



January 21<sup>st</sup>, 2014

Gail Farber, Director, L.A. County  
Dept. of Public works  
P.O. Box 1460  
Alhambra, CA 91802

**RE: Devil's Gate Reservoir Sediment Removal Draft EIR**

Dear Ms. Farber,

As President and Founder of Friends of the Los Angeles River (FoLAR), I am submitting comments regarding the Draft Environmental Impact Report (DEIR) for the Devil's Gate Reservoir Sediment Removal and Management Project issued by the Los Angeles County Department of Public Works on October 23, 2013.

The DEIR fails to identify and quantify the downstream flood threat as well as steps that could be taken to reduce that threat. This is a major concern to FoLAR as it could impact the now and future plans of the Los Angeles River. The DEIR acknowledges that there will be impacts on air quality, yet the DEIR is unclear that steps will be taken to reduce impacts to biological resources and the surrounding communities including the Los Angeles River. We at FoLAR urge to County to find ways to work with natural forces in their management strategy, and to cooperate with the stakeholders to achieve this goal. The DEIR fails to provide genuine alternatives to the project by considering alternate methods of sediment management. The DEIR provides no rationale for permanent destruction of more than 50% of the biologically diverse habitat within the basin, a key piece of wildlife corridor revitalization planned in the US Army Corps Arroyo Seco Study and documented breeding home to avian endangered and sensitive species. To summarize, there are serious gaps in the current DEIS. I strongly urge you to reject the DEIR in its current form and instruct LA County Flood Control District to perform the required further environmental analysis. Alternatives considered in the DEIR vary as to the amount of sediment to be removed (2.4 – 4.0 million cubic yards), where the excavation would occur, and different routes the trucks might take. All of the alternatives include a permanent 50- to 120-acre sediment maintenance area in the streamzone that will be stripped of vegetation each fall. Alternatives do not consider other methods of sediment removal, amounts or additional timeframes for achieving the target reservoir capacity within the Hahamongna basin, part of the Los Angeles River Watershed. The Devil's Gate Reservoir Sediment Removal and Management Project will have important implications for the management of rivers and flood facilities in Southern California for many decades to come, including those downstream.

Sincerely,

Lewis MacAdams  
President/Founder

**FoLAR**

570 W. Ave 26 Suite 250 Los Angeles, CA 90065-1047

Tei: 323-223-0585

[www.folar.org](http://www.folar.org)

E-mail: [contact@folar.org](mailto:contact@folar.org)

