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ISA #4264A

January 21, 2014

County of Los Angeles
Department of Public Works, Water Resources Division
Attn: Reservoir Cleanouts Program
PO Box 1460
Alhambra, California 91802-1460

**Subject: Comments on Devil's Gate Sediment Removal and Management Project
Draft and Environmental Impact Report (DEIR), State Clearinghouse No.
2011091084, October 2013**

Letter transmitted via e-mail to: reservoircleanouts@dpw.lacounty.org

Dear Department of Public Works Personnel,

Please accept for the official record my comments and questions regarding the DEIR and the proposed project for reservoir cleanouts. In my opinion, the project was not adequately noticed to the public, it hypes the threat of downstream flooding and minimizes the potential for less damaging, slower sediment removal alternatives. The cumulative impacts of the proposed pipeline to carry water to Eaton Canyon in combination with the proposed project impacts have not been adequately considered.

The University of California Eskalen Laboratory has confirmed the presence of an invasive insect/fungal complex in the willows, sycamore, alders, castor bean and other plants in the basin. The Polyphagous shot hole borer carries and farms several fungus pathogens that can kill trees. Since it is a fairly new pest, the extent of potential damage is unknown. At this point, the insect/fungal disease complex has killed trees along the foothills from La Canada to Ontario. The DEIR does not discuss the insect and treatments required to prevent the spread of the insect. The insect is an ambrosia beetle, the same insect responsible for the mortality of woodlands in Florida, Northern California and San Diego Counties.

I have concerns about the proposed project and believe that none of the proposed alternatives are acceptable. In my opinion, the County needs to revisit the project and find an alternative that removed sediment in a slower, steadier fashion allowing the vegetation to recover between events. The area is an alluvial fan and the vegetation is used to disturbance. However, the County's plans to denude the area of vegetation are shortsighted and unnecessary. Growing up in Altadena, I watched Jim, the gravel and

rock operator remove sediment and gravel slowly and move around the basin. The vegetation would be destroyed in an area and then regrow between removal events.

The project notification failed. As a regular user of Hahamongna Watershed Park and the Arroyo Seco Trails, I did not see notification at the beginning of the trails at the parking lot corner of Ventura and Windsor in Altadena where many people start walking/running/biking. When I asked visitors if they knew about the project, they did not.

Some of my clients in Altadena live adjacent to spreading basins where wood was stored after the 2010 Windstorm. These clients have infestations of PSHB (Polyphagous shot hole borer) that may be directly linked to the wood storage activities. I am concerned that if the County does not properly handle the wood from the tree removal operations, the insect could be spread to currently uninfested areas and cause property damage (loss of trees = loss of property value).

Questions:

1. Will the County seriously consider the slower sediment removal alternatives?
2. Did the County consider the impact of the PSHB insect/fungus? Were they in contact with County Agriculture (Gevork Arkalian) and UC Riverside (Akif Eskalen) to discuss the spread and extent of the insect?
3. How will the County adjust their operations to prevent the spread of the insect/fungal complex?
4. How will the County contain the dust that will be generated from the operations and protect the trees from the impacts? Dust on the leaves prevents the trees from photosynthesizing.
5. How will the County protect the nearby schools (LCHS, Flintridge prep, St. Francis) from dust and noise?
6. Removal of trees impacts carbon sequestration, storm water interception and pollution filtration. Will the County quantify these impacts and mitigate?

Sincerely,



Rebecca Latta

Consulting Arborist, Horticulturalist

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Member, American Society of Consulting Arborists
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