

COMMENTS IN RESPONSE TO
**THE DEVIL'S GATE SEDIMENT REMOVAL AND MANAGEMENT
PROJECT**

1/17/2014

Overview:

The County of Los Angeles Department of Public Works, Flood Control Division is to be commended for moving forward with an Environment Impact Report (EIR) as opposed to trying to obtain a Statement of Overriding Consideration which would not have allowed for this important opportunity for community input.

As someone who is in touch with the multiple agencies and numerous individuals who have been involved with the Devil's Gate and Hahamongna Watershed Park for almost three decades, I know that detailed comments will be forthcoming that touch on many aspects of the project – biology, traffic, air pollution, water conservation, noise, etc. Therefore, these comments deal not so much with specifics as with the goals of sediment management and how best to accomplish them. They emphasize the overriding need for a long-term comprehensive sediment management, water conservation and stream management plan – something long overdue and still, to my knowledge, not contemplated by the Department of Public Works (DPW).

Before commenting, I want to make clear that I recognize the tremendous responsibility of DPW, Flood Control Division for protecting the public safety downstream and helping to maintain the structural integrity of Devil's Gate dam. For this reason, it is clear to almost all who have studied the issues that some sediment must be removed. The real question is how much and how best to accomplish it.

Sediment has value:

When the County Sanitation District had a problem with "sludge," once regarded as a waste product, it developed a treatment plant for processing it into fertilizer. That fertilizer now nurtures vegetable fields in Central California. Santa Anita Race Track had a similar problem with horse manure until it struck a deal with nearby mushroom farms. What's to stop DPW from finding creative, cost effective ways of processing or refining sediment for use at beaches, in gardens or on roads or driveways?

In this day and age, it's no longer viable to mow down old-growth forests in order to create "sediment placement sites." New methods of reuse must be found. Although transferring some sediment to gravel pits in nearby cities may help, it is not the long-term solution that is needed. ***Sediment must be treated as something of value due to its potential for reuse. To make this happen, the talented engineers at DPW should be released and encouraged to analyze and present new opportunities and methods for sediment use.***

Scope of the Devil's Gate Sediment Removal:

In its documents to the County Board of Supervisors and the State of California requesting funding, the DPW Flood Control Division stipulated a project of "up to 2 million cubic yards" of sediment to be removed from behind Devil's Gate Dam. As the project developed and, without further communication with those agencies, (at least not any made available to the public), the project was arbitrarily expanded to approximately 4 million cubic yards. This has raised many questions about how DPW arrived at the increase.

Although members of the public have repeatedly asked for answers to the questions listed further on in this document so that they could intelligently comment on some of the technical assumptions and goals of the project, their requests have gone unanswered by DPW. In a community that is home to both JPL and Caltech and where the public consists of numerous highly skilled engineers and scientists, some of whom were seeking this information, such an omission is tragic. DPW lost valuable input that might have enhanced the project and expanded its own understanding.

Given that DPW told both the State of California and the Board of Supervisors that the public safety could be protected with the removal of "up to 2 million cubic yards" of sediment, there is a strong movement within the surrounding communities of Altadena, Pasadena and La Canada to restrict the project to those dimensions while DPW examines other methods for gradual long-term sediment removal.

The Pasadena Connection:

Behind Devil's Gate Dam is Hahamongna Watershed Park which is partly owned by the City of Pasadena and leased to the County. It is an important multi-use area with streams, meadows, hiking and equestrian trails and settling ponds. Uses for the area are governed by the Hahamongna Watershed Park Master Plan as well as the City's Green City Plan. There is every indication that the Devil's Gate DEIR for the removal of 4 million cubic yards as currently proposed by the County would violate important parts of these agreements and could make the City liable. **Therefore, County DPW should honor its agreement with its Board of Supervisors, the State of California (for its grant) and the City of Pasadena by proposing and executing a project of under 2 million cubic yards of sediment.**

Need for Blue Ribbon Committee:

Just as no person has all the answers to any given problem, no agency, even a “stand alone agency,” has all the knowledge, experience and creativity to address every problem or issue. Today more than ever before, the Department of Public Works, Flood Control Division is addressing many pressing problems simultaneously. Managing debris, controlling flooding and finding new locations for sediment are among them. So is finding ways to retain more water. Because of the lingering drought, water is California’s new gold. The pressure is on DPW to conserve or transfer more of it to nearby settling ponds as well as to reduce the amount of storm water run-off now sent over dam spillways.

Many who have been studying the situation at Devil’s Gate for decades feel it is time for new thinking at DPW. They are strongly recommending the creation of a Blue Ribbon committee of outside specialists to work with DPW engineers in analyzing past sediment management practices and devising appropriate new approaches. In order to stop the cycle of massive excavation of sediment at long intervals, it may be time for an innovative long-range approach to sediment management and water conservation. No city in the nation has more qualified resources and experts to partner with in seeking solutions than Los Angeles. All that is needed is leadership and the willingness of DPW management and staff to work together with their colleagues in the academic, engineering or business world to bring about change. Many in the community ***strongly encourage such a partnership in the form of a Blue Ribbon committee to develop a long-range comprehensive plan for both sediment management and water conservation for the future of Los Angeles.***

Important unanswered questions:

1. How much sediment needs to be removed?

In its own documents, the County told the State of California in its grant application for funding that it would remove “up to 2 million cubic yards” of sediment and not 4 which is the current proposal. The request before the Board of Supervisors was also for the smaller amount. Was the Board of Supervisors informed of the change and did they approve it? As a “stand alone agency,” DPW may feel that it is immune to supervision by our elected officials. The public sees it differently. And this kind of conflicting information creates distrust among those who believe that what is promised is what will happen. So ***how did the project expand in size and who authorized an increase from roughly 2 to 4 million cubic yards?***

2. What is the technical basis for providing the capacity for two as opposed to one Debris Design Event (DDE)?

Because of the recent Station Fire, it is fairly impossible for the vegetation in the foothills behind Devil's Gate to grow to the extent that they would supply sufficient fuel for another disaster of a similar nature. Because of the lack of fuel, is it reasonable to assume that there is not likely to be another major fire for up to 20 years and this will reduce the risk of even one "worst case disaster" during that period. ***So why 2 DDEs and has the goal of the Sediment Removal Project been adjusted to account for post-fire flood and erosion events?***

3. What is the record of the frequency of Floods?

One of the prime purposes of an EIR is to provide information to the public which they may use in preparing their comments. A key question in the Devil's Gate project is how frequently have floods occurred in the past and, in this era of drought, what does it portend for the future. ***So did the engineers at DPW study historical records to determine the maximum discharge for the 50-year design flood used for this DEIR?***

4. Is there a comparison of the costs associated with levels of flood risk based on the removal of different quantities of sediment?

It is appropriate to know what level of flood risk might be anticipated during a 50-year design storm. Because flood prevention in the form of sediment removal or channel repairs requires considerable public expense, a cost/benefit analysis at different levels of risk should have been included in the DEIR. ***Therefore, did DPW analyze the level of cost associated with the risk for the removal of 2, 3 and 4 million cubic yards? If so, why was not a cost and risk benefit analysis made available in the DEIR?***

5. What amount of sluicing is too much?

I understand that an independent review of sluicing was done for DPW and it was determined that increased sluicing would not work because of the accumulation of sediment in the storm channels. ***Was any analysis done to compare the costs and effectiveness of reinforcing flood channels at key choke points (Highland Park) where sediment builds up and doing regular maintenance of the channels to prevent build up? Could such a maintenance program reduce the costs and need for the massive excavation at Devil's Gate?***

Thank you for your consideration of these comments in response to the Devil's Gate DEIR on the Sediment Removal and Management Project.

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