra Madre, Ca 91024

For Janet Cobb
Executive Officer
California Oaks

Cc:

Christopher Stone
Assistant Deputy Director, Water Resources Division
Los Angeles County Department of Public Works
900 S. Fremont Avenue
Alhambra, CA 91803

Supervisors Don Kanabe, Gloria Molina, Mark Ridley-Thomas, Zev Yaroslavsky



Refer to Responses: 2b and 3b

December 1, 2010

Honorable Mike Antonovich,
Los Angeles County Supervisor
11thdistrict@laobos.org

RE: Santa Anita Dam Debris Storage Site

Dear Supervisor Antonovich,

The Environmental Impact Report for Los Angeles County's plan to store debris from the Santa Anita Dam is missing an engineering report that would indicate another site in the same area is far more adequate. The other site would eliminate having to destroy one of the County's last oak woodlands.

Oak woodlands provide sustainable wildlife habitat, contribute to healthy watersheds and groundwater replenishment. Healthy, mature oak woodlands are a major factor in slowing climate warming throughout the state.

Please insist that reconsideration be given to the more appropriate adjacent site.

It is clear that the accumulated debris needs to be removed to increase capacity for the run off for the next several winters. However, it is not necessary to do this at this inferior site at the expense of climate stability

Thank you for your consideration.

Sincerely,

Janet S. Cobb, Executive Officer

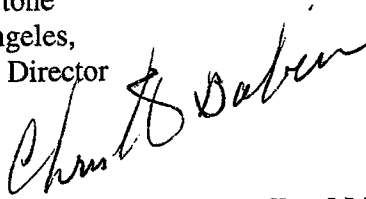
A Memo from HINTZ & BALVIN COMMUNICATIONS

695 South Catalina Avenue, Pasadena, California 91106 * (626) 792-6463 * Cbalvin@sbcglobal.net

To Mr Christopher Stone
County of Los Angeles,
Water Resources Director

December 28, 2010

From. Christle Balvin



Re **Urgent Request for an Arcadia Woodland Meeting**

Before the public meeting that the Department of Public Works held in Arcadia, I had written asking about the possibility of bringing a couple of community members to meet with you and appropriate DPW staff. You requested some background on the purpose of the meeting which I sent.

I'm writing now to follow up and see if Glen Owen, Cam Stone and I might meet with you and Keith Lilley prior to the next Board of Supervisor's meeting in January. We have no official standing other than being good neighbors trying to negotiate a workable solution to a problem that impacts many of us.

The purpose of the meeting would be to look at the situation with the Arcadia woodland and see how we can each meet our principle objectives. Ours is to protect the oak woodland which county refers to as the middle disposal site. Your objective, as stated in the EIR, is to find adequate space for the estimated 500,000 cubic yards of sediment that must be removed from behind Santa Anita Dam. We feel both objectives can be met and you can begin dredging immediately by using the existing sites. There need be no costly delays or contract revisions for the work you have already commissioned.

The main area of disagreement seems to center on the possibility that the county had hoped to create a middle site for sediment coming from behind other dams, not just Santa Anita. To establish such an area, the oak woodland/wildlife corridor would need to be demolished. Yet this was never spelled out in the EIR and the community is now strongly opposed to it.

At the moment, there is a lot of emotion attached to this situation that a small meeting might be able to defuse. By abandoning any plans for the removal of the woodland to create the middle site, the county will regain the goodwill of the neighbors and environmental community that very much understands and supports the county's important mission of flood control. What the community does not support is the elimination of a wildlife corridor and the cutting down of old growth trees with valuable carbon sequestration capacity. The recommended mitigation of planting saplings is not adequate replacement for what is lost, particularly in the smog prone San Gabriel Valley.

We see a compromise. Wide-spread community support for the sediment removal as planned in exchange for preservation and protection of the Arcadia Oak Woodland. Surely there is time for the county to begin negotiating for other sites for the sediment and debris from other dams.

I look forward to hearing back from you prior to January 4th when the Board of Supervisors meets. Or feel free to contact Glen Owen or Cam Stone whose numbers you have on file.

CC Keith Lilley, DPW Project Manager
Mike Pestrella, DPW Assistant Director of Water Resources