Devil's Gate Reservoir Sediment Removal and Management Project

COMMENT CARD

Date: January 21, 2014

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Comment:

It is my understanding that this Sediment Removal and Management Project will permanently destroy 50-120 acres of riparian willow-mulefat habitat in the Hahamongna Watershed Park.

I certainly take exception to this project. I have heard that the draft EIR is lacking in science and the biological survey describing the impact on flora and fauna of the area north of Devil's Gate dam is misleading and insufficient.

It is my purpose here to define some scientific information that is lacking in the DEIR as it stands today.

My data is derived from a publication by the U.S. Fish and Wildlife Survey titled: <u>The Ecology of Riparian Habitats of the Southern California Coastal Region: A community profile.</u> This publication was extensive (152 pages) and addresses riparian habitats like the flood basin above Devil's Gate Dam. This is what we are dealing with – a riparian habitat; whether it has always been riparian or not is not pertinent, we have a riparian habitat now and must deal with that kind of habitat in all further considerations.

In the document, it states "Floodplains and alluvial fans of a number of watercourses flowing out of the San Gabriel, San Bernardino, and San Jacinto Mountain support a distinctive plant community, structurally and floristically diverse, consisting of an unusually large proportion of arborescent evergreen shrubs and a rich assemblage of subshrubs…"

It further describes "the modern riparian plant community of Southern California is derived from a southern madro-tertiary xeric element and a northern arcto-tertial mesic element. Species distribution in this flood-prone habitat is closed tied to the water regime of streams, not only for water supply in a seasonally dry landscape but for a series of events important in plant establishment and succession. Common trees include white alder (a riparian indicator species), willow, cottonwood, and sycamore. The zone closest to the water is most frequently disturbed by storms and is dominated by alder and willow, while cottonwood, sycamore, and oak grow to large sizes on terraces above the river. This part of the riparian community is the most depleted. Species composition varies somewhat from north to south, coastal to inland, and low to high elevational gradients. There are only a few rare or endangered plants associated with riparian habitat, but the riparian community itself is an endangered community due to the activities of man".

It states that "Riparian zones usually have a high rate of recovery and develop a range of successional vegetation where the habitat is protected or appropriately managed."

The publication goes in depth to discuss not only the flora of riparian habitat but also the fauna, from aquatic and terrestrial insects (which have recently been used in some environmental impact reports), fish (both native and introduced), amphibians and reptiles, birds (including distribution, breeding, food & foraging, birds for insect control, changes in status, birds species of concern, expanding species, winter bird use and taxonomic indication), and mammals (riparian-associated mammals and status).

In light of the recent Station Fire, a certain portion of the Fish and Wildlife publication stands out as especially important today:

<u>"Role of Fire in Nutrient Cycling Between Eco-systems</u>

A vast amount of the riparian habitat of Southern California intergrades with chaparral or coastal scrub communities. Chaparral vegetation is particularly prone to fire because of its dense, contiguous growth and lack of moisture. Often the chaparral community produces an abundance of fuel that accumulates faster than it decomposes because of resistance to decay or climatic factors. These plant accumulations are highly flammable; thus fire is a regular occurrence under natural conditions and infrequent but inevitable due to fire-exclusion policies, particularly near urban areas.

"R. Vogl suggests that the riparian community serves an important role in fire/flood sequences in Southern California, resulting in energy flows between plant communities. Fires reduce organic matter to a buoyant ash and charcoal. The flotsam component is usually transported in an emulsion that resists burial and assures widespread surface deposition. During winter rains and flood, charcoal and emulsified mineral products are carried into streams, where they are deposited onto the land by flood waters or carried downstream toward coastal wetlands. Nutrients bound in light, non-wettable fragments of charcoal and ash emulsion are buoyant and remain in the upper layers of flood-deposited sediments, readily available to new plant growth. Nutrients derived from a chaparral community in a fire/flood cycle may remain in the same community or be transported to the banks or floodplain of an adjacent coastal freshwater or saltwater marsh. The riparian corridor thus becomes a kind of circulatory system linking plant communities in the fire/flood model. In area where riparian cover has been removed, leaf-litter levels are reduced or elimination and soils are exposed. As a result, stream sediment loads from erosion are increased and water velocity increases, minimizing the energy-transfer potential of fire/flood cycles. Nutrient may then be transferred in fast-flowing water downstream and lost in the ocean."

Further "the degree of disturbance of riparian habitat is important, particularly where the understory is removed or altered. Where escaped exotics are invasive and dominant, habitat become less valuable to wildlife. In a study along the Santa Clara River, 24 species of birds were observed in a stand of riparian woodland trees with an undisturbed understory, in contrast to 6 species observed in a similar stand of riparian woodland trees with a disturbed understory (Smith, 1979). Nests in the open are more susceptible to predators, inclement weather, and other environmental factors."

The proposed DEIR describes 50 species utilizing the riparian corridor above Devil's Gate dam. It is a true shame to think that in five years that number would be decreased 75% to about 10 species due to the habitat destruction described in the plan.

In the scenario suggested by the current DEIR proposed by L.A. County, the natural riparian habitat will be continually removed and disturbed. The loss of natural successional growth by plants, insects, amphibians, reptiles, birds and mammals of the riparian habitat will be lost forever.

It is our choice to keep this from happening! Since this quoted Fish and Wildlife publication was written in 1989, it follows that artificial pressures from the expansion of human population are even greater today in 2013. Existing riparian habitat becomes exponentially more important with its loss of energy, wildlife, and the human pleasure derived from its existence.

I make the case that L.A. County of Public Works makes a "forever plan" that is sustainable and does not permanently destroy this important riparian region. A more limited removed of debris would suffice for the safety of the populations below the dam. Please consider the scientific facts and impact of what is proposed and not just the simple solution to arbitrarily remove everything. This is not a solution, it is a travesty being decried by the humans who have intimate knowledge of that area; dog walkers, joggers, birders, horseback riders, hikers, biologists, botanists, etc.

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Suggested Citation:
Faber, P.A., C. Keller, A. Sands, and B.M. Massey, 1989. The Ecology of Riparian Habitats of the Southern California Coastal Region: A Community Profile. U.S. Fish and Wildlife Serv. Biol. Rep. 85(7.27), 152 pp.

"Only when the last tree has died, the last river has been poisoned, and the last fish has been caught will we realize we cannot eat money." old Cree saying