A. Purpose and Need for Action

The Palmdale Water District (PWD) and the USDA Forest Service (Forest Service) have prepared a joint Environmental Impact Statement (EIS) and an Environmental Impact Report (EIR) referred to as an EIS/EIR for the Littlerock Reservoir Sediment Removal Project proposed by PWD. This joint EIS/EIR has been prepared under the direction of the PWD, as the lead agency under California law, and the Forest Service as the lead agency under federal law to comply with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

A.1 Overview of Proposed Action/Project and Alternatives

The Littlerock Dam and Reservoir are located on Little Rock Creek below the confluence of Santiago Canyon in the Angeles National Forest (ANF) (see Figure B-1 [Regional Project Location and Sediment Removal Truck Routes]). The PWD operates the Littlerock Reservoir as a local surface water impoundment, and water is conveyed from the reservoir to Lake Palmdale. Inflow into the Reservoir is seasonal and varies widely depending on stream flows and snowmelt within the watershed. The Reservoir was constructed in 1924 with an initial design capacity of 4,300 acre-feet. By 1991, the capacity of the Reservoir had been reduced by siltation to approximately 1,600 acre-feet. As a result of the 1992 Littlerock Dam and Reservoir Restoration Project, the height of the Dam was raised to increase the reservoir capacity by approximately 1,723 acre-feet with a surface area of nearly 100 acres. Preliminary calculations conducted by PWD indicate that the Reservoir capacity is further reduced at a rate of approximately 30 to 40 acre-feet per year (WCC, 1992). PWD proposed an excavation of sediment from the reservoir as a part of the 1991/1992 Littlerock Dam and Reservoir Restoration Project EIS/EIR. This portion of the Project was not implemented, however, due to the presence of federally endangered arroyo toad (*Anaxyrus californicus*) upstream of River Station 4,235. PWD proposes to excavate sediment from the reservoir and construct a grade control structure (proposed action or proposed project) at, or just downstream of River Station 4,235, also known as Rocky Point.

A.2 Purpose and Need

Both the NEPA Regulations (Section 1502.13) and the CEQA Guidelines (Section 15124[b]) require that the purpose, objectives, and need for a proposed action be described in the EIS/EIR. The description of project purpose should state the specific objectives of the proposed action, whereas the statement of need should discuss the broader underlying need to which an agency is responding.

A.2.1 Statement of Purpose and Objectives

The proposed action purpose and PWD's objectives for implementing the proposed action include the following:

- Restore the Reservoir to 1992 water storage and flood control capacity, and maintain that capacity through annual sediment removal; and
- Preserve habitat for the arroyo toad (*Anaxyrus californicus*) through construction of a grade control structure that prevents sediment loss and headcutting of the stream channel upstream of Rocky Point.

A.2.2 Project Need

The Project is needed to increase PWD's water storage capacity. Littlerock Reservoir is a critical part of the larger water resource, treatment, and distribution system operated by PWD to provide service to customers in the City of Palmdale and the surrounding unincorporated communities (USFS, 1997). The Reservoir also provides debris control and flood protection for downstream areas, as well as recreational opportunities, fish and wildlife enhancement, and serves as a historical and cultural resource. Additionally, Little Rock Creek upstream of the Reservoir provides habitat for the federally endangered arroyo toad (*Anaxyrus californicus*). Siltation and sedimentation has resulted in a substantial reduction in water storage and flood control capacity. Previous plans for sediment removal from the Reservoir, however, posed potential risks for "take" of arroyo toad and degradation of arroyo toad habitat upstream of the Reservoir beyond the Rocky Point area.

By constructing a grade control structure at or just downstream of River Station 4,235 (the Rocky Point area) prior to the removal of sediment from the Reservoir, any headcutting or sediment loss due to sediment removal activities would be limited to the area downstream and would not affect the stream channel upstream of the grade control structure. Consequently, because Project effects to the stream channel upstream of River Station 4,235 would be minimized, the risk of "take" of arroyo toad through habitat degradation would also be minimized.

A.3 Agency Use of this Document

As indicated in the Project Overview (Section A.1), the proposed action is located on land administered by the Forest Service that is referred to as National Forest System (NFS) land. The PWD would require a Special Use Authorization from the Forest Service to implement the proposed action. In order to consider approval of the requested authorization, the Forest Service will prepare an Environmental Impact Statement (EIS) pursuant to NEPA that identifies the proposed action's potential impacts. PWD will also take into account the environmental impacts of the proposed action through its preparation of an Environmental Impact Report (EIR) pursuant to CEQA. Based on these requirements, a joint EIS/EIR has been prepared under the direction of both agencies to satisfy the permitting and decision-making requirements of each agency prior to project approval. NEPA and CEQA also require that the EIS/EIR development process include public notice of the proposed action, and address concerns that the public may have regarding the proposed action.

A.3.1 Decision Framework for U.S. Forest Service

Littlerock Dam and Reservoir are operated and maintained by PWD, pursuant to a Forest Service special use permit. The proposed action includes an application from PWD for a special use authorization from the Forest Service to construct the proposed grade control structure and to remove sediment from the Reservoir. The Forest Supervisor, as the Responsible Official for the preparation of the EIS, will decide whether to permit the proposed activities or an alternative to the proposed action on NFS lands. If approved, the EIS will include mitigation measures that have been adopted to reduce or avoid impacts, which will be guided by a mitigation monitoring, reporting, and compliance program intended to ensure enforcement of measures.

A.3.2 Decision Framework for Palmdale Water District

Prior to making a decision on the proposed action, PWD will prepare an EIR pursuant to CEQA requirements that will evaluate the environmental impacts from the proposed action and alternatives, and will

identify feasible mitigation measures for potentially significant impacts. Per CEQA Guidelines (Section 15097(a)), a mitigation monitoring program must also be adopted for an EIR to ensure measures are implemented.

In addition to its responsibility to review the proposed action as the CEQA Lead Agency, PWD must ensure the proposed action's compliance with a California Department of Water Resources' (DWR) contract. In 1992, PWD entered into an agreement with the DWR under the Davis-Grunsky Act to partially fund the cost of the Littlerock Dam and Reservoir Restoration Project, which included the following two phases:

- Phase I: Strengthen and enlarge Littlerock Dam to correct for seismic and spillway deficiencies. This phase was completed in 1994; and
- Phase II: Restore the lost water supply and water storage benefits of Littlerock Reservoir. This phase would be completed by the proposed action.

The DWR agreement requires PWD to maintain a minimum recreation pool (i.e., 500 acre-feet in volume, and 3,228 feet in elevation) in the Reservoir throughout the recreation season (ending Labor Day each year) as long as sufficient surface flows from Little Rock Creek are available (DWR, 1998). However, in June 2014, PWD stated its plan to address the current statewide drought by diverting water from Littlerock Reservoir to Lake Palmdale for treatment and distribution to customers, beginning July 1, 2014 through August 2014 until the Reservoir was completely empty. The PWD diversion plan was determined consistent with the DWR contract per Article A-26 (Force Majeure) of that contract, which provides exceptions to the stated obligations in the event of an "Uncontrollable Force" such as a drought (DWR, 1998).

PWD will continue to be subject to its obligations and responsibilities under the DWR contract, which will guide its design and management of the proposed action.

A.3.3 Authorizing Actions

Several other federal, State, and local agencies will rely on information in this EIS/EIR to inform them in their decision over issuance of specific permits related to Project construction or operation. Under CEQA, a public agency with discretionary approval authority over a portion of a project is a responsible agency, while under NEPA a federal agency with similar discretionary approval over a project is a cooperating agency (14 CCR 15096; 40 CFR 1508.5). In addition to a special use authorization from the Forest Service, PWD may be required to obtain permits from the following cooperating or responsible agencies: U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, California Department of Fish and Wildlife, Antelope Valley Air Quality Management District, Lahontan Regional Water Quality Control Board, County of Los Angeles, and City of Palmdale.

Table A-1 lists the federal, State, and local permits and authorizations required for the proposed action.

Table A-1. Federal, State, and Local Permits and Authorizations

Agency	Permit/Approval
USDA Forest Service	Special Use Authorization
U.S. Fish and Wildlife Service	Biological Opinion in compliance with Section 7 of the Endangered Species Act
U.S. Army Corps of Engineers	Section 404 Permit in compliance with the Clean Water Act (see 404(b)(1) Evaluation Summary in Appendix F)
California Department of Fish and Wildlife	Section 2081 Incidental Take Permit in compliance with the California Endangered Species Act
	Lake and Streambed Alteration Agreement

Table A-1. Federal, State, and Local Permits and Authorizations	
Agency	Permit/Approval
Lahontan Regional Water Quality Control Board	Section 401 Certification in compliance with the Clean Water Act
	Section 402 Permit in compliance with the Clean Water Act
Antelope Valley Air Quality Management District	Permit to operate
County of Los Angeles	Conditional Use Permit for sediment storage
	County agreement regarding road damage and repairs
City of Palmdale	Conditional Use Permit for sediment disposal
	City agreement regarding road damage and repairs

As discussed in Section C.1 (Introduction to Affected Environment and Environmental Consequences), the Forest Service and PWD have pre-emptive jurisdiction over the proposed action and no local discretionary permits or local plan consistency evaluations are required for the proposed action or alternatives. However, the sites identified to receive the sediment removed from the Reservoir would be required to obtain any necessary permits from local jurisdictions. Additionally, the Forest Service and PWD, in accordance with NEPA and CEQA (respectively), have included evaluation of local land use plans in this document in cases where these local plans and policies would help reduce or eliminate an environmental impact.

A.4 Overview of the Environmental Review Process

Both NEPA and CEQA encourage agencies to prepare a single joint environmental assessment document, because the environmental review process under both laws are similar and somewhat parallel. Therefore, the Forest Service and PWD will direct the preparation of a joint EIS/EIR for the Littlerock Reservoir Sediment Removal Project proposed by PWD. Under the direction of the Forest Service as the federal lead agency, and PWD as the lead agency under California law, a Draft and a Final EIS/EIR will be prepared to comply with NEPA and CEQA. However, the Forest Service and PWD will take separate decision actions on the EIS/EIR prepared for the proposed action.

After the completion of the EIS/EIR, the Forest Service will issue a Draft Record of Decision (ROD) that states the Forest Service's determination on issuance of the Special Use Permit/Authorization and the rationale for that decision. The Draft ROD is subject to administrative review under the Forest Service predecisional administrative review process (36 CFR 218).

In compliance with CEQA requirements, PWD will determine the adequacy of the Final EIS/EIR and, if adequate, will certify the document as complying with CEQA. If PWD approves the Project with significant and unmitigable impacts, it must state why in a "Statement of Overriding Considerations," which would be included in PWD's decision on the document.

Section F.1 (Public Participation and Notification) of this document describes the public scoping process for the Project. Section F.4 (Distribution of the EIS/EIR) includes a detailed discussion of the public review period, EIS/EIR document availability, and opportunities to provide public comment on the Project.

A.5 Reader's Guide to this Document

A.5.1 EIS/EIR Organization

The organization of this EIS/EIR is listed below. Please note that all figures are included at the end of their respective sections.

- **Executive Summary.** A summary description of the proposed action, the alternatives, and their respective environmental impacts is included.
- **Section A (Purpose and Need for Action).** A brief overview of the proposed action, purpose and need for the Project, and the public agency use of the EIS/EIR is described.
- **Section B (Description of Proposed Action/Project and Alternatives).** Detailed descriptions of the proposed action and alternatives to the proposed action are presented. The process for selection of Project alternatives is described along with the steps and rationale for elimination of certain alternatives from further analysis.
- **Section C (Affected Environment and Environmental Consequences).** A detailed description of the affected environment and regulatory framework is presented for each technical issue area, followed by a comprehensive analysis of proposed action impacts and impacts of the Project alternatives. Mitigation measures are presented that would help reduce or minimize any potential impacts resulting from implementation of the Project.
- **Section D (Cumulative Effects).** This section identifies past, present, and reasonably foreseeable future actions in the Project vicinity that help define the cumulative scenario for each issue area. The cumulative analysis discusses the incremental impact of the proposed action and Project alternatives when considered with other cumulative projects.
- **Section E (Other Federal Requirements and CEQA Considerations).** A summary of all significant and unavoidable impacts resulting from the Project is provided as well as a discussion of long-term implications. This section also describes how the Project has been developed in accordance with the requirements of federal environmental regulations.
- **Section F (List of Preparers and Persons Consulted).** This section describes the public scoping process, as well as the distribution and availability of the EIS/EIR and the public comment period. A list of the EIS/EIR authors and the agencies or individuals contacted during preparation of the EIS/EIR is included.
- **Section G (References).** This section lists the research conducted in preparation of the document.
- **Section H (Glossary and Acronyms).** Definitions to terms and abbreviations used in the EIS/EIR are provided.
- **Section I (Index).** An index of important or useful subjects is provided for ease in locating information in the EIS/EIR.
- **Appendices.** Technical background information used in preparation of the EIS/EIR is included.

A.5.2 Topics not Relevant to the EIS/EIR

Both NEPA and CEQA provide guidance on focusing the environmental analysis on information or data that is relevant to the EIS or EIR (FSH 1909.15, Chapter 23.3[6]; CEQA Sections 21061, 15126.2[a], 2011). If an issue or topic is found to be irrelevant to the proposed action, it is not to be included in the impact discussion. The following topics were not considered relevant to this EIS/EIR:

- **Paleontology.** The bedrock surrounding the Reservoir is Lowe Granodiorite. While there is some recent alluvium, there is no presence of geologic units that would have any paleontological sensitivity (Dibblee and Ehrenspeck, 2001).
- **Public Services/Utilities.** The Project would not generate any additional population that could affect the capacity of local public service or utility providers. Potential impacts associated with sediment disposal are discussed in Section C.6 (Hazards and Public Safety).
- **Socioeconomics/Environmental Justice.** No housing is located within the Littlerock Recreation Area. Census tracts that would be traversed or located within one-half mile of any proposed vehicle travel route do not contain more than 50 percent minority population, nor do they contain more than 50 percent low-income population (U.S. Census Bureau, 2000). The Project would not disproportionately affect minority or low-income populations. An environmental justice screening analysis and a discussion of the Project's compliance with Executive Order 12898 is provided in Section E.2.5.
- **Wilderness.** Project activities would not be located within or adjacent to a designated Wilderness Area. Potential impacts to other recreational resources are discussed in Section C.9 (Recreation and Land Use).