



## PASADENA AUDUBON SOCIETY

*Founded April 1904*

1750 N. Altadena Drive  
Pasadena, CA 91107  
WWW.PASADENAAUDUBON.ORG

November 8, 2011

Los Angeles County Department of Public Works  
Water Resources Division—Reservoir Cleanouts  
P.O. Box 1460  
Alhambra, CA 91802-9974

To the Water Resources Division of the LA County DPW:

Thank you for the opportunity to comment on the sediment removal project for Devil's Gate Dam in Hahamongna Watershed Park. As an organization that cares about birds and their habitats, we the members of the Board of the Pasadena Audubon Society have some serious concerns regarding this project, and we look forward to working with the County to find a solution that will benefit the birds while protecting the people.

Our first concern is that the sediment removal be done at times and in places that will not harm or disturb nesting birds, as specified by the Migratory Bird Treaty Act of 1918. We recognize the challenge this poses, as birds nest almost year-round in Hahamongna Watershed Park, but we need assurances that the work will be done at places and times that will not disturb the birds that nest there. We know a biologist will survey these areas, but we have some concerns about the thoroughness of previous biological surveys in Hahamongna, and so we would also like to offer our knowledge and expertise of dates and locations of when and where birds have nested in the past.

Another concern is that this project will cause serious loss of habitat. While we recognize that a project of this scope will lead to the loss and destruction of some habitat, we still insist that the value and quality of habitat in Hahamongna requires that this project be done with incredible sensitivity and respect. We ask that the work be done slowly and carefully, destroying as little habitat as possible, and providing for effective restoration of any habitat that is disturbed or destroyed. If the work is done this way, this will also make it easier to protect nesting birds.

Another concern we have is the location and quality of mitigation. Hahamongna is comprised of several types of habitats, including willow and alluvial scrub. These types of habitats are increasingly rare in Southern California, and Hahamongna is one of the few places where people and birds can find these habitats. Because the willow, alluvial scrub, and other habitats are so valuable in Los Angeles, we insist that the mitigation for this be done in Hahamongna or the Arroyo Seco, not some distant location. We ask that the habitats that are destroyed be restored properly, and that the County leave Hahamongna in better shape than it found it, with more of the land restored to its natural

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state. We know that the DPW would like to maintain some areas of the park as permanent working space for sediment removal, and while we see the possible wisdom of this plan, we urge the DPW to preserve and restore as much of the habitat as possible and to keep the footprint of the permanent work area as small and unobtrusive as possible.

We urge the County to see sediment not as a waste product but as a valuable resource. Not only can sediment be a commodity, but it can also be valuable to the environment. If we treat the Arroyo Seco like the watershed system that it is, then we can see that the sediment can have environmental value. We'd like to see a restored Arroyo Seco, with some of the sediment in the river where it belongs.

We also urge the County to continue researching to look for alternate ways to move sediment besides digging, trucking, and dumping. We insist that the County to revisit ideas like launching and sluicing, and to keep examining how other agencies around the country and the world have managed this process. We expect to see a full report of these alternates listed and described in the EIR, with complete explanations of their benefits and drawbacks.

Lastly, we ask that the Department of Public Works treat Hahamongna Watershed Park as part of a watershed system, one that stretches from the mountains to the ocean, and that the DPW continue to work on creating a system that will allow the watershed to function as naturally as possible. We need a "forever plan" for sediment and watershed, not one that is already obsolete. We thank you for your time and look forward to working with you.

On behalf of the Board of the Pasadena Audubon Society,

Laura Garrett (signed)  
Conservation Chair

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