

December 31, 2013

To: The Los Angeles County, Department of Public Works, Flood Control District

Re: Devil's Gate Reservoir Sediment Removal and Management Project, Draft Environmental Impact Report

This serves to provide my comments on the Devil's Gate Reservoir Sediment Removal and Management Project, Draft Environmental Impact Report and the Project of sediment removal itself. I am Field Biologist by training with over 45 years' experience in Los Angeles County and Southern California and have performed environmental assessments and floral and faunal surveys inside Los Angeles County Flood Control Basins over the years. I have read through much of the Draft EIR and am familiar with all of the alternatives proposed. I do not support any of the alternatives as I believe the entire project is too large and attempts to remove too much sediment in an antiquated manor.

All the alternatives permanently remove most of the ecologically valuable Willow Woodlands and understory in the basin. The proposed project is entirely within a Los Angeles County Significant Ecological Area (proposed "Altadena Foothills SEA") which was analyzed and added to this system by the County Department of Regional Planning. This clearly indicates the Hahamongna basin is of high, County-wide ecological importance and should not be disturbed by a massive cleanout project that fails to address the natural resource values.

Specific comments on the Draft EIR.

1. Despite requests during the scoping process, from a number of conservation organizations, the proposed project fails to consider maintaining a permanent lake at the south end of the basin, with design during sediment removal aimed at creating a more natural, contoured and uneven-edged body of water that benefits wildlife while providing flood protection. This lake could be designed with one or more islands of vegetation and peninsulas jutting out to provide more edge for vegetation and wildlife. As proposed, all the alternatives call for creating a very deep (approximately 50 ft. deep), steep-sided pit in the wake of sediment removal, and such a pit is both hazardous to hikers and much less effective as functioning wildlife habitat.
2. BIO-7 in the Mitigation Measures, and elsewhere, suggests to "replace all trees 1:1 by acreage." Virtually all projects in Southern California that disturb riparian habitat are required by Resource Agencies to apply a 3:1 to 5:1 replacement ratio to ensure effective mitigation for the significant losses. The project proponents must work with the State and Federal Fish & Wildlife agencies to mitigate any loss in the most effective way. The lack of a detailed mitigation plan, including where on-site and off-site mitigation will be conducted, makes it virtually impossible to evaluate the projects impacts.

3. The Biologists preparing the DEIR appear to have failed to utilize additional information on wildlife known to be using the project site, specifically Endangered and Sensitive bird species, in spite of this being provided to Los Angeles County Flood Control District staff. I am aware of documented and mapped locations for sightings of Least Bell's Vireo, Yellow Warblers and other breeding birds found in the project area in the last two years, performed by the Pasadena Audubon Society. These additional sightings and locations add constraints to the project and this information should be added to the evaluation of impacts which appear less significant than they are based on the DEIR.

4. Page 104 of DEIR: The section on Wildlife – Amphibians and Reptiles contains significant errors in naming species said to have been observed in the project area. Examples include listing two types of toad, “California Toad (*Anaxyrus boreas halophilus*)” and Western Toad (*Bufo boreas*) when in fact these are the same toad, and the only one known from the project site. The former is the current accepted name for the subspecies of our common local toad and the latter is an older name for the species minus a subspecific name. The same problem is carried through for two kinds of Side-blotched Lizard and two kinds of whiptail lizard. The “Great Basin Gopher Snake” is the wrong subspecies for our Gopher Snake in coastal Los Angeles County, which is the San Diego Gopher Snake. Most troubling is this suggests that rather than a clerical error, the preparers were unfamiliar with the local species of reptiles and amphibians and more, it suggests a lack of understanding of species and subspecies concepts. This is very important since many listed (Rare and Endangered) taxa are listed and protected at the subspecies level. The preparers failed to cite some important, specific references for this study, such as Allan Schoenherr's Herpetofauna of the San Gabriel Mountains, and the up-to-date Field Guide to Amphibians and Reptiles of California, 2012, Stebbins and McGinnis.

The report also states elsewhere that the Coast Patch-nosed Snake (*Salvadora hexalepis virgulata*), a Federal and California Species of Concern, was found in the project area during surveys, yet its listed status is not noted. This is a very uncommon snake on the coastal side of the San Gabriel Mountains.



5. Recreational Impacts: My form of recreation and relaxation is to regularly walk the Hahamongna basin throughout the trail system both around and through the Willow Woodlands.

I record birds, herps and plants seen and I photograph them for teaching presentations and personal enjoyment. The report states repeatedly that “Recreational Impacts were found to be less than significant.” The massive magnitude of 5 years of sediment removal truck noise and traffic, and closure of trails coupled with the annual followup clearing of future sediment, constitutes a “significant impact to my recreation”, and to the hundreds of others who hike, jog, walk dogs, ride horses, and study birds in the basin.

Overall, in spite of problems with the Draft EIR, it is the project that is flawed rather than the DEIR. I ask that a new alternative be prepared that reduces and naturalizes the sediment removal process to meet both the needs for sediment removal and protection of wildlife habitat in the Devil’s Gate basin. This includes a greatly reduced sediment removal, an extended timetable rather than the 5 years of continuous removal, creation of a wildlife lake, and a much greater emphasis on sluicing (FASTing) as the most natural way of allowing sediment to flow, as it has for thousands of years.

Sincerely,

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Cc: Sup. Michael D. Antonovich  
City of Pasadena  
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