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January 21, 2014

To: Los Angeles County Department of Public Works

RE: Devil's Gate Dam Sediment Removal Proposed Project

After reviewing the Devil's Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report (DEIR), I have a few comments. I preface these comments with a general admiration for the scope of the DEIR and the apparent attention to the many details encompassed by the various alternatives, potential impacts, and proposed mitigations. I can also appreciate the complexity and entanglements produced when a city park is established in part on the accumulated sediments behind a county flood control reservoir.

It seems that the justification of the proposed sediment removal (and reservoir maintenance) project hinges on the LACDPW directive to provide flood control to the Lower Arroyo Seco and the Los Angeles River below its confluence with Arroyo Seco. In order to support the need for this project it would be helpful to provide an analysis of the likelihood that flood-producing storms will occur in the future. While nobody has a crystal ball to see what will happen next year and beyond, with over a century of rainfall and runoff measurements within Arroyo Seco, the probabilities of specific storms can be estimated. With storm size and watershed conditions, the probability of sediment events could also be determined. LACDPW routinely performs these estimates and they should be presented in the DEIR.

Similarly, it would be helpful to the project justification if an analysis of the potential downstream damage in Lower Arroyo Seco and the Los Angeles River were performed assuming a DDE would occur without any of the proposed work being done. Residents and taxpayers need to know the potential costs of the no project alternative if the worst case scenario is realized.

As proposed, the project is to be completed in five years. Presumably there would be less impacts to the surrounding communities (traffic, schools, residents) if the project timeline could be extended, with less intensive activity during any one year. If the project area is currently at risk with inadequate reservoir capacity, a delay in project completion only exacerbates this risk. However, a risk analysis should be included in the DEIR to quantify the impacts of potential floods and sediment events caused by project delays, whether accidental or intentional.

Under any alternative (except the no project), sediment would be excavated away from the upstream side of the dam. This would lower the local base level to which the channel upstream would adjust by downcutting. An analysis should be made of the values at risk (if any) that could be impacted by this channel incision and the need for any mitigation measures to protect these values (bridges, trail crossings, pipelines, structures, etc.).

Thank you for the opportunity to comment on this DEIR.

Sincerely,



/s/ PETER M. WOHLGEMUTH

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