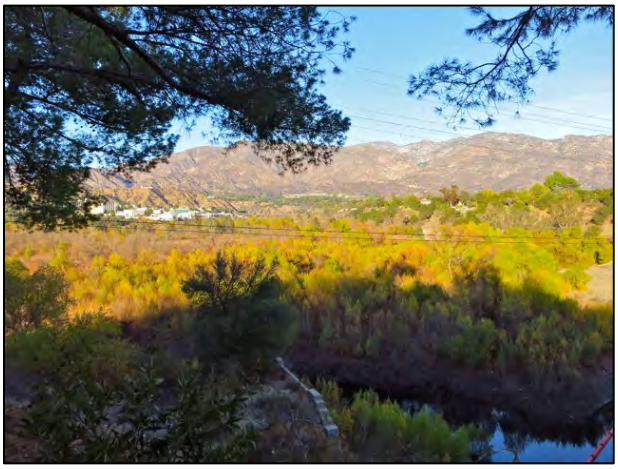
20 January 2014



The winter colors of the trees in HWP basin were enhanced near sunset on 1 December 2013. (Photo by L. Paul)

Gale Farber, Director
Los Angeles County Department of Public Works
Los Angeles County Flood Control District,
Water Resources Division, Reservoir Cleanouts
P. O. Box 1460
Alhambra, CA 91802-9974

Re: **Devil's Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report (DEIR) / October 2013**

Dear Ms. Farber and DPW Staff,

Please enter my comments regarding the *Devil's Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report* (hereafter DEIR) into the official record. Regrettably, I find the massive DEIR unacceptable for so many reasons that it is difficult to prioritize my concerns. I intend to focus most on issues I believe others may not have emphasized, though this in no way reduces the importance of the criticisms submitted by others in their own areas of expertise or personal interest. I concur wholeheartedly with submissions by noted regional stakeholders, including *Friends of Hahamongna*, *Arroyo Seco Foundation*, *Pasadena Audubon*, *Santa Monica Mountains Conservancy*, *Friends of the Los Angeles River*, and individuals long devoted to protection of HWP, including its wildlife and water projects, Robert Staehle, Christle Balvin, Hugh Bowles and Marietta Kruells, plus arborist Rebecca Latta.

I have enjoyed, and acted to protect, Hahamongna Watershed Park (HWP) for several decades. As a local Altadena resident, hiker, and wildlife biologist, I am particularly devoted to the park's flora and fauna, its trails that connect four regional trail systems, and support pastoral recreational activities that encourage exercise. This natural park… where ancient oak woodland meets seasonal ponds, wetlands, and streams; alluvial scrub; and arid chaparral… provides numerous benefits to local communities. I also value HWP's importance as a functional watershed, biodiverse habitat, and critical (if tenuous) wildlife corridor that connects the San Gabriel Mountains (Angeles National Forest) with the remnant natural stretches of the lower Arroyo Seco, with the San Raphael Hills and, from there, the Verdugo Mountains. HWP is the last viable connection between species in the San Gabriels and the Verdugo Mountains.

While I recognize the multifaceted role of HWP as a popular recreational destination, wildlife habitat, and flood control structure (Devil's Gate Dam), and I respect the need to protect property below the dam from damage during high flood events, I adamantly oppose the assertion by the DPW that the current level of sediment constitutes an emergency that justifies the proposed obliteration of this incredible natural resource and beloved park. From the frisbee golfers and dog walkers, to horse riders and hikers, to birders, runners, and mountain bikers, and to its many other visitors and neighbors, HWP is irreplaceable. Yet the DPW has set itself on a course with this DEIR to destroy HWP as thoroughly, and with as little justification and regard, as it destroyed the ancient oaks in the Acradia Oak Woodland in January 2011 to create a Sediment Placement Site (SPS) for Santa Anita Dam sediments that the County has never used (see Concern VII).

The DPW has failed from inception of its sediment removal approach (Project Goals and Objectives in the DEIR) to acknowledge the importance and sacredness of the park. It's first assumption *should have been* to respect and commit to protect the park, its habitat, and its visitors… then work from that premise to design a project which preserves those high values while achieving flood control goals. I, and many others, believe that such a conservative project plan is not only possible; it is imperative.

As an analogy, if the DPW concluded that Disneyland or Yosemite Valley posed a potential future flood risk to nearby communities, its first conclusion would certainly not be to mar and destroy those iconic places. Instead, the first priority would be to study ways to preserve these important landmarks while reducing the risk they pose. First, *commit to cause less harm*, then plan and innovate from there. Though of less overt

grandeur and flamboyance than either Disneyland or Yosemite, HWP is a multi-valued resource, as evidenced by the many protective designations and jurisdictions it holds (see concern II), the many persons who visit the park every day, the abundant wildlife that depends upon it for survival, and the freshwater it returns to the earth. The DPW's very first priority should be dedicated to preserving what is there, while also maintaining the integrity of Devil's Gate Dam, or designing a replacement plan for removing the outdated dam that would restore the Arroyo Seco's natural flow of sediment to the sea while protecting vulnerable property along the historic water course.

I am not the only one who feels the DPW has inappropriately scoped and undervalued HWP in its blind rush to correct decades of neglected maintenance behind Devil's Gate Dam.

Notably, the **California Regional Water Quality Control Board (**CRWQCB), Los Angeles Region, in a letter to Christopher Stone dated 18 March 2011: "*Denial without prejudice of water quality certification for proposed Devil's Gate Dam and Reservoir Sediment Removal Project (Corps' Project No. 2010-01122-CO, Arroyo Seco, City of Pasadena, Los Angeles County (File No. 10-170)*" refused to issue a required Certification for the originally proposed sediment removal level of 1.6 million cubic yards because "We do not find that the potential significant impacts have been minimized to the fullest degree possible and we do not find an analysis of alternatives, which should include alternatives in terms [of] the overall size of the project..." The CRWQCB denied Certification approval because the *1.67 million cubic yard excavation was too big and there was insufficient analysis of "alternatives for cumulative impacts to habitat and affected species using the habitat."*

Additionally, scoping comments from numerous stakeholders prior to the publication of the October DEIR appear to have been disregarded. For example, Norman ("Norm") Brooks, Professor Emeritus of Caltech, who literally wrote the book on sediment management, provided extensive comments and asked questions which, to my knowledge, have never been adequately answered.

Why has the DPW failed to provide appropriate cost benefit and flood risk analysis for the proposed project and, instead of reducing the amount of sediment and acreage of habitat destroyed as required by the CRWQCB, significantly *increased* the amount of sediment removal from an unacceptable 1.6 million to a far greater 4 million cubic yards, involving the destruction of up to120 acres of natural habitat?

Adult San Diego nightsnake (*Hysiglena ochrorhyncha klauberi*) that was was injured, but survived. This is a small, seldom seen species with a splotchy brown dorsal pattern of brown spots and a beautiful, opalescent white underbelly. (Photo by R. Staehle)

What alternatives has the DPW explored for improving flood control near the only downstream areas at high risk in a future Design Debris Event (DDE) in the vicinity of Highland Park? Why did the DPW promote inappropriate panic and inaccurate media sensationalism by implying that the Rose Bowl and Pasadena homes might be flooded during rain storms and suggest that local freeways might be "over-topped" when that is not the case according to official inundation maps? Why were the two inundation maps requested by myself and others never presented at the public briefings about the sediment removal project; thereby perpetuating the myth of imminent inundation in Pasadena and downstream necessitating "emergency" sediment removal?

The DEIR repeatedly characterizes obviously severe impacts as "less than significant." For example, under "Aesthetics," it is stated that large scale excavation and removal of hundreds of acres of all natural terrain and vegetation in HWP basin, including establishment of a permanent maintenance facility, will "result in a less than significant impact to scenic vistas." This is demonstrably untrue, since scenic overlooks from the top of the dam, from the Oak Grove day use area, and from Sunset Ridge Overlook… indeed from vantage points all over the park that now look upon stands of willows,

sycamores, sage and red buckwheat shrubs, low contoured hills and open water… visitors would instead see a barren and lifeless wasteland if any alternative in the DEIR becomes a reality.

Why has the DPW inaccurately categorized so many obviously adverse impacts as “less than significant?”

Why is there no detailed mitigation plan for this draconian project? The public and stakeholders cannot comment on important mitigation issues and options for HWP without a mitigation plan in the DEIR.

Questions like these are the tip of the iceberg for a DEIR that appears to be bulked out by the environmental consultant with boilerplate content and conflicting or inaccurate information. The alternatives offered in the DEIR are not authentic alternatives representing significant differences; instead, they are essentially identical repetitions of a theme involving permanent destruction of HWP basin utilizing polluting truck convoys that resort to outdated sediment dumping instead of exploring different sustainable sediment management options.

I. Inaccurate Biological Survey and Adverse Impacts on Native Plant Assemblages & Wildlife

The DEIR asserts that the extensive obliteration of all trees and native vegetation, resulting in the death or displacement of resident wildlife, for the creation of a steeply sloped barren pit approximately 50 feet deep will result in a “less than significant impact” to biological resources. The proposed large crater will eliminate the heart of HWP, its expansive living basin, leaving only a “Friar Tuck” fringe of living trees around the perimeter of the park. I would certainly call that a “significant impact.”

The biological surveys conducted in HWP were incomplete and inaccurate. For example, in the Biological Resources section, the DEIR states that “most of the vegetation and trees in the Proposed Project area site were dead, washed out, or buried under sediment.” Photos in the DEIR were taken during natural dormancy for the *deciduous* willow trees, which were not dead, but simply losing their leaves for the season (see photo of willow leaves turning yellow). In fact, the willows, mulefat, California sycamores and other vegetation thrived in the fresh sediments and water that flowed through the park. The referenced statement and photos of “brown,” allegedly dead vegetation in the DEIR are either the result of shocking ignorance, or were deliberately intended to give a false, negative impression of HWP’s basin ecosystem.

Deciduous willow leaves in HWP, winter 2013. Photo by L. Paul

Species present in HWP were not listed accurately, as present and/or breeding, such as the federally endangered Least Bell’s Vireo (*Vireo bellii pusillus*) in 2013. After damage caused by illicit SCE road grading near riparian areas in the park that spring, the vireos may have been driven away from nesting in the basin for a season; however, their presence has been well documented in the past. Yellow warblers (*Setophaga petechial*, formerly *Dendroica petechial*) have also been confirmed in HWP.

Several reptile species, including, for example, the San Diego nightsnake (*Hysiglena ochrorhyncha klauberi*) pictured on page 2, are present in the park. The rare coast patch-nosed snake (*Salvadora hexalepsis virgultea*) is listed in the DEIR, but it was not noted that this snake is a U.S. Fish & Wildlife Service and California Department of Fish & Wildlife “Species of Special Concern.” http://www.californiaherps.com/snakes/pages/s.h.virgultea.html

Worse, the DEIR lists both the western toad (*Bufo boreas*) and the California toad (*Anaxyrus boreas halophilus*), which are actually the same toad species. The genus Bufo is the former (older) name while the genus Anaxyrus is the current scientific name including sub-species: http://www.californiaherps.com/frogs/pages/b.b.halophilus.html

Western Side-blotched Lizard (*Uta stansburiana elegans*) photographed in HWP in February 2013 (Photo by L. Paul)

The subspecies of gopher snake cited in the DEIR is not the one present in HWP: the Sand Diego gopher snake (*Pituophis catenifer annectens*): http://www.californiaherps.com/snakes/pages/p.c.annectens.html

Why does the DEIR list of birds omit over 150 species, including migratory birds dependent upon the basin along the Pacific Flyway, that have been verified as present in the HWP? How many biological surveys were conducted over what time period? What surveys, if any, were conducted to ascertain the presence of rare butterflies, insects, arachnids, scorpions, and invertebrates?

The list of native plants is insufficient, as well. For example, Plummer's (aka hairy) mariposa lily (*Calochortus plummerae*) is not listed as documented in HWP, though several of these perennial bulbs grow in the margins of the basin among chaparral species. This beautiful and rare lily, formerly classified by the California Native Plant Society as a California Rare Plant Rank 1B, remains on the "watch list" (Rank 4) and its presence should be noted: http://www.rareplants.cnps.org/detail/1599

BIO-7 in the Mitigation Measures section suggests replacement of all trees in the basin 1:1. This ratio is paltry compared to the standard replacement ratio of 3:1 to 5:1 for the loss of riparian, alluvial sage scrub, chaparral and trees across Southern California. Furthermore, HWP contains one of the largest contiguous assemblages of willow and mulefat habitat remaining in the region, which means that adequate mitigation lands for this large park in the "urban wildland interface," where there are important wildlife corridors and recreational trails, may not be possible. Without an actual mitigation plan, no accurate critique of DPW plans is possible. This is unacceptable under CEQA.

I. a. Polyphagous Shot Hole Borer (PSHB) in HWP

Biological consideration for the proposed project alternatives failed to recognize and address impact of a new, highly invasive tree pest, the **polyphagous shot hole borer** (*Euwallacea sp.*, see photo of a female borer at right) that is rapidly spreading across Los Angeles County. I emphasized the importance of this highly "contagious" tiny ambrosia beetle, that introduces a deadly fungus, *Fusarium euwallaceae,* into trees, back at an initial "coffee klatch" briefing about the DEIR alternatives with Keith Lilley and a project consultant; however, this important information was still omitted from the DEIR.

The polyphagous shot hole borer (PSHB) is widely present in HWP, in much of the surrounding neighborhoods, and in trees within local Angeles National Forest Canyons (including live oaks, scrub oaks, California sycamore, willows, alders, big leaf maple and other native tree species). The DPW cannot cut down basin trees for the project and stockpile or haul the wood out without spreading this devastating insect and its accompanying fungal disease. All downed wood will need to be ground with a tub grinder (into chips less than 2 inches in diameter) on site and spread in the immediate project area. No firewood can be collected or wood recycled from HWP due to the presence and threat of spreading PSHB.

That is the latest information on this introduced pest from the U.S. Forest Service and University of California Cooperative Extension experts. Local botanists speculate that 30-40% of the mature native willows, white alders, sycamores and other mature trees in the foothills will be dead within 3-5 years from PSHB attack. Can we really afford to take down uninfected trees across the HWP basin

or risk spreading this new pest? How does the DPW intend to manage PSHB borer infestation and control in all of its project alternatives?

I. b. Displacement of Wildlife = Risk to Sensitive Species & Creation of Neighborhood Intrusions

The following photo was taken on 5 January 2010. Though of poor quality, it clearly documents a Western grey squirrel (*Sciurus griseus*) foraging within Hahamongna Watershed Park in the woodland portion of the Annex (near JPL). Western grey tree squirrel populations are in decline and classified by the U. S. Fish and Wildlife Service as a "Federal Species of Concern." Locally, these squirrels are usually found at higher elevations. Those that survived the 2009 Station Fire have been forced, like other surviving wildlife, to move down into transitional habitat, including HWP. Western grey squirrels, Merriam's Chipmunk (*Neotamias merriami*) and numerous woodland birds and reptiles, including listed and declining species, will suffer increased predation if excavation of the basin "evicts" coyotes, bobcats, grey foxes, raptors, rattlesnakes, and other predatory species that will move into the remaining fringe of woodland in the park to hunt.

Predators and other species, including wood rats, mice, voles, ground squirrels, pocket gophers, moles, snakes, rabbits, skunks, raccoons, rattlesnakes and other snakes, lizards… along with larger species, such as mule deer, bears, and cougars displaced by the catastrophic loss of 50 to 120 acres of diverse habitat… will move into the territory of wildlife residing in surrounding neighborhoods and wild areas, causing stress and competition that will result in death of many individual animals and creating nuisance conflicts with surrounding homeowners, schools, and the JPL campus. With much of the Angeles National Forest above HWP burned and not fully re-vegetated, and destruction of the basin commencing with trucks and rock crushers generating noise, dust and blocking movement across Flint Wash Bridge down into the Lower Arroyo Seco or up into the San Raphael Hills, displaced wildlife has few options for successful relocation.

Additionally, increased truck convoy traffic and massive earth-moving in the basin will result in widespread fatalities as small animals become alarmed and retreat into burrows, where they will be buried alive or crushed. On site "biological monitors" will not see the small animals that flee underground as vegetation and trees are uprooted. How can the DPW reduce loss of wildlife, including listed species, during and after proposed excavation of HWP basin?

Migratory bird species, including several species of hummingbirds, songbirds, raptors, and waterfowl, depend upon HWP for sustenance, concealment, and water during their movement along the great Pacific Flyway. If any proposed alternative is implemented, migratory birds, as well as local species who nest in the basin, will be deprived of needed habitat. Why has the DEIR not taken this adverse impact into full consideration?

I. c. Denuded Regions of HWP Will Type Convert to Invasive, Flammable Weeds, Necessitating Use of Toxic Herbicides

Permanently scoured areas of HWP will lack organic soil and native vegetation cover, resulting in permanent "type conversion" to non-native, invasive weed species, such as star-thistle, tamarisk, black mustard, castor bean, Spanish broom, and annual foreign grasses. These undesirable weed species are flammable and will present an unsightly fire hazard to surrounding neighborhoods, schools, JPL, and the adjacent Angeles National Forest below the Station Fire burn zone. As a

result, the DPW is likely to attempt control of these invasive weeds by spraying pre-emergent herbicide “cocktails” (including products such as Round Up) as is routinely done at local SPSs and catch basins. It is inappropriate for such toxic chemicals to be sprayed in heavily used parkland and on a natural watershed. How will the DPW avoid type-conversion of permanently graded areas of HWP to weed species? Will there be use of herbicides to control inevitable non-native, flammable weed growth in the basin? Why was this issue not covered in the DEIR?

II. Failure to Recognize Protective Designations and Jurisdictions over HWP

HWP is protected by several special designations and jurisdictions, including, but not limitied to:

Altadena Arroyos & Foothills Significant Ecological Area (SEA) was reviewed and accepted by County staff and can be viewed in the current version of the General Plan at:
http://planning.lacounty.gov/view/altadena_foothills_sea/
This SEA encompasses all of HWP.

The **City of Pasadena** owns HWP and is heavily invested in preserving their wild parkland for the enjoyment of the public. Pasadena has installed interpretive signage at Sunset Overlook and elsewhere that educates visitors about the habitat and wildlife values in the park and Upper Arroyo Seco. Pasadena administers the easement for DPW flood control work above Devil’s Gate Dam. It also is responsible for honoring a settlement agreement with the **Spirit of the Sage** that requires wildlife habitat to remain intact in HWP basin. All alternatives in the DEIR would destroy park values and abrogate the legal settlement Pasadena is obligated to defend.

Why has the DPW failed to note the environmental importance of the biodiverse habitat in the basin, which qualifies as a Significant Ecological Area in Los Angeles County and is a preserved natural parkland owned by the City of Pasadena? Pasadena has spent years and funds on developing a **Hahamongna Watershed Park Master Plan** that would be largely invalidated by any alternative in the DEIR.

HWP is also located on the **Rim of the Valley Trail Corridor** and is included in the federal **Rim of the Valley Special Resources Study** originally sponsored by Congressman Adam Schiff and conducted by the National Park Service.

HWP is a hub for four popular regional trail systems:
-- **La Canada Flintridge Trails** to the west
-- **Lower Arroyo Seco trail** into Pasadena south of the park
-- Gateway trails, including the **Gabrielino Trail**, north into **Angeles National Forest**
-- and the **Altadena Crest Trail** to the east of HWP provides further connections to Angeles Forest destinations. Efforts are in progress to reconnect the historic Altadena Crest Trail from HWP to Eaton Canyon with support from the **Altadena Crest Trail Restoration Working Group** (ACTRWG).

The **U. S. Army Corps of Engineers** is involved in Arroyo Seco stream and habitat restoration, according to their recently released study. **Friends of the Los Angeles River** and the **City of Los Angeles**, are moving towards restoration of the L. A. River habitat, linear park design, and removal of concrete channelization. This trend is occurring as the DPW intends to scour thriving habitat and maintain access roads and a permanent graded zone within natural HWP.

What is the DPW doing to move towards sustainable sediment management and restoration of habitat and away from repeated, costly trucking of sediment? (See Concern IV.)

III. Disturbance of Station Fire Micro-Abrasive Ash and Associated Dust Pollution / Health Hazards

In all Draft EIR alternatives, a massive amount of excavation will occur, disturbing the upper layers (10-15 feet?) of Station Fire debris flows containing a significant percentage of ash. Most of the fine, micro-abrasive ash particles that have not been washed away on the surface of the basin are currently embedded safely

among vegetation and tree roots that keep these fine particles from becoming airborne. However, the proposed sediment removal activities will disturb the ash and add it to the fugitive dust caused by habitat destruction and sediment loading onto trucks. High winds that typically blow down local canyons will loft these tiny particles high into the air, increasing, along with other particulates, the air pollution that poses a serious health risk to park users, local schools, JPL employees, neighbors of the park, resident wildlife, along with visiting dogs and horses.

There is ample evidence indicating that wildfire ash contains toxic components. In addition, the small size and abrasive nature of ash can be breathed deep into lung tissue with devastating results even in healthy persons. Those with compromised health, such as asthmatics and those with seasonal allergies or other respiratory conditions, are at the highest risk. See excerpts below.

White Mulefat (*Baccharis salicifolia*) flowers resemble tiny Edelweiss from the Swiss Alps. It is difficult to find extensive stands of native willow and mulefat in Los Angeles County. HWP represents one of the few remaining multi-acre groupings. (Photo by L. Paul, HWP. Dec. 2013)

Wetting down the excavation site as described in the DEIR with one water truck (page 87) will not be sufficient to eliminate the profound health risks associated with fine particulate pollution in HWP basin during sediment removal. Even adding multiple water trucks will not change the fact that the extensive excavation of the living basin into a barren, denuded crater will cause ongoing particulate pollution in the typically arid (low humidity) environment that is frequently prone to high winds.

Why does the DEIR fail to acknowledge the additional particulate pollution caused by sediment removal disturbing in situ Station Fire ash carried into the basin by post-fire debris flows?

Healthy riparian vegetation, for example dense stands of willow and mulefat, not only serve to slow flood waters and enhance recapture of freshwater through their roots and associated animal burrows, but also serve to entomb and convert post-Station Fire ash and sandy sediment into organic soil.

Why hasn't the DPW recognized the high value of intact native vegetation for reduction of micro-abrasive ash in addition to other fine, fugitive dust pollution? How will the DPW protect surrounding trees and native plants from heavy "dust fall" onto their foliage, which will block photosynthesis and dehydrate plants, especially during summer heat waves and the current extended drought.

Add to dust pollution to cancer-causing diesel emissions from the truck convoys (that will not meet current EPA standards) operating and idling in staging lines 12 hours per day, 6 days per week, for up to 9 months per year for a duration of at least 5 years, and it becomes obvious that Hahamongna Watershed Park will become a source of intense air pollution and a health risk instead of an asset to the community if any alternative in the DEIR becomes a reality.

Why has the DPW not considered alternative sediment management strategies that do not cause serious and prolonged health hazards in the region?

Health Impacts of Wildfires
November 2, 2012
Finlay SE, Moffat A, Gazzard R, Baker D, Murray V. PLOS Currents Disasters. Edition 1.
http://currents.plos.org/disasters/article/health-impacts-of-wildfires/

A review of the published evidence shows that human health can be severely affected by wildfires. Certain populations are particularly vulnerable. Wood smoke ash contains high levels of particulate matter and toxins. Respiratory morbidity predominates, but cardiovascular, ophthalmic and even psychiatric problems can also result… However more research is needed to evaluate longer term health effects from wildfires.

Particulate matter is the predominant air pollutant seen in wildfire smoke, caused especially by the burning of vegetation and wood into micro-abrasive ash. PM_{10} particles (which are able to pass through the upper respiratory tract and are deposited in the airways), and $PM_{2.5}$ particles (may be respired deeper within the lungs and deposited in the gaseous exchange region of terminal bronchi and alveoli) are produced by burning vegetation.

> -- Boman BC, Forsberg AB, Jarvholm BG. "Adverse health effects from ambient air pollution in relation to residential wood combustion in modern society." Scand J Work Environ Health 2003 Aug;29(4):251-60.

Ash debris following the Californian wildfires of 2007 was found to contain high levels of heavy metals, including arsenic, cadmium, copper, and lead. A national clean up campaign was organised because of concerns that exposure to high levels of such metals could cause long term health effects.

> -- Wittig V, Williams S, DuTeaux SB. "Public Health Impacts of Residential Wildfires: Analysis of Ash and Debris from the 2007 Southern California Fires" in Epidemiology 2008;19(6).

A study looking at symptoms of 21 local patients with chronic obstructive pulmonary disease (COPD) in the two months following the Denver wildfires of 2002 revealed that dyspnoea, cough, chest tightness, wheeze and sputum production all increased on days when $PM_{2.5}$, PM_{10} ash particle levels increased, thus illustrating the link between air pollution resulting from wildfires and COPD exacerbation.

> -- Sutherland ERMM, Make BJM, Vedal SM, Zhang LP, Dutton SJM, Murphy JRP, et al. "Wildfire and respiratory symptoms in patients with chronic obstructive pulmonary disease." [Letter] Journal of Allergy & Clinical Immunology 2005 Feb;115(2):420-2.

IV. Sediment Is a Resource Not Trash

Why does the DPW continue to treat sediment as costly "trash" to be dug out, trucked to a remote site, and dumped? Sediment is a resource that should be removed in a way that emulates natural processes as much as possible and may involve sale of sand, gravel aggregate, and rock for useful purposes, such as reduction of beach erosion, as construction materials, and so forth.

The DPW lacks an authentic long term, beyond 20 year, sustainable plan. Future sediment will not be recycled and used, or sent to the ocean to replenish beaches, etc. It will simply be trucked out, over and over again, at ever-increasing high cost, to a dump site in some pit or, worse, in a local wild canyon that will also be destroyed... until there is nowhere left to dump. Then what? It makes far more economic and conservation sense to explore alternatives now, while there is something left to save. Even the U.S. Army Corps of Engineers has been rethinking the value of HWP and its associated drainages down the Arroyo Seco.

The time is long overdue for the DPW to work with talented specialists, at institutions like Caltech, JPL, UCLA's Institute of the Environment & Sustainability, or wherever there is special, creative expertise. Other communities and countries handle flood and sediment management very differently. Why is the DPW stuck in the past, repeating the same sediment removals over and over again?

Why isn't the Los Angeles County DPW leading the charge to rethink how sediment and flood hazards can be managed creatively and in a more cost effective manner? Why hasn't the DPW answered numerous calls to work with an independent, objective, highly innovative "blue-ribbon committee" of hydrology, geology and engineering specialists from regional academic institutions?

Spending millions of dollars to destroy riparian habitat, pollute the air, and noisily truck OUT sediment for years via congested freeways, while also spending millions of dollars to truck IN sediment, sand, and rock to severely eroding beaches, no longer makes sense. We can no longer afford the financial and environmental cost for DPW's insular tunnel vision.

VI. Devil's Gate and Eaton Storm Water Flood Management Project (Proposition 1E) and other Concurrent Projects in HWP.

Others will undoubtedly question the $28 million grant approved to, in part, construct a diversion pipeline to pump water (according to the grant application 4500 acre feet!) from HWP basin to Eaton Canyon spreading grounds. It is unclear why water present in HWP must be pumped across a costly pipeline to be built across Altadena to Eaton Canyon, where soil percolation is virtually identical to HWP, though one suspects that money has something to do with the motivation for this project. That said, why has the DPW not included this concurrent project as a cumulative Project in its DEIR?

VII. Arcadia Oak Woodlands to Wasteland / DPW "Track Record" Adversely Affects Public Trust

In January of 2011, the DPW culminated a deeply flawed and corrupted EIR process with the destruction of an ancient live oak and California sycamore woodland ostensibly needed as an emergency dump site for the removal of sediment from behind Santa Anita Dam. Public protest was intense and alternatives were available; however, the DPW refused to listen to reason and, in fact, made attempts to circumvent required approval for the project from the California Department of Fish & Game (now CA Dept. of Fish & Wildlife) and to misrepresent the scope of the project. Most shocking of all, after a beautiful and biologically valuable 11+ acres of biodiverse woodland at the northern end of the Santa Anita Wash Trail had been graded and literally wiped bare of all its trees and wildlife, *no sediment from behind Santa Anita Dam was ever dumped on the site.* Before and After photos and other documentation of this fact are readily available. I can provide further information upon request. Thus the blighted Santa Anita Wasteland was created where once stood magnificent oaks, toyons laden with red berries, sycamores, fragrant bay laurel trees, and where the songs of many birds and frogs were heard.

The mitigation plan for the Arcadia SPS, debuted in June 2013, is woefully inadequate and restoration of the site to authentic native habitat is, according to many experts, impossible. One wonders how the $650,000.00 the Board of Supervisors provided for restoration in "compensation" for the loss of the oak woodland will ultimately be spent.

This tragedy is the end result of insular arrogance that has unfortunately become a hallmark of the DPW. The unnecessary loss of the Arcadia Oak Woodland was caused either by *blatantly incompetent miscalculation of the capacity needed for placement of sediment* from above the dam; or, the destruction of the woodland was *deliberately duplicitious*, by claiming an emergency that did not exist for ulterior motives, perhaps to "get rid" of the oaks and wildlife so that a future site would be available for dumping that would not otherwise have been approved by any agency.

It is astonishing to me and many others that those responsible for the misrepresentations and manipulations of CEQA process involved in the loss of the Arcadia Oak Woodland have, to general knowledge, faced no official consequences for their actions, which constituted a profound betrayal of public trust. Even more shocking, those same managers have been assigned to… manage the EIR process for the proposed excavation and destruction of habitat in HWP.

This revelation is extremely disturbing. What evidence can the DPW provide that the proposed project urgency expressed in the DEIR is authentic, unlike the inaccurate assertions made to justify removal of the Arcadia Oak Woodland?

BEFORE the Arcadia Oak Woodland was "removed."

(Photos by Lori Paul unless otherwise credited)

AFTER

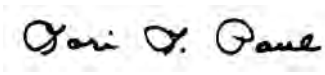
The former site of the Arcadia Oak Woodland in June 2013: The site looks almost as desolate as it did a week after all the life there had been toppled, bull-dozed, buried or hauled away.

In conclusion, I urge the DPW and County Supervisors to reject the October 2013 DEIR in its entirety pending a revised, accurate, independent risk / benefit / and cost analysis of flood risk below Devil's Gate Dam.

I also request that expertise from outside the DPW be assembled to provide needed objective review of sediment management for the County and to explore sustainable, less destructive options for maintaining flood control safety while restoring natural riparian habitat and streams for this region and for future public benefit.

Thank you for your consideration. Please retain my contact information and keep me on all mailing lists associated with DPW sediment removal in HWP and other reservoir or potential sediment placement sites in Los Angeles County.

Respectfully,



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CC:
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Terry Tornek, Pasadena Councilperson
Ann Wilson, for La Canada Flintridge