



Pasadena Group

November 11, 2011

Gale Farber, Director, Los Angeles County Department of Public Works
ATTN: Water Resources Division – Reservoir Management
PO Box 1460
Alhambra, CA 91802-9974

RE: Scoping Comments: Environmental Impact Report for Devils Gate Dam Reservoir Sediment Removal and Management Project

This appears to be first large-scale project to remove sediment resulting from the aftermath of the 2009 Station Fire from one of DPW's major reservoirs, and to address the topic of managing sediment from anticipated reservoir inflows that are expected in future years.

Your department has a once-in-a-generation opportunity to make a comprehensive study and evaluation of each and every environmentally and economically feasible alternative method of addressing this significant problem.

We therefore urge that the EIR for the Devils Gate Dam project do just that.

As a start, the EIR needs to address the source of the problem: the continued erosion of rock, soil, and debris that enters the reservoir from the dam's upstream watershed. We realize this watershed is primarily within the legal and management jurisdiction of Angeles National Forest, and therefore urge DPW's EIR consultant and its own staff to work collaboratively with the Forest Service in evaluating ways in which this sediment inflow might be better controlled. In this evaluative process we suggest that research staff of the Forest Service's San Dimas Experimental Forest (a separate jurisdictional unit, with a long history of studying sediment flow from the Forest's chaparral hillsides – contact the Glendora Ranger District office) be consulted in addition to staff at the Angeles National Forest Supervisor's office in Arcadia.

In addition, alternative methods of removing the existing sediment which impedes efficient functioning of the reservoir for flood control and water conservation purposes need to be comprehensively evaluated.

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Alternative methods of removing sediment that must be fully evaluated include:

Sluicing: According to information presented at scoping meetings for this project, this method was utilized in 1945 to remove sediment from the dam. The EIR should describe in detail the quantity of material sluiced, sluicing methods used, the time (days, hours) that it took to do the sluicing, as well as the results in terms of efficiency of the process, the downstream deposition locations of the material sluiced, the acceptability of the process and results to affected communities, and all direct and indirect costs.

Using this baseline information, the EIR should then evaluate this alternative as a possible means of removing some or all the sediment needed to restore Devils Gate Dam Reservoir to its intended function. Evaluation should address all aspects of this alternative, such as those mentioned in the paragraph above.

Slurry pipeline: During scoping meetings several speakers pointed out that Devils Gate Dam, like other dams on the southern side of the San Gabriel Mountains, interrupts sediment flow that otherwise would flow down to the Pacific Ocean, providing sand and other material to replenish the beaches there. The alternative of constructing a slurry pipeline to remove some or all the sediment needed to restore the reservoir to its intended function should be evaluated in detail.

This evaluation should carefully consider different lengths of pipeline that might be appropriate. It would not be necessary to construct such a pipeline all the way to the ocean; a pipeline that ended at the confluence of the Arroyo Seco with the Los Angeles River, or immediately downstream of the unpaved portion of the Los Angeles River, might be feasible alternatives that would deposit measured amounts of sediment at specific times during which the Los Angeles River was flowing at sufficient rates to move the sediment down to the ocean.

Discussion of this alternative needs to address the obvious topics of differing lengths of pipeline, pipeline size and material (concrete? metal?), construction and maintenance costs, seasons and conditions during which sediment would be conveyed down the pipeline, deposition locations, environmental and other impacts on these locations, and anticipated public acceptability to this process.

Both the short-term and long-term environmental and economic benefits and costs of the two alternatives discussed above must be fully evaluated in comparison to the environmental and economic costs of DPW's traditional methods of sediment removal via trucks. These two alternatives have the positive environmental benefit of moving sediment to the ocean where it would have naturally flowed had Devils Gate Dam not been constructed.

In comparison, trucking has several negative environmental impacts, including fuel consumption of increasingly expensive petroleum products, generation of undesirable air emissions (including particulate matter if diesel fuel is used),

generation of greenhouse gas emissions, annoying noise from both truck travel on streets through nearby residential and/or school neighborhoods and from the frequent movement of trucks in reverse gear (which generates a safety beeping required by state law), damage to the streets and roads over which trucks travel, and generation of pollutants spilled on the ground during truck operation which pollute both the ground and surface and subsurface water.

Trucking also involves forever ongoing costs to the County in terms of the purchase or rental of trucks to perform the work assigned, payment for truck drivers and staff who must coordinate their work, as well as indirect costs to nearby communities such as Pasadena and La Canada Flintridge which must monitor trucking operations in order to minimize impacts to their communities.

Trucking is not a sustainable method of dealing with sediment accumulation that will continue to occur, at varying rates, into the indefinite future. The reduction of sediment inflow, and the removal of sediment from county-owned reservoirs, as well as reservoirs owned by other entities, in the foothills of the San Gabriel Mountains requires a sustainable approach if ever-increasing costs of sediment removal are to be avoided.

Water conservation and water quality impacts: The EIR must address issues related to water conservation and water supply, including positive and negative impacts on the operation of spreading basins upstream and (potentially) downstream of the dam, impacts to the Raymond Basin Aquifer and other impacted aquifers, and impacts to surface and underground water quality.

Terrestrial, avian, riparian, and aquatic flora and fauna: The EIR must fully evaluate these impacts, including impacts on any endangered, threatened or sensitive species, and must propose mitigation measures for flora and fauna that would be impacted by the project.

Recreation: The land area immediately upstream of and surrounding Devils Gate Dam Reservoir is a heavily used recreation area known as Hahamongna Watershed Park. Short-term and long-term impacts on the numerous types and quantities of recreation use in this area need to be fully discussed and evaluated, and mitigation measures for these impacts need to be proposed.

Cumulative Impacts: The EIR must evaluate the cumulative impacts of this project along with proposed projects to manage and remove sediment from several other reservoirs in the foothills of the San Gabriel Mountains that are owned and operated by the Los Angeles County Department of Public Works. The Department's Watershed Division has initiated a Sediment Management Strategic Planning process that is currently preparing a 20-year plan to address this topic. Preparation of the EIR for the Devils Gate Dam Reservoir Sediment Management Project must be coordinated with, and incorporate information and analysis, prepared in and for that planning process.

In conclusion, we recognize that a limited amount of trucking may occasionally be necessary to remove sediment immediately adjacent to the upstream face of the dam. If and when such trucking is done, we strongly urge the Department to either purchase low-emission trucks for its own use, or require that the Department only issue contracts for rental vehicles which meet the highest low-emission standard available. By so doing, the Department, along with other public entities, can play a role in forcing low-emissions standards for trucks and other vehicles throughout the public works community.

In recognizing this limited role for use of low-emission trucks for the specific purpose noted above, we in no way want to minimize our strong belief that trucking is an outmoded means of dealing with sediment flow into foothill reservoirs. On the contrary, we want to re-emphasize the need for the Department to move to sustainable solutions such as sluicing and/or the use of slurry pipelines to facilitate the movement of sediment down to the ocean.

Please feel free to contact us should you have any questions regarding our comments.

Sincerely,

David Czamanske, Vice-Chair, Pasadena Group of Sierra Club