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TO: Los Angeles County Flood Control District

Attn.: Water Resources Division -- Reservoir Cleanouts

**SUBJECT: Devil's Gate Reservoir Sediment Removal and Management Project -
Comments**

I appreciate the opportunity to submit some questions and comments for the abovementioned project. I was not able to attend either of the scoping meetings, but I did access internet postings regarding them. I have also downloaded and reviewed "Initial Study, Devil's Gate Reservoir Sediment Removal and Management Project ", prepared by Chambers Group, Sept. 2011.

My questions and comments should be taken as preliminary, because they might change as more information becomes available to me during the EIR process.

Introduction

I concur that there must be a program of sediment removal due to the inevitable geologic processes of erosion of the mountains, and the human occupancy of the adjacent alluvial fans. Managing the sediment yield has become a major problem for long-term sustainability of developments along the foothills of Southern California mountains; but at the same time many beaches and shorelines are suffering erosion from lack of sediment outflow from rivers.

At present I see no better way for removal of the sediments and organic debris than by trucking. For Devil's Gate Reservoir the volume of sediments to be trucked through the surrounding community is very large, with quantities of up to 4,000,000 cubic yards being proposed by the Los Angeles County Flood Control District for this Environmental Impact Report.

Questions and Comments

1. Explain the technical bases for the project goal of providing capacity for two DDE's (Debris Design Events), with more facts and figures relative to the Arroyo Seco watershed. Is there public access to the LA County DPW "Hydrology and Sedimentation Manuals", referred to on p. 7 of "Initial Study"? If not, can they be made available for review by interested individuals?
2. Why hasn't the project goal of two DDE's been adjusted to account for the large fire and post-fire flood and erosion events which have occurred recently? Another major fire cannot occur until there is regrowth of significant fuel, taking 20 years or more. And at five years or so after a fire, the erodability of the natural watershed drops several fold to near non-fire normal. The use of two DDE's instead of only one results in an increase of 2,000,000 cubic yards to be removed.

3. Please provide the maximum discharge and hydrograph(s) for the 50-year design flood used for this project. Also of interest would be the historical flood frequency data/graphs for the Arroyo Seco.

4. The EIR needs to deal with the rationale for the design criteria for both sediment volumes and predicted flood control benefits, rather than presenting project objectives as firmly fixed.

5. Present a clearer overall reservoir sediment and storage inventory: total storage; storage now occupied by sediment and debris; free water storage needed for flood control at various risk levels; and water storage presently available for flood control. Also of interest would be the cumulative historical record of sediment inflows and removals, to the extent that it exists. In addition, some data on sediment size distributions would be helpful.

6. Are there reports giving hydraulic analyses of flood control for various flood hydrographs and sediment volumes in the reservoir? They would be of value for review. What is the flow capacity of the existing downstream channel?

7. If 2,000,000 cubic yards of debris is removed, what is the remaining flood risk downstream? What level of damages might be expected during a 50 year design storm? Then what are the answers to the same question for removal of 3,000,000 or 4,000,000 cubic yards? Does the improvement in flood safety and reduction of flood risk justify the additional expenditure and community impacts for larger removal?

8. Explain why a limit of 4 million cubic yards is being sought when only 2.6 million cubic yards is the recent measurement of stored sediment?

9. The EIR analysis should present several alternative project goals for sediment removal and available flood control volumes with clear accounting of benefits, costs, and community impacts. The public can then have a clearer idea of choices, and express preferences.

10. Some long-term objectives need to be considered along with short-term project goals. For example, if it were found that only 2 million cubic yards needed to be removed for flood control now, the removal of the other 2 million would still have to be done sometime. So the question of timing should be opened up---e.g. if 4 million is to be removed, it might be scheduled in segments over say 10 or 12 years, rather than all at once in a single long multi-year effort. In the long run, a more uniform rate of removal might be preferred over the present situation with large amounts of "catch-up".

I will be glad to discuss or clarify these comments.

Submitted by:

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