10604 Walnut Drive
Shadow Hills, CA 91040
11 November 2011

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

Re: Devils Gate Reservoir Sediment Removal and Management Project Public Scoping Meeting

Dear Mr. Lilley:

Thank you for extending the comment period for the Devils Gate Reservoir Sediment Removal and Management Project. I attended the Scoping Meeting on October 15 at La Canada High School and addressed many issues there. My intent with this letter is primarily to reiterate these issues and make my comments available in written form for the betterment of the project.

Sediment Management needs to be an ongoing program. Not a 5-year plan, not a 20-year plan, but a forever plan. The upper parts of the watershed are highly erodable, and even once the predominantly chaparral vegetation has matured, there will still be sediment flow. Any management plan that contains at its core the transporting of sediment to a dump site is not a forever plan. Dump sites are finite, and almost all of the land in the Los Angeles basin has been developed.

(As a side note, one of the other speakers at the Scoping Meeting suggested modifying the vegetation in the upper watershed to reduce erosion. Mature chaparral is the best vegetation for retaining soil in this watershed, so the best management regime to minimize erosion is to minimize fire and other disturbances in the upper watershed. Any efforts to modify the vegetation will hamper the recovery of the chaparral and increase erosion)

There has been much learned in the fields of sediment and watershed management in the 90 or so years since the Devils Gate Dam was built. Let's incorporate some of that knowledge into the planning for this project and subsequent operation of the reservoir area. We want the Devils Gate Dam to be the first in a new generation of sediment management rather than the last of an old generation.

Rivers move sediment for free. The downstream channels may need to be modified or even redesigned to carry sediment. Let us take the opportunity to restore the streams, and improve flood protection and recharge our groundwater in the process. Let's value our water resources, rather than relegating them to a concrete ditch.

The downstream channel modifications that may be necessary to carry sediment are not free, but neither is the historical process of trucking sediment to a dump site. In addition to an accurate comparison of the financial costs among alternatives (specifically, hauling the sediment to a dump vs. outfit the river to carry it to the beach), please consider a full accounting of the environmental costs of each way of doing business, including the amount of carbon dioxide

released to the atmosphere by the burning of diesel or other fuel to power all of the heavy equipment involved in each process.

Please consider the broader issue of atmospheric pollutants. There is much sensitivity to particulate pollutants resulting from diesel fuels, but I'd like to encourage you to consider overall greenhouse gas emissions as well. Running vehicles on Compressed Natural Gas results in less carbon dioxide released to the atmosphere than using diesel fuel. Vehicles can be converted to run on CNG, and contractors can be required to operate their vehicles on CNG. The Port of Los Angeles provides a recent example of how to do this.

Realizing that there will be a need for revegetating areas disturbed in the process of removing sediment, and that the best plants with which to revegetate are those which were there before a disturbance, please consider setting up a nursery to propagate the plant material currently growing in the areas where sediment is to be removed. There is space in the Hahamongna Watershed Park that could be used for this purpose. I would like to suggest working with the City of Pasadena and possibly a nonprofit organization such as the Arroyo Seco Foundation to establish a native plant nursery for the benefit of this project and the local community. Taking a step such as this early in the current EIR process and starting the propagation efforts for the eventual revegetation portion of the project would be a refreshing and beneficial step in improving the Department's image with the greater environmental community.

As the project necessarily impacts the area, please consider a comprehensive program to minimize invasive exotic (plant) species. Weeds such as Castor Bean (from which the potent poison Ricin is derived) will show up, but bare and disturbed dirt can be managed to minimize such unwanted vegetation. Coarsely chipped organic material makes a good mulch to suppress weeds, and there will be plenty of material available for chipping once the sediment removal starts in earnest. Weeds are much easier to remove when they're small (and even easier to pull out when they grow through a generous layer of mulch), so with a little bit of thoughtful effort along the way, it's not too hard to keep these alien invaders from taking over. This issue is especially important in a habitat area such as the Hahamongna Watershed Park, which is already impacted by invasive non-native vegetation. Please pay attention to the weeds!

In closing, I'd like to recognize that sediment has accumulated in the Hahamongna basin and the local environment has adapted over the course of the 90+ years that the Devil's Gate dam has been here. Please don't insult the environment with a sudden traumatic wholesale cleanout of the basin, but rather take a longer time and work in smaller sections, revegetating as each phase of the work is completed, to achieve a more sustainable configuration with lower and more manageable impacts to the local and global environments.

Thank you for your attention.

Sincerely,

Roger Klemm