

10604 Walnut Drive
Shadow Hills, CA 91040
21 January 2014

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

Re: Comments to the Draft Environmental Impact Report for the Devils Gate Reservoir
Sediment Removal and Management Project

Dear Ms. Farber:

Thank you for extending the comment period for the Draft Environmental Impact Report (DEIR) for the Devils Gate Reservoir Sediment Removal and Management Project.

In preparing my comments to the DEIR, I re-read the comments I'd submitted to the Scoping Meeting, and am saddened that these comments are all still relevant. I am disappointed that the comments that I and others made at that time seem to have been completely disregarded in the very statement of the project objectives. Objectives 5 and 6, in particular, virtually ensure that the sediment be trucked to a landfill, and that other real alternatives cannot be selected. The document is rigged, and any discussion of real alternatives is effectively rendered moot because of how the project objectives have been stated. This is certainly not the intent of CEQA, and renders the document inadequate from the start.

What is the scientific basis for determining the amount of sediment to be removed from the basin, and the timeframe in which to do the removal? The basin still has some capacity, and sluicing has been successfully utilized in the past, to discharge in excess of a million cubic yards of sediment from behind Devils Gate Dam. If there is no factual emergency driving quick removal of such a large amount of sediment, why *not* employ a method that has worked in the past, and which requires so little effort? Without adequate rationale, it seems foolish to embark on such a costly and destructive project.

The DEIR is inadequate in specifying meaningful biological mitigations. Of what use is it to monitor, when the entirety of the habitat is to be razed anyway? It's as though my house were in the way of a freeway project and the mitigation measure is to make sure the bulldozers don't touch my house while I'm in it. That's all well and good, but the minute I step out, the bulldozers obliterate my house, and I'm left with nowhere to go. At the end of the day, of what benefit is that mitigation measure? Additionally, under whose jurisdiction is the biological monitor? If the monitor is employed by the County, does this not create a conflict of interest?

The DEIR is inadequate in specifying meaningful recreational mitigations. The existing willow forest is unique habitat for wildlife, and provides unique recreational opportunities for people. An expanse of vegetation that is mowed annually does not provide much in the way of

recreational opportunities; redirecting people to use other facilities is not a meaningful mitigation.

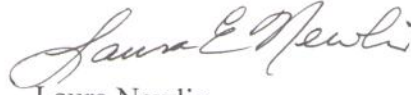
There are plenty of other inadequacies in the DEIR. The document should be rejected in its entirety, and a new plan be undertaken that takes into account the many comments stakeholders have made in the Scoping Meetings held over two years ago. This new plan should embody more respect for the natural world, and consider that sediment has value. The coarser components can be extracted and used in construction, while the finer sediments can (and really should) be sent downstream to nourish our beaches. Looking at sediment with a new paradigm can have many benefits, and save much money.

Thank you for your attention.

Sincerely,



Roger Klemm



Laura Newlin

c Supervisor Antonovich