



November 14, 2011

Los Angeles County Department of Public Works (LACDPW)
Attn: Water Resources Division - Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974
reservoircleanouts@dpw.lacounty.gov

RE: Scoping Comments - Devil's Gate Reservoir Sediment Removal and Management Project

Dear LACDPW,

Thank you for the opportunity to comment on the scope of the draft environmental impact report on the Devil's Gate Reservoir Sediment Removal and Management Project. It is appropriate that your environmental review considers not only sediment removal but the management of ongoing sediment in the basin. We believe a sustainable and long-term approach to sediment management is critical flood protection and the health of the Arroyo Seco Watershed.

The Arroyo Seco Foundation would like to ask that the draft EIR include all of our comments, which are summarized by these underlying principles:

- Sediment is a valuable natural resource and not a waste product; sediment management should be evaluated in a watershed context incorporating the principles of Integrated Regional Water Management
- All negative impacts on habitat, wildlife and people from the proposed project and its related flood control system including Devil's Gate Dam and the downstream concrete lined flood channel should be evaluated
- The preferred project and proposed alternatives should minimize these negative impacts, and an alternative that incorporates restoration of the downstream river channel and comprehensive watershed management should be evaluated

A complete and detailed list of our comments is attached. Thank you very much for the consideration of our comments. The Arroyo Seco Foundation looks forward to working with the LACDPW on this project in the future. As part of our Watershed Coordination program we would be glad to help with education and outreach efforts for this project.

Sincerely,

A handwritten signature in blue ink that reads "Tim Bruck". The signature is written in a cursive, flowing style.

Managing Director

Arroyo Seco Foundation, 570 W. Avenue 26 #300, Los Angeles, CA, 90065 (323) 405-7326

**Arroyo Seco Foundation
Scoping Comments –
Devil’s Gate Reservoir Sediment Removal and Management Project**

The Arroyo Seco Foundation asks the County of Los Angeles Department of Public Works to review and respond to these comments on the notice of preparation of the draft environmental impact report on the Devil’s Gate Dam Sediment Removal and Management Project.

Provide a detailed proposed action for both the sediment removal and sediment management

The project description in the notice of preparation provides only a broad overview of the goals of the removal portion of the project. There is no clear proposed action for the sediment removal method. This makes it difficult to anticipate potential impacts. There is no proposed action for the management portion of the project. Please provide a detailed proposed action for both the removal and management and briefly extend the public comment period prior to completing the draft EIR.

The notice of preparation states: “The ultimate reservoir configuration and volume of sediment to be removed will be determined based on location of access roads; areas for preservation of restoration of native vegetation; and the amount and location of sediment inflow that occur during the upcoming storm season.” Please propose an action based on planned access roads, areas for preservation of restoration of native vegetation; and estimates of the amount and location of sediment inflow that occur during the upcoming storm season given maximum and minimum hypothetical seasonal rainfall totals.

Propose a sediment management program that integrates water resource management.

- It is important to integrate the sediment management and water resources management, as these two are highly dependent on each other. This should include consideration of:
- A conservation pool within Hahamongna
- Expanding percolation (Is sediment excavation good or bad for percolation?)
- Increasing storm water capture
- Other measures to increase sustainable water resource management

Stream restoration alternative

Evaluate in the draft environmental impact report an alternative that involves the restoration of the Arroyo Seco which substantially restores the hydrologic function of the stream downstream of the Devil’s Gate Dam. This alternative should include restoring available land in the floodplain of the Arroyo Seco downstream of the Devil’s Gate Dam, to be made available for flooding and sediment and floodwater storage in wetlands. With the Arroyo Seco restored to close to its natural conditions, the high flow events can carry sediment downstream and the sediment would be processed in a more natural and less expensive manner.

It is of critical importance that this project protects sensitive habitat including:

- Riparian habitat
- Riversidian Alluvial scrub
- Wetlands

- Pond Marsh such as that found near the dam on the west side

Address in the draft EIR how this project will impact these habitat types. Propose alternative to the project that will minimize any disturbance and enhance these habitat zones.

Evaluate the redesign of the current channel and the dam operating regime to transport more sediment

Use the Arroyo Seco channel to transport sediment downstream from Devil's Gate Dam to the extent feasible. Evaluate re-engineering the concrete lined portion of the Arroyo Seco to transport more sediment during low flow conditions. This would provide an opportunity to retrofit an old and weathered, and in some cases deficient, flood channel.

Consider an alternative that makes full use of the Arroyo Seco's current sediment carrying capacity

Analyze the channel, as it is, to transport sediment from the reservoir. This entails saturating the flow with a healthy amount of sediment.

Consider an alternative to trucks to move sediment from within the basin to a truck loading station outside of the basin

This will limit the need for constructed or paved roads, limit activity that will cause sediment compaction within the basin, and limit habitat disturbance. Note that the alternative does not need to transport the sediment all the way to the placement sites, it only needs to transport the sediment out of the basin its self.

Propose a sediment management program that encompasses the entire Arroyo Seco Watershed from the peaks to the confluence and integrates the Los Angeles River Watershed to the Pacific Ocean.

Devil's Gate Dam is part of a system, the Los Angeles River system. Sediment management that occurs within the reservoir will affect sediment issues downstream. Assess how the proposed sediment management plan affects sediment management from the most upstream point of influence to the Pacific Ocean. Propose alternative sediment management programs that work in cooperation with all other sediment management throughout the watershed. Evaluate the relationship between sediment capacity in the Devil's Gate Dam and the ability of the concrete downstream channel to protect property from flood damage.

Pursue sediment management options that safely mimic natural processes from the top of the watershed to the bottom (sluicing, stream and floodplain restoration, and others).

The Arroyo Seco, and the whole of the Los Angeles Basin, has been responding to the high sedimentation rate of the San Gabriel Mountains for millions of years. Evaluate which natural processes or pseudo natural processes of sediment transport can be restored to remove sediment from the Devil's Gate Reservoir.

Evaluate SMART and LID development and re-development

Include land use regulations (green buffers, density, proximity to wildlands, defensible space, distance from geologic hazards) and mandate low-impact/Green building design.

Address sediment and storm water as valuable resources of the Arroyo Seco basin

Dispel the myth that both sediment and storm water are waste products. Acknowledge that both sediment and waste water are valuable resources of the Arroyo Seco. Sediment is a critical component of a stream system. Sediment can be collected and used for construction and beach nourishment. Sediment can also be hydrologically transported downstream where it can aid in the restoration of the Arroyo Seco River. Storm water can be captured, treated and used for multiple purposes including ground water recharge and irrigation.

Address the natural sedimentation process

To adequately develop a sediment management program, sedimentation must be examined from a geologic perspective. Begin with the uplift of the San Gabriel Mountains. Address in detail the source and fate of sediment within the Arroyo Seco. Evaluate the source of sediment. Evaluate the sediment load into the Devil's Gate Basin based on factors such as uplift, erosion and condition of the upper watershed.

Review the recommendations of the Philip Williams & Associates Study, "Flood Hazard Sediment Management, And Water Feature Analysis, Hahamongna Watershed Park," (2000) and analyze them for their applicability to this project.

Consider the US Army Corps of Engineers' Arroyo Seco Watershed Ecosystem Restoration Study

This study raises important concerns and suggests improvement to the current state of the Arroyo Seco Watershed.

Fully evaluate the stakeholder concerns listed in section 2.3. Describe in detail how these concerns have been addressed.

Evaluate and report in detail how this project increases or mitigates relevant problems described in section 2.4.1 such as:

- Devil's Gate Dam barrier to fish passage
- Disturbance of the Hydrologic Regime
- Reduced Groundwater Recharge
- Channelized Stream Bottom
- Uncertainty regarding flood risk management
- Limited Flood Storage at Devil's Gate Dam

Evaluate and report in detail how this project supports relevant opportunities for watershed improvement described in section 2.4.2 such as:

- Opportunities exist to provide for fish passage over or around the Devil's Gate Dam
- The opportunity exists for removal of the concrete flood control channel along Arroyo Seco
- The opportunity exists to develop a basin-wide sediment management plan to protect and improve the health of the watershed.
- The opportunity exists to identify where flooding problems exist and where flood risk management mechanisms need to be put in place

Review the effectiveness and viability of flood control methods

Evaluate and report on the effectiveness and viability of the Devil's Gate Dam. Evaluate alternative flood control measures.

Review the environmental impact of the Devil's Gate Dam

The flood control and debris basins were for the most part constructed without regard to environmental consequence. Devil's Gate Dam was built in 1920 and the flood control channel in the 1930s and 1940s, before the current environmental review process. Evaluate and report on the full environmental impact of Devil's Gate Dam. Include the intended and unintended environmental consequences of the dam. Evaluate the effectiveness of upper watershed debris control structures and their impact on Devil's Gate Dam sediment input.

Conduct educational outreach to the public to improve understanding about natural processes

Residents within the watershed should be aware of the purpose of the Devil's Gate Dam and the role of sediment in flood protection and watershed management. This project should educate the public about the dam outside the realm of an environmental impact report scoping session.

Evaluate the potential for low carbon emission vehicles to be used for the transportation of sediment from the basin to the destination

Low emission vehicles can lower the air pollution concerns of the project, which are likely to be massive. Steps should be taken to reduce any air quality impacts in this region.