

SANTA MONICA MOUNTAINS CONSERVANCY

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Ms. Gail Farber
Director
Los Angeles County Department of Public Works
Attn: Water Resources Division - Reservoir Cleanouts
P.O. Box 1460
Alhambra, California 91802-9974

**Devil's Gate Reservoir Sediment Removal and Management Project
Draft Environmental Impact Report Comments**

Dear Ms. Farber:

The Santa Monica Mountains Conservancy staff offers the following comments on the proposed Devil's Gate Reservoir Sediment Removal and Management Project proposing the removal of as much as 4 million cubic yards of sediment. The proposed project neither works with natural forces nor integrates key input from stakeholders. The impacts of this massive earth-moving project will have enormous environmental, and public impacts. The impacts cannot be mitigated. Therefore we ask the Department of Public Works to reconsider its sediment management program.

Natural Integrated Approach

The Draft Environmental Impact Report (DEIR) does not make a sufficient science-based argument for the need to remove 2.4 to 4 million cubic yards of sediment. The DEIR is also deficient in making a case for the need to remove this much sediment within a five-year period. The DEIR does not identify or document an immediate flood threat to the Arroyo Seco downstream of the dam that warrants rushing this project.

A DEIR map illustrates areas where there may be a downstream flood channel capacity problems in the event of a fifty-year flood, but it does not describe either what the flooding effects are likely to be in the deficient areas or what steps the County Flood Control District is taking to deal with channel capacity. County records reveal that the dam has stored greater amounts of sediment in the past and currently still has about 47 percent capacity. With a low probability of a massive sediment flow similar to the two years after the Station Fire, there does not appear to be a need to remove 2.4- 4 million cubic yards of sediment in 5 years.

An integrated approach that works with nature must be analyzed in a CEQA document. Simply extending a time-frame for this project would create a more sustainable sediment management program: A 20-year project will reduce the amount of sediment built up behind Devil's Gate Reservoir and minimize all negative environmental impacts. The County should remove 160,000 cubic yards for ten years instead of the proposed removal of 800,000-1,200,000 cubic yards each year for the shorter project. After ten years the sediment management program can adapt the base amount based on inflow into the basin. As long as the County removes more than what flows in, the capacity of the dam will increase.

While the County has used sluicing or flow-assisted sediment transport (FAST) in the past, it has not included it in this proposed program. The County can incorporate this natural hydraulic process to reduce the levels of sediment in the dam. By proceeding with a natural integrated approach the County may utilize large storms more effectively to sluice sediment. Sluicing returns sediment to where it belongs - the river and beaches. The Arroyo Seco and Los Angeles River restoration efforts need sediment. This natural integrated approach provides a low cost, sustainable, low pollution management program rather than the County's proposed big dig.

Permanent Loss of Significant Habitat

Thirteen-hundred-acre Hahamongna Watershed Park, a rare and unique environmental resource, is one of southern California's most spectacular alluvial canyons. Much of the land in the proposed impact area supports willow and mule fat. It is difficult to find an equivalent amount of contiguous willow and mule fat in Southern California. The County's sediment removal project would permanently destroy 50-120 acres of regionally significant willow and mulefat riparian habitat.

Given all of the significant habitat found in Hahamongna Watershed Park, how does the County justify the permanent loss of this significant habitat that provides resources for key species when less destructive and less costly means of removing the sediment are available? The DEIR provides no rationale for permanent destruction of habitat as opposed to a slower, smaller, and longer project. A natural integrated program will create only small areas of temporary biological disturbance and will not require a permanently denuded maintenance area of up to 120-acres after the initial removal.

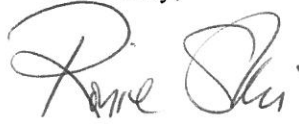
Inadequate Habitat Mitigation

The DEIR does not include a mitigation plan. Mitigation measures MM BIO 1-8 contain the underpinnings of a fully vested mitigation plan but these measures alone are not enough to constitute a mitigation plan. The Conservancy cannot comment on a mitigation plan not found in the DEIR.

MM BIO - 6, MM BIO - 7, and MM BIO - 8 all propose replacing vegetation on a 1:1 ratio. How can such a low mitigation rate be justified for the pristine riparian, woodland, and Riversidean Alluvial Fan Sage Scrub habitat found at Hahamongna Watershed Park? MM BIO - 8 states that mitigation will occur in a combination of onsite and offsite locations. The odds seem stacked against the County being able to find 120 suitable acres to perform appropriate mitigation.

Should you have any questions or clarification requests, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rorie Skei".

RORIE SKEI
Chief Deputy Director