APPENDIX A – Initial Study / Notice of Preparation /Scoping Comments

APPENDIX A1 – Initial Study / Notice of Preparation

NOTICE OF PREPARATION
INITIAL STUDY

DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT PASADENA, CA (LOS ANGELES COUNTY)

Prepared for:

LOS ANGELES COUNTY
FLOOD CONTROL DISTRICT
P.O. Box 1460
Alhambra, CA 91802-9974

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SECTION 1.0 – INTRODUCTION

1.1. PURPOSE OF THE NOTICE OF PREPARATION AND INITIAL STUDY

The Los Angeles County Flood Control District (LACFCD) proposes a comprehensive sediment removal project at Devil's Gate Reservoir that will restore flood control capacity and establish a reservoir configuration more suitable for routine maintenance activities including sediment management.

"Projects" within the State of California are required to undergo environmental review to determine the environmental impacts associated with implementation of the project in accordance with the California Environmental Quality Act (CEQA) unless a project is exempt. CEQA was enacted in 1970 by the California Legislature to disclose to decision makers and the public the significant environmental effects of a proposed project and identify possible ways to avoid or minimize significant environmental effects of a project by requiring implementation of mitigation measures or recommending feasible alternatives. CEQA applies to all California public agencies at all levels, including local, regional and state, as well as boards, commissions, and special districts (such as LACFCD). As such, LACFCD is required to conduct an environmental review to analyze the potential environmental effects associated with the proposed project.

The attached IS analyzes the potential for the Devil's Gate Reservoir Sediment Removal and Management Project (proposed project) to result in environmental impacts. The findings in this Initial Study (IS) have determined that an Environmental Impact Report (EIR) is the appropriate level of environmental documentation because the project could result in potentially significant impacts. These potential impacts are discussed below and will be further addressed in the EIR.

LACFCD will be the Lead Agency for purposes of CEQA as it is the agency charged with carrying out or approving the project. This Notice of Preparation (NOP)/IS is the first step in the process to inform the public of the project and its potential impacts and to invite input.

LACFCD seeks community input regarding the scope and content of the environmental information that should be included in the EIR. The EIR will be prepared by LACFCD and will include any information necessary for public agencies to meet their respective responsibilities related to the proposed project. These agencies will need to use the EIR when considering any permit or other approvals necessary to implement the project. A preliminary list of the environmental topics identified for study in the EIR is provided in the IS checklist (Section 5). If the topics of concern to you have already been identified for analysis in the IS, you need not provide a response to this notice.

The project description, location, and the environmental issues to be addressed in the EIR are contained in the attached materials.

A forty-five-day (45-day) public review period shall commence on **Wednesday, September 28, 2011**. Written comments must be sent to the LACFCD by **Friday, November 11, 2011**. The LACFCD will hold two public scoping meetings to allow public agencies and members of the public to provide input on which environmental issues merit further analysis in the EIR. These scoping meetings will occur on **Wednesday, October 5, 2011** at 6:30 p.m. in the Rose Bowl Locker Room (1001 Rose Bowl Drive, Pasadena, 91103, park in Lot F, enter at Gate A) and **Saturday, October 15, 2011** at 9:00 a.m. in the La Canada High School Cafeteria (4463 Oak Grove Drive, La Canada, 91011).

Correspondence and comments can be delivered to:

Los Angeles County Flood Control District
Attn: Water Resources Division – Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974.

Comments can also be sent by email to reservoircleanouts@dpw.lacounty.gov, or by FAX to (626) 979-5436. Include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line. Agency responses to the NOP should include the name of a contact person within the commenting agency.

1.2. AVAILABILITY OF THE NOP/IS

The NOP/IS for the Devil's Gate Reservoir Sediment Removal and Management Project is being distributed through the State Clearinghouse and directly to numerous agencies, organizations, and interested groups and persons for comment during the scoping period. The NOP/IS is also available for review at the following locations:

- Linda Vista Library, 1281 Bryant Street, Pasadena
- San Rafael Branch Library, 1240 Nithsdale, Pasadena
- Pasadena Central Library, 285 East Walnut Street, Pasadena
- Altadena Library District, 600 East Mariposa Street, Altadena
- Bob Lucas Memorial Library, 2659 Lincoln Avenue, Altadena
- La Canada Flintridge Library, 4545 North Oakwood Avenue, La Canada Flintridge
- Irwindale Public Library, 5050 Irwindale Avenue, Irwindale
- County of Los Angeles Department of Public Works, 900 South Fremont Avenue, Alhambra

In addition, the NOP/IS is also available online at the following website: www.lasedimentmanagement.com/devilsgate.

SECTION 2.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

2.1. INTRODUCTION

Devil's Gate Dam and Reservoir was built in 1920 to provide flood protection to the Cities of Pasadena, South Pasadena, and Los Angeles and to facilitate water conservation. The City of Pasadena is the landowner of the project site, and the LACFCD holds an inundation easement granting LACFCD the right to construct, reconstruct, inspect, maintain, repair and operate the dam, spillway, reservoir and other support structures for the purposes of flood protection and water conservation. The project is being undertaken in order to restore reservoir capacity to the facility to meet its intended level of flood protection for downstream communities.

2.2. PROJECT LOCATION AND SITE CHARACTERISTICS

2.2.1 Location

The Devil's Gate Reservoir Sediment Removal and Management Project is located in the City of Pasadena, in Los Angeles County approximately 14 miles north of downtown Los Angeles (see Figure 1, Project Vicinity Map). The City of La Canada Flintridge and the community of Altadena are located near the project site to the west and east, respectively.

Lying south of the San Gabriel Mountains, the project site is located within the Arroyo Seco watershed. The Arroyo Seco extends approximately 11 miles from the border of the Angeles National Forest to its confluence with the Los Angeles River. Stormwater runoff from approximately 20,416 acres (31.9 square miles) of both residential and undeveloped land drains into Devil's Gate Reservoir.

The project site includes transportation and placement of material at facilities already prepared and designated to accept such material. For the purposes of this IS, Waste Management Facility in Azusa, Manning Pit Sediment Placement Site in Irwindale, and Scholl Canyon Landfill were considered as facilities available for the project.

2.2.2 Project Site

The proposed project site (see Figure 2, Project Boundary Map) includes the Devil's Gate Dam and Reservoir and covers approximately 175 acres (0.27 square miles). The topography in the vicinity of the project site is generally flat, with a slight incline to the north. The San Gabriel Mountains are located to the north of the project site, and are characterized by both the foothills and steep slopes associated with mountainous terrain. The proposed project site can be accessed via Oak Grove Drive and Foothill Boulevard on the west through the City of Pasadena Hahamongna Watershed Park and Windsor Avenue via La Canada Verdugo Road on the southeast and Explorer on the northeast.

2.2.3 General Plan Designation/Zoning

The proposed project site has a General Plan Land Use designation of Open Space and is zoned as Open Space under City of Pasadena General Plan (City of Pasadena, 1994).

2.2.4 Adjacent Land Uses

The project site is located within the reservoir behind Devil's Gate Dam. The Hahamongna Watershed Park is approximately 1,300 acres of open space extending up the Arroyo Seco Canyon from the Devil's Gate Dam. The park includes areas within and adjacent to the reservoir. The Hahamongna Watershed Park is owned and operated by the City of Pasadena and includes Oak Grove Park. Oak Grove Park contains picnic facilities, restrooms, a play field, an equestrian staging area, trails, and a disc golf course. The current leaseholders within the Hahamongna Watershed Park include the United States Forest Service (USFS), Los Angeles County Fire Camp 2, and the Rose Bowl Riders who sublet to the Tom Sawyer Camp. In addition, Southern California Edison, Southern California Gas Company, and Pasadena Water and Power hold easements within the Hahamongna Watershed Park. Other land uses directly adjacent to the project area include the California Institute of Technology – Jet Propulsion Laboratory (JPL) to the northwest, La Canada High School and Hillside School and Learning Center to the west, single-family residential uses to the south, north, and east, and the 210 Foothill Freeway to the south.

2.3. PROJECT BACKGROUND

2.3.1 LACFCD History

Since 1860, major flood events have occurred along the Arroyo Seco, which led to the development of the Los Angeles River and Arroyo Seco flood control channels. Flooding over the past century has caused loss of life and severe damage to structures and infrastructure.

The Arroyo Seco has a long history of flooding from winter storms including:

- In 1861, severe flooding occurred along the Arroyo Seco.
- In 1884, the most destructive flood recorded in Los Angeles County.
- In 1889, Arroyo Seco experienced severe flooding.
- In 1914, a devastating flood occurred in Los Angeles County, primarily the result of floodwaters originating in the San Gabriel Mountains. The flood caused over $10 million in property damage, destroyed 10 bridges, 30 homes, and claimed many lives. Peak flows in the Arroyo Seco at the USGS Gage 11098000, located approximately 2.2 miles upstream of the reservoir, were recorded at 5,800 cubic feet per second (cfs).
- In 1916, a flood recorded peak flows at 3,150 cfs occurred on January 17.
- In 1938, flooding damaged the Angeles Crest Highway (SR-2). The USGS gage station recorded a maximum peak flow of 8,620 cfs on March 2.
- In 1943, a flood damaged portions of the Arroyo Seco flood control channel.

The Los Angeles County Flood Control Act was adopted in 1915 by the State Legislature after a regional flood took a toll on both lives and property. The Los Angeles County Flood Control Act established the LACFCD, tasked with controlling and conserving the flood waters of the LACFCD. The LACFCD encompasses 2,760 square miles: all of Los Angeles County except Catalina and San Clemente islands and everything north of Avenue S in Antelope Valley.

2.3.2 Hahamongna Watershed Master Plan

In 1993, the City of Pasadena established the Hahamongna Watershed Park which includes the Devil's Gate Reservoir area. Recreational uses in the park include hiking, bicycling, horseback riding, picnicking, and disc golf.

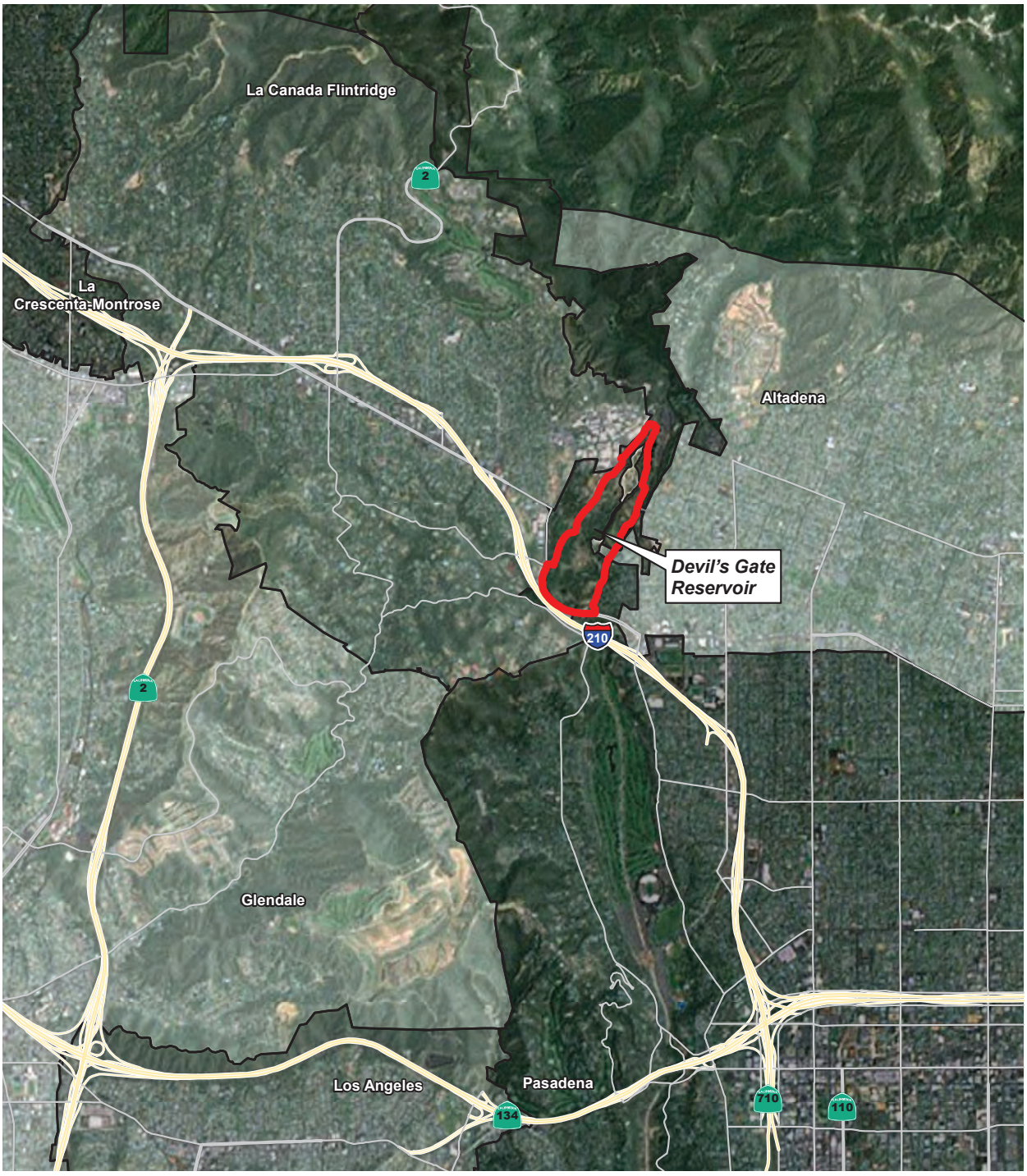

Figure 1 - Project Vicinity Map

Figure 2 - Project Boundary Map

The City of Pasadena has developed and adopted (between 2003 and 2005) three separate master plans that govern Pasadena parks along the Arroyo Seco: the Lower Arroyo Master Plan, the Central Arroyo Master Plan, and the Hahamongna Watershed Master Plan. These plans attempt to balance many competing objectives, including habitat restoration, recreational access, water supply, and other uses.

2.3.3 Devil's Gate Dam and Reservoir History

Following the floods of 1914 and 1916, the Devil's Gate Dam was built in 1920, for the purposes of water conservation and flood control. Devil's Gate Dam is the oldest dam constructed by the LACFCD. Devil's Gate Dam and Reservoir had an original storage capacity of approximately 7,423,000 cubic yards. Between 1934 and 1947, most of the Arroyo Seco downstream of the dam (approximately 450 feet south of the dam) was channelized.

Following the 1971 Sylmar Earthquake, heightened safety concerns and better understanding of seismic behavior prompted new investigations and analysis of LACFCD dams, including Devil's Gate Dam. In response to findings from these studies, in 1978 the State Department of Water Resources Division of Safety of Dams (DSOD) officially imposed an operational restriction preventing the holding of water at Devil's Gate Dam due to concerns with the dam's ability to withstand a major earthquake. In 1998, the District completed a construction project that seismically rehabilitated Devil's Gate Dam. The rehabilitation project also enlarged the spillway to safely pass the Probable Maximum Flood, the required level of flood protection, without overtopping the dam. After project completion, the DSOD restriction was removed restoring the dam and reservoir to its full operational capacity, thus providing its potential for water conservation. The project improvements resulted in Devil's Gate Dam meeting current maximum credible earthquake design standards and probable maximum flood design standards.

The reservoir captures storm water, sediment and debris during storm events and retains storm water to prevent high flow rates from overwhelming the downstream flood control channel. The outflow from the reservoir is controlled by three outlet corridors; a low level gate, the outlet valve, and the outlet tunnel gates. These allow the dam to discharge up to 5,500 cfs. Controlled releases are made through the outlet valve and tunnel gates after the reservoir has impounded storm water. During major storm events that exceed the capacity of the valves and gates, the dam is designed such that the reservoir level rises until flow discharges, uncontrolled thru the spillway ports (openings in the spillway structure) and then over the spillway.

2.3.3.1 Recent Sediment Removal

The need for a sediment removal project is determined based on the amount of sediment deposition behind the dam. Too much sediment accumulation can affect the ability of the outlet works (valves, gates and spillway) to function correctly or reduce available reservoir capacity below that necessary for flood control storage or to safety contain future sediment inflow including the Design Debris Event (DDE). The "Design Debris Event" is the predicted amount of sediment that will flow into the reservoir after the undeveloped portion of the tributary watershed is completely burned and a 50-year design storm event occurs after four years of watershed recovery. The 50-year design storm and the DDE are defined by the Los Angeles County Department of Public Works Hydrology and Sedimentation Manuals respectively. The DDE for the Devil's Gate Reservoir is approximately 2,000,000 cubic yards.

The last major reservoir sediment removal project occurred in 1994, when 190,000 cubic yards of sediment were removed. Sediment was trucked off site via a maintenance road just west of the dam which exits on to Oak Grove Drive. Since then, two smaller sediment removal operations have taken

place with 14,000 cubic yards removed in 2006 and 3,800 cubic yards removed in 2009. The volume of these sediment removal projects was limited in order to prevent impacts to vegetation growing in the accumulated sediment within the reservoir.

The 2009 Station Fire was the largest fire in recorded history of the Angeles National Forest (est. 1892) and the 10th largest fire in California since 1933. It burned over 160,000 acres leaving vast areas of the San Gabriel Mountains denuded and susceptible to sediment flows. The fire impacted five of the LACFCD's dams and reservoirs, one of which is the Devil's Gate Dam and Reservoir. Approximately 68% of the watershed tributary to Devil's Gate Reservoir (approximately 100% of the undeveloped portion) was burned, making sediment deposition inevitable during subsequent storm events. The storms that occurred in the two wet seasons after the fire increased sediment accumulation in the reservoir by approximately 1,300,000 cubic yards reducing the available capacity to less than one DDE. In October 2010, the California DSOD recommended the removal of sediment build-up behind the dam as well as the removal of vegetation growth.

In 2010, LACFCD initiated project planning to remove 1,670,000 cubic yards from the reservoir. This activity was found to be exempt from CEQA. In March 2011, in recognition of stakeholder and environmental concerns, the Los Angeles County Board of Supervisors directed LACFCD to complete an EIR to assess the impacts associated with removing sediment from the project site. Since the EIR would take considerable time to complete, LACFCD was also directed to implement interim measures to reduce downstream flood risk until the EIR is completed and a sediment removal project is implemented.

The Interim Measures Project (IMP), is currently underway to reduce downstream flood risk. The interim measures include dam modifications to keep debris from plugging the outlet works and allow for the removal of up to 25,000 cubic yards of sediment per year from the dam face until the project associated with the EIR is started. In 2011, 13,000 cubic yards were removed from the dam face and placed at Johnson Field.

2.4. PROJECT GOALS AND OBJECTIVES

The LACFCD must remove sediment that has accumulated behind the dam to restore the capacity of Devil's Gate Reservoir to minimize the level of flood risk to downstream communities along the Arroyo Seco. In its current condition, the reservoir no longer has the capacity to safely contain another major debris event; and the outlet works have a risk of becoming clogged and inoperable. The proposed project would remove up to 4,000,000 cubic yards of sediment from the reservoir behind Devil's Gate Dam to restore it to its current design standard, (capacity for two DDEs below the spillway elevation of 1040.5 ft) and establish a reservoir configuration more suitable for routine maintenance activities including sediment management.

Primary project objectives include:

- Reducing flood risk to the communities downstream of the reservoir adjacent to the Arroyo Seco by restoring reservoir capacity for flood control and future sediment inflow events;
- Supporting sustainability by establishing a reservoir configuration more suitable for routine maintenance activities including sediment management;
- Removing sediment in front of the dam to facilitate an operational reservoir pool to reduce the possibility of plugging the outlet works with sediment or debris during subsequent storm events

- Removing sediment placed at Johnson Field during the Devil's Gate Reservoir Interim Measures Project;
- Supporting dam safety by removing sediment accumulated in the reservoir in a timely manner to ensure the ability to empty the reservoir in the event of a dam safety concern.
- Delivering the sediment to placement or reuse facilities that are already prepared and designated to accept such material without native vegetation and habitat removal.

2.4.1 Sediment Removal

Approximately 2.6 million cubic yards of sediment is the current excess amount of sediment in the reservoir. However, additional sediment accumulation is anticipated during the upcoming storm seasons due to the burned condition of the watershed. Proposed project excavation activities would take place within the project's excavation limit boundaries (see Figure 3, Project Excavation Boundary). The specific excavation limits, ultimate reservoir configuration, and volume of sediment to be removed within the boundary will be determined based on locations of access roads; areas for preservation or restoration of native vegetation; and the amount and location of sediment inflow that occur during the upcoming storm seasons.

Over the years, as storm events deposited sediment in the reservoir, native and non-native vegetation established itself in the sediment deposits. During subsequent storm events some of the vegetation is washed out by storm flows or submerged when the reservoir level rises. Despite the dynamic changes to vegetation over time, much of the reservoir has recently contained areas of mature black willow trees, Riversidian alluvial fan sage scrub, mule fat scrub and riparian vegetation. During storm events following the Station Fire, a large portion of the reservoir vegetation was buried in sediment; however significant amounts of vegetation, including numerous mature willow trees remain present. In order to remove the sediment from the reservoir, vegetation growing in it within excavation areas will require removal. The accumulated sediment will be removed with construction equipment including but not limited to: bulldozers, front-end loaders, excavators, scrapers and trucks. Removed vegetation and organic debris will be separated from sediment and hauled to Scholl Canyon Landfill. Coarse material may need to be processed through sorters and crushers to prepare it to be hauled off-site. Depending on the moisture content of the sediment removed, the sediment may need to be stockpiled for drying to occur. Stockpiling of the sediment would occur on-site, within the Devil's Gate Reservoir.

The sediment and organic materials will be trucked off-site via local roads accessing the 210 Freeway and then taken to sites that are already prepared and designated to accept such material without native vegetation and habitat removal.

For the purpose of assessing the level of potential impacts to the various environment factors, this IS considered the following potential traffic routes and existing disposal sites/placement locations which are currently available to accept the sediment/organic material: The sediment will be trucked off-site to either the Waste Management Facility in Azusa or the Manning Pit Sediment Placement Site (SPS) in Irwindale. In addition to the sediment excavated as part of the proposed project, sediment stockpiled as part of the IMP will also be removed. For sediment removal, the trucks will take maintenance road, west of the reservoir, to Oak Grove Drive, following it until Berkshire Place, and then merge onto the eastbound Interstate 210 Foothill Freeway. Trucks carrying sediment will continue to follow the 210 Freeway east until exiting Irwindale Avenue southbound, turning eastward onto Gladstone (Waste Management Facility) and then south onto Vincent (Manning Pit SPS). To return to the reservoir, the trucks will follow Arrow Highway eastward, turn north onto Azusa Avenue, and take the 210 Foothill

freeway westbound on-ramp. The access road used to access Oak Grove Drive will be widened to accommodate the truck traffic. For organic material, the trucks will follow the 210 Freeway east until the 134 Ventura Freeway west, exit Figueroa Street northbound, and then following Scholl Canyon Road to the Scholl Canyon Landfill.

2.4.2 Project Schedule

The proposed project is expected to occur between Spring 2014 and Winter 2019. Excavation and associated activities within the reservoir area is expected to take place during dryer months, from April to December, Monday through Saturday (except on holidays), as weather permits. Activities will take place between the hours of 7:00 a.m. to 7:00 p.m. on Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturday. Removal of sediment and organic materials off-site is expected to take place between these hours but specific hours may be further defined to avoid sensitive travel times.

2.5.3 Sediment Management

The proposed project is expected to result in a reservoir configuration and appropriate access ways to facilitate future routine periodic maintenance and sediment removal and minimize any environmental impacts associated with these future activities.

2.4.3 Environmental Commitments / Best Management Practices

The proposed project lies within the boundaries of the County of Los Angeles and shall conform to the following requirements:

- Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities therein, except the City of Long Beach (Order No. 01-182, NPDES No. CAS004001).
- Within the unincorporated areas of the County of Los Angeles, Los Angeles County Code, Chapter 12.80.
- Other applicable Federal, State, and local requirements.

To reduce potential impacts to water quality, the proposed project would be conducted in accordance with applicable standards and BMPs. The following environmental safeguards would be implemented as part of the proposed project:

- Sediments shall not be discharged to the storm drain system or receiving waters.
- Sediments generated on the project site shall be contained within the project site using appropriate Best Management Practices (BMPs).
- No project activity-related materials: waste, spills, or residue shall be discharged from the project site to streets, drainage facilities, receiving waters, or adjacent property by wind or runoff.

Figure 3 - Project Excavation Boundary

- Non-storm water runoff from equipment, vehicle washing, or any other activity shall be contained within the project site using appropriate BMPs.
- Erosion from exposed topsoil slopes and channels shall be prevented.
- Minimize grading during the wet season. All erosion susceptible slopes shall be covered, planted, or protected in any way that prevents sediment discharge from the project site.
- If the project is active during the rainy season (October 15 – April 15), the Contractor shall prepare an accumulated precipitation procedure (APP) for review and approval by the LACFCD Project Engineer before any discharge from the project. The APP shall describe the location of proposed discharges, the BMPs to prevent pollution, and the actual equipment to be used. The APP shall be prepared and submitted in accordance with BMP NS-2 and the LACDPW Construction Site BMPs Manual (BMP Manual) Section 7.

2.5. REQUIRED PERMITS AND APPROVALS

2.5.1 Lead Agency Approval

The Final EIR must be certified by the Los Angeles County Board of Supervisors (Board) as the governing board of the LACFCD as to its adequacy in complying with the requirements of CEQA before taking any action on the proposed project. The Board will consider the information contained in the EIR in making a decision to approve or deny the Devil's Gate Reservoir Sediment Removal and Management Project (Proposed Project). The analysis in the EIR is intended to provide a full disclosure of the proposed project's potential environmental impacts in accordance with CEQA requirements.

2.5.2 Other Required Permits and Approvals

A Responsible Agency is a public agency, other than the lead agency, that has discretionary approval authority over a project. The Responsible Agencies, and their corresponding approvals, for this project include the following:

City of Pasadena - Pasadena Tree Protection Ordinance Permit

Department of Fish and Game – Section 1600 Streambed Alteration Agreement

Regional Water Quality Control Board – Section 401 Water Quality Certification

US Army Corps of Engineers – Section 404 Permit

2.5.3 Reviewing Agencies

Reviewing Agencies include those agencies that do not have discretionary powers, but that may review the IS for adequacy and accuracy. Potential Reviewing Agencies include the following:

State of California

- Office of Historic Preservation
- Department of Transportation (Caltrans)

- Resources Agency
- Department of Conservation, Division of Oil, Gas and Geothermal Resources
- Native American Heritage Commission
- State Lands Commission
- California Highway Patrol

Regional Agencies

- Southern California Association of Governments
- South Coast Air Quality Management District

SECTION 3.0 – ENVIRONMENTAL DETERMINATION

3.1. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☒ *Aesthetics*	☐ *Agriculture Resources*	☒ *Air Quality/GHG Emissions*
☒ *Biological Resources*	☒ *Cultural Resources*	☒ *Geology /Soils*
☒ *Hazards & Hazardous Materials*	☒ *Hydrology / Water Quality*	☒ *Land Use / Planning*
☒ *Mineral Resources*	☒ *Noise*	☐ *Population / Housing*
☒ *Public Services*	☒ *Recreation*	☒ *Transportation / Traffic*
☒ *Utilities / Service Systems*	☒ *Mandatory Finding of Significance*	

3.2. DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐
2. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☐
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☒
4. I find that the proposed project **may have a "potentially significant impact" or "potentially significant unless mitigated impact"** on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐
5. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Ryan C. Butler — 9/27/11

Signature — Date

Ryan C Butler — Associate Civil Engineer

Name, Title

SECTION 4.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses," may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a. Earlier Analysis Used. Identify and state where they are available for review.

   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. The explanation of each issue should identify:

    a. the significance criteria or threshold, if any, used to evaluate each question; and

    b. the mitigation measure identified, if any, to reduce the impact to less than significance

*Note: Instructions may be omitted from final document.

SECTION 5.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

5.1. AESTHETICS

1.	AESTHETICS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐
(c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

5.1.1 Impact Analysis

(a) The proposed project site is located in the City of Pasadena within the Devil's Gate Reservoir. There are no designated scenic vistas in the project vicinity (City of Pasadena, 1994), however, public views of the proposed project site are available from various viewpoints along the reservoir and Hahamongna Watershed Park including trails and lookouts that are readily accessible by the public. The project site would also be visible from private residences and the private property within JPL. Views of the project site from both public and private vantage points may be impacted by the sediment and vegetation removal. Changes to views associated with the proposed project site will be further analyzed in the EIR.

(b) The California Department of Transportation designates Official and Eligible scenic highways within the State. The proposed project is located approximately 1.8 miles from State Highway 2 - Angeles Crest Highway, an Officially Designated State Scenic Highway; and is located in close proximity to the 210 Freeway, an Eligible State Scenic Highway (Caltrans, 2011). The Los Angeles County General Plan has assigned the same designations to these highways (LACDRP, 2011). State Highway 2 – Angeles Crest Highway does not provide views of the proposed project site (City of Pasadena, 2002). Therefore, the proposed project would not damage scenic resources within an officially designated state scenic highway. As the site is characterized by its open space park features, views of the site from the 210 Freeway could be altered. Changes to views of scenic resources from the 210 Freeway, an Eligible State Scenic Highway, will be further analyzed in the EIR.

(c) Views of the proposed project site and the immediate area are characterized by open space, active and passive recreation facilities, trails, and native and non-native vegetation surrounded by urban development against the backdrop of the San Gabriel Mountains. The proposed project would remove both sediment and vegetation from the reservoir, which would change

the visual character of the site and alter public and private views of the site. Changes to the existing visual character and quality of the project site will be further analyzed in the EIR.

(d) The proposed project would remove sediment and vegetation from the reservoir and eventually transport the sediment and vegetation to approved disposal sites. The proposed project would involve limited addition of lights or structures that would cause glare. There would be no significant impacts related to effects from added sources of light or glare. No further study of the issue is required.

5.2. AGRICULTURE & FOREST RESOURCES

2.	**AGRICULTURE & FOREST RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.) In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.) Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?	☐	☐	☐	☒

5.2.1 Impact Analysis

(a) The proposed project site is designated as Open Space by the City of Pasadena General Plan. No agricultural activities presently occur on site. The site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; and there is no farmland in the immediate vicinity of the project site (FMMP, 2011). Therefore, the proposed project would not convert Farmland to non-agricultural use. No impact would result, and no further study of the issue is required.

(b) The proposed project would not conflict with agricultural zoning or a Williamson Act contract. There are no Williamson Act contracts applicable to the proposed project site; the site is zoned Open Space and contains no agricultural uses. No impact would result, and no further study of the issue is required.

(c) through (e). The proposed project site does not contain any forest land or timberland. The site is zoned for Open Space; and although it contains trees and other vegetation, it is not designated as forest land. No impact would result, and no further study of the issue is required.

5.3. AIR QUALITY

3.	**AIR QUALITY. (Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.) Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
(b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
(c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
(d)	Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
(e)	Create objectionable odors affecting a substantial number of people?	☒	☐	☐	☐

5.3.1 Impact Analysis

(a) The proposed project is located in the South Coast Air Basin (SCAB), which is under the South Coast Air Quality Management District (SCAQMD). The Air Quality Management Plan (AQMP) for the SCAB sets forth a comprehensive program that will lead the SCAB into compliance with all federal and state ambient air quality standards. The AQMP control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with the Southern California Association of Governments (SCAG). Accordingly, conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plans, population projections, and SCAQMD Regulations. The proposed project involves sediment removal and sediment transport. Impacts related the obstruction or conflicts with the implementation of the applicable air quality plan will be analyzed in the EIR.

(b) CEQA inquires as to whether a project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. A violation could occur over the short-term during sediment removal, or over the long-term during subsequent maintenance activities. The SCAQMD has established standards for air quality constituents generated by construction and by operational activities for such pollutants as ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and particulate matter (PM_{10} and $PM_{2.5}$). The SCAQMD maintains an extensive air quality-monitoring network to measure criteria pollutant concentrations throughout the SCAB. Violations of air quality standards or contribution to an existing or projected air quality violation will be analyzed in the EIR.

(c) In addressing cumulative impacts for air quality, the AQMP is the most appropriate document to use because the AQMP sets forth a comprehensive program that will lead the SCAB, including the project area, into compliance with all federal and state air quality standards. The proposed project could potentially result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under the applicable federal or state ambient air quality standard. Impacts related to a cumulatively considerable net increase of any criteria pollutant will be analyzed in the EIR.

(d) Sensitive receptors are land uses such as residences, schools, daycare centers, and medical and recreational facilities that are more susceptible to the effects of air pollution than are the population at large. The proposed project would remove sediment and vegetation from the proposed project site and truck the sediment and vegetation to various off site locations. The haul routes pass near schools, both in the vicinity of the proposed project and the off site disposal locations. In addition, the proposed project site contains, and is immediately adjacent to, recreational uses. The proposed project could emit air pollutants in substantial concentrations that would affect both off-site and on-site receptors. Impacts associated with exposing sensitive receptors to substantial pollutant concentrations will be analyzed in the EIR.

(e) The proposed project does not propose an odor generating use identified in the SCAQMD (e.g. wastewater treatment plants, agricultural operations, landfills, composting, food processing plants, chemical plants, refineries, etc.) and would not create an odor nuisance pursuant to Rule 402. Project sediment removal would involve the use of heavy equipment creating exhaust pollutants from on-site earth movement and from equipment hauling the sediment and vegetation off-site. With regard to nuisance odors, any air quality impacts will be confined to

the immediate vicinity of the equipment itself. However, recreational uses as well as residences are located in the immediate vicinity of the proposed project site. The EIR will further analyze objectionable odors that could occur as a result of the proposed project.

5.4. BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
(c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

5.4.1 Background

Over the years, as storm events deposited sediment in the reservoir, native and non native vegetation established itself in the sediment deposits. During subsequent storm events some of the vegetation is washed out by storm flows or submerged when the reservoir level rises; however much of the reservoir recently included areas of riparian vegetation and upland vegetation communities such as mature black willow trees, riversidian alluvial fan sage scrub, and mule fat scrub. During the major sediment inflows following the Station Fire, a large portion of the reservoir vegetation was buried in sediment; however

significant amounts of vegetation, including mature willow trees remain present. In order to remove sediment from the reservoir, some of the vegetation growing within it will require removal.

5.4.2 Impact Analysis

(a) The proposed project site is located in the reservoir behind Devil's Gate Dam, where vegetation has grown over the accumulated sediment. The proposed project involves the removal of both the sediment and vegetation located within the reservoir. Due to the amount of sediment and vegetation to be removed, the proposed project has the potential to affect a candidate, sensitive, or special status species. The EIR will further analyze impacts on any species identified as a candidate, sensitive, or species status species.

(b) The proposed project would remove vegetation as well as sediment from riparian habitats. Therefore, the proposed project would have the potential to have an adverse effect on a riparian habitat. The EIR will further analyze impacts to the riparian habitat and any other sensitive natural communities.

(c) Biological surveys will be undertaken and a detailed biological resources technical report completed for the proposed project in order to fully characterize the existing biological and hydrological conditions of the project site and to evaluate the potential impacts associated with the proposed project. The technical report will be included as an appendix to the EIR and the results of the biological resource surveys will be summarized and incorporated into the EIR.

(d) The proposed amount of sediment and vegetation proposed to be removed could have an effect on wildlife corridors or native wildlife nursery sites. The EIR will further analyze impacts of the proposed project on the movement of wildlife and wildlife nursery sites.

(e) The proposed project will remove vegetation, including trees, from the proposed project site. As the proposed project site is located within the City of Pasadena, it is subject to the Pasadena Tree Protection Ordinance. Due to the volume of vegetation to be removed from the proposed project site, the proposed project has the potential to conflict with local policies or ordinances protecting biological resources, including the Pasadena Tree Protection Ordinance. The EIR will analyze conflicts with any local policies or ordinances protecting biological resources on the proposed project site.

(f) The project site is not within a City-designated or County-designated Significant Ecological Area (SEA), habitat conservation plan, or natural community conservation plan (LACDRP, 2009). No impact would result, and no further study of the issue is required.

5.5. CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☒	☐	☐	☐

(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
(c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
(d)	Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐

5.5.1 Impact Analysis

(a) through (d). Field surveys and a records search will determine if there are historical, archaeological, or paleontological resources in the vicinity. A technical report will be prepared and included as an appendix to the EIR. The EIR will further analyze impacts to historical, cultural, and paleontological resources on the proposed project site.

(d) The records search and field survey will determine if there is the potential to encounter buried resources during project sediment removal. The EIR will further analyze potential impacts to human remains on the proposed project site.

5.6. GEOLOGY AND SOILS

6.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
	ii) Strong seismic ground shaking?	☐	☐	☐	☒
	iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
	iv) Landslides?	☐	☐	☐	☒
(b)	Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
(c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒

6.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

5.6.1 Impact Analysis

(a) The proposed project site is located in the seismically active region of southern California. However, the site is not located within an Alquist-Priolo Earthquake Fault Zone. There are various unnamed faults to the west, south, and east of the proposed project site; however none traverse the site. The nearest faults include the Raymond Fault and the Sierra Madre Fault. Because southern California is a seismically active region, it is highly likely that regional earthquakes would occur in the vicinity of the proposed project site. The proposed project site could be subjected to moderate to severe ground shaking in the event of a major earthquake on any of the faults listed above or other faults in Southern California. The proposed project site is also located in an area identified area that could be subject to liquefaction, but is not identified as an area subject to landslides (California Geological Survey, 2011). The proposed project does not involve the construction or placement of any buildings on the proposed project site. Therefore, the proposed project would not create substantial risks to life or property associated with earthquake faults, seismic ground shaking, ground failure, and landslides. No impacts would occur. No further study of this issue is required.

(b) The proposed project involves the removal and hauling of sediment and vegetation from the site. Erosion could occur within the reservoir during excavation and sediment loading, and possibly during sediment transport. Impacts related to sediment excavation and transport will be further analyzed in the EIR.

(c) Liquefaction occurs when seismic-induced groundshaking causes water-laden, cohesionless soils to form a quicksand-like condition below the ground surface. The proposed project does not involve the construction or placement of any buildings on the proposed project site. Therefore, the proposed project would not create substantial risks to life or property associated with liquefaction. No impacts associated with liquefaction would occur. No further study of this issue is required.

(d) Expansive soil is defined as soil that expands to a significant degree upon wetting and shrinks upon drying. A hazardous condition is created when buildings are placed on expansive soils and structural damage could occur. The proposed project does not involve the construction or placement of any buildings on the proposed project site. Therefore, the proposed project would not create substantial risks to life or property due to being located on expansive soil. No impacts associated with expansive soils would occur. No further study of this issue is required.

(e) The proposed project involves the removal of sediment from a reservoir and debris basin, and would not construct any buildings. Therefore, the proposed project will not use septic tanks or alternative wastewater disposal systems. No impacts associated with the use of a septic system would occur. No further study of this issue is required.

5.7. GREENHOUSE GAS EMISSIONS

7.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
(b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

5.7.1 Impact Analysis

(a) The proposed project will generate emissions of greenhouse gases (GHGs) from mobile sources mostly related to the operation of machinery on site associated with sediment removal and transport of sediment and vegetation from the proposed project site to the disposal sites. The California Air Resources Board (CARB) has statutory responsibility to maintain a statewide inventory of GHG emissions. The California GHG inventory compiles statewide anthropogenic GHG emissions and sinks. An analysis of GHG emissions from the proposed project is being prepared as part of the EIR. The EIR will further analyze impacts related to the generation of GHG emissions.

(b) An analysis of the proposed project's impacts on applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs will be included in the EIR.

5.8. HAZARDS AND HAZARDOUS MATERIALS

8.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	☒	☐	☐	☐
(b)	Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐

(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
(d)	Be located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
(e)	For a project located within an airport land use plan or, where such a plan had not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
(f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
(g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
(h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

5.8.1 Impact Analysis

(a) through (b) The proposed project would not require the extended use of acutely hazardous materials or substances. Project activities, involving construction equipment, would be short term and would involve the limited transport, use, disposal, and storage of hazardous materials. Some examples of the hazardous materials that may be handled include fuels, lubricating fluids, and solvents. These types of materials, however, are not acutely hazardous, and all storage, handling, and disposal of these materials is regulated by the California Department of Toxic Substances Control (DTSC), U.S. Environmental Protection Agency (EPA), the Occupational Safety & Health Administration (OSHA), the Los Angeles County Fire Department, and the Los Angeles County Health Department. Adherence to the regulations set forth by County, state, and federal agencies would reduce the potential for hazardous materials impacts to a less than significant level and would not pose a safety hazard to sensitive receptors. No further study of this issue involving construction equipment is required.

The proposed project involves the excavation and transportation of sediment. A Hazards and Hazardous Materials Study will be prepared to analyze impacts associated with hazards to the public or the environment through the excavation, transportation, and disposal of this sediment. The results of this study will be analyzed in the EIR.

(c) There are two schools located within one-quarter mile of the proposed project site, La Canada High School (4463 Oak Grove Drive) and Hillside School and Learning Center (4331 Oak Grove

Drive), located to the west of the project site. Additionally, the haul route away from the Manning Pit SPS and Waste Management SPS passes near Azusa High School (1340 N. Enid Avenue) (Google Earth, 2011). The EIR will analyze impacts of hazardous emissions and hazardous materials within one-quarter mile of an existing or proposed school.

(d) A Hazards and Hazardous Materials Study will be undertaken and will include an electronic database review of federal, state and local files to investigate known occurrences of hazardous materials sites. The Hazards and Hazardous Materials Study, as well as the EIR, will further analyze the location of hazardous materials sites and the creation of a hazard to the public or environment.

(e) The nearest airport to the proposed project site is the Bob Hope Airport in Burbank, approximately 10.45 miles to the west. El Monte Airport is located 10.8 miles to the southeast of the project site; and Whiteman Airport, another public use airport, is located 14.5 miles to the northwest of the site (Google Earth, 2011). Therefore, the proposed project would not result in an airplane safety hazard for people residing or working in the project area. No further study of this issue is required.

(f) There are no private airports or airstrips in the vicinity of the proposed project site. Therefore, the proposed project would not result in an airplane safety hazard for people residing or working in the project area. No further study of this issue is required.

(g) Emergency response facilities are located in and adjacent to the Hahamongna Watershed Park. The County of Los Angeles Fire Department Camp 2 facility is located in the northwestern part of Hahamongna Watershed Park. Camp 2 is supported by a helipad that is used for emergency operations. A second helipad, operated by the City of Pasadena Police Department is located at 2175 Yucca Lane, southeast of Devil's Gate Dam (City of Pasadena, 2002). The EIR will analyze impacts to emergency response plans or emergency evacuation plans.

(h) The project site is located in an open space area with native and non-native vegetation existing on the site. Adjacent land uses are mostly urban, with some additional open space areas to the west and north. Due to the open space and existing vegetation, there is some potential for wildfire. Wildfire avoidance measures will be coordinated with the Pasadena Fire Department prior to sediment removal activities. Impacts related to wildland fires would be less than significant and no further analysis of this issue is required.

5.9. HYDROLOGY AND WATER QUALITY

9.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements?	☒	☐	☐	☐

9.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site.	☒	☐	☐	☐
(d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
(e)	Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
(f)	Otherwise substantially degrade water quality?	☒	☐	☐	☐
(g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
(h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
(i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
(j)	Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

5.9.1 Impact Analysis

(a) The California Regional Water Quality Control Board (RWQCB) is the authority in charge of protecting the water quality of surface and ground waters in the region. The proposed project would involve the removal of sediment that could cause the deterioration of water quality if sediment or excavation-related pollutants wash into the surface water system. Since the

proposed project site is greater than one acre, the proposed project would require the preparation and compliance with a Storm Water Pollution Prevention Plan (SWPPP), which would feature erosion control measures. In addition, the proposed project would require compliance with the Storm Water Construction Activities General Permit and obtain a National Pollution Discharge Elimination System (NPDES) permit. The Hydrology/Water Quality Report, as well as the EIR, will further analyze impacts of the proposed project on water quality standards and waste discharge requirements.

(b) The proposed project does not involve the withdrawal of groundwater and would not increase the impervious surface area on the proposed project site. In addition, the proposed project would not increase the impervious surface area on the proposed project site. No impacts would occur and no further study of the issue is required.

(c) The proposed project involves the removal of sediment from the reservoir, which would alter the existing drainage pattern of the site. Due to the amount of sediment removal that is required and potential impacts to biological resources, a Streambed Alteration Agreement from the CDFG may be required. The EIR will further analyze impacts of the proposed project on erosion or siltation on- or off-site.

(d) The proposed project, in removing sediment and vegetation from the reservoir, will alter the existing drainage pattern of the site. Since the proposed project site is located within the reservoir behind Devil's Gate Dam, it is not expected to increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. In fact, the removal of sediment would reduce the potential for flooding. No impacts would occur and no further study of the issue is required.

(e) The storm water runoff from the proposed project site drains into the Arroyo Seco through the outlet works in the dam. As the proposed sediment removal is not expected to create or contribute runoff water, the proposed project would not exceed the capacity of existing or planned storm water drainage systems, nor would it significantly increase polluted runoff originating from the site. The proposed project would improve the reservoir's capacity for stormwater runoff. No impacts would occur and no further study of the issue is required.

(f) The proposed project involves removal of sediment from the reservoir. During the removal of and the hauling of the sediment, all applicable water quality requirements would need to be followed. The project would be required to comply with NPDES regulations and require the preparation and implementation of a SWPPP, which would avoid significant water quality impacts from sediment removal runoff. The EIR will further analyze impacts of the proposed project on water quality.

(g) through (h). The proposed project involves sediment removal from the reservoir, and would not involve any construction or placement of structures on the proposed project site. The proposed project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map. Therefore, no flood related impact would result, and no further study of the issue is required.

(i) The proposed project involves sediment removal from the reservoir behind Devil's Gate Dam, which will, in fact, decrease the risk of loss, injury or death involving flooding both above and below the dam. In its current state the reservoir has accumulated a large volume of sediment

behind the dam, which puts the surrounding communities at risk for potential flooding. The sediment removal will alleviate the heightened level of this risk. Therefore, the proposed project will not expose people or structures to a significant risk of loss, injury or death involving flooding; and no further study of the issue is required.

(j) The proposed project is located inland and is not within the vicinity of any large bodies of water. At designated instances the reservoir may hold water before releasing the runoff into the downstream Arroyo Seco; however this would be temporary and infrequent. The proposed project site located at the foothills of the San Gabriel Mountains, and may be subject to mudflow. However, the reservoir is designed to be able to retain runoff, sediment flow and debris from the upstream watershed. Therefore impacts will be less than significant; and no further study of this issue is required.

5.10. LAND USE AND PLANNING

10.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	☐	☐	☒	☐
(b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
(c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

5.10.1 Impact Analysis

(a) The proposed project site is located within the City of Pasadena, and shares borders with the City of La Canada-Flintridge and the community of Altadena. The proposed project site serves as a defining feature in the landscape as well as the community, and serves to provide recreational opportunities for many of the surrounding cities and communities. The proposed project involves sediment removal from the reservoir and would not change the existing land use. Although the site would be physically altered, it would remain as open space. Therefore impacts will be less than significant; and no further study of this issue is required.

(b) The proposed project site has a General Plan land use designation of Open Space and is zoned as Open Space (Pasadena, 1994). The adjacent land in Pasadena, La Canada-Flintridge, and Altadena is zoned Residential. The proposed project will not conflict with or require any change to the zoning or General Plan land use designations for the site.

Hahamongna Watershed Park is located within and adjacent to the project site. The Hahamongna Watershed Park is regulated by the Hahamongna Watershed Park Master Plan

(HWPMP) (City of Pasadena, 2003). The proposed project may delay or required changes in implementation of aspects of the HWPMP. An analysis of the proposed project's impacts on the HWPMP will be included in the EIR.

(c) As noted in Section 4 (f), the project site is not within a City-designated or County-designated Significant Ecological Area (SEA), habitat conservation plan, or natural community conservation plan (LACDRP 2011). No impact would result, and no further study of the issue is required.

5.11. MINERAL RESOURCES

11.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☒	☐	☐	☐
(b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☒	☐	☐	☐

5.11.1 Impact Analysis

(a) through (b). The proposed project site was once used for sand and gravel mining operations. However, all mining operations within the proposed project site ceased in December 1994. Since that time, actions have been taken to rehabilitate the basin from past mining operations. However, multiple areas remain disturbed due to the past mining operations. The City of Pasadena is responsible for assuring resource conservation in areas that contain significant mineral resources. These areas are designated on mineral land use classification maps that delineate Mineral Resource Zones (MRZs). The Devil's Gate Reservoir is designated MRZ-2. The MRZ-2 designation is for areas where there is adequate information that significant mineral resource deposits are present, or there is a high likelihood that significant mineral resources are present, such as sand, gravel, and stone (City of Pasadena, 2002). The proposed project would likely remove mineral resources as part of sediment removal activities. An analysis of the proposed project's impacts on significant mineral resources will be included in the EIR.

5.12. NOISE

12.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐

(b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
(c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
(d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
(e)	For a project located within an airport land use plan or, where such a plan had not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
(f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

5.12.1 Impact Analysis

(a) through (b). The proposed project involves the removal of sediment and vegetation from the site, as well as the hauling of the sediment and vegetation to various off-site locations for disposal. The sediment excavation, as well as the hauling of sediment away from the site could potentially disturb nearby sensitive receptors. These activities could also have the potential to expose sensitive receptors to groundbourne vibration or groundbourne noise. The Noise and Vibration Study, as well as the EIR, will analyze impacts of the proposed project on generation of excessive noise levels or excessive groundbourne vibration.

(c) After the proposed removal of sediment to restore reservoir storage capacity is complete, maintenance of the proposed project will involve annual inspection and periodic small-scale cleanout of sediment from the reservoir. These minor sediment removal efforts will result in a temporary increase in ambient noise levels in the project vicinity but would be periodic and temporary and would not result in a substantial permanent increase in ambient noise levels. Therefore no further study of this issue is required.

(d) The proposed project involves both the excavation and hauling of sediment and vegetation from the proposed project site. These activities would result in a temporary increase in ambient noise levels in the project vicinity. The Noise and Vibration Study, as well as the EIR, will further analyze impacts of the proposed project on temporary or periodic increases in ambient noise levels in the project vicinity.

(e) through (f). The proposed project site is not in the vicinity of any airports or airstrips. The nearest airport to the proposed project site is the Bob Hope Airport in Burbank, approximately 10.45 miles to the west. Further, the project does not involve a change in land use that would generate new residents or employment. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels. No further study of this issue is required.

5.13. POPULATION AND HOUSING

13.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
(b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
(c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

5.13.1 Impact Analysis

(a) The proposed project site is currently used by LACDPW for flood control. The proposed project involves restoration and maintenance of the existing reservoir and would not stimulate population growth; no further study of this issue is required.

(b) through (c). There is no housing located on the proposed project site. The proposed project site is currently used for flood control. No housing units or persons would be displaced as a result of the proposed project. The proposed project would have no impact on housing or populations that would require the construction of replacement housing elsewhere; no further study of this issue is required.

5.14. PUBLIC SERVICES

14.	PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services::	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Fire Protection?	☐	☐	☐	☒
(b)	Police Protection?	☐	☐	☐	☒
(c)	Schools?	☐	☐	☐	☒
(d)	Parks?	☒	☐	☐	☐
(e)	Other public facilities?	☐	☐	☐	☒

5.14.1 Impact Analysis

(a) through (b). Fire protection for the project area is currently provided by the Pasadena Fire Department. The Pasadena Fire Station that would respond to calls in the area of the proposed project site is Fire Station 38, located approximately 1.32 miles from the site at 1150 Linda Vista Avenue. Police protection is provided by the Pasadena Police Department located approximately 3.08 miles from the proposed project site at 207 North Garfield Avenue. Project activities may temporarily increase the need for fire protection services; however, avoidance measures will be coordinated with the Pasadena Fire Department prior to sediment removal activities to reduce the potential for accidental fire during project implementation. The proposed project is not expected to increase the need for police protection services as project activities would not change the existing land uses or increase the number of service calls. Impacts to fire and police protection services would not be significant; no further study of this issue is required.

(c) No impacts to schools are anticipated to result from project implementation, as populations will not be affected. As such, no new schools will need to be built as a result of the proposed project that would cause significant environmental impacts; no further study of this issue is required.

(d) The proposed project involves sediment and vegetation removal activities within the Hahamongna Watershed Park. The sediment and vegetation removal activities may have an impact on the existing recreational uses within the Hahamongna Watershed Park. The area is frequented by hikers, bicyclists, and equestrians. No new construction of parks would be required. However, the sediment and removal vegetation operations would occur over a period of approximately five years, and may affect recreational opportunities within the Hahamongna Watershed Park. This regional park provides recreational opportunities for many of the surrounding cities and communities and therefore, the EIR will further analyze impacts of the proposed project the park.

(e) No other public facilities are anticipated to be impacted by the proposed project; no further study of this issue is required.

5.15. RECREATION

15.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐	☐

5.15.1 Impact Analysis

(a) through (b). The proposed project involves sediment removal from within the Hahamongna Watershed Park. Existing recreational facilities include Oak Grove Park on the west side of the reservoir. Oak Grove Park includes an upper and lower terrace, and its facilities include picnic facilities, restrooms, an equestrian staging area, group picnicking facilities, an amphitheater, Oak Grove field, and a disc golf course. The proposed project would remove sediment and vegetation adjacent to both recreational facilities. In addition, there are multiple trails within the Hahamongna Watershed Park, for pedestrian, bike, and equestrian use. The proposed project, through the sediment and vegetation removal, could affect recreational uses within the Hahamongna Watershed Park. Other recreational facilities in the surrounding area include Friedman Field, Upper Arroyo Park, Charles White Park, and Loma Alta Park, all located within 1.5 miles of the proposed project site (Google Earth, 2011). These parks or recreational facilities could also be affected indirectly by the proposed project through a potential increase in use during project activities which would occur over a period of approximately five years. No long-term impacts are anticipated, as the proposed project will not induce population growth; however, short-term impacts could occur. The EIR will further analyze the impacts of the proposed project on recreational facilities.

5.16. TRANSPORTATION AND TRAFFIC

16.	TRANSPORTATION/TRAFFIC. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
(b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
(c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
(d)	Substantially increase hazards due to a design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐

16.	TRANSPORTATION/TRAFFIC. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(e)	Result in inadequate emergency access?	☒	☐	☐	☐
(f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☒	☐	☐	☐

5.16.1 Impact Analysis

(a) through (b). Implementation of the proposed project has the potential to cause an increase in traffic that could conflict with the performance of the circulation system and decrease level of service standards on the roadways. Construction workers would need to access the site during the various stages of the project. Sediment removal and hauling activities would take place over a period of approximately five years and would add traffic to the existing roadways. The Traffic Study, as well as the EIR, will further analyze impacts of the proposed project on the circulation system, congestion management program, and level of service standards.

(c) The proposed project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. The nearest airport to the proposed project site is the Bob Hope Airport in Burbank, approximately 10.45 miles to the west. Because the proposed project is over two miles from the nearest airport, the proposed project would not have any impact on air traffic patterns; no further study of this issue is required.

(d) The proposed project involves the removal of sediment and vegetation, and the hauling of that material to various off-site locations. The hauling of sediment will increase truck traffic on various streets and freeways in the vicinity of the proposed project. These impacts could be potentially significant. The Traffic Study, as well as the EIR, will further analyze impacts of the proposed project related to the increase of traffic hazards.

(e) The hauling of sediment will increase truck traffic on various streets and freeways in the vicinity of the proposed project. These impacts could be potentially significant. The Traffic Study, as well as the EIR, will further analyze impacts of the proposed project related to inadequate emergency access.

(f) The proposed project involves the removal of sediment from the reservoir behind Devil's Gate Dam.. This could impact trails within the reservoir that are used by pedestrians, bicyclists, and equestrians. Additionally, the hauling of sediment and vegetation away from the site would increase truck traffic on the streets and freeways in the vicinity of the proposed project. The increase in traffic has the potential to conflict with alternative transportation routes. The Traffic Study, as well as the EIR, will further analyze impacts of the proposed project on adopted plans, policies, or programs regarding public transit, bicycle, or pedestrian facilities.

5.17. UTILITIES AND SERVICE SYSTEMS

17.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
(b)	Require or result in the construction of new water or wastewater treatment facilities (including sewer (waste water) collection facilities) or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
(c)	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
(d)	Have sufficient water supplies available to serve the project (including large-scale developments as defined by Public Resources Code Section 21151.9 and described in Question No. 20 of the Environmental Information Form) from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
(e)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
(f)	Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
(g)	Comply with federal, state, and local statutes and regulations related to solid wastes?	☐	☐	☒	☐

5.17.1 Impact Analysis

(a) through (b). The proposed project would not directly generate wastewater, and thus would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. Additionally, the proposed project would not require the use of water or wastewater treatment facilities, as the proposed project would not involve long term water use or wastewater generation. Therefore, the proposed project would not have significant impacts on wastewater treatment requirements, or water or wastewater treatment facilities. No further study of this issue is required.

(c) The proposed project involves the removal of sediment and vegetation from the proposed project site to restore a portion of the original storage capacity within the reservoir. The impacts associated with the improvements to an existing facility will be examined in the EIR.

(d) The proposed project does not involve the long term use of water supplies. The proposed project would not require new or expanded water entitlements; no further study of this issue is required.

(e) The proposed project would not produce any wastewater or require expanded wastewater treatment capacity. No further study of this issue is required.

(f) As part of the proposed project, sediment that is not hauled to a SPS, would be hauled to the Waste Management Facility in Azusa. The Waste Management Site – Azusa Land Reclamation Landfill is permitted to accept up to 6,500 tons per day (tpd) of non-hazardous waste and has over 66 million cubic yards of capacity remaining. The Waste Management Facility also has an agreement with the LACDPW to accept 4.5 million tons of sediment until approximately 2028 (CalRecycle, 2011). The vegetation removed as part of the proposed project would be hauled to the Scholl Canyon Landfill in the City of Los Angeles. The Scholl Canyon Landfill has an estimated 20% of its capacity remaining, over 12,000,000 cubic yards, and its estimated closure date is December of 2024 (CalRecycle, 2011). These sites all have adequate storage capacity for the sediment and green waste that will be disposed of as part of the proposed project. There would be a less than significant impact on landfills; no further study of this issue is required.

(g) The sediment, vegetation, and any other materials disposed of would be required to comply with all federal, state, and local statutes and regulations related to solid waste. As the proposed project would comply with these existing regulations, it would ensure a less than significant impact in regards to solid waste regulations. No further study of this issue is required.

5.18. MANDATORY FINDINGS OF SIGNIFICANCE

18.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐

18.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	☒	☐	☐	☐
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

5.18.1 Impact Analysis

(a) As mentioned in sections 5.4 and 5.5, the proposed project, due to the scale of the sediment removal, has the potential to affect both biological and cultural resources on the proposed project site. The Biological Resources Report and Cultural Resources Report, as well as the EIR, will further analyze the proposed project impacts on the quality of the environment, wildlife and plant populations, and important examples of the major periods of California history or prehistory.

(b) Due to the scale and location of the project, the proposed project has the potential to result in significant cumulative impacts. Both the sediment removal and sediment hauling could occur at the same time as other projects in the area, and the incremental effect could result in potentially significant impacts as the impacts could be cumulatively considerable. This issue will be further analyzed in the EIR.

(c) Both the sediment removal and sediment hauling activities have the potential to result in substantial adverse effects on human beings, either directly or indirectly. The excavation and hauling activities of the proposed project would generate air pollutants, noise, and traffic volumes that would directly and indirectly impact the nearby residents, recreational users, and travelers on the haul routes. Further analysis of the proposed project's impacts on human beings will be provided in the EIR; and the EIR will examine ways to minimize potential impacts through project design and the use of mitigation measures, to the extent feasible.

SECTION 6.0 – SOURCE REFERENCES

The following is a list of references used in the preparation of this document.

1) *California Department of Transportation (Caltrans), California Scenic Highway Mapping System. Accessed online July 2011 at http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm.*

2) *California Geological Survey. Alquist-Priolo Earthquake Fault Zone Maps. Accessed online July 2011 at http://www.quake.ca.gov/gmaps/ap/ap_maps.htm.*

3) *CalRecycle. California Department of Resources, Recycling, and Recovery. Active Landfills Profile. Accessed online July 2011 at http://www.calrecycle.ca.gov/profiles/Facility/Landfill/.*

4) *CEQA Guidelines*. CCR Title 14, Division 6, Chapter 3, Section 15381, 2008.

5) *City of Pasadena. Planning Division. City of Pasadena General Plan. 1994.*

6) *City of Pasadena. Arroyo Seco Master EIR. May 2002.*

7) *City of Pasadena. Hahamongna Watershed Park Master Plan (HWPMP). September 2003.*

8) *Farmland Mapping and Monitoring Program (FMMP). California Resources Agency. Accessed online July 2011 at ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2008/.*

9) *Google Earth, 2011.*

10) *Los Angeles County Department of Regional Planning (LACDRP). "Significant Ecological Areas" figure. December 2009.*

11) *Los Angeles County Department of Regional Planning (LACDRP). Los Angeles County Draft 2035 General Plan. April 2011.*

SECTION 7.0 – REPORT AUTHORS AND CONSULTANTS

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Meghan Directo
Associate Environmental Planner

APPENDIX A2 – Notice of Preparation

NOTICE OF PREPARATION

TO: Agencies, Organizations and Interested Parties

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report in Compliance with Title 14, Section 15082(a), 15103, and 15375 of the California Code of Regulations

The Los Angeles County Flood Control District (LACFCD) is the Lead Agency under the California Environmental Quality Act (CEQA) in the preparation of the Environmental Impact Report (EIR) for the project identified below. The Lead Agency has prepared this Notice of Preparation (NOP) for the EIR in order to provide the widest exposure and opportunity for input from public agencies, stakeholders, organizations, and individuals on the scope of the environmental analysis addressing the potential effects of the proposed project.

PROJECT TITLE: Devil's Gate Reservoir Sediment Removal and Management Project

AGENCIES: LACFCD requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the proposed project, in accordance with California Code of Regulations, Title 14, Section 15082(b).

ORGANIZATIONS AND INTERESTED PARTIES: LACFCD requests your input on which environmental issues associated with the proposed project which merit further analysis in the EIR.

PROJECT LOCATION: The Devil's Gate Reservoir Sediment Removal and Management Project is located in the City of Pasadena, in Los Angeles County approximately 14 miles north of downtown Los Angeles (see Figure 1, Project Vicinity Map and Figure 2, Project Boundary Map).

PROJECT DESCRIPTION: The proposed project would remove up to 4.0 million cubic yards of sediment from the reservoir behind Devil's Gate Dam to restore it to its current design standard, and establish a reservoir configuration more suitable for routine maintenance activities including sediment management. Although approximately 2.6 million cubic yards of sediment is the current excess amount of sediment in the reservoir, additional sediment accumulation is anticipated during the upcoming storm seasons due to the burned condition of the watershed that will have to be removed. The ultimate reservoir configuration and volume of sediment to be removed will be determined based on locations of access roads; areas for preservation or restoration of native vegetation; and the amount and location of sediment inflow that occur during the upcoming storm seasons.

Over the years, as storm events deposited sediment in the reservoir, native and non-native vegetation established itself in the sediment deposits. During storm events following the Station Fire, a large portion of the reservoir vegetation was buried in sediment; however significant amounts of vegetation, including numerous mature willow trees remain present. In order to remove the sediment from the reservoir, vegetation growing within excavation areas will require removal. The sediment and organic materials will be trucked off-site via local roads accessing the 210 Freeway and then taken to sites that are already prepared and designated to accept such material without additional construction or vegetation and habitat removal.

The goal of this project is to return adequate flood control capacity to the facility and establish a reservoir configuration more suitable to Los Angeles County Department of Public Works' routine maintenance activities. Primary project objectives include:

- Reducing flood risk to the communities downstream of the reservoir adjacent to the Arroyo Seco by restoring reservoir capacity for flood control and future sediment inflow events;

- Supporting sustainability by establishing a reservoir configuration more suitable for routine maintenance activities including sediment management;
- Removing sediment in front of the dam to facilitate an operational reservoir pool to reduce the possibility of plugging the outlet works with sediment or debris during subsequent storm events;
- Removing sediment placed at Johnson Field during the Devil's Gate Reservoir Interim Measures Project;
- Supporting dam safety by removing sediment accumulated in the reservoir in a timely manner to ensure the ability to empty the reservoir in the event of a dam safety concern.

PROJECT SCHEDULE: The proposed project is expected to occur between Spring 2014 and Winter 2019. Excavation and associated activities within the reservoir area is expected to take place during dryer months, from April to December, Monday through Saturday (except on holidays), as weather permits. Activities will take place between the hours of 7:00 a.m. to 7:00 p.m. on Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturday. Removal of sediment and organic materials off-site is expected to take place between these hours but specific hours may be further defined to avoid sensitive travel times.

POTENTIAL ENVIRONMENTAL EFFECTS: LACFCD has prepared an Initial Study that describes the potential environmental effects of the proposed project. Based on the conclusions of the Initial Study, it has been determined that an EIR is the appropriate level of environmental documentation. The topic areas to be discussed in the EIR are Aesthetics, Air Quality/GHG Emissions, Biological Resources, Cultural Resources, Geology/Soils, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Public Services (Parks), Recreation, and Transportation/Traffic. The EIR will include the provision of alternatives.

PUBLIC SCOPING PERIOD: LACFCD has determined to make this NOP and Initial Study available for public review and comment pursuant to California Code of Regulations, Title 14, Section 15082(b). *LACFCD will accept written comments for the NOP regarding the scoping of the EIR between September 28, 2011 and November 11, 2011.* The LACFCD will hold two public scoping meetings to allow the agencies and members of the public to provide input on which environmental issues merit further analysis in the EIR. These scoping meetings will occur on **Wednesday, October 5, 2011** at 6:30 p.m. in the Rose Bowl Locker Room (1001 Rose Bowl Drive, Pasadena, 91103, park in Lot F, enter at Gate A) and **Saturday, October 15, 2011** at 9:00 a.m. in the La Canada High School Cafeteria (4463 Oak Grove Drive, La Canada, 91011).

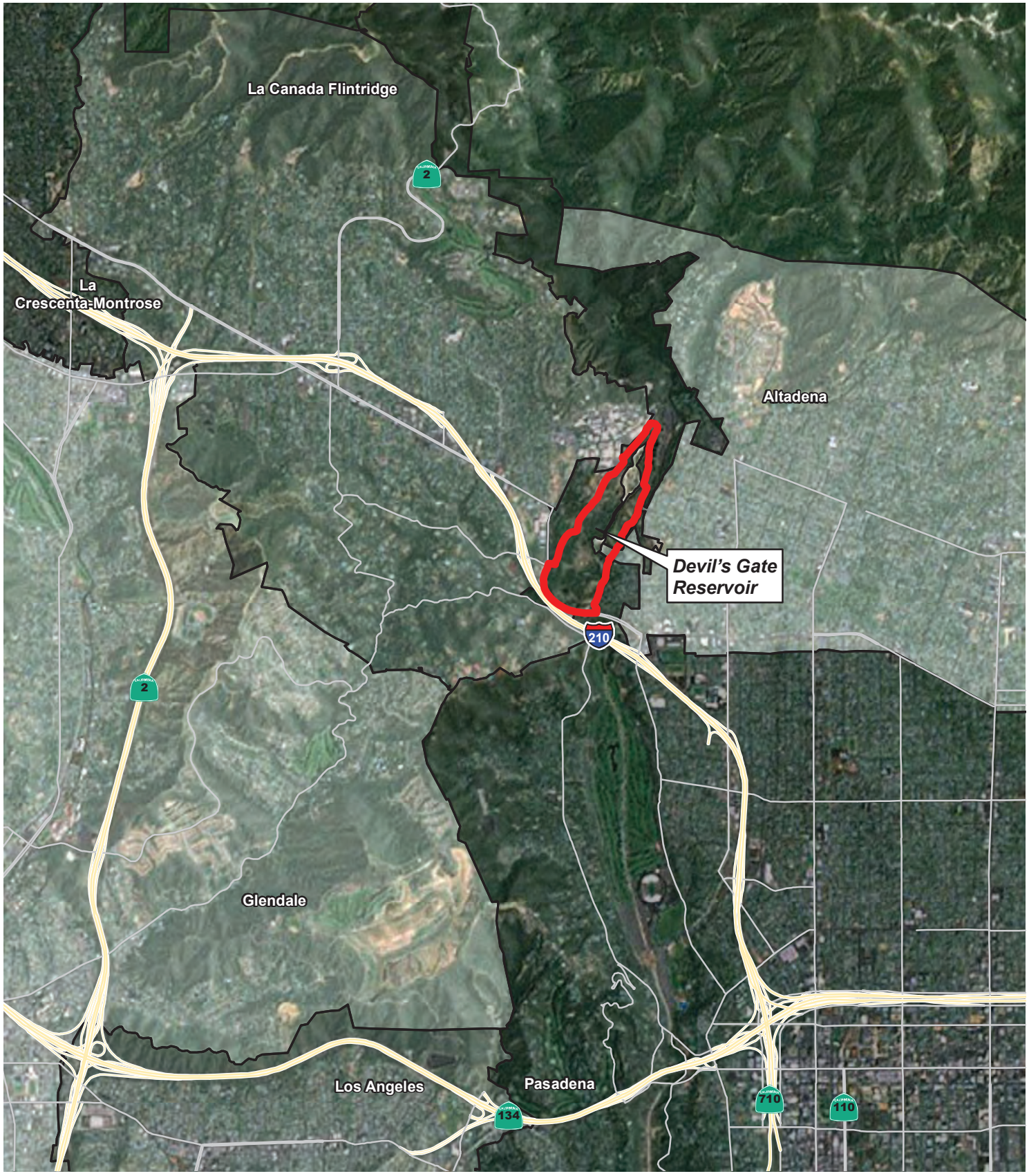
RESPONSES AND COMMENTS: Please indicate a contact person for your agency or organization and send your comments to:
Los Angeles County Department of Public Works
Attn: Water Resources Division – Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974

Your comments may also be sent by FAX to (626) 979-5436 or by email to reservoircleanouts@dpw.lacounty.gov and include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line.

DOCUMENT AVAILABILITY: The Initial Study is available for public review during regular business hours at the locations listed below.

- Linda Vista Library, 1281 Bryant Street, Pasadena, California
- Pasadena Central Library, 285 East Walnut Street, Pasadena, California
- San Rafael Branch Library, 1240 Nithsdale, Pasadena, California
- Altadena Library District, 600 East Mariposa Street, Altadena, California
- Bob Lucas Memorial Library, 2659 Lincoln Avenue, Altadena, California
- La Canada Flintridge Library, 4545 North Oakwood Avenue, La Canada Flintridge, California
- Irwindale Public Library, 5050 Irwindale Avenue, Irwindale, California
- County of Los Angeles Department of Public Works, 900 South Fremont Avenue, Alhambra, California

In addition, the NOP/IS is available online at the website (www.lasedimentmanagement.com/devilsgate).



Legend

Proposed Project Site

City Limit

N
W E
S

1:50,000

0 0.5 1
Miles

Figure 1
Project Vicinity Map

Chambers Group Inc.

Figure 2
Project Boundary Map

APPENDIX A3 – Scoping Comments

SCOPING COMMENTS & SCOPING SUMMARIES

FOR

DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS

DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT
WRITTEN SCOPING COMMENT SUMMARIES

Alison Snow

- Only remove the amount of sediment necessary to maintain downstream safety.
- Disturb as little as possible of the natural environment in the watershed.
- Investigate any and all alternatives possible for future sediment removal and initiate long range comprehensive planning strategies to avoid the need for future digging and trucking of sediment.

Allen and Mignonne Decker

- Please leave Devil's Gate Dam the way it is now.
- We don't want parking lots, a soccer field, and modern improvements.

Altadena Town Council – Harold J. Bissner III, Corresponding Secretary

- Altadena Town Council unanimously voted to support Route 2 (from Oak Grove to Berkshire to the 210 Freeway) for the removal of sediment.
- The motion was introduced by Councilman Shackelford.

Arroyo Seco Foundation – Tim Brick, Managing Director

- Sustainable and long-term approach is necessary for flood protection and the health of the watershed.
- Sediment is not waste, it is a valuable natural resource.
- All impacts to habitat, wildlife, and humans from the proposed project should be evaluated.
- Evaluate an alternative that restores the downstream watershed, and that minimizes impacts.
- The project description should give a detailed description of sediment removal and management.
- Water resource management should be included with sediment management.
- Stream restoration alternative for the Arroyo Seco should be included
- Sensitive habitat that needs to be protected includes riparian habitat, riversidian alluvial scrub, wetlands, and a pond marsh.
- Use the Arroyo Seco channel to transport sediment downstream.

- Consider an alternative to trucks to move sediment from the basin to a truck loading area outside the basin
- Evaluate the relationship between the Devil's Gate Project and the Los Angeles River Watershed.
- Evaluate low-impact/Green building design, SMART and LID development.
- Address sediment and storm water as valuable resources of the Arroyo Seco basin
- Study the natural sedimentation process
- Review previous studies such as the "Flood Hazard Sediment Management, And Water Feature Analysis, Hahamongna Watershed Park," (Philip Williams & Associates Study, 2000) and the Army Corps of Engineer's Arroyo Seco Watershed Ecosystem Restoration Study.
- Evaluate the effectiveness and environmental impact of Devil's Gate Dam
- Educate the public to understand the natural processes involved in the Devil's Gate Dam.
- Consider using low-emission vehicles for the transport of sediment.

Arroyo Park Estates Home Owner's Association – Pat Merrill, President

- The need for the project is understood, but a more expeditious and feasible alternative should be found rather than the three-year, 400,000 truck current option. With the amount of trucks, there will be added noise, dust, and traffic.
- Route 2 (from Oak Grove to Berkshire to the 210 Freeway) is the preferred route, rather than using neighborhood streets.

Asif Ahmed

- Is a member of the Winsor Arroyo Homeowners Association, and is opposed to the sediment removal project.
- Agrees with the interim project to clear debris from the front of the dam, but is opposed to thousands of trucks destroying important habitat over the next three years. It would be similar to someone driving a bulldozer through your backyard.
- The Hahamongna basin has become a rare habitat and sanctuary for families, hikers, naturalists, and others. Real wildlife lives in the basin, and people go there to enjoy it.
- Instead of destroying this resource, please look at other alternatives.

Betsy Bour, Friends of Hahamongna

- The Friends of Hahamongna is an advocacy group dedicated to protecting the Hahamongna Watershed Park.
- The now proposed four million cubic yards is a significant increase from the original 1.7 million cubic yards of removal that was the original plan. Limit the amount of debris removed to only what is necessary to protect the operation of the dam and manage the flood waters. Then, the removal effort could be supplemented with an ongoing maintenance plan to remove new sediment as necessary.
- The existing Master Plan and cumulative projects should be considered in the planning process for this project. DPW should also review and respect the concerns of the Spirit of the Sage Council as stated in the legal settlement with the City of Pasadena.
- Although the sediment removal initiative overlaps with some of the projects in the Master Plan, however the County should recognize that some of the elements of the Master Plan were controversial such as roads, paved surfaces, and multi-purpose playing fields. Therefore, the Friends of Hahamongna urges the County to not co-mingle projects related to the Master Plan.
- Hahamongna Watershed Park provides habitat for many species including blue heron, egrets, mallard ducks, and many reptile species. Since the habitat destruction that occurred during the Station Fire, the

need for habitat has increased. Preservation of habitat should be a priority when developing the project scope and assessing impacts.

- Alternatives to trucking, such as sluicing, should be considered. Trucking activity within the basin should be minimized, and could be achieved by conveyance of the sediment from the northern portion of the reservoir to the southern portion. Environmental review should be performed on this and any other feasible alternatives.
- For aesthetics, the proposed project would degrade existing scenic resources and visual character both in the short-term and long-term. In addition, portions of the site are visible from private property on the eastern edge of the basin.
- For air quality, impacts would include airborne dust from grading and dirt hauling, and gaseous emissions from heavy equipment, hauling trucks, and employee vehicles. Pollutant concentrations, especially carbon monoxide, would increase due to an increase in traffic in the immediate vicinity of the project. The degraded air quality could impact schools, playing fields, and residences.
- For biological resources, the project would modify habitat and impact species found in the basin, and there would be a substantial adverse impact on riparian habitats and other sensitive natural communities. Migratory wildlife species and wildlife corridors would also be adversely affected.
- For cultural resources, buried resources could be encountered during excavation.
- For geology and soils, the project could result in soil erosion, loss of topsoil, changes in topography, or unstable soil conditions due to excavation and grading. There could also be impacts from fault surface rupture, liquefaction, and unstable slopes.
- For hazardous materials, impacts to the public could result from potential vehicle fueling onsite, servicing construction equipment onsite, and transporting fuels, lubricating fluids, and solvents. Construction workers could be exposed to contaminated soil or water near the Superfund site in the northwest portion of the basin.
- For water quality, the project would alter the existing drainage pattern of the area, including the alteration of the course of a stream. Construction activity could impact water in the basin and in the spreading ponds along the eastern edge of the basin.
- For noise, high noise levels would be generated during sediment removal, and the excavation and hauling activities would disturb nearby residents as well as schools in the area.
- For recreation, existing recreational activities would be impacted from the closure of trails, and potential long-term impacts could result from the sediment management plan.
- For transportation and traffic, the substantial number of truck trips in and out of the basin would affect the surrounding streets, as well as the freeways and streets used to transport the sediment to other sites. The impact analysis needs to address disruption of normal traffic flow to area schools, JPL, and the Rose Bowl during events.
- For utilities and service systems, there would be impacts to the storm drain system due to construction activities necessary for repair and renovation of the drains. There are also power lines and phone poles located on the proposed project site that could potentially be impacted.
- Use the Friends of Hahamongna as a resource, as they have extensive knowledge of Hahamongna Watershed Park and the history of past projects and controversy.

Carla Bollinger

- Need to balance the need to remove sediment with the need to protect the natural areas.
- The County should minimize the removal of sediment to enable water flow to minimize destruction within Hahamongna Park.
- Alternative structures or mechanisms need to be developed to better control sediment flow. Ongoing systematic removal is a better alternative than complete destruction of habitats and open space.

City of La Canada – Flintridge – Erik Zandvliet, City Traffic Engineer

- The City of La Canada – Flintridge has ownership over the main haul routes intended to be used by this Project. Multiple sensitive receptors occur along those routes. The City requests to be fully involved in the preparation of the EIR.
- The City asks for the ability to review scoping documents for all elements of the EIR prior to County approval to ensure critical impacts are correctly analyzed.
- Any hauling or construction activities that use streets in La Canada Flintridge will require a Haul Route Permit, and other permits that impose special conditions on days, times, and frequency of truck trips.
- An alternatives analysis should be done for alternative haul routes, including splitting in-bound and out-bound trips on different streets. The City will not allow hauling on Foothill Boulevard or on Oak Grove between Foothill Boulevard and Oak Grove adjacent to several schools.
- The high number of truck trips will accelerate the deterioration of the roadways used along the truck route; therefore the project should include reconstruction of the roadways or other measures.
- The potential impacts from the permanent access road need to be evaluated.
- Long term impacts of ongoing sediment management need to be addressed in the EIR.
- The Traffic Study should include a LOS analysis for any stop intersections in the area. Mid-day analysis (2-4pm) should also be completed. JPL work shifts, bus schedules, school schedules, and an ambient growth factor need to be considered.
- A hauling and construction management plan should be required as a mitigation measure
- Construction parking will need to be identified, as well as analyzing cueing at ramps, left-turn pockets, and staging areas.
- Maximum hauling frequencies need to be identified and construction area traffic control. All traffic signals along the proposed haul route need to be analyzed to see if they can handle the additional truck volume.
- A full Air Quality Analysis needs to be completed, including particulate matter from diesel engines.
- A full Noise Study needs to be completed, with special attention given to the proximity of schools and other sensitive noise receptors.

City of Pasadena – Julie A. Gutierrez, Assistant City Manager

- The City of Pasadena is a responsible agency pursuant to CEQA.
- The adopted Hahamongna Watershed Park Master Plan should be consulted regarding the proposed project and any alternatives.
- Regarding light and glare, there will need to be an evaluation of the impacts to wildlife if lights are to be used during the dark hours.
- The City's Green Action Plan outlines goals to reduce greenhouse gas emissions; this plan should be considered and evaluated.
- The Project's impact to fire does need to be evaluated for work in the summer months, as it is designated a high fire zone by the LA County and Pasadena Fire Departments.
- The City feels that security issues do need to be addressed, since the construction contractor will retain a presence on site during non-construction times.
- Sending green waste to a landfill is not consistent with the City's Green Action Plan to reduce waste, other options than the landfill should be considered.
- There should be coordination between LACDPW, the City of Pasadena, and the Rose Bowl Operating Committee to ensure that there will be no impacts to Rose Bowl events.
- Coordination between the City and County regarding haul routes needs to be completed to ensure the protection of neighborhoods and to minimize traffic conflicts.

- The City supports sustainable sediment management plans for Hahamongna as well as the central and lower arroyos.
- The County should consider secondary downstream impacts.
- The City has several approved projects on-site that may help reduce impacts from the sediment removal.
- In anticipation of loss of habitat the County should consult the HWPMP for appropriate mitigation. The EIR should be consistent with the Arroyo Seco MEIR and HWPMP, especially in reference to the biological communities.
- The LACDPW needs to protect the infrastructure of Pasadena's Tunnel Water is the southeast quadrant of the dam, near the basin.
- Cumulative impacts should consider the following projects: JPL's proposed parking structure and the newly funded IRWMP projects in the basin and upper Arroyo Seco.
- Any impacts to the adjacent oak woodland needs to be evaluated.

Claudette E. Buddie

- Will the removal of sediment negatively impact human health?
- Wants the haul route to be from Oak Grove to Berkshire to the 210 Freeway.

Constance Brines

- Understands that sediment must be removed for flood control, but any impact to the natural Hahamongna environment should be minimized.
- No new development should be implemented in the Hahamongna Watershed area.

Cosmo Bua

- Only long-range, comprehensive, area-wide solutions should be considered. We need to preserve the natural environment that is remaining in the area. The destruction of the Arcadia Woodlands brought these issues to the public's attention.

County of Los Angeles Fire Department – John R. Todd, Chief, Forestry Division

- Since the project is entirely within the City of Pasadena, so City of Pasadena Fire Department has jurisdiction. It is not a part of the emergency response area for the Los Angeles County Fire Department.
- The project is in close proximity to the jurisdictional area of the Los Angeles County Fire Department, but is unlikely to have a negative impact.
- Potential impacts to erosion control, watershed management, rare and endangered species, vegetation, fuel modification, archaeological and cultural resources, and the County Oak Tree Ordinance should be discussed in the EIR.

Dana Kennedy

- Understands that the issue of sediment removal does need to be addressed. The bigger concern is how to address the issue.
- Trucking large amounts of sediment out is the easy option. Instead, alternatives seriously need to be considered in order to solve the problem creatively, and in a less damaging way.
- Sluicing feasibility should be considered, letting natural processes carry the sediment to the sea.
- Hopes that the sediment at Johnson Field will be removed at some point in the relatively near future.

Darren Dowell – on behalf of Pasadena Audubon Society

- Sent a list of bird sightings in Hahamongna, including rare species and California Bird Species of Special Concern.
- Sent observations of recent bird nesting activity in Hahamongna
- Requests that impacts on birds and other wildlife be minimized, by scheduling work outside of the nesting season, minimizing the disturbance of habitat, and using appropriate and local mitigation.

Department of Water Resources Division of Safety of Dams – Michael Waggoner, Chief

- Based on the project description, maintenance work will not affect the safety of the dam, provided that the work does not occur within ten feet of the dam or other appurtenant structures.
- If alterations or modifications to the dam are necessary, an alteration application must be filed along with plans and specifications.

Dianne Patrizzi

- Wonders if a deep channel with living levee walls could be constructed to move depending on water flow activity based on levees that move based on seismic activity. If this is used for the Devil's Gate project maintenance will be confined to the channel. Additionally, sediment will be allowed to reach the ocean, where it is needed.
- The proposed channel with living levees would also have a serpentine alignment through the reservoir.
- Included attachments of other projects, reports that outline this "sliding levee" plan.

Don Bremner, Chair, Hahamongna Watershed Park Advisory Committee

- Because the project is so important, the EIR should address some alternatives that seem unlikely or unfeasible.
- The project should minimize downstream flooding risks.
- Be consistent with the Hahamongna Master Plan, preserve habitat and wildlife, improve opportunities for recreation, improve water conservation, minimize noise, dust, and pollution impacts, be feasible, and maintain a long term management plan.
- Alternatives that should be considered include using a conveyor belt system, using natural gas or electric vehicles, reduce the size of the excavation, excavate sediment at the northern end of the reservoir, do more sluicing, consider using sediment for beneficial uses, and look at cost feasibility.

Doris L. Stewart

- Windsor should be used for hauling since other streets are too narrow for heavy trucks.

Gabrieleno Band of Mission Indians – Christina Swindall Martinez, Secretary

- The Arroyo Seco basin is an extremely culturally sensitive area. In 1826, a massacre occurred in the Arroyo Seco, and evidence of this massacre has been found in the area.
- The tribe's history is very rich in the area, and the tribe is requesting one or more of their certified monitors to be onsite during ground disturbing activities.

Grace Wong

- The removal of sediment will leave the basin barren and destroy valuable natural habitat.
- Trucking out sediment is not a viable, long-term solution.
- Best practices and new technology should be used.

Gregg Oelker

- Has lived in Pasadena for 35 years, and has lived adjacent to Hahamongna Park for 20 years, with the park bordering his backyard. As residents, they use the park for hiking and biking every weekend, and enjoy the trails and animals within the reservoir. The recent fires have greatly changed the watershed.
- The forest near the dam is full of wildlife and should be preserved. There are many birds, rabbits, coyotes, foxes, and other wildlife. This area developed because the agency didn't remove sediment for years; why was nothing done before now? The area should be left in the natural state that it has developed into.
- Somewhat supports removal at the face of the dam and in areas further upstream since the sediment from the fire filled a canyon that used to be 15 to 20 feet deep. This upstream area that used to be a natural streambed should be focused on to recreate the stream to its original depth, then perhaps one-tenth of the four million cubic yards could be removed. Reducing the amount of sediment removal would reduce some of the concerns with noise, pollution, and number of trucks.
- If a smaller amount of sediment upstream were removed, then nature could return to the canyon that was once present. Then the County needs to be able to maintain the area, and remove sediment on a schedule. Shouldn't wait for a disaster in order to take action.
- The natural area that has developed should be left alone; and efforts should be focused on the sediment, not nature. Would like a more environmentally friendly and sustainable plan.

H. Guido Meindl

- Although there is a lot of uproar about this project, the debris needs to be removed to maintain the basin's primary function. Overall, the inconvenience is a small price to pay for adequate flood control.

Hill Penfold

- Remove only the amount of sediment necessary to maintain the safety of downstream areas.
- Preserve as much of the natural habitat as possible.
- Begin a long-range comprehensive study of alternatives for sediment removal including the upper watershed and downstream channels and the other 14 dams. Look into different transportation models for sediment removal.

Hugh Bowles – Hahamongna Watchdog Group

- There should be a strong focus on finding less impactful alternatives in the EIR.
- The County needs to issue a RFP to find a qualified hydrological consultant to find a less impactful alternative than the four million or two million cubic yards of sediment removal. Phillip Williams and Associates and Flow Science should be consulted.
- Included a scope for a hydrological consultant.
- The County's original proposal to allow sediment to flow into a smaller area with planned periodic cleanout should be looked at.
- What was the impact of lowering the spillway? What's the ability of the Arroyo Seco to handle spillway flow? What role do willow trees play in slowing intense storm flows and preventing large debris from getting to the dam? What's the chance of having another large flow of sediment into the basin in the next 5 to 20 years?
- The EIR should include a mitigation and restoration plan, with associated costs, budget, and a commitment to follow through. Objectives and benchmarks need to be outlined, as well as designating experts to monitor the restoration and mitigation.

- As part of the City of Pasadena's approval to use Johnson Field, the County was required to repair damage to a trail that had eroded due to a leaky storm drain. This trail was repaired, but the storm drain was not, and the erosion continues. The County needs to follow through with mitigation.
- The EIR must show a full budget, and all sources of funding for the project.
- The EIR needs to outline an ongoing maintenance plan and budget after removal takes place.

Jack Lindblad

- Remove only the amount of sediment needed to maintain downstream safety.
- Preserve as much of the surrounding woodland environment as possible. No oak removal.
- Begin a long-range comprehensive study for this and the other 14 dams.
- Sediment is not a waste product, it is necessary for habitat, river and beach nourishment, fills valleys and coastal plains and could be used for construction purposes.
- Different transportation models need to be studied for sediment removal. Hahamongna is a vital link between the upper and lower Arroyo Seco watershed.
- The current sediment management system fails due to costs, human health risks, and denying downstream systems of sediment.
- This project is an opportunity to set a new paradigm. Pursue sediment management options that apply bio-mimicry, promote SMART development, apply prudent land use regulations, lowered impact development, and a carbon-neutral building design.

Jaime Parker

- Opposed to the continued debris removal in the Hahamongna Watershed, lives only a few houses from the entrance to the watershed on La Canada Verdugo Road. Offended that 400,000 truck trips over the next three years is being considered as the plan.
- Many families use the watershed every day, and having to deal with the noise, number of trucks, and pollution is "unacceptable."
- The watershed is an extension of many people's backyard, and it is used by hundreds of people everyday by walkers, bikers, naturalists, and runners, who are inconvenienced and annoyed by the ongoing construction. The construction disturbs the natural beauty and wildlife habitat that both humans and wildlife use the watershed for.
- This proposed project is very "close to home" for the residents surrounding the reservoir, and will have a large impact on the community.

Jake Robbins – Advocacy for Pacoima Canyon

- The sediment removal project should preserve the wildlife habitat, especially oak woodlands. Contact biologists to survey for any rare and endangered species.
- Only remove the amount of sediment necessary to preserve downstream safety.
- Conduct a thorough study of methods of sediment removal.

Jill Boddie

- Will the hauling times be controlled to avoid peak commuting hours?
- How much sediment will be removed per day?
- Will the trucks be low-emission fuel vehicles since diesel is harmful to human health?
- What will be the long-term management process to prevent future build-up of sediment?

Laurel Beck

- A long term study of alternatives needs to be completed to include all the dams under the County's supervision.
- The amount of sediment removed needs to be reduced, since preserving natural areas is of much importance. It is just as important as saving lives or saving money.

Laurie Barlow

- A long term study of sediment management is needed instead of short-term, costly remedies.
- Dam reconstruction would allow natural ecosystems to be restored.
- Natural flood plain protection could be attained through restoring wetlands and floodplains, and restoring the natural flow of a river's meandering channel.
- The County should partner with professionals and non-profits to create a strategic plan. Reconstruction and modification of the dam will allow water to carry the sediment downstream. A floodplain easement program could minimize flood impacts, and could store water for beneficial uses.
- Check dams upstream can be used for sediment, water contaminants and garbage catchment.

Madeline Schleimer

- The excessive use of dams and concrete channels has diverted water from the aquifer, and sand for beaches or stream banks.
- Stream restoration is important to consider along with sediment management.
- Check dams and paved channels isolate the larger community from the natural system.
- The removal of sediment will not address the concerns of alluvial buildup or restoring water to the aquifer.
- The truck trips transporting sediment will further increase air pollution in the communities between Pasadena and Irwindale.
- Consultation should be done with professionals and public agencies to better understand sediment and watershed management as well as ecosystem recovery.
- Waterways should be restored to their original condition as much as possible.

Mark Hunter

- How is the sediment in the reservoir an emergency all of the sudden, even though the sediment has been accumulating for years? Shouldn't the project address a smaller, emergency amount and then have a separate project address the remainder of the sediment?
- Why does the reservoir need to accommodate two worst case storm events? Perhaps it would make more sense to use reality instead of models.
- Sluicing is the easy, natural, and lower impact way to deal with the problem. The process is quiet, can occur 24/7, does not impact traffic, and does not impact air quality. Has the DPW calculated the amount of sediment the Arroyo Seco could carry? This should be included in the EIR.
- The City of Pasadena diverts water above Hahamongna; what if they didn't divert the water? Could the County use this for sluicing and reimburse the City for the water replacement costs? Or are there other sources of water to aid in sluicing, such as using reclaimed water?
- How have other jurisdictions handled sediment management in alternative ways?

Markus Klemm

- Every year, in the summer time, the reservoir is used to educate children about nature. This experience could be harmed by the removal of sediment and natural habitat. The park needs to be preserved for recreation, education, and retaining natural habitats.

- If the sediment is removed in smaller portions, perhaps the park could still be used for recreation. This would promote re-growth of natural habitat rather than invasive species.
- Many people use the reservoir for recreation purposes, and keeping people out of the area for the five year duration of the project would not be a good option.

Marnie Gaete – Fund for Wild Nature

- The wetland habitat is unique to the area and should be completely protected. Taking all the sediment out of the reservoir will eliminate any chance for wildlife to exist there.
- The project will impact the schools, equestrian centers, the proximate community, and the people that use the reservoir for recreation.
- The pollution from the truck trips will negatively impact human health.

Mary E. Barrie

- There is no disagreement that the sediment needs to be removed. However, a comprehensive study needs to be done to study the methods for all 14 dams looking at different transportation models for sediment removal.
- The alternative should protect Hahamongna's diverse and important habitats, while protecting the air quality of the surrounding communities. The County should remove enough sediment to protect public safety, but not heavily impact the natural resources. Mitigation should be done in Hahamongna.
- Alternatives such as conveyor belts, sluicing, launching, and other techniques should be considered. Look at options regarding fewer trucks.
- The project should not facilitate future development within the park, including future roads.
- Other projects being considered in the park need to be considered for the cumulative impacts. These projects include the Sycamore Grove Multi-Purpose Field, an expanded parking lot, the Westside Perimeter Trail, and the restoration of Berkshire Creek, spreading basin development on east and west sides, a pump system from Devil's Gate reservoir to the spreading basins and Eaton Canyon.
- In order to lessen truck impacts, an unpaved access road on the southern end of the park should be used. If sediment must be removed from the north portion of the basin, then a conveyor belt should be used to transport sediment to the southern portion.
- Tree removal impact on wildlife needs to be considered, even if the removal is phased.
- JPL parking and a road through the basin are complex issues and have been for the past 20+ years.

Metropolitan Water District of Southern California

- The Metropolitan Water District of Southern California has no existing facilities or rights of way within the limits of the project.

Michael Long

- Watershed management needs to include all functioning parts of the watershed system, needs a holistic approach.
- County process should incorporate all aspects of biological resource management.
- Incorporate natural areas into all flood and sediment management projects. Areas should be treated as a lake-reservoir, not just a flood reservoir. Through sediment removal, consider creating a meandering stream in the upper portion of the watershed. (Included a design concept.)
- All construction and sediment removal must avoid the nesting bird season.
- Any loss of riparian vegetation needs to be mitigated at a ratio of 2:1. Impacts could occur to waters of the U.S. including wetlands. Alluvial sage scrub should be able to remain intact, or should be restored if any impacts take place.

- The Hahamongna basin has high value as a passive recreation area; this should be an integrated component of the watershed management plan.

Mitzi Shpak

- The project description is limited and does not discuss the complexity and the full scope of total actions necessary. The EIR must encompass the sediment management plan for the entire watershed (14 dams and 162 basins in the LACFCD); otherwise the report is overlooking the cumulative impact.
- The management of the Devil's Gate Reservoir should be informed by the Integrated Regional Water Management Plan (IRWMP).
- Sediment management should include feasible, alternative technology to mitigate human health risks from emissions, noise, traffic, dust, and other harmful outcomes. Trucks should not operate during school hours. Feasible alternatives include using compressed natural gas vehicles and adopting a no idling rule.
- The truck trips on the I-210 will increase traffic, increase commute times, and increase the pollutants in the area.
- The sediment should be tested for pollutants before the sediment is placed somewhere else. Possible pollutants could include fire retardants and perchlorate.

Native American Heritage Commission

- A Native American Heritage Commission Sacred Lands File search was conducted and Native American cultural resources were not identified within the coordinates identified for the proposed project.
- The absence of archaeological resources does not preclude their existence.
- Consultation with Native American tribes in the area of the project is the best way to avoid unanticipated discoveries of cultural resources or burial sites. A list of Native American contacts was attached to the comment letter; the NAHC strongly urged making contact with the listed tribes.
- The Secretary of the Interior's standards regarding Historic Properties recommends that lead agencies consider the historic context of proposed projects and research the cultural landscape that might include the area of potential effect.
- The Public Resources Code, California Government Code, and Health & Safety Code provide provisions for accidentally discovered archaeological resources during construction and mandate specific processes to be followed in the event of accidental discovery of any human remains in a project location other than a dedicated cemetery.
- To be effective, the project should have ongoing consultation between the lead agency, Native American Tribes, project proponents, and contractors.

Norman H. Brooks – Professor of Civil Engineering, Cal Tech

- Agree that there needs to be an ongoing program to address sediment removal and sees no better way to remove sediment than trucking
- What is the technical basis for needing to provide capacity for two DDEs? Is there public access to DPW Hydrology and Sedimentation Manuals? Why hasn't the project goal taken into account the large fire and post-fire events that have occurred recently? Another fire is not possible until regrowth takes place.
- Interested in the maximum discharge and hydrographs for the 50-year flood design used for the project, as well as historical flood frequency data and graphs for the Arroyo Seco.
- Analyze rational for design criteria for both sediment volumes and predicted flood control benefits.
- Present a clearer overall reservoir sediment and storage inventory
- Are hydraulic report analyses available? What is the flow capacity of the existing downstream channel?

- If only two million cubic yards of debris are removed, what are the resulting impacts and risks? Why are four million cubic yards planned to be removed when there is only 2.6 million cubic yards current stored in the reservoir?
- Present alternatives for sediment removal and flood control volumes with clear accounting of benefits, costs, and community impacts.
- Long-term objectives need to be considered with short-term goals.

Neal Turner

- With the project, the basin would become a wasteland of bare dirt and rock. The trees and habitat that attracts the migratory birds and other wildlife would be destroyed. The large number of truck trips would negatively impact nearby residents for a long period of time.
- A long-term plan needs to be developed that leaves the vegetation in place and keeps alterations gradual.

Ninarose Mayer

- In favor of placing sediment at Johnson Field and then trucking it out at a later date.
- Not in favor of removing the trees and vegetation.
- There are sufficient areas for recreation in Oak Grove Park; does not want development of additional recreation areas within the stream bed region.

Pamela Folgert

- The amount of sediment removed should be kept to the minimum amount necessary for public safety. This way impacts to the natural areas as well as the community will be reduced.
- More study is needed to reduce the impact of removing and relocating the sediment.

Pasadena Audubon Society – Laura Garrett, Conservation Chair

- Sediment removal should be done at times and in places that will not harm or disturb nesting birds. Although a biologist will survey the area, the Audubon Society is concerned about the thoroughness of previous biological surveys in the Hahamongna basin. The Audubon society is offering their knowledge and expertise of the area and known birds in the area.
- The Audubon society asks that work be done with sensitivity and respect, going slowly and carefully, and to destroy as little habitat as possible.
- The willow and alluvial scrub habitats are very rare in Southern California. Due to this fact, mitigation should be done within the Hahamongna Reservoir or in the Arroyo Seco, not in some distant location. DPW should restore as much habitat as possible and leave Hahamongna in better shape than it is now.
- Sediment is a valuable resource that has environmental value, and the Arroyo Seco could be restored with some of the sediment present.
- Look for alternate ways to remove sediment such as launching or sluicing. Examine how other agencies around the country and world have managed this process.
- The Hahamongna Watershed Park should be treated as part of a complete watershed system. A plan needs to be put in place to make the watershed function as naturally as possible.

R. Rhoads Stephenson

- Keep the cubic yards to be removed as small as possible. Make the perimeter as small as possible, and instead make it as deep as possible. Avoid as many trees as possible.
- Protect the perimeter by cleaning out unwanted vegetation every year
- Consider presorting sediment at the site

- Include water settling ponds to replace those that will be removed.
- Partner with local organizations such as Tom Sawyer Camps and the Audubon Society to monitor habitat.
- For transportation options, consider all of the options included in the 20-year study.
- Use a conveyor belt to get the sediment to the trucks lined up on the dam or on Berkshire Drive.
- Avoid Windsor and residential areas, avoid JPL rush hour traffic, use natural gas powered vehicles, and make sure truck beds are covered. Have DPW announce use of low-emission vehicles now to allow time to find a company that has these trucks, or to give them time to order new trucks.
- Consider all destination alternatives being developed in 20 year study. Consider using Iwindale/Azusa Pit or other pits. Do not use La Tuna Canyon for sediment placement; La Tuna Canyon should transfer ownership to a conservancy group.

Raymond Basin Management Board – Anthony Zampiello, Executive Officer

- The Raymond Basin Management Board is supportive of the LACFCD's efforts to enhance flood protection.
- The DEIR should address groundwater replenishment and the ability for water to percolate.
- Section 5.9 of the IS states that there is no impact to the depletion of groundwater supplies; however the Raymond Basin Management Board requests that this concern be addressed.

Roger Klemm

- Sediment Management needs to be an ongoing program, not just for five or 20 years. Dump sites are a finite plan. The best vegetation for minimizing erosion is mature chaparral, so modifying vegetation will hamper chaparral recovery and increase erosion.
- Become the first in a new generation of sediment management, based on the knowledge that has been gained regarding sediment management in the past 90 years.
- Sluicing is a better option, downstream channels may need to be modified to carry this amount of sediment, but sluicing will also restore the streams. Options need to be considered that can both improve flood protection as well as improve groundwater recharge.
- Consider full environmental costs of every alternative. Atmospheric pollutants need to be addressed, and the Port of Los Angeles could be used as an example of using low-emission vehicles to attempt to reduce pollutants from trucking.
- If plant material is to be removed, perhaps it could be relocated to another portion of the reservoir. In addition, a program should be implemented to minimize invasive exotic species.

Sanitation Districts of Los Angeles County - Mark Giljum, Civil Engineer

- They have no specific areas of concern at this time, but would like to be considered an Interested Party due to the use of their landfills, particularly Scholl Canyon Landfill.

Sierra Club, Pasadena Group – David Czamanske, Vice Chair

- A comprehensive study should be done that addresses each and every environmentally and economically feasible alternative.
- The EIR needs to address the source of the problem, the erosion of debris from the upstream watershed. Recommend consulting with the Forest Service staff to address this issue.
- Alternative methods need to be comprehensively evaluated including sluicing, a slurry pipeline, and short-term and long-term environmental and economic benefits and costs. Trucking is not a sustainable method of dealing with sediment accumulation.

- The EIR should discuss water conservation and water quality impacts, impacts to sensitive species, recreation impacts, and cumulative impacts.
- Sierra Club strongly urges the use of low-emission trucks for this project.

South Coast Air Quality Management District – Ian McMillan, Program Supervisor

- Upon completion of the DEIR, forward a copy directly to the SCAQMD (not through the State Clearinghouse) as well as all air quality and greenhouse gas studies, modeling, health risk assessments and emission calculations.
- URBEMIS 2007 and CalEEMod can be used to estimate emissions. Look at the CEQA Air Quality Handbook, PM2.5 emissions and PM2.5 significance thresholds, SCAQMD's Localized Significance Thresholds, and Health Risk Assessment Guidance on the SCAQMD website (links in letter).
- If the project impacts air quality adversely, all feasible mitigation measures that go above and beyond the law should be utilized during project construction and operation. Refer to chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample mitigation measures. Links provided in letter for measures to reduce air quality impacts.
- Relevant air quality reports are available from the SCAQMD.

Steven S. Lamb

- Since the County has a legal obligation to remove sediment, why does environmental documentation need to be completed?
- The area above the dam is not natural habitat; the only reason any habitat is there is due to accumulation of debris. The vegetation and wildlife would not exist if the dam was not there. With the accumulation of sediment the wildlife and vegetation is being altered; the removal of sediment would get the area closer to its natural state.
- A temporary road at the southwestern end of the dam would be the best route.
  Sediment removal needs to be done to provide flood control and protect the lives and property of those below the dam.

Sylvia Stachura

- The project will disrupt wildlife, especially birds, in the Hahamongna area. Research environmentally sensitive ways to clean up the dam while preserving wildlife in the area. Hahamongna is an important area for people who want to get in touch with nature.

State of California Department of Transportation – Dianna Watson, Program Manager

- Complete a traffic study to evaluate impacts from the haul trips to and from the project sites during AM and PM peak periods, including existing traffic volumes and LOS on the 210 Freeway, affected on/off ramps, and freeway intersections .
- If the project will have a significant impact, mitigation measures will need to be included.
- Based on the NOP, the access road to Oak Grove Drive will need to be widened.
- If there are potential freeway access control issues on Berkshire Drive, a Caltrans Encroachment Permit may be required.
- If work is performed downstream of the dam, a Caltrans permit will be needed due to the proximity to the I-210 Freeway bridge.
- To the extent feasible, haul trips should be limited to off-peak commute hours, and avoid "platooning" of truck trips on the freeways.
- If over-sized or overweight vehicles will be using State highways, a Caltrans Transportation Permit will be needed.

Takako Suzuki, field representative to Pasadena Councilmember Steve Madison, District 6

- A streambed restoration project just north of the Colorado Bridge was destroyed by the surge of water from the storm.
- What mitigation will be included for work south of the dam, especially around the Colorado Bridge?

Thomas Holaday

- Opposed to LACDPW's plan to remove 2.6 or 4 million cubic yards of sediment from the reservoir. This would cause catastrophic destruction of the watershed.
- New thinking and new ideas regarding management of excess sediment and abatement should be used.
- Supports maintaining downstream safety and flood protection
- "Mini-digs" should be used to keep the face of the dam, trash racks, gates and valves clear. Along with small-scale removal, a "natural" method of sluicing the sediment through the dam should be used.
- If more than the "mini-digs" and sluicing are done, a lifeless scar like the basin below Eaton Canyon would be created.
- To keep the dam clear of obstructions, natural sluicing should be used. Natural sluicing has occurred in the Arroyo Seco for years. If sediment is placed below the dam, through conveyor belt or other method, it could be sluiced downstream with daily runoff.
- Develop new ways to sluice the sediment out of the watershed, and develop new ways and means to recycle the sediment. Some options include beach replenishment or use in the construction industry.
- The sediment that was placed at Johnson Field during the Interim Measures Project should be removed.
- Independent, expert sources should be contacted to gain insight into sediment abatement and protecting the environment. For example, hydrologists could help protect downstream safety, the Audubon society and expert environmentalists or naturalists would know about biological resources present in the Hahamongna Watershed.
- Creative thinking is needed for the dam maintenance for all 14 dams within the San Gabriel Mountains. Along with thinking about all 14 dams, careful thinking about the broader impact on the watershed systems is necessary.
- The current plan is unsustainable.

Unknown

- Do not scrape 50 acres of Hahamongna Basin to remove sediment.
- Do not using diesel trucks, use natural gas vehicles.
- Sluice the dam, use natural processes as much as possible. Sluicing is the way to make the plan more sustainable.
- Use conveyor belts to extract sediment to transport to trucks waiting on Oak Grove Drive. Do not build a new road.
- Preserve all trees and natural habitat, and do not develop projects in the Hahamongna basin.
- Delineate the natural Hahamongna flow path
- Can keep the face of the dam clear, but do not remove four million cubic yards of sediment. Could also place sediment outside the dam at the south face to sluice sediment downstream.
- Wetland restoration is needed throughout the Arroyo Seco; better research needs to be done regarding the wildlife and habitat in the reservoir.
- About 10-15% of the master budget should be spent in advance of the project on preparation and research.
- City of Pasadena needs to have environmentally educated staff overseeing the project.

Windsor-Arroyo Neighborhood Association – Tecumseh Shackelford, Vice-President

- The Windsor-Arroyo Neighborhood Association supports the use of Route 2 (from Oak Grove to Berkshire to the 210 Freeway) for debris removal.

From: Lilley, Keith
Sent: Wednesday, November 09, 2011 6:41 AM
To: Butler, Ryan
Subject: FW: Hahamongna watershed protection

Categories: Scoping Comments

Please add to the official comments

-----Original Message-----
From: Alison Snow [mailto:alpal@linkline.com]
Sent: Tuesday, November 08, 2011 8:35 PM
To: Lilley, Keith
Subject: Hahamongna watershed protection

Dear Mr. Lilley,

Please take the time and effort to help direct removal of sediment from behind Devil's Gate Dam to include ONLY THAT WHICH IS NECESSARY to assure downstream safety, AND in so doing disturb AS LITTLE AS POSSIBLE the natural environment of this crucial and beautiful watershed area. I also implore you to investigate any and all alternatives possible for future sediment removal and initiate IMMEDIATE LONG RANGE COMPREHENSIVE PLANNING STRATEGIES that will help avoid the present shortsighted methods of digging and trucking out of sediment.

Thank you,
Alison Snow

From: Migonne & Al [oldyelller@earthlink.net]
Sent: Wednesday, November 09, 2011 5:34 PM
To: reservoircleanouts
Subject: Devils gate

Categories: Scoping Comments

Dear sirs, Please leave Devils Gate Dam the way it is now. We don't want smog from the deisel trucks poisoning our school children .The floodplain will continue to fill forever. we love the area the way it is without new parking lots. soccer fielDs and modern improvements. Thanks you ALLEN AND MIGNONNE DECKER

ALTADENA TOWN COUNCIL

serving the Altadena community since 1975

www.altadenatowncouncil.org

730 East Altadena Drive • Altadena, California 91001

Los Angeles County Department of Public Works
Attn: water Resources Division-Reservoir Cleanouts
P.O. Box 1460
Alhambra.CA 91802-9974

October 23, 2011

Re: Debris removal from Devil's Gate Dam

On October 18, 2011 at their regularly scheduled meeting the Altadena Town Council a motion was made and passed with a unanimous vote supporting the adoption of route 2 for removal of sediment and debris from Devils Gate Dam.

The following is from the minute's transcript:
"...Devil's Gate vote on the removal of the dirt settlement. Councilman Shackelford proposed that the trucks use route# 2 where the trucks will not have to go through Windsor to remove the dirt. Councilman Shackelford made a motion that the Altadena Town Council sends a letter to the Los Angeles County Public Works Department stating our position in support of Route Number Two on the Devils Gate Dam Project. Selecting Route 2 will impact the community the least by going from Oakgrove Drive to Berkshire, and then entering onto the 210 Freeway. The motion was carried and seconded by the Council. The Corresponding Secretary is hereby asked to draft this letter as stated in the motion by Councilman Shackelford. So moved..."

Sincerely,

Harold J Bissner III
Corresponding Secretary

Cc: Dr. Sandra Thomas, Chair Altadena Town Council

Harold J Bissner III
Altadena Town Council
730 East Altadena Drive
Altadena, CA 91001

SANTA CLARITA
CA 913 7 L
04 NOV 2011 PM

Los Angeles County Department of Public Works
Attn: water Resources Division-Reservoir
Cleanouts
P.O. Box 1460
Alhambra.CA 91802-9974

91802+2460

From: Elverie Merrill [e_patmerrill@yahoo.com]
Sent: Friday, November 11, 2011 3:26 PM
To: reservoircleanouts
Subject: Devil's Gate Reservoir Sediment Removal and Management

Categories: Scoping Comments

To: Whom It May Concern

Whereas, I understand the purpose and necessity of removing the sediment in the Hahamonga Watershed, I ask that you find a more expeditious, feasible way to complete this task, rather than (1) prolong this task over a three year period and (2) utilize 400,000 trucks in our neighborhood to remove this sediment over a three year period. This disrupts our neighborhood with noise, dust and increased traffic.

Additionally, for sediment removal as well as work being done in conjunction with this project by the County of Los Angeles or City of Pasadena, I support the use of Route 2 (Berkshire to 210 Freeway) rather than neighborhood streets such as LA CANADA VERDUGO ROAD.

Again, please for the reasons listed above, find a more expeditious way to accomplish the aforementioned project.

Best Regards,

Pat Merrill
President
Arroyo Park Estates Home Owners' Association

(626) 296-0696

ARROYO SECO
FOUNDATION

November 14, 2011

Los Angeles County Department of Public Works (LACDPW)
Attn: Water Resources Division - Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974
reservoircleanouts@dpw.lacounty.gov

RE: Scoping Comments - Devil's Gate Reservoir Sediment Removal and Management Project

Dear LACDPW,

Thank you for the opportunity to comment on the scope of the draft environmental impact report on the Devil's Gate Reservoir Sediment Removal and Management Project. It is appropriate that your environmental review considers not only sediment removal but the management of ongoing sediment in the basin. We believe a sustainable and long-term approach to sediment management is critical flood protection and the health of the Arroyo Seco Watershed.

The Arroyo Seco Foundation would like to ask that the draft EIR include all of our comments, which are summarized by these underlying principles:

- Sediment is a valuable natural resource and not a waste product; sediment management should be evaluated in a watershed context incorporating the principles of Integrated Regional Water Management
- All negative impacts on habitat, wildlife and people from the proposed project and its related flood control system including Devil's Gate Dam and the downstream concrete lined flood channel should be evaluated
- The preferred project and proposed alternatives should minimize these negative impacts, and an alternative that incorporates restoration of the downstream river channel and comprehensive watershed management should be evaluated

A complete and detailed list of our comments is attached. Thank you very much for the consideration of our comments. The Arroyo Seco Foundation looks forward to working with the LACDPW on this project in the future. As part of our Watershed Coordination program we would be glad to help with education and outreach efforts for this project.

Sincerely,

Tim Brick

Managing Director

Arroyo Seco Foundation, 570 W. Avenue 26 #300, Los Angeles, CA, 90065 (323) 405-7326

Arroyo Seco Foundation
Scoping Comments –
Devil's Gate Reservoir Sediment Removal and Management Project

The Arroyo Seco Foundation asks the County of Los Angeles Department of Public Works to review and respond to these comments on the notice of preparation of the draft environmental impact report on the Devil's Gate Dam Sediment Removal and Management Project.

Provide a detailed proposed action for both the sediment removal and sediment management

The project description in the notice of preparation provides only a broad overview of the goals of the removal portion of the project. There is no clear proposed action for the sediment removal method. This makes it difficult to anticipate potential impacts. There is no proposed action for the management portion of the project. Please provide a detailed proposed action for both the removal and management and briefly extend the public comment period prior to completing the draft EIR.

The notice of preparation states: "The ultimate reservoir configuration and volume of sediment to be removed will be determined based on location of access roads; areas for preservation of restoration of native vegetation; and the amount and location of sediment inflow that occur during the upcoming storm season." Please propose an action based on planned access roads, areas for preservation of restoration of native vegetation; and estimates of the amount and location of sediment inflow that occur during the upcoming storm season given maximum and minimum hypothetical seasonal rainfall totals.

Propose a sediment management program that integrates water resource management.

- It is important to integrate the sediment management and water resources management, as these two are highly dependent on each other. This should include consideration of:
- A conservation pool within Hahamongna
- Expanding percolation (Is sediment excavation good or bad for percolation?)
- Increasing storm water capture
- Other measures to increase sustainable water resource management

Stream restoration alternative

Evaluate in the draft environmental impact report an alternative that involves the restoration of the Arroyo Seco which substantially restores the hydrologic function of the stream downstream of the Devil's Gate Dam. This alternative should include restoring available land in the floodplain of the Arroyo Seco downstream of the Devil's Gate Dam, to be made available for flooding and sediment and floodwater storage in wetlands. With the Arroyo Seco restored to close to its natural conditions, the high flow events can carry sediment downstream and the sediment would be processed in a more natural and less expensive manner.

It is of critical importance that this project protects sensitive habitat including:

- Riparian habitat
- Riversidian Alluvial scrub
- Wetlands

- Pond Marsh such at that found near the dam on the west side

Address in the draft EIR how this project will impact these habitat types. Propose alternative to the project that will minimize any disturbance and enhance these habitat zones.

Evaluate the redesign of the current channel and the dam operating regime to transport more sediment

Use the Arroyo Seco channel to transport sediment downstream from Devil's Gate Dam to the extent feasible. Evaluate re-engineering the concrete lined portion of the Arroyo Seco to transport more sediment during low flow conditions. This would provide an opportunity to retrofit an old and weathered, and in some cases deficient, flood channel.

Consider an alternative that makes full use of the Arroyo Seco's current sediment carrying capacity

Analyze the channel, as it is, to transport sediment from the reservoir. This entails saturating the flow with a healthy amount of sediment.

Consider an alternative to trucks to move sediment from within the basin to a truck loading station outside of the basin

This will limit the need for constructed or paved roads, limit activity that will cause sediment compaction within the basin, and limit habitat disturbance. Note that the alternative does not need to transport the sediment all the way to the placement sites, it only needs to transport the sediment out of the basin its self.

Propose a sediment management program that encompasses the entire Arroyo Seco Watershed from the peaks to the confluence and integrates the Los Angeles River Watershed to the Pacific Ocean.

Devil's Gate Dam is part of a system, the Los Angele River system. Sediment management that occurs within the reservoir will affect sediment issues downstream. Assess how the proposed sediment management plan affects sediment management from the most upstream point of influence to the Pacific Ocean. Propose alternative sediment management programs that work in cooperation with all other sediment management throughout the watershed. Evaluate the relationship between sediment capacity in the Devil's Gate Dam and the ability of the concrete downstream channel to protect property from flood damage.

Pursue sediment management options that safely mimic natural processes from the top of the watershed to the bottom (sluicing, stream and floodplain restoration, and others).
The Arroyo Seco, and the whole of the Los Angeles Basin, has been responding to the high sedimentation rate of the San Gabriel Mountains for millions of years. Evaluate which natural processes or pseudo natural processes of sediment transport can be restored to remove sediment from the Devil's Gate Reservoir.

Evaluate SMART and LID development and re-development

Include land use regulations (green buffers, density, proximity to wildlands, defensible space, distance from geologic hazards) and mandate low-impact/Green building design.

Address sediment and storm water as valuable resources of the Arroyo Seco basin

Dispel the myth that both sediment and storm water are waste products. Acknowledge that both sediment and waste water are valuable resources of the Arroyo Seco. Sediment is a critical component of a stream system. Sediment can be collected and used for construction and beach nourishment. Sediment can also be hydrologically transported downstream where it can aid in the restoration of the Arroyo Seco River. Storm water can be captured, treated and used for multiple purposes including ground water recharge and irrigation.

Address the natural sedimentation process

To adequately develop a sediment management program, sedimentation must be examined from a geologic perspective. Begin with the uplift of the San Gabriel Mountains. Address in detail the source and fate of sediment within the Arroyo Seco. Evaluate the source of sediment. Evaluate the sediment load into the Devil's Gate Basin based on factors such as uplift, erosion and condition of the upper watershed.

Review the recommendations of the Philip Williams & Associates Study, "Flood Hazard Sediment Management, And Water Feature Analysis, Hahamongna Watershed Park," (2000) and analyze them for their applicability to this project.

Consider the US Army Corps of Engineers' Arroyo Seco Watershed Ecosystem Restoration Study

This study raises important concerns and suggests improvement to the current state of the Arroyo Seco Watershed.

Fully evaluate the stakeholder concerns listed in section 2.3. Describe in detail how these concerns have been addressed.

Evaluate and report in detail how this project increases or mitigates relevant problems described in section 2.4.1 such as:

- Devil's Gate Dam barrier to fish passage
- Disturbance of the Hydrologic Regime
- Reduced Groundwater Recharge
- Channelized Stream Bottom
- Uncertainty regarding flood risk management
- Limited Flood Storage at Devil's Gate Dam

Evaluate and report in detail how this project supports relevant opportunities for watershed improvement described in section 2.4.2 such as:

- Opportunities exist to provide for fish passage over or around the Devil's Gate Dam
- The opportunity exists for removal of the concrete flood control channel along Arroyo Seco
- The opportunity exists to develop a basin-wide sediment management plan to protect and improve the health of the watershed.
- The opportunity exists to identify where flooding problems exist and where flood risk management mechanisms need to be put in place

Review the effectiveness and viability of flood control methods

Evaluate and report on the effectiveness and viability of the Devil's Gate Dam. Evaluate alternative flood control measures.

Review the environmental impact of the Devil's Gate Dam

The flood control and debris basins were for the most part constructed without regard to environmental consequence. Devil's Gate Dam was built in 1920 and the flood control channel in the 1930s and 1940s, before the current environmental review process. Evaluate and report on the full environmental impact of Devil's Gate Dam. Include the intended and unintended environmental consequences of the dam. Evaluate the effectiveness of upper watershed debris control structures and their impact on Devil's Gate Dam sediment input.

Conduct educational outreach to the public to improve understanding about natural processes

Residents within the watershed should be aware of the purpose of the Devil's Gate Dam and the role of sediment in flood protection and watershed management. This project should educate the public about the dam outside the realm of an environmental impact report scoping session.

Evaluate the potential for low carbon emission vehicles to be used for the transportation of sediment from the basin to the destination

Low emission vehicles can lower the air pollution concerns of the project, which are likely to be massive. Steps should be taken to reduce any air quality impacts in this region.

From: Asif Ahmed [asifahmed@attinteractive.com]
Sent: Thursday, November 10, 2011 1:15 PM
To: reservoircleanouts
Cc: savehahamongna@arroyoseco.org; Jaime Parker
Subject: Devil's Gate Reservoir Sediment Removal and Management Project

Categories: Scoping Comments

To Whom It May Concern:

As a resident of 895 Arwin St., Pasadena and member of Windsor Arroyo Homeowners Association, I wanted to express my opposition to the sediment removal project. While i agree with the interim project to clear debris in front of the dam and could see this happening every few years I am vehemently opposed to thousands of trucks for the next year 3 years destroying a precious habitat. It would be akin to me driving a bull dozer and destroying your backyard.

The Hahamongna basin has evolved into a rare habitat that has become a sanctuary from everyday life for families, hikers, nature lovers, children, and more. There is real wildlife living there and each day I can witness something new. I also make new friends down there as the folks that visit the basin are all warm, friendly souls.

Please don't destroy this precious resource. There must be better alternatives.

Sincerely,
Asif Ahmed

To: **Gale Farber, Director, Los Angeles County Department of Public Works**
ATTN: Water Resources Division – Reservoir Management
PO Box 1460
Alhambra, CA 91802-9974

From: **Betsy Bour, Friends of Hahamongna**
bourel@sbcglobal.net

RE: **Scoping Comments: Environmental Impact Report for Devils Gate Dam Reservoir Sediment Removal and Management Project**

Introduction:

The Friends of Hahamongna (FOH) is an advocacy group of Pasadena, La Canada and Altadena residents working together for the protection of Hahamongna Watershed Park, one of Pasadena's last great open spaces. Our members are united in our support of this environmental treasure. We have attended hundreds of meetings over the past decade monitoring Pasadena's Hahamongna master planning. We have been working cooperatively with the Spirit of the Sage Council, the Hahamongna Watch Group and other park advocacy groups as the City of Pasadena moves forward to implement the Hahamongna Watershed Park Master Plan, a component of the Arroyo Seco Master Plan. Because this initiative may significantly impact the Hahamongna Watershed Park and the existing Master Plan, we plan to be active participants in this scoping effort as well as the overall sediment removal initiative. Our request for general considerations for project development as well as required environmental review categories are outlined below:

General Considerations:

- FOH has heard that this project may now be planning to remove up to 4 million cubic yards of sediment from the basin. This is a significant increase from the original plan to remove approximately 1.7 million cubic yards. FOH urges the DPW to limit the scale of this project to remove only the excess debris that is necessary to protect the operation of the dam and to manage flood waters. We ask that the DPW supplement this sediment removal effort with an on-going maintenance plan that will remove new sediment deposits as necessary.

- For the past 14 years, Hahamongna Watershed Park has gone through an extensive Master Planning Process that includes 100+ projects, many of which are in the basin area. FOH asks that the existing Master Plan and cumulative environmental impacts identified in the Master EIR be considered in the planning process for this project. It is also important that the DPW review and respect the concerns of the Spirit of the Sage Council as stated in the legal settlement with the City of Pasadena.

- FOH recognizes that there is some overlap in the Master Plan projects and anticipated projects for the sediment removal initiative. However, it is important that DPW recognize that some of these Master Plan projects, including but not limited to roads, paved surfaces and multi-use playing fields, were controversial. It is the public's expectation is that they will have the opportunity to review these projects as they are implemented for both focused environmental impact and overall merit. For that reason, FOH urges you not to comingle projects related to the Master Plan with anticipated projects necessary for sediment removal.

- Hahamongna Watershed Park provides significant habitat for many species including Egrets, Blue Heron, Mallard Ducks, and numerous reptile species. Since the devastation from the Station Fire, the need for this habitat has become more significant, if not critical. FOH asks that the preservation of the habitat be a priority in developing project scope and environmental impact statements.

- FOH asks that alternatives to trucking out all the sediment, such as sluicing, be considered. We further ask that trucking activity within the basin be minimized, perhaps through the use of sediment conveyance from the northern portion of the basin to the southern portion. Finally, we ask that full environmental review be performed on this and other reasonable alternatives.

Required Environmental Review Categories:

- Aesthetics
    - Degradation of existing scenic resources and visual character both temporarily and long term
    - Portions of the project site that will be visible from private properties along the eastern edge of the basin.
- Air quality
    - Impacts, including airborne dust from grading, and dirt hauling and gaseous emissions from heavy equipment, delivery and dirt hauling trucks, and employee vehicles.
    - Impacts from pollutant concentrations, primarily carbon monoxide, resulting from traffic increases in the immediate vicinity of a project
    - Impact of the degraded air quality on schools, athletic fields and residences in the immediate area.
- Biological Resources
    - Substantial adverse effect from habitat modifications impacting any of the species currently found in the basin.
    - Substantial adverse effect on any riparian habitat or other sensitive natural community
    - Substantial adverse effect on migratory wildlife species or with established migratory wildlife corridors
- Cultural resources
    - Impact to cultural resources in the project vicinity due to the potential to encounter buried resources during excavation.
- Geology and soils
    - Impacts from potential soil erosion, loss of topsoil, changes in topography or unstable soil conditions from excavation, grading,
    - Potential impacts from fault surface rupture, liquefaction, and unstable slopes.
- Hazardous materials
    - Impacts to the public or the environment from the handling of hazardous materials including fueling and servicing construction equipment onsite, and the transport of fuels, lubricating fluids, and solvents.
    - Impacts to construction workers due to potential exposure to contaminated soils or groundwater at and around the “superfund site” in the northwest portion of the basin.
- Water quality
    - Impacts from potential alteration of existing drainage patterns in the site area, including the alteration of the course of the stream.
    - Construction impacts on the water in the basin and the spreading ponds along the eastern edge.
- Noise
    - Impacts from high noise levels generated during sediment removal. Excavation and sediment hauling activities would potentially disturb nearby residences to the east and south of the project site, as well as several nearby schools.
- Recreation
    - Limitation to existing recreational activities due to trail closures during the sediment hauling phase.
    - Impacts caused by a permanent sediment management plan
- Transportation/traffic
    - Impacts of the substantial number of truck trips in and out of the basin for sediment removal on surrounding streets. The analysis must consider traffic impacts beyond the immediate project site in that the area freeways will be impacted by truck traffic to landfills and sediment placement sites.

    - Impact analysis must address disruptions to normal traffic flows to area schools, JPL and the Rose Bowl during events.
- Utilities and service systems
    - Impact to the storm drain system in Hahamongna Watershed Park due to the construction activities necessary for to repair or renovation of the drains.
    - Impact to power poles and/or phone service poles that are positioned in the basin and likely within the project site.

FOH members have extensive historical knowledge on Hahamongna Watershed Park, the projects planned for the area and the controversies that have arisen over the past 15 years. Please feel free to use us as a knowledge source and please feel free to contact with any questions regarding our scoping comments.

Sincerely,
Betsy Bour
Friends of Hahamongna

From: Lilley, Keith
Sent: Wednesday, November 09, 2011 8:16 AM
To: Butler, Ryan
Subject: FW: EIR for Hahamongna/Devil's Gate Dam

Categories: Scoping Comments

Please include with the official comments

From: Carlamamay@aol.com [mailto:Carlamamay@aol.com]
Sent: Wednesday, November 09, 2011 7:55 AM
To: Lilley, Keith
Cc: meb787@aol.com; hopebird@lafn.org; fifthdistrict@lacbos.org; newSSMPAofficers@yahoogroups.com
Subject: EIR for Hahamongna/Devil's Gate Dam

Dear Keith Lilley,

My apology: My first e-mail was accidentally sent before completing my comments.

I recognize the complexity of DWP needing to remove sediment behind the dams to prevent an overflow catastrophe. However, we also need to balance the need to protect the natural wild lands in these areas. The Arcadia Oaks Woodland was destroyed without alternative consideration to preserve this region. This destruction of our open space/native plants and trees/wildlife habitat can't keep happening throughout Los Angeles County.

We urge DWP to consider alternatives:

1) Minimize the removal of sediment to enable water flow with minimal destruction of Hahamongna Park.

2) Develop alternative supportive structures/mechanisms that can be built to better control sediment flow to avoid the inevitable mud choking basin buildup behind dams.

3) Consider alternatives to destruction of the surrounding open space/wild lands/wildlife habitats by removal in on-going systematic removal rather than waiting until the buildup is overwhelming and threatening.

Sincerely,

Carla Bollinger

Affiliations: Board Member of Santa Susana Mountain Park Association, Member of SFV Audubon Society, LA.Chapter Sierra Club and Allied Artists of Santa Monica Mountains and Seashore.

November 10, 2011

VIA EMAIL AND U.S. MAIL

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

Subject: City of La Cañada Flintridge Comments on
Notice of Preparation and Scope of a Draft Environmental Impact Report
Devil's Gate Reservoir Sediment Removal and Management Project

Dear Water Resources Division Personnel:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) and scope of the proposed Environmental Impact Report ("EIR") for the Devil's Gate Reservoir Sediment Removal and Management Project. As a responsible agency within the affected project area, we reserve the right to submit further comments and objections. The City has identified several comments and issues to be addressed in the EIR and supporting studies and analyses. A summary of the primary concerns are listed below:

GENERAL

1. The City of La Cañada Flintridge has ownership of the main haul routes intended to be used by the project. There are several sensitive receptors along the proposed route, including a high school, church, equestrian trails, bike lanes, and natural resources. As such, we request that the City be fully involved in the preparation of the EIR as a participant in meetings, conference calls, working sessions, etc. with the County and the County's consultants.

2. We request that the City be given the ability to review scoping documents for all elements of the EIR prior to the County's approvals to ensure that critical potential impacts affecting the City are correctly analyzed.

3. Please note that any hauling and construction activities that use streets in La Cañada Flintridge will require a Haul Route Permit and other permits that will impose special conditions on the days, hours and frequency of truck trips as well as Stormwater and Urban Runoff best management practices. Hauling will generally be prohibited between 7-8:30am and 2-4pm on school days to avoid conflict with high school and JPL peak traffic hours.

4. An alternatives analysis should be made for alternate haul routes, including splitting inbound and outbound routes on different streets to determine the minimal potential traffic impacts. One recommended alternative is an inbound route via freeway ramps at Arroyo Boulevard. It should be noted that the City will not allow hauling on Foothill Boulevard or on Oak Grove between Foothill Boulevard and Oak Grove adjacent to several schools.

5. It is expected that the high volume of truck trips will significantly accelerate the deterioration of the roadways used along the truck route. As such, the project description shall either include reconstruction of those roadways, namely Oak Grove Drive and Berkshire Drive, or the EIR needs to include measures to address this impact.

6. The potential impacts of a permanent access road from the project site to Oak Grove Drive will need to be identified, with particular emphasis on biological resources, recreation, and transportation access to bicycle, equestrian and walking paths.

7. Long term impacts of ongoing sediment management will need to be addressed in the EIR, such as future sediment removal activities and emergency stormwater events. Alternatives to the current debris basin configuration should be considered as a way to minimize future maintenance needs and to preserve the natural and recreational resources of the reservoir area.

TRAFFIC

8. The traffic study should include a Level-of-Service analysis of any stopped or signalized intersections along the haul route within the City. At a minimum, the study intersections should include: Berkshire Place/I-210 Eastbound Ramps, Berkshire Place/I-210 Westbound Ramps, Oak Grove Drive/Berkshire Place, and Oak Grove Drive/La Canada High School, Oak Grove Drive/Foothill Boulevard.

9. Mid-afternoon traffic counts and Level-of-Service analysis need to be conducted between 2 and 4pm on a typical school day for intersections in the City to capture school related traffic, which is the peak period of the street.
10. Work shifts at Jet Propulsion Laboratory (JPL) will need to be considered in the traffic study with recommendations proposed to mitigate traffic impacts.
11. Potential impacts to bus service on Oak Grove Drive and Berkshire Avenue caused by construction traffic will need to be addressed and mitigated.
12. The traffic study shall consider the high school schedule and activities in the preparation of mitigation measures to avoid traffic impacts. Hours of operation and non-work days will need to be identified to mitigate adverse impacts to sensitive land uses.
13. The traffic study should apply an ambient growth factor on future year scenarios per LA County Congestion Management Plan rates.
14. The traffic study will need to apply a truck equivalency factor for truck trips and queuing analyses.
15. A hauling and construction management plan should be required as a mitigation measure to enforce limitations and regulations due to construction activity.
16. Construction parking will need to be identified for the project and made part of the hauling and construction management plan.
17. The traffic study will need to analyze vehicle queuing at freeway ramps, intersection left-turn pockets and any project site entry/exit driveway(s) especially during school hours. Any impacts will need to be mitigated.
18. The traffic study will need to identify the staging area for unloaded trucks. The City of La Cañada Flintridge does not allow staging on city streets.
19. The traffic study will need to identify the maximum hauling frequency in loads per hour and loads per day allowed to avoid adverse impacts to nearby sensitive land uses.
20. The traffic study will need to analyze the potential impacts of construction area traffic control on the roadway network due to reduced lane capacity.
21. The traffic signal at Oak Grove Drive/Berkshire Place and both freeway ramp intersections need to be analyzed to determine if the existing operation can accommodate the added truck volume. Traffic signalization and/or additional signal equipment may be necessary to mitigate impacts due to construction trips.

AIR QUALITY

22. A full air quality analysis will be needed to identify potential impacts of construction activity and hauling on sensitive receptors within the project vicinity

and along the haul route(s). In addition, the study will need to analyze particulate matter (PM-10 and PM-25) generated by diesel engines, tires, and earthmoving in addition to regulated pollutants. This study should compare alternative solutions and construction methods to minimize this impact.

NOISE

23. A full noise study will be needed to identify and quantify noise generating activities due to the project, including excavation and hauling operations. Special attention needs to be given to the proximity of schools and other sensitive noise receptors along the truck routes and near excavating operation. Noise impacts need to be addressed by time-of-day.

Thank you for your consideration of these preliminary comments in response to the NOP. Please ensure that we are provided with advanced written notice of any and all meetings, hearings, actions and votes related to this matter. Please contact us with any questions or comments.

Sincerely,

Erik Zandvliet, P.E.
City Traffic Engineer

OFFICE OF THE CITY MANAGER

November 10, 2011

Los Angeles County Department of Public Works
Keith A. Lilley
Senior Civil Engineer Water Resources Division
Water Resources Division – Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974

Re: City of Pasadena Comments on the Notice of Preparation and Initial Study for the Devil's Gate Reservoir Sediment Removal and Management Project

Dear Mr. Lilley:

Thank you for forwarding a copy of the Notice of Preparation (NOP) and Initial Study (IS) for the Devil's Gate Reservoir Sediment Removal and Management Project. The project as described would remove up to 4.0 million cubic yards of sediment from the reservoir behind Devil's Gate Dam to restore it to its current design standard, and establish a reservoir configuration more suitable for routine maintenance activities including sediment management. Although approximately 2.6 million cubic yards of sediment is the current excess amount of sediment in the reservoir, additional sediment accumulation is anticipated during the upcoming storm seasons due to the burned condition of the watershed that will have to be removed. The ultimate reservoir configuration and volume of sediment to be removed will be determined based on locations of access roads; areas for preservation or restoration of native vegetation; and the amount and location of sediment inflow that occur during the upcoming storm seasons. In order to remove the sediment from the reservoir, vegetation growing within excavation areas will require removal. We understand the sediment and organic materials are planned to be trucked off-site and then taken to sites that are already prepared and designated to accept such material without additional construction or vegetation and habitat removal. We also understand the primary goal of this project is to return adequate flood control capacity to the facility and establish a reservoir configuration more suitable to Los Angeles County Department of Public Works' (LACDPW) routine maintenance activities. Based on our review of the NOP and IS we believe that the project's primary potential impacts to the City of Pasadena are related to Air Quality, Noise and Traffic and Transportation.

The City is a responsible agency pursuant to CEQA, and looks forward to consultation with LACDPW throughout the CEQA process. The following comments from the Department of Public

City Hall
100 N. Garfield Avenue
Mailing Address: P.O. Box 7115 · Pasadena 91109-7215
(626) 744-4333 · Fax (626) 744-4774

Works, Department of Transportation and Water and Power Department are provided based on review of the Notice of Preparation and Initial Study:

1. The adopted Hahamongna Watershed Park Master Plan must be considered in the project's design as well as in all alternatives. LACDPW may recall the discussions and collaboration between our two agencies in developing a strategy and conceptual grading plan, which is part of the adopted HWPMP, for sediment removal in the basin that helped achieve the best possible balance between all the other competing issues in the basin including water resources, habitat, recreation, flood & sediment management and cultural resources. We provide the following link to the HWPMP and can provide hard copies upon request.
   http://www.cityofpasadena.net/PublicWorks/arroyo_plans_and_projects/

2. Page 18 - 5.1.1d – Light and glare: The City disagrees; there will need to be an evaluation of the impacts to wildlife if lights are used during the dark hours.

3. Page 25 - 5.7.1 Greenhouse Gases – The City's Green Action Plan, Action #3, identifies goals to reduce greenhouse gases which should be considered and evaluated.
   http://www.ci.pasadena.ca.us/GreenCity/Green_Team/

4. Page 26 - 5.8.1h – Fire: The City disagrees; the area is designated a high fire zone by LA County Fire and the Pasadena Fire Department; work during the summer months in Hahamongna and the project's impact to fire needs to be evaluated.

5. Page 34 - 5.14.1 – Security protection: The City disagrees with IS; since it is anticipated that the construction contractor will retain a presence on site during non-construction times, the City feels there is a need to address the project's impacts to the security issues of the site during non-construction times.

6. Page 37 - 5.17.1 Green Waste to Landfill – This is not consistent with Action 4 of the City's Green Action Plan to reduce waste. Alternatives to green waste going to the landfill should be considered.

7. Coordination between LACDPW, The City of Pasadena and the Rose Bowl Operating Company will be necessary to ensure there are no or minimal impacts to planned Rose Bowl events.

8. There must be coordination between the County and the City regarding the details on the project's truck haul routes and overall traffic/staging plan to ensure the neighborhoods are protected and to minimize and traffic conflicts.

9. The City is supportive of sustainable sediment management proposals for Hahamongna and the Central and Lower Arroyos.

10. The City asks that the County consider and analyze any secondary impacts downstream of Devil's Gate Dam.

11. In anticipation of the need to replace lost habitat, the City is supportive of the County considering the habitat projects identified in the HWPMP as appropriate mitigation.

12. In anticipation of the need to remove sediment from the basin, the City would like to make LACDPW aware of several approved projects on-site that have anticipated the County's sediment project and that may help reduce impacts through collaborative construction efforts with the City.

13. The HWPMP and the Master EIR are well known documents in the community. The City suggest that the EIR/bio studies to be prepared for the project are consistent with the studies of the Arroyo Seco MEIR and the HWPMP, specifically in their reference to plant communities/biological terminology, for the benefit of the public's understanding.

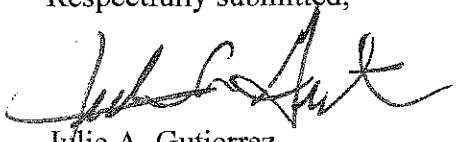
14. LACDPW must protect the infrastructure for Pasadena's Tunnel Water in the southeast quadrant of the basin, near the dam.

15. There are several related projects that the County needs to be aware of for purposes of evaluating cumulative impacts. These projects include: a) JPL's proposed parking structure; and b) the newly funded Prop. 84 IRWMP projects in both the basin and in the upper Arroyo Seco.

16. Tree protection: Any potential impacts to the adjacent oak woodland in the Oak Grove area of HWP needs to be evaluated. This project will be subject to review by the City's Urban Forestry Advisory Committee.

The City of Pasadena is pleased to coordinate with Los Angeles County Department of Public Works those topics of particular interest and impact to Pasadena residents pursuant to State CEQA Guidelines Section 15086. Pasadena looks forward to further participation in the comment and review period for the EIR, and continued cooperation and consultation with the County/Flood Control District. At this time Pasadena is commenting as a responsible agency since discretionary approval is required by Pasadena per the lease agreement between our two agencies. Pasadena requests to receive future CEQA notices for the project. The City of Pasadena appreciates the opportunity to comment on the referenced documents. Should you have any questions regarding this letter, please do not hesitate to contact me at (626)744-7371.

Respectfully submitted,



Julie A. Gutierrez
Assistant City Manager
City of Pasadena

cc: Siobhan Foster, Director, Department of Public Works (PW)
Dan Rix, PW
Loren Pluth, PW
Rosa Laveaga, PW
Elise Jackson, PW
Rich Yee, PW
Theresa Fuentes, Office of the City Attorney
Brad Boman, Department of Water and Power
Jennifer Paige Saiki, Planning Department
David Sinclair, Planning Department
Michael Bagheri, Department of Transportation

From: Constance Brines [yconnie.brines@gmail.com]
Sent: Monday, November 07, 2011 3:49 PM
To: reservoircleanouts
Subject: Devil's Gate Reservoir Sediment Removal and Management Project

Categories: Scoping Comments

While I realize that sediment must be removed for flood control, I wish to add my comment that any impact to the natural Hahamongna environment should be minimized and that NO NEW Development should be implemented in the Hahamongna watershed area.

Thank you

--
Constance Bidwell Brines
950 Laguna Road
Pasadena, CA 91105
Home Office: 626.403.7500

From: Lilley, Keith
Sent: Wednesday, November 09, 2011 3:15 PM
To: Butler, Ryan
Subject: FW: Devil's Gate Dam Sediment

Categories: Scoping Comments

Please add this to the official comments

From: Cosmo Bua [mailto:philemata@gmail.com]
Sent: Wednesday, November 09, 2011 3:13 PM
To: Lilley, Keith
Subject: Devil's Gate Dam Sediment

Los Angeles Department of Public Works
Mr. Lilley, Project Manager

RE: **Devil's Gate Dam Sediment**

Dear Manager Lilley:

I am concerned that the analysis of all possible sediment removal actions be thorough. All possible alternatives must actually be considered, with the highest priority given to doing the least possible harm to the area and it's wildlife. Only long-range and comprehensive, area-wide solutions (going well beyond Hahamongna to include all of our dams and their entire watersheds) should be considered.

We can not have our government destroying rather than preserving what little natural environment we have left. These areas do not belong to DPW, but are held in trust for all. More crimes like the violent destruction of the Arcadia Woodlands would be unconscionable. Now that there has been so much public attention to these issues - and so much relevant information provided to your department by the public - such unnecessary destruction will no longer be excusable.

Thank you for your consideration,

Cosmo Bua,
Santa Monica

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

October 19, 2011

Christopher Stone, Assistant Deputy Director
Department of Public Works
Water Resources Division
P.O. Box 1460
Alhambra, CA 91802-9974

Dear Mr. Stone:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT, CITY OF PASADENA, (FFER#201100161)

The Notice of Preparation has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. The subject property is entirely within the City of Pasadena, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

LAND DEVELOPMENT UNIT:

1. This project is located entirely in the City of Pasadena. Therefore the City of Pasadena Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

2. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within Contract Cities (Cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities located within non-contract Cities. The County of Los Angeles Fire Department, Land Development Unit, may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

3. The County of Los Angeles Fire Department, Land Development Unit, appreciates the opportunity to comment on this project.

4. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Claudia Soiza, at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Draft Environmental Impact Report.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. We have no comments at this time.

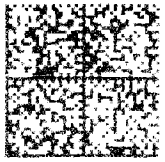
If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:sc

COUNTY OF LOS ANGELES
FIRE DEPARTMENT
Forestry Division
5823 Rickenbacker Road, Room #123
Commerce, CA 90040



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CHRISTOPHER STONE
ASSISTANT DEPUTY DIRECTOR
DEPARTMENT OF PUBLIC WORKS
P.O. BOX 1460
ALHAMBRA CA 91802-9974

9160232460 BSCO

Devil's Gate Reservoir Sediment Removal
and Management Project

COMMENT CARD

Name Dianne Patrizzi Address 564 N. Oakland Ave., Pasadena, CA 91101

Email thaddius.d.patrizzi@gmail.com

Organization, if any None

I would like to provide the following comment:

You have a great opportunity to be the engineers that solve this problem for Devil's Gate and be the innovators of a new age in flood, watershed, and wetlands management. In my research, so many places are in need of a solution, if one can be developed and tested here, it could be crucial to life sustainability all over our watery planet. So with that, let me plant some seeds for you.

Since I am more of a visual person than a verbal one, please refer to my drawings (enclosed 4 pgs). It is a proposed living levee/canal system. It is based on an idea borrowed from Curt Schmutte of DWR (enclosed 1996 original proposal, 7 pgs). I have highlighted my lightbulb moments on the hard copy mailed to you via USPS.

When I heard Mr. Schmutte explain that the levees in his project moved then returned to place as a reaction to seismic activity, it made me wonder if we could create living levees of the same construction to move depending on water flow activity. He said that when they were excavating sediment for another project the shovels hit a barrier. It was a rhizome netting or network that although buried under soil for at least several hundred years, appeared to still be alive--just simply dormant.

In my drawings, the rhizome material covers a berm of sediment, at its base is a slippery peat or clay layer creating mobility. My theory is when water flow is heavy instead of breaching the

levee it would move out to accommodate it. Then when the water flow subsides, it would move back in place by gravity. The depth of the channel, and slant for the sliding levee wall would be calibrated to the least average flow position.

This would optimize the rate of water flow and thereby decrease sediment settling out of the water and depositing itself. Adding the serpentine element, as discussed in the Hobble Creek Flow Recommendation Report (enclosed 57 pgs) would provide additional flow enhancement and allow for the ability to protect certain flora/fauna locations within Hahamongna.

Maintenance of sediment removal from the channel would be reduced or at least confined to the channel, summer weed abatement from the channel may be regular, and sediment/debris clean-out from 100 yards of the dam would be maintained until such a time in the future when the dam could be safely disassembled. Then the Arroyo Seco will be contiguous, as it should be, and sediment will flow downstream helped with collaboration along its way to reach the sea. The ocean ecosystems have been starved for it.

One day, I hope to stand before a room of people and tell them how proud I am of this generation (or multi-generations) of engineers, scientists, biologists, and cultural enablers through cooperation have created a paradise by devising a plan that solved one of the most difficult and universally important problems in history.

Respectfully Submitted,

Dianne Patrizzi

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY **EDMUND G. BROWN JR.**, *Governor*

DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

NOV - 4 2011

Mr. Ryan Butler
Los Angeles County Flood Control District
Post Office Box 1460
Alhambra, California 91802-9947

SCH #2011091084, Notice of Preparation for the Devil's Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report
Los Angeles County

Dear Mr. Butler:

We have reviewed the subject Notice for the above referenced project, which entails removal of up to 4 million cubic yards of reservoir sediment behind Devil's Gate Dam to restore the reservoir's original storage capacity. Work to complete the proposed project is expected to take place between Spring 2014 and Winter 2019.

Devil's Gate Dam, No. 32-3, is currently under State jurisdiction for dam safety. Based on the information provided, the maintenance work described will not affect the safety of the dam. An application will not be required for this project, provided that the work does not encroach within 10 feet of the dam or its appurtenances. If this criterion is not met, we will need to be notified beforehand to review and approve the work.

If any alterations or modifications to this jurisdictional dam are necessary as part of the scope of work, an alteration application, together with plans and specifications, must be filed with the Division prior to the construction of the project. All dam safety related issues must be resolved prior to approval of the application, and the work must be performed under the direction of a Civil Engineer registered in California. Sharon Tapia, our Design Engineering Branch Chief, is responsible for the application process and can be reached at (916) 227-4660.

If you have any questions or need additional information, you may contact Office Engineer Randy Fessler at (916) 227-4601 or Regional Engineer Shawn Jones at (916) 227-4600.

Sincerely,

Michael Waggoner

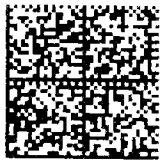
Michael G. Waggoner, Chief
Field Engineering Branch
Division of Safety of Dams

cc: (See attached list.)

cc: Ms. Nadell Gayou
Resources Agency Project Coordinator
Environmental Review Section
Division of Statewide Integrated Water Management
901 P Street
Sacramento, California 95814

Governor's Office of Planning and Research
State Clearinghouse
Post Office Box 3044
Sacramento, California 95812-3044

STATE OF CALIFORNIA
CALIFORNIA NATURAL RESOURCES AGENCY
DEPARTMENT OF WATER RESOURCES
P.O. BOX 942836
SACRAMENTO, CALIFORNIA 94236-0001



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MR RYAN BUTLER
LOS ANGELES COUNTY FLOOD
CONTROL DISTRICT
POST OFFICE BOX 1460
ALHAMBRA CA 91802-9947

9180242460

November 9, 2011

To: L.A. County Flood Control District
Water Resources Division – Reservoir Cleanouts

From: Don Bremner
1680 Walworth Ave.
Pasadena, CA 91104
Tel: 626-794-2603
Email: donbremner@earthlink.net

Re: EIR for Devil's Gate Dam Project

INTRODUCTION:

The Devil's Gate project comes amid a growing sense that flood control in Los Angeles County must evolve to consider entirely new ways of dealing with sediment at our dams and debris basins. The series of public meetings in 2011 to discuss a Sediment Management Strategic Plan underscores the estimate of County officials that known placement sites for sediment may be adequate for only two more years.

If we really are running out of conventional placement sites, it's time to analyze and test methods that may not have been considered earlier. Because the Devil's Gate Dam sediment project will begin to set a pattern for future big cleanouts, the Devil's Gate Environmental Impact Report should include alternatives that may seem unlikely or unfeasible. In the process, we can seek to restore some of the hydrologic function the Arroyo Seco once had before the dam and downstream channelization ended natural sediment transport and distribution. This could benefit the environment and help in future sediment management.

Environmental impacts are especially critical at Devil's Gate reservoir because of its location in the City of Pasadena's Hahamongna Watershed Park, a sensitive ecological region, recreation and water conservation area.

OBJECTIVES:

The Devil's Gate project must:

- Minimize downstream flooding risks through sediment management and dam operation

- Be consistent with Pasadena's Master Plan for Hahamongna, and with the Integrated Regional Water Management Plan (IRWMP).

- Preserve habitat and wildlife

- Not harm opportunities for recreation – hiking, biking, bird watching, etc. -- and improve conditions if possible.

- Maintain or improve water conservation and percolation into the basin

- Minimize impacts on residents from noise, dust and fumes

- Aim for a sustainable pattern of sediment management that deals with sediment accumulation regularly, not on a semi-emergency basis.

- Be feasible and cost-effective.

ALTERNATIVES:

The EIR should describe and analyze these alternatives for managing sediment in Hahamongna:

1. The project proposed by the County Flood Control District. This would remove 2.6 million to 4 million cubic yards of material, mainly from a 50-acre site just north of the dam. The resulting steep-sided bowl would be expected to receive most of the sediment entering the basin in future years.
   The excavation would remove many mature black willow trees and other vegetation and their wildlife habitat. It would leave a continuing scar on the environment.

   Environmental impacts could be reduced by use of a conveyor, if feasible, to carry sediment to trucks on top of the dam, or to Oak Grove Drive, rather than widening the access road up the west side of the basin for a haul route. Electric trucks or very low-emission vehicles should be used to reduce emissions, especially near two schools in the vicinity.

2. Reduce the size of the excavation just north of the dam. When this project was first publicly described in November 2010, it was to remove 1.67 million cubic yards. The excess sediment now is estimated at 2.6 million cubic yards, with more expected during the coming storm seasons, and the Initial Study says the proposed project would remove up to 4 million cubic yards. In their planning, County officials cite a “Design Debris Event” -- a 50-year storm, four years after a fire in the watershed, that would bring an estimated 2 million cubic yards into the reservoir. How likely is a 50-year storm during the next few years?

   Given these varying figures, the unpredictability of future sediment flows, and recent improvements to the dam’s trash racks and other features, would a

smaller project be adequate, something considerably less than 2 million cubic yards? That would reduce environmental impacts, although it might mean that the interval before the next sediment removal project would be shorter.

3. Excavate sediment at the north end of the reservoir, downstream from the JPL bridge, in addition to the area near the dam. This will require analysis of the effects on coastal sage scrub, oaks and other vegetation and habitat in the surrounding area and the reach between the northern excavation site and the one near the dam. And its effects on water percolation in the City's spreading ponds and in the streambed need to be assessed, as well as potential enhancement of recreational opportunities.

4. Do more sluicing. How can storm flows be used to improve transport of sediment through the dam and downstream channel system? How much could be sluiced effectively, and how much water would be "wasted" by reduced ponding and percolation behind the dam? A conduit or pipeline down the Arroyo Seco to carry sediment toward the beach, or to some place short of the beach, could transport sediment with less water than sluicing.

5. Arrange for beneficial uses of usable portions of the sediment removed from Hahamongna. With proper processing, some may be suitable for beach replenishment, for agricultural purposes, or in sand and gravel operations. Sales of this sediment would offset the costs of processing.

6. Recognizing the huge long-term costs of removing sediment from Devil's Gate and other dams (not to mention the problem of space to put the sediment), one alternative could sketch the feasibility and costs of letting the stream return to its natural state, or to something closer to its natural state than it is now. What might it cost to buy out property owners in critical areas downstream, or to protect them against flooding? This approach may be unfeasible, but it would emphasize the importance of restricting development in flood plains in the future.

   It will be argued that the purpose of this project is simply to clean out sediment at Devil's Gate with minimal environmental impact, and that time and funds don't allow a study of the feasibility of returning the Arroyo Seco and other streams to a more natural state a generation or two from now. And the EIR for Devil's Gate may not be the best forum for a look at the distant future. But such an alternative could draw on the general findings of the County's Sediment Management Strategic Plan Task Force, and add the particular focus of the consultants and engineers who will shape the Devil's Gate project, to produce a valuable case study of how sediment in one of our major streams might be managed more effectively in the future.

   Don Bremner
   November 9, 2011

GABRIELEÑO BAND OF MISSION INDIANS
Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

County Department of Public Works
900 S Fremont Ave
Alhambra, CA 91803

Re: Hahamonga Watershed project

Dear Department of Public Works,

August 22, 2011

We are writing to express our great concern over the moving of earth at Hahamongna. While we understand the delay in obtaining an EIR, we are making you well aware that the Arroyo Seco basin is an extremely culturally sensitive area. We have documents from the Huntington Library dictating a massacre in the Arroyo Seco area in 1826 where thousands of Indians from Mission San Gabriel were marched to the area of the village of Hahamongna. They were massacred as a result of their uprising during the mission secularization period. Around 1874, a citizen of Pasadena found a pistol in the Arroyo Seco almost consumed by rust, on the barrel of which was the date of its manufacture 1810. It was probably lost in this battle. More recently a human skull was found in this area and is currently in our possession awaiting reinterrment.

Our tribe's history is very rich in this area. The primary Gabrieleno village of this area was Hahamongna (a variation of Povomeparngna which was the original name for the Pasadena Arroyo Seco area) of which its inhabitants occupied what is now known as the Arroyo Seco. The name for the City of Pasadena came from the village of Puntitavjatngna. Haramoknga is another village located in Pasadena.

In order to protect our resources, we're requesting one (or more depending on the scope of work) of our experienced and certified Native American monitors to be on site during all ground disturbances. While we have concerns about this project and it's environmental impacts, the purpose of having Native American monitors on site is not to delay or stop construction. The purpose of monitors is to protect and preserve our resources and our culture. There is so little of it left that even the smallest artifacts are priceless to us and the future of our children. We hope to hear from you soon.

Sincerely,

Christina Swindall

Christina Swindall Martinez, secretary
cell (818)406-1392
email: christinaswindall@yahoo.com

cc: City of Pasadena
Don Bremner, Chair of Hahamongna Watershed Park Advisory Committee
Supervisor Michael Antonovich
Larry Myers, Native American Heritage Commission

From: Grace Wong [gywseven7@gmail.com]
Sent: Thursday, October 20, 2011 10:20 AM
To: reservoircleanouts
Subject: Devil's Gate Reservoir Sediment Removal & Management Project

Categories: Scoping Comments

Dear DPW,

I like to comment on you current plan on the sediment removal at the Devil's Gate Reservoir. This plan of scrape out the basin leaving it barren will severely destroy many valuable nature habitat for wild lives.
Trucking out sediment only when it causes concern is not viable solution. We need a sustainable plan of less impact methods of sediment removal.
We should look for the very best practices and the newest technology and strategies and see this as an opportunity to rethink and redo sediment management.
Hahamongna is a valuable habitat and a necessary open space for the community. Do not take away this diminishing haven in the urban world!

Sincerely,

Grace Wong
Altadena, CA

From: Oelker, Gregg [Gregg.Oelker@UnitedWater.com]
Sent: Wednesday, November 09, 2011 7:19 PM
To: reservoircleanouts
Subject: Devil's Gate Reservoir Sediment Removal and Management Project

Categories: Scoping Comments

Hello,

I am a 35 year resident of Pasadena, and 20 year next-door neighbor to Hahamongna Park. Frankly, it's literally my back yard neighbor, as my yard ends at the park. We live on Crestford Dr. near the end of Altadena Drive. My wife and I hike and bike in the upper Arroyo from the JPL bridge to Devil's Gate Dam and back at least once every weekend. When I'm on vacation, I go down there every day. I know all the trails, and animal trails throughout this part of the Arroyo. We have watched the basin change and evolve over the years. It's really nature in action. The recent fire and sediment deposition have made changes come in rapid time.

The forest that has developed near the dam is certainly a place full of wildlife that should be saved. We often walk there near sunset, and wildlife there is abundant. The migratory birds living there are numerous, and amazing, not to mention the rabbits, coyotes, foxes, and other wildlife. We've even seen cougar tracks in that area. Many places like this used to exist, and this one developed due to your agency not removing sediment for many years. If you are worried so much about the sediment now, why did you do NOTHING for many years before now? I cannot remember any sediment removal except at the face of the dam in the 20 years I have lived in this area. This area should be left in the natural state it has developed into.

I somewhat support sediment removal at the face of the dam and in areas further upstream. It seems that after the fires of two years ago, sediment has filled the canyon 15-20 feet deep. Where once was a stream bed, now is meters of sand and rock. I think this is the place to focus your efforts on. Re-create the stream at the depth it once was. Instead of 4 million cubic yards as you plan, perhaps $1/10^{th}$ that much could be removed to recreate the stream bed. Limiting it as such would reduce the negative comments I have heard. Noise, pollution, 400,000 trucks all could be reduced with a more focused effort.

This should be done in a way to remove the sediment, then allow nature to retake the canyon bottom. Then, of course, you need to maintain the area, removing sediment on a schedule. Don't wait for disaster to come. Your current plans would change the Arroyo (my back yard!) in ways I cannot imagine. Leave the natural area that has developed alone! Let the plants and animals live! Focus your efforts on sediment, not nature.

Please consider this a comment against your plans, and hope for a more environmentally friendly and sustainable plan.

Thank you,

-gregg

Gregg Oelker
Pasadena, CA

From: Guido [guidoserious@charter.net]
Sent: Wednesday, October 05, 2011 3:45 PM
To: reservoircleanouts
Subject: Comments

Categories: Scoping Comments

Regarding Devils Gate Sediment Removal

The uproar re Sediment Removal by members of the community in the affected area is uncalled for. Devils Gate was not built in the 20's to provide better access to La Canada, but as a Catch Basin for mountain water runnoff. Unfortunately the County has been remiss in maintaining the Hahomonga Catch Basin for many years and it has become a convenient Recreational Area. Mother Nature in the mean time has provided the green amenities.

Now that the County has finally committed to remove the accumulated debris and reestablish the basin's primary function the surrounding community is upset. Yes there will be some inconvenience, but it is a small price to pay for the Greate Good, i.e. down stream Flood Control.

It also appears that our Dry Spell is over and we must be prepared for the present and future.

Sincerely,

H. Guido Meindl

From: Lilley, Keith
Sent: Wednesday, November 09, 2011 6:40 AM
To: Butler, Ryan
Subject: FW: HAHAMONGNA/DEVIL'S GATE DAM

Categories: Scoping Comments

Please add to the official comments

From: Hill Penfold [mailto:hpenfold@gmail.com]
Sent: Tuesday, November 08, 2011 9:58 PM
To: Lilley, Keith
Subject: HAHAMONGNA/DEVIL'S GATE DAM

Remove only the amount of sediment necessary to assure downstream safety.
Preserve as much of the natural surrounding environment as possible.
Immediately begin a **long-range comprehensive study** of alternatives to traditional DPW sediment removal methods for Hahamongna and all other 14 dams. Comprehensive means going beyond simply digging and trucking out the sediment. Among other things, it means looking at different transportation models for sediment removal. It also means including the upper watershed and the downstream storm channels in the analysis.

Hill Penfold
Tujunga

From: Beck, Michael
Sent: Monday, November 07, 2011 7:07 AM
To: Foster, Siobhan
Subject: FW: Initial Study Public Comment -- Hahamongna Sediment Removal

Siobhan,

FYI,

...Michael

From: Hugh Bowles [mailto:hsbowles@yahoo.com]
Sent: Sunday, November 06, 2011 5:26 PM
To: resevoircleanouts@dpw.lacounty.gov
Cc: molina@bos.lacounty.gov; seconddistrict@bos.lacounty.gov; zev@bos.lacounty.gov; aavila@lacbos.org; fifthdistrict@lacbos.org; Tornek, Terry; Bogaard, Bill; Gordo, Victor; Madison, Steve; Masuda, Gene; Robinson, Jacque; McAustin, Margaret; Holden, Chris; tim brick; tim wendler; ann scheid; donbremner@earthlink.net; Lori Paul; leeona@earthlink.net; mariettaemail@aol.com; Laura Garrett; Beck, Michael; Gutierrez, Julie; Williams, Tina; breauxarts@sbcglobal.net; mlbrowne@pasadena.edu; lbh@sprintmail.com; meb787@aol.com
Subject: Initial Study Public Comment -- Hahamongna Sediment Removal

This e-mail is a follow up to comment made at the EIR scoping session at La Canada High School cafeteria on Saturday, October 15 2011. These comments are submitted on behalf of the Hahamongna Watchdog Group.

1. Due to the large number of items in the Initial Study checked with “Potentially Significant Impact”,

there should be a strong focus on finding less impactful alternatives within the EIR. This is required by CEQA. The County's only alternative so far is to move from a project that plans to excavate 2 million cubic yards of sediment, to a project to excavate 4 million cubic yards of sediment. The expanded plan also includes a mining component with a plan to sell marketable materials as part of the excavation process. The County has moved from one proposal with a significant impact to a second proposal with even more significant impact. The County is going in the opposite direction required by law. To satisfactorily, and convincingly bring the EIR process within CEQA, the County must issue an RFP and distribute the RFP to independent firms of qualified hydrological consultants with a proven experience in working with water conservation, sediment management, and dams. The express purpose of the RFP must be to assist the County with finding a less impactful alternative to the sediment issue in Hahamongna and avert the many significant impacts the project will currently create.

The plan to expand the scope of the impacted area indicates the County cannot credibly assess alternatives on its own. There has to be a demonstrable effort to find less impactful options. If the County decides not to adopt those options in the EIR, this must be discussed in detail and backed up with full scientific analysis. The standard cursory examination of alternatives by the lead agent in an EIR is inadequate for a project with this level of impact on the environment.

The RFP distribution should include Philip Williams and Associates:

San Francisco: 550 Kearny Street, 9th Floor
San Francisco, CA 94108-2404

And Flow Science (Pasadena location):

723 East Green Street
Pasadena, CA 91101

2. Within the scope of alternatives there should be an assessment of:
    - The County's original proposal to allow sediment to flow into a smaller area with planned periodic clean out.
    - The impact the lowering of the dam spillway in 1998. This lowered the overall capacity of the dam to fulfill its flood control function. Is the planned scope of the clean out area enlarged as the County purposely reduced the dam capacity by lowering the spillway?
    - The large storm event that occurred in December 2005 where water was held behind the dam for over two weeks. While the dam was full we had a significant storm event of approximately 6 inches of rain. The flood control impact of the dam was minimal during this storm – the dam was already full. The water went uncontrolled over the spillway. What was the damage from this storm event downstream? There needs to not only be an assessment of the dam's capacity to engage in flood control, but also the downstream channel's ability to absorb significant uncontrolled storm flows over the dam spillway. (Note: During the 2005/2006 season 60 inches of rain were recorded at JPL).
    - The role mature willows play in slowing intense storm flows, and preventing large debris items from inhibiting the dam function. The heavy flows of the storm seasons after the Station Fire brought large debris items into the basin – the trunks of charred pine trees –the willows acted as a significant brake on the water flow, and prevented many of these items from reaching the dam.
    - The fact that 60% of the watershed burned in the Station Fire, a large proportion of the moveable debris within the watershed is already in the basin, and the likelihood within the proposed project period of 50% of the watershed burning again, with equivalent debris

deposits. In effect, the fact that components of the worst case scenario are already present, and the major impacts realized, how likely is this to occur again? Is it reasonable to assume that we will not likely have a 50% burn of the watershed again within a 5, 10, 20 year period – there just is not the material? This then reduces the risk of the worst case disaster event occurring during that period, and reduces the need for such an invasive approach to removing the sediment now.

3. The EIR must include a documented mitigation and restoration plan, with associated costs, a budget, and a demonstrated commitment to follow through. The mitigation and restoration plan should:

- Outline objectives and benchmarks for achieving those objectives.
- Assign designated and publicly acceptable experts to monitor restoration and mitigation – e.g. Pasadena Audubon should monitor the recovery of bird populations and measure against the planned objectives.
- Provide for enforceable sanctions if the County fails to meet the objectives.

In 1998 during the dam refurbishment, there was a requirement under the mitigated negative declaration for 3 years of restoration work consisting of re-seeding the project area with native plants and removing invasive species. This never occurred and is the reason for the large number of eucalyptus trees in the middle of the basin now.

Also, as part of the City of Pasadena's approval of the use of Johnson Field to store debris for the intermediary project, there was a condition placed that damage to the upper trail on the east side of the basin caused by a leaking storm drain be repaired along with the storm drain. The trail was repaired, but the storm drain was not. The storm drain has now started to erode the trail just to the south of the repaired section.

The County has a poor record on following through on mitigation and restoration efforts.

4. The EIR must contain full budget projects for the whole project and the source of funding for the project. For example if the County plans to sell gravel from the excavation, how much of that sale will go toward the project costs. All sources of funding need to be identified – disaster funds, property taxes, bond measures etc.

5. The EIR must outline an ongoing maintenance plan and budget once the project is complete. Does the County intend to maintain the whole excavation area as free of vegetation? How will this be managed, how will this be funded over time?

No one doubts the severity of the situation, or the need for action. The key is how to prevent the remediation of one man made environmental disaster by creating another man made environmental disaster.

Please ensure these comments are added to the administrative record.

Sincerely yours,

Hugh Bowles

Hahamongna Watchdog Group
Shelly Street
Altadena
626 482 9116

From: Lilley, Keith
Sent: Monday, November 14, 2011 7:04 AM
To: Butler, Ryan
Subject: FW: Hahamongna Sediment Scoping Comments

Categories: Scoping Comments

Please add to official comments

From: Jack Lindblad [mailto:jplindblad@gmail.com]
Sent: Friday, November 11, 2011 4:30 AM
To: Lilley, Keith
Subject: Hahamongna Sediment Scoping Comments

Similar to ecological disfigurement, social and environmental degradation and associated costs the offending corporation is responsible for - is Pacoima Canyon strip mining - yet another San Gabriel Mountains debasement in the making: Hahamongna Sediment 'Removal'

Attention: Keith Lilley, DPW Project Manager

It has come to my attention that the Los Angeles County Department of Public Works (DPW) has conducted two EIR scoping meetings addressing the removal the sediment from behind Devil's Gate Dam. The dam is located in Pasadena's Hahamongna Watershed Park which includes over 300 acres of beautiful and ecologically essential watershed above JPL - the Jet Propulsion Laboratory.

In keeping with the highest standards and practices of watershed management, and revitalization in these perilous times of Extreme Climate Disruption-caused weather events:
- Remove only the amount of sediment necessary to assure downstream safety.
- Preserve as much of the natural surrounding woodland environment as possible. Harm or remove No Oaks!
- Immediately begin a long-range comprehensive study of alternatives to the usual DPW sediment removal methods for Hahamongna and all other 14 dams. "Comprehensive:" in terms of moving beyond the argument of myopic digging and trucking out sediment.
- Sediment is not a waste by-product.
- Sediment provides habitat for fish and aquatic species.
- Sediment nourishes rivers and beaches.
- Sediment fills our valleys and the coastal plain.
- Sediment can be used for construction purposes.
- Study different transportation models for sediment removal. A conveyor belt may not have the least footprint. Include the upper watershed and the downstream storm channels in the analysis.
- Hahamongna is the vital link between the Upper and Lower Watershed...between the mountains and the city.

The current system of sediment management in Southern California is economically and environmentally unsustainable and Fails by:
- costing $3-5 billion in the next 20 years.
- aggravating human health risks (heavy equipment emissions, noise, traffic, dust, precludes natural flushing events).
- denying downstream landscapes and ecosystems of their essential building blocks (fine sediments, sands, gravel, nutrients, etc.)

This work presents an opportunity to set a new, positive paradigm to develop a Sustainable Integrated

Sediment Management Program by:
- Pursuing sediment management options that applies biomimicry to restore natural processes from the top of the watershed to the bottom (sluicing, stream and floodplain restoration, and others).
- Promoting SMART development and re-development.
- Applying prudent Land use regulations (green buffers, density, proximity to wildlands, defensible space, distance from geologic hazards).
- Mandating lowered impact development (LID)/Green, carbon-neutral building design.

Thanks,

Jack Lindblad

2012 - 2010 - 2008 Green Party candidate for the 39th California Assembly District seat
Accepts no corporate donations. Accepts donations only from human beings.
http://cambioconjack.com/
http://lindbladforassembly.blogspot.com/p/welcome_02.html
http://apps.facebook.com/jack_lindblad/
https://www.facebook.com/jack.lindblad
https://www.facebook.com/pages/Lindblad-for-Assembly-2012-Cambio-con-Jack/218484541520144
Lindblad for Assembly Cambio con Jack 2012 - 2010 - 2008
East San Fernando Valley Greens Local
East San Fernando Valley Community-based Economics: Locally-grown Produce
Move to Amend - East San Fernando Valley
Advocacy for Pacoima Canyon
(818) 785-2724

From: Jaime Parker [jaimepkr@yahoo.com]
Sent: Thursday, November 10, 2011 1:19 PM
To: reservoircleanouts
Cc: Pat Merrill
Subject: Devil's Gate Reservoir Sediment Removal and Management Project

Categories: Scoping Comments

To whom it may concern.

My family and I are very oppossed to the continued construction, dirt, and debris removal of the sediment in the Hahamonga Watershed. We live only a few houses from the entrance to the watershed on La Canada Verdugo Rd. and are offended that anyone would think it is ok to continue the ongoing removal of sediment that will require an additional 400,000 truckloads of sediment to be removed over the next three years. We, and other families, use the watershed everyday and having to deal with all the heavy trucks, noise, and pollution is unacceptable. The watershed is an extension of our backyard and used by hundreds of people everyday (i.e. bikers, runners, walkers, naturalists, etc) who are extremely inconvenienced and annoyed by the ongoing construction as it disturbs the natural beauty, wildlife habitat, and tranquility that we, and our local wild animals,seek in the wathershed rufuge. Place yourself in our position for one moment and how would you like it if we showed up in your backyard tomorrow and ran a bulldozer each and everyday for the next few years.....that's how 'close to home' your proposal for ongoing works hits all of us in this community.

Please leave it alone.

Sincerely,

Jaime E. Parker
p. (818) 281-8236

From: Lilley, Keith
Sent: Monday, November 14, 2011 7:07 AM
To: Butler, Ryan
Subject: FW: Hahamongna Watershed Park & Dam

Categories: Scoping Comments

Please add to official comments.

Looks like he is involved in opposing the mining operation at Pacoima and should be added to a contact list for that project.

From: jake robbins [mailto:kukumat@gmail.com]
Sent: Friday, November 11, 2011 2:35 AM
To: Lilley, Keith
Subject: Hahamongna Watershed Park & Dam

Keith Lilley
L.A. County Dept. Public Works

Mr. Lilley:

Urbanwild has informed me that your next project, after leveling and destroying the Arcadia Woodlands, will inevitably be to erect a dam and remove sediment at Hahamongna. As per Supervisor Mike Antonovich, who stands to profit from the endeavor, I understand you will be hoping to erect a total of 14 dams in the San Gabriel Mountains.

Let Hahamongna Watershed Park be an ideal model for what can be accomplished without removing the mature oak woodland. In other words, should your sediment removal program successfully preserve the wildlife habitat, others can be approved.

Please remove ONLY the amount of sediment necessary, as such, to preserve downstream safety AND the integrity of the oak woodland.

Please conduct a THOROUGH study of methods of sediment removal that accomplish this.

Please contact knowledgable biologists to survey for any rare or endangered species and habitat requirements, and leave ALL mature oaks standing.

Sincerely,

Jake Robbins
Advocacy for Pacoima Canyon
Green Party of California

From: Lilley, Keith
Sent: Wednesday, November 09, 2011 3:22 PM
To: Butler, Ryan
Subject: FW: Hahamonga

Categories: Scoping Comments

Please add...

-----Original Message-----
From: Laurel Beck [mailto:lifebloom@earthlink.net]
Sent: Wednesday, November 09, 2011 3:21 PM
To: Lilley, Keith
Subject: Hahamonga

Dear Mr. Lilley --

I am writing to urge that a long-term study of alternatives to current DPW methods of sediment removal, a study that would encompass the whole chain of dams under your supervision. I would also request a significant reduction in the amount of sediment to be removed from Hahamonga in the near future (less than half of that stated in the IER). Preserving our natural areas should be among the highest priorities, and is compatible with protecting lives, property and saving money.

Sincerely,
Laurel Beck
Pasadena resident

From: L Barlow [barlow.co@att.net]
Sent: Wednesday, October 05, 2011 9:22 PM
To: reservoircleanouts
Subject: Further comments on the Sediment EIR

Categories: Scoping Comments

Per my comments tonight, further elaboration. Submitted in writing, this is the digital copy.

DPW must begin a long-term study of sediment management rather than continuing with short-term remedies that require costly sediment removal programs year-after-year:

Dam reconstruction is effective and entirely feasible in the restoration of natural processes which carry away the sediment instead of trucking it from behind an outdated and unmaintained dam. The short-term costs to change the dam structure and clear out the obstructions to natural flow are vastly smaller than ongoing sediment removal programs which are not actually carried out, for cost reasons, endangering all the communities downstream of the dam. Life cycle estimates (100 years) should be the basis for cost comparisons that include the maintenance and repair for all structures, and this would integrate the value of natural ecosystems into the equation.

Sediment management is the self-inflicted result of placing dams in the way of natural water processes that carry the sediment to the base of the mountains and create a fertile alluvial plain. In order to replenish nutrients in the soil, as well as recharge the natural aquifers that supply well water, these natural drainage patterns must be restored. That doesn't preclude artificial water storage, but these strategies must engage the natural terrain properties that exist free of charge. Water flow moves sediment, and managing that flow rather than stopping it provides a sustainable way to provide water, soil nutrients, sand, gravel and mud into areas that sustain the ecology of the region.

Natural flood protection can be attained by protecting and restoring wetlands and floodplains, and by restoring a river's natural flow and meandering channel. Giving at least some floodplain back to a river will give the river more room to spread out. Furthermore, wetlands act as natural sponges, storing and slowly releasing floodwaters after peak flood flows have passed.

The following steps should be taken:

1. Adopt a strategic conceptual plan identifying the watershed region and its component functioning parts. Begin implementation of this concept by adopting public-private partnerships that can continually fund the ongoing restoration efforts through private fiscal investment repaid with bond or tax structures. Partner with communities and their leadership, mountains conservancies, conservation nonprofits and the County. Everyone working together can make this happen.

2. Implement reconstruction/modification of the dam to allow water and sediment flows downstream into the areas that need these natural flows. Develop water storage strategies that are effective and multivalent, possibly a series of check dams* that work in optimal natural locations and recharge the Raymond Aquifer.

3. Establish a flood plain easement program to minimize flood impacts, reduce repeat damages and store floodwaters for benefits of downstream residents and communities.

*Many check dams tend to form stream pools. Under low-flow circumstances, water either infiltrates into the ground, evaporates, or seeps through or under the dam. Under high flow (flood) conditions, water flows over or through the structure. Coarse and medium-grained sediment from runoff tends to be deposited behind check dams, while finer grains are usually allowed through. Extra nutrients, phosphorus, nitrogen, heavy metals, and floating garbage are also trapped or eliminated by the presence of check dams, increasing their effectiveness as water quality control measures. In nearly all instances, erosion control blankets, which are biodegradable open-weave blankets, are used in conjunction with check dams. These blankets help enforce vegetation growth on the slopes, shorelines and ditch bottoms.

Laurie Barlow, AIA
October 5, 2011
Hahamongna/Devil's Gate sediment removal scoping meeting

--

:: design :: collaboration :: innovation

Laurie Barlow, AIA
http://www.barlowcoweb.com/
http://greenswardcivitas.blogspot.com/

From: Madeline Schleimer [mdimbi@gmail.com]
Sent: Friday, November 11, 2011 8:34 PM
To: reservoircleanouts
Cc: Madeline Schleimer
Subject: comments regarding environmental impact of Devil's Gate Reservoir Sediment Removal and Management Project

Categories: Scoping Comments

Dear persons involved with this project and members of the larger community,

the system of check dams and concrete channels and excessive pavement of our communities has robbed
the community of the water destined for the aquifer, the sand for the beaches and the streamside areas belonging to all of us, wildlife included.

Stream restoration has to be an essential part of the management of sediment.
the continuation of the check dam and paved channel system only serves to isolate the larger community from the natural system which has inestimable value for our overall health in the long term. we have built our communities in the floodplain and have sought to protect them from flooding through check dams and channels.

the slated removal of the sediment is projected to cost around 3 to five billion dollars over the next 20 years, and it while it may address current concerns of excessive alluvial buildup, it neither prevents the recurring buildup
of sediment behind the dam nor restores water to the aquifer.
the use of hundreds of trucks a day will add to the already polluted air suffered by the folks living between pasadena and irwindale, where the sediment is intended to be placed.

there needs to be an alternative to the current plan of the county.
is one environmental disaster to be remedied by throwing great amounts of treasure to create another environmental disaster?
there must be great effort made to consult with ethical, competent professionals and public agencies who deal with sediment and watercourse management as well as ecosystem recovery in urban settings to uncover more environmentally sound approaches.
perhaps it is time to seek places where communities are coexisting with their waterways so as to restore the original ecosystems as much as possible.
there have been other comments made by folks who have experience dealing with this sort of thing.
at least one city council member in pasadena supports the developing of alternate approaches to the current plan.

in the past winter, the plants in the gathered sediment have stopped the progress of burned logs heading for the dam

there are 600,000 acre feet flowing out to the sea through arroyo and the los angeles river.
communities throughout the county are seeking water sources from as far as the great lakes.
restoration of streams and riparian areas throughout the watershed on it way to the ocean will return the water to the aquifer as it is intended.
these dams were built before we had environmental protection laws brought about by our more lately acquired environmental awareness.

we would not use technology from less aware early-last-century mindsets to solve most other problems before us today.

thank you

madeline schleimer
po box 731
altadena ca
91003-0731

the sediments contain essential minerals that contribute to the fertile valleys we know and love.
we must use our eyes that have been educated to the requirements for a healthy ecosystem and we will also restore our blighted communities

From: Mark Hunter [fishingyak@yahoo.com]
Sent: Sunday, November 06, 2011 9:42 AM
To: reservoircleanouts
Subject: Devil's Gate Reservoir Sediment Removal and Management Project

Categories: Scoping Comments

I attended the scoping meeting at La Canada High School on October 15, and got a lot of useful information. But I was still left with some questions. I want to be sure that the draft EIR will cover those questions.

Thanks,
Mark Hunter
818-957-5044

The County is treating the Devil's Gate sediment situation as an emergency. But the numbers don't add up. DPW did no serious sediment removal for 15 years. Then in autumn 2009 a huge, disastrous fire occurred, followed by a rainy winter, and the reservoir filled up with about a million cubic yards of new sediment. That is indeed a frightening development. But in response, the County wants to remove *4* million cubic yards. So in spring 2009 the County saw no emergency but now, in retrospect, they have decided that Hahamongna was actually 3 million cubic yards too full, even then? Doesn't make sense. How about removing the 1 million cubic yards quickly, then we can talk in a non-emergency way about the rest?

The County says they got to the 4 million number by calculating the absolute worst case model for a 50-year storm (2 million yards), then deciding that they needed to accommodate two of those events in rapid succession. Huh? Why two in succession, if this is such a rare event? Using reality instead of models, in the winters after the *entire* undeveloped watershed of Hahamongna was denuded by fire, they only got 1 million yards of sediment. That was a real, catastrophic event that yielded only half the problem forecast by their model. So maybe this storm model of theirs is flawed? I'd like to see a better justification for the proposed target of 4 million yards removed, quickly, rather than working in a lower-impact and more sustainable way.

The DPW is failing to use easy, natural, low-impact ways to clear sediment. (I'll use the term "sluicing" to mean deliberately allowing outflow water to mix with sediment and carry it downstream. I'm told there are additional terms for this process depending upon how and when it occurs, but the goal is the same in all cases.) Although DPW sluice a little sediment through the dam at the beginning of each rainy season, they subsequently stop sluicing later in the season. Nor do they sluice during the dry season, although there is still a steady flow of water then. But sluicing is:
(a) quiet
(b) active 24/7, without regard to working hours or rush hours
(c) without any traffic impact
(d) with almost no pollution or greenhouse gas impacts
(e) without the need to dry the sediment before transport - the wetter, the better

Some additional questions for DPW:

1. The Arroyo Seco below Devil's Gate is a fast, well-engineered channel. It seems it could carry quite a bit of sediment. Have you calculated that number? For example, for every 10 cubic feet of stream flow, how much fine sediment (the kind that is most troublesome to the dam) could be carried? That would be a year-round, sustainable, permanent way to reduce sediment. That number would be an important fact to mention in the EIR.

2. The City of Pasadena diverts a major portion of the Arroyo Seco flow at a station in the canyon above Hahamongna. What would happen if Pasadena stopped diverting water there during dry season, thus increasing the dry-season flow in Hahamongna? What effect would that have on dry-season sluicing efforts? Certainly Pasadena would be reluctant to stop diversions, because they would have to replace that water with more expensive MWD water. However, the heavy equipment and trucks used by the County are very expensive, too. What if the County used the extra stream flow for

sluicing or launching sediment instead of trucking, and reimbursed Pasadena for the extra water replacement costs? That might actually save the County money, and it would certainly reduce environmental impacts. This possibility should be addressed in the EIR.

3. Are there other sources of water that could aid in sluicing? Reclaimed sewage water?

From: Mark Hunter [fishingyak@yahoo.com]
Sent: Sunday, November 06, 2011 9:50 AM
To: reservoircleanouts
Subject: Re: Devil's Gate Reservoir Sediment Removal and Management Project

Categories: Scoping Comments

Sorry, I pressed "Send" just a little too quickly - bad habit of mine.

One additional area I would like to see treated in the EIR is a study of how other jurisdictions have handled sediment buildup in alternative ways. The "dig, truck, and dump" protocol was reasonable in the early days of flood control when the natural environment wasn't under much stress and Southern California wasn't so crowded. But that protocol now raises serious concerns in the areas of pollution, disturbance of neighborhoods, and degradation of scarce riparian habitat. It seemed to me, at the scoping meeting, that DPW had already decided to dig, truck, and dump, and now they were just noodling about details and mitigation. I would like to see DPW take two giant steps backward, expand the scope of their vision somewhat, and truly research the alternatives, such as helping the sediment run down stream channels to the sea, as it has for millions of years.

Thanks,
Mark Hunter

From: Mark Hunter <fishingyak@yahoo.com>
To: "reservoircleanouts@dpw.lacounty.gov" <reservoircleanouts@dpw.lacounty.gov>
Sent: Sunday, November 6, 2011 9:42 AM
Subject: Devil's Gate Reservoir Sediment Removal and Management Project

I attended the scoping meeting at La Canada High School on October 15, and got a lot of useful information. But I was still left with some questions. I want to be sure that the draft EIR will cover those questions.

Thanks,
Mark Hunter
818-957-5044

The County is treating the Devil's Gate sediment situation as an emergency. But the numbers don't add up. DPW did no serious sediment removal for 15 years. Then in autumn 2009 a huge, disastrous fire occurred, followed by a rainy winter, and the reservoir filled up with about a million cubic yards of new sediment. That is indeed a frightening development. But in response, the County wants to remove *4* million cubic yards. So in spring 2009 the County saw no emergency but now, in retrospect, they have decided that Hahamongna was actually 3 million cubic yards too full, even then? Doesn't make sense. How about removing the 1 million cubic yards quickly, then we can talk in a non-emergency way about the rest?

The County says they got to the 4 million number by calculating the absolute worst case model for a 50-year storm (2 million yards), then deciding that they needed to accommodate two of those events in rapid succession. Huh? Why two in succession, if this is such a rare event? Using reality instead of models, in the winters after the *entire* undeveloped watershed of Hahamongna was denuded by fire, they only got 1 million yards of sediment. That was a real, catastrophic event that yielded only half the problem forecast by their model. So maybe this storm model of theirs is flawed? I'd like to see a better justification for the proposed target of 4 million yards removed, quickly, rather than working in a lower-impact and more sustainable way.

The DPW is failing to use easy, natural, low-impact ways to clear sediment. (I'll use the term "sluicing" to mean deliberately allowing outflow water to mix with sediment and carry it downstream. I'm told there are additional terms for this process depending upon how and when it occurs, but the goal is the same in all cases.) Although DPW sluice a little sediment through the dam at the beginning of each rainy season, they subsequently stop sluicing later in the season. Nor do they sluice during the dry season, although there is still a steady flow of water then. But sluicing is:

(a) quiet
(b) active 24/7, without regard to working hours or rush hours
(c) without any traffic impact
(d) with almost no pollution or greenhouse gas impacts
(e) without the need to dry the sediment before transport - the wetter, the better

Some additional questions for DPW:

1. The Arroyo Seco below Devil's Gate is a fast, well-engineered channel. It seems it could carry quite a bit of sediment. Have you calculated that number? For example, for every 10 cubic feet of stream flow, how much fine sediment (the kind that is most troublesome to the dam) could be carried? That would be a year-round, sustainable, permanent way to reduce sediment. That number would be an important fact to mention in the EIR.

2. The City of Pasadena diverts a major portion of the Arroyo Seco flow at a station in the canyon above Hahamongna. What would happen if Pasadena stopped diverting water there during dry season, thus increasing the dry-season flow in Hahamongna? What effect would that have on dry-season sluicing efforts? Certainly Pasadena would be reluctant to stop diversions, because they would have to replace that water with more expensive MWD water. However, the heavy equipment and trucks used by the County are very expensive, too. What if the County used the extra stream flow for sluicing or launching sediment instead of trucking, and reimbursed Pasadena for the extra water replacement costs? That might actually save the County money, and it would certainly reduce environmental impacts. This possibility should be addressed in the EIR.

3. Are there other sources of water that could aid in sluicing? Reclaimed sewage water?

10604 Walnut Drive
Shadow Hills, CA 91040
11 November 2011

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

Re: Devils Gate Reservoir Sediment Removal and Management Project Public Scoping Meeting

Dear Mr. Lilley:

The entirety of Hahamongna Watershed Park is used for recreational purposes, be it Frisbee golfers, horseback riders, hikers, geo-cachers, cross-country runners, or summer day-campers. The day-campers explore through the area that is marked in your excavation plan. If no one were allowed in the entire area for five years, everyone on the aforementioned list would be unhappy. The horses would not get as much exercise, and the day-campers would lose a significant portion of their experience with nature. This experience with nature is important, and especially so in the youngest campers (2 – 5 year-olds), and is therefore a major part or the camp culture.

As the project was presented in the initial study document, for the five year duration of the sediment removal, no one will be allowed into the designated area. Once the area has been excavated, it will take time for the vegetation to regrow. Since the vegetation takes time to grow back, the campers would not be able to use the basin the way they use it now, which is to frolic amongst mature trees and to seek shade from the occasional clump of willow trees while on a hike, among other things.

However, if you excavate in sections, people can use the majority of the park, and hopefully by the time you get to the last portion of the park, some portions of the park will have regrown their ***NATURAL*** habitats, not some invasive exotic species like Castor Bean, Ivy, Tree Tobacco, or other such non-native species.

It is imperative that the park be preserved, for the aforementioned reasons of education of nature, and retaining natural habitats. There are other ways for the park to remove sediment from the basin while still maintaining recreational operability within the park, but this is the option that I urge you to consider, because it fits in perfectly with the schedule of the day camp that I went to (Tom Sawyer Camp), and it should fit in reasonably well with the schedules of everyone else that uses the park. It will also allow the park to still be used for all the current recreational purposes.

Sincerely,

Markus Klemm (age 14)

From: Meb787@aol.com
Sent: Thursday, November 10, 2011 1:28 PM
To: reservoircleanouts
Cc: evizcarra@lacbos.org; Stone, Christopher; Sharp, Daniel B.; Lilley, Keith; cbalvin@sbcglobal.net
Subject: Scoping letter - Devil's Gate Reservoir Sediment Removal and Management Project

Categories: Scoping Comments

November 10, 2011

Los Angeles County Department of Public Works
Water Resources Division—Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974

To LA County DPW Water Resources Division:

The Devil's Gate Reservoir Sediment Removal and Management Project calls for the removal of up to 4.0 million cubic yards of sediment within a project area which has now grown to 175 acres. Despite the impact the project will have on Hahamongna, the Los Angeles County Flood Control District's Initial Study does not define the project in sufficient detail. This is unfortunate because the scope of the project is such that it will shape what sort of park Hahamongna is to be for decades to come. The massive inflow of sediment caused by the Station Fire must be dealt with, of course. There is no disagreement about that; the disagreement is about how this is to be done.

I concur with the comments made by the Urbanwild Network that the County should immediately begin a long-range comprehensive study of alternatives to traditional DPW sediment removal methods for Hahamongna and all other 14 dams. "Comprehensive" means going beyond simply digging and trucking out the sediment. It means looking at different transportation models for sediment removal and looking beyond the immediate Hahamongna basin to include the upper watershed and the downstream storm channels in the analysis.

As the Initial Study shows, the project will have a wide variety of significant environmental impacts upon such areas as biological resources, air quality, recreation, transportation, and noise. Since the immediate surroundings of the park include residential neighborhoods and several schools, it is critical that the plan alternative chosen be that which best addresses air quality issues.

The alternative chosen should also best protect Hahamongna's rich and diverse habitats: coast live oak woodland, willow scrub, mule fat scrub, riversidian alluvial fan sage scrub, sage scrub, and southern sycamore riparian woodland. These deserve protection not only for their ecological importance but also because the park with its scenic beauty and abundant natural life has become a haven for the community seeking a respite from an ever more hectic urban environment. The alternative chosen should remove enough sediment from the basin to ensure public safety while at the same time allowing time for the County to develop a long-term sediment management strategy for Hahamongna. I concur with the comments made by the Pasadena Audubon Society that as little of the habitat as necessary should be disturbed and that all mitigation for what must be removed should be done in Hahamongna, not offsite.

The environmental report should investigate alternatives such as the use of conveyor belts within the park, the use of sluicing, launching, and other techniques which would lessen the need for trucks and roads within Hahamongna. The fewer trucks are required, the less the impacts upon the park as well as the surrounding communities.

This is not a typical scoping letter because this is not a typical reservoir cleanout project. As Pasadena stated in its Master Plan for the park, Hahamongna meets many needs: flood control, water conservation, wildlife habitat and recreation. The city has adopted an ambitious plan which will have many environmental impacts upon the park. The DPW reservoir cleanout will not proceed in a vacuum but rather at the same time Pasadena is undertaking many of its projects. My comments which follow will focus upon this issue as well as addressing the recent history of development plans in Hahamongna. The County should study this so as to accomplish its sediment removal objectives without facilitating further development in the park which the community has been opposing since the late 1980s.

DPW's sediment removal project is only one of many projects planned for the park in the near future. The cumulative environmental impacts of all these projects must be studied together so that the community and the decision makers can fully assess their impacts.

Among these, one of the most significant is the Hahamongna Basin Multi-use Project, a joint project of the Arroyo Seco Foundation, the City of Pasadena and the County Flood Control District. This is the title of the project as it was presented for Prop. 84 Integrated Regional Water Management Plan funds. Pasadena subsequently designated certain projects within the scope of the Hahamongna Basin Multi-use Project as the Hahamongna Multi-benefit Project. These include the controversial Sycamore Grove Multi-Purpose Field and the expanded parking lot, the Westside Perimeter Trail, and the restoration of Berkshire Creek.

Pasadena's project includes moving between 250,000 and 500,000 cubic yards of sediment to create 23 acres of land for the sports field and expanded parking above the flood plain and so will have environmental impacts of the same nature, if not scale, as those of DPW's project. There will be extensive removal of trees and a major reconstruction of a natural area.

The restoration of Berkshire Creek, according to the Hahamongna Master Plan, includes the widening of what is now a one lane road which crosses over the creek. The plan is to open up what is now a serene, wooded area of the park to vehicle traffic. The most recent version of the Hahamongna Multi-Benefit Project shows a new connection to the sediment removal area and the enlarging of the project area. The changes were not explained to the Hahamongna Advisory Committee so their significance is not known. <u>The significance to DPW's sediment removal project planning, however, is that the community is relying upon the County to choose alternatives which do not have the potential to become future roads in the park.</u> More park roads in Hahamongna have been rejected time and time again.

One alternative which would greatly lessen truck impacts both upon the park and the neighborhoods would be to use an unpaved road at the southern end of the park for sediment removal. If there was an access on both sides of the dam, the width of the road could be reduced and trucks could enter on one side and exit on the other, allowing for a simple one way path of travel. This is exactly what Pasadena proposed in the Hahamongna Master Plan, Summary of Proposed Projects. A new entry slip lane on the east side from Oak Grove Drive would allow direct access to the dam and basin. On the west side Pasadena proposed using the existing unpaved access road which was used during prior construction projects on the dam. Traffic would only be allowed to turn right and would access the freeway at Berkshire Place. If sediment must be removed in the northern portion of the basin, it should be moved by conveyor belt to the southern end of the basin so as to cause as little disruption as possible to the park and the surrounding neighborhoods.

The environmental impacts of the tree removals for DPW's project must also be considered in light of Pasadena' stated policy that all non-native trees are to be removed in Hahamongna. An inventory should be completed which shows how many trees are ultimately to be removed in the park, taking in to account DPW's project as well as the various city projects, the time frame within which the trees will be removed, and what will be the effects upon the wildlife in the park even if the tree removals are done on a phased basis.

Among other Pasadena projects which will impact the park in the next few years are the renovation of the spreading basins on the east side of the park, the building of new spreading basins on the west, and a pumpback system which will draw water from the storage pool behind the dam back up to the spreading basins. Another water project is discussed in Pasadena's Water Integrated Resources Plan but not in the Hahamongna Master Plan. This would pump water stored behind Devil's Gate Dam over to the Eaton Canyon spreading basins for additional ground water recharge. The city plans to coordinate with Los Angeles County with the goal of construction by 2015.

Recently the Greater Los Angeles Integrated Regional Water Management was awarded $25.6 million for twelve water projects, one of which is the Central Los Angeles County Regional Water Recycling Program, a plan involving the Los Angeles Department of Water & Power, the Foothill Municipal Water District, Pasadena Water & Power and Glendale Water & Power, according to the IRWMP grant application. The plan is to support a regional expansion of recycled water to be supplied by the LA-Glendale Water Reclamation plan to replace potable water consumption. The plan is also studying the feasibility of spreading recycled water in the Eaton Canyon spreading basins for groundwater recharge. The map for the Groundwater Replenishment Facilities Planning Study in the IRWMP grant application includes the Arroyo Seco spreading grounds in Hahamongna as well. (This may be the same project described in the Pasadena Water Integrated Resources Plan.)

All of the above suggests big changes ahead for Hahamongna. The environmental impacts of all these upcoming projects should be considered when the impacts of the DPW sediment removal project are considered. If they are not, the total impacts will not be known nor will they be properly mitigated.

The other issue of concern is somewhat unique to Hahamongna. It will not be found on any standard CEQA checklist but is nevertheless critical to the future of the park. For over twenty-five years the community has resisted further development and worked steadfastly to keep the park as natural as possible. There is concern, however, that the tragedy of the Station Fire may be compounded by a sediment removal plan with haul routes within the park which would allow for the future roads and expanded development the community has opposed for so long.

The following is a brief summary of the development proposals for the west side of the park beginning in the late 1980s, both those of the City of Pasadena and others, which show the enormous pressure the park has been under.

Pasadena decided in the early 1990s to take out the east side Jet Propulsion Lab (JPL) parking lot and replace it with water spreading basins. A parking garage was to be built in the park to house the displaced cars, thus generating revenue from increased water percolation while still retaining the JPL parking revenues. One of the locations proposed for this garage as early as 1992 was the JPL West Arroyo parking lot, carved out of open space as a temporary parking lot in 1986. In the 2002 Hahamongna Watershed Park Master Plan, park user access to this garage was proposed via a new road to be built across the Annex property. According to city documents, as many as 600 cars were projected to pass through the park to access the garage on weekends. One consultant even suggested that revenue could be generated by using this parking garage for off-site parking for the Rose Bowl.

But to return to 1986 – it was actually two west Hahamongna open space parcels, including one on the Hahamongna Annex (the 30 acres which Pasadena purchased from the Metropolitan Water District(MWD) in 2005), which were rezoned so that the JPL West Arroyo parking lot could be created. These two open space parcels became Planned Development-16. Although the Annex parcel was never used for JPL parking, it still to this day retains the PD zoning. The strange result is that part of the Annex, protected in perpetuity by an open space easement, is zoned for a planned development!

In 2007, JPL received notification from Pasadena that in 2013 the spreading basin project would begin and JPL would have to vacate the east parking lot as of spring 2013. Where those 1200 cars would park in the future and how that would impact Hahamongna became questions of more than academic interest. As of today, JPL is planning to build a parking garage on its own campus although the funding has not yet been approved by the federal government. Until this funding is secured, the issue of JPL parking will continue to impact the park.

Over the years, various developments have been proposed for the park in addition to the parking garage. In 1988, William H. Pickering, a former JPL Director, sent a letter to the City expressing interest in building a Hall of Science in Oak Grove Park. In 1991, a Devil's Gate draft park plan map shows a general science museum located immediately to the east of the Annex property with a large parking lot just to the north. A year later, a Pasadena staff report mentions the south knoll near the Equestrian Staging Area as a possible location for a science museum. In 1993 Pasadena staff submitted to the City Council a proposal to bring the Southwest Museum to Hahamongna. This was an ambitious project which would have changed the nature of the park forever – an influx of 300,000 visitors was projected!

Five year later, in 1998, Pasadena approached MWD expressing interest in purchasing the Annex property where Los Angeles County Fire, the U.S. Forest Service, Rose Bowl Riders and Tom Sawyer Camps had been located for many years. At the time MWD was not ready to sell but proposed instead a low cost long-term lease. For over 5 years the lease negotiations dragged on without success. MWD wanted to retain the existing tenants while Pasadena wanted a lease which would give them the ability to substitute users and change the intensity of land uses on the property in the future. Foothill Municipal Water District also wanted to retain part of the property for a water storage tank which further complicated the lease negotiations.

In 2005 MWD's Board of Directors reversed course. They decided the property was no longer needed for any water purpose and could be sold. Pasadena then purchased the property and began the Annex planning process which resulted in the reappearance of the road to the west JPL parking lot, a critical component of earlier development proposals.

Pasadena was not the only entity still interested in developing the Annex, however. In 2001, JPL met with MWD staff and set forth a plan for a science museum and a parking garage on what is now the Annex property. The JPL Master Plan, released in 2003, identified the Annex property as having acquisition potential for Laboratory expansion. There was interest from the private sector as well. In 2003, when word got out that the Forest Service was not interested in renewing their lease, a real estate broker contacted MWD about putting an office park on the Annex. About the same time, another broker offered his services to find what he considered a suitable tenant for the property such as a private school campus.

Throughout the years, despite this enormous development pressure, the community remained steadfast in its commitment to a natural, rustic Hahamongna, attending hundreds of meetings over the years. The equestrian community was particularly active, concerned that the plan was eventually to move Rose Bowl Riders, Tom Sawyer Camps and MACH 1 off the Annex and out of the Arroyo in favor of higher intensity uses which would generate more revenue.

The community was so concerned about Hahamongna and the rest of the Arroyo that, in 2003, over 600 comments were sent in concerning the Arroyo Seco Master Environmental Impact Report. In response to those comments, Pasadena removed the parking garage and the road through the Annex from the Hahamongna Watershed Park Master Plan.

The specter of the road reappeared once again, however, after Pasadena purchased the Annex from MWD and began planning for the use of the property. A long, complicated planning process took place which involved options including a road and a "trail corridor" wide enough to become a road at some future date. There was community protest led by the Friends of Hahamongna demanding that the road be removed once and for all. The Planning Commission, the Design Commission, the Hahamongna Advisory Committee, and the City Council heard the community loud and clear. The Council issued a set of Guidelines for Staff which directed staff to prepare "a design for a 10 foot wide (maximum) bikeway along the northern perimeter of the HWP Annex with a design... that does not lend itself to becoming a road..." Has the road finally been laid to rest? There are a few worrisome signs that this may not be the case, however, as planning for the park moves forward.

All those who have worked to protect Hahamongna from development over the past twenty-five years look to the County of Los Angeles to design a sediment removal project which will accomplish its objectives without facilitating more intensive development of the park. The community looks to the County because, despite all of Pasadena's master planning and all the community input over all these years, development plans for Hahamongna never seem to be beaten down for good.

Thank you for the opportunity to comment.

Sincerely,

Mary E. Barrie

Cc: Edel Vizcarra, Planning Deputy for Supervisor Mike Antonovich
Chris Stone, Assistant Deputy Director, LA County Department of Public Works
Dan Sharp, Sediment Management Strategic Plan Manager, LA County DPW
Keith Lilley, Principal Engineer, LA County DPW, Water Resources Division
Christle Balvin, Urbanwild Network

NOTICE OF PREPARATION

TO: Agencies, Organizations and Interested Parties

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report in Compliance with Title 14, Section 15082(a), 15103, and 15375 of the California Code of Regulations

The Los Angeles County Flood Control District (LACFCD) is the Lead Agency under the California Environmental Quality Act (CEQA) in the preparation of the Environmental Impact Report (EIR) for the project identified below. The Lead Agency has prepared this Notice of Preparation (NOP) for the EIR in order to provide the widest exposure and opportunity for input from public agencies, stakeholders, organizations, and individuals on the scope of the environmental analysis addressing the potential effects of the proposed project.

PROJECT TITLE: Devil's Gate Reservoir Sediment Removal and Management Project

AGENCIES: LACFCD requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the proposed project, in accordance with California Code of Regulations, Title 14, Section 15082(b).

ORGANIZATIONS AND INTERESTED PARTIES: LACFCD requests your input on which environmental issues associated with the proposed project which merit further analysis in the EIR.

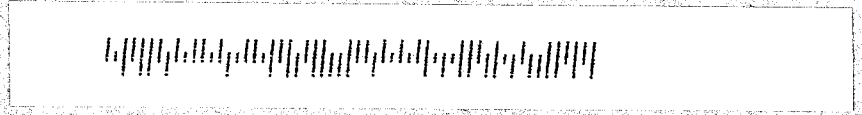
PROJECT LOCATION: The Devil's Gate Reservoir Sediment Removal and Management Project is located in the City of Pasadena, in Los Angeles County approximately 14 miles north of downtown Los Angeles (see Figure 1, Project Vicinity Map and Figure 2, Project Boundary Map).

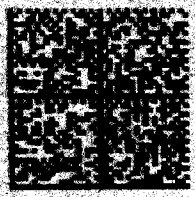
PROJECT DESCRIPTION: The proposed project would remove up to 4.0 million cubic yards of sediment from the reservoir behind Devil's Gate Dam to restore it to its current design standard, and establish a reservoir configuration more suitable for routine maintenance activities including sediment management. Although approximately 2.6 million cubic yards of sediment is the current excess amount of sediment in the reservoir, additional sediment accumulation is anticipated during the upcoming storm seasons due to the burned condition of the watershed that will have to be removed. The ultimate reservoir configuration and volume of sediment to be removed will be determined based on locations of access roads; areas for preservation or restoration of native vegetation; and the amount and location of sediment inflow that occur during the upcoming storm seasons.

Over the years, as storm events deposited sediment in the reservoir, native and non-native vegetation established itself in the sediment deposits. During storm events following the Station Fire, a large portion of the reservoir vegetation was buried in sediment; however significant amounts of vegetation, including numerous mature willow trees remain present. In order to remove the sediment from the reservoir, vegetation growing within excavation areas will require removal. The sediment and organic materials will be trucked off-site via local roads accessing the 210 Freeway and then taken to sites that are already prepared and designated to accept such material without additional construction or vegetation and habitat removal.

The goal of this project is to return adequate flood control capacity to the facility and establish a reservoir configuration more suitable to Los Angeles County Department of Public Works' routine maintenance activities. Primary project objectives include:

- Reducing flood risk to the communities downstream of the reservoir adjacent to the Arroyo Seco by restoring reservoir capacity for flood control and future sediment inflow events;





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Devils Gate

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
Box 54153, Los Angeles, California 90054-0153

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Attn: (Water Resources Div.) 162
P.O. Box 1460
Alhambra, CA 91802-9974

Form 136 3/94

Comments on Devil's Gate Reservoir Sediment Removal and Management Project
Sediment Removal and Habitat Enhancement Concepts **Mickey Long**

November 9, 2011

Watershed is much more than water and sediment. Therefore a Watershed Management program must include all functioning parts of the watershed ecosystem, including, but not limited to vegetation, wildlife and phenology (timing of ecosystem functions, such as flowering, bird nesting seasons, etc.) into sustainable planning for the watershed.

Therefore a County Watershed Management Division must broaden its thinking, planning and actions to encompass this Holistic approach to this Watershed Management mission.

County Public Works has applied Physical and Engineering management into its work in the past, with obvious success in terms of flood control, sediment capture and ground water recharge. It is critical that the County planning process incorporates all aspects of Biological resource management into the plans to make the mission complete. This would be Ecological Engineering, or "Eco-engineering".

At Hahamongna the following concepts should be recognized and included in any sediment removal and overall maintenance plan.

1. One stated goal in the Devil's Gate Reservoir Sediment Removal and Management Project is "Supporting sustainability by establishing a reservoir configuration more suitable for routine maintenance activities including sediment management."

2. The Devil's Gate Dam interrupted natural processes and those processes of water flow and sediment movement downstream along with vegetation dynamics (establishment and re-establishment of riparian vegetation) need to be restored by reincorporating these functions into the management plan. Holistic, ecosystem planning must be incorporated into the project process in order to have real sustainability.

3. Incorporate natural areas and native vegetation and functioning ecosystems into all flood and sediment planning. Integrate wildlife habitat into the Hahamongna Basin plan. The southern and central portion, behind the dam, floods most often and forms a lake, and is utilized as a buffer pool for sediment dropout to protect the dam valve. Treat that feature and surrounding area as a wildlife lake-reservoir, not just a flood reservoir. Design sediment removal to create such a lake with irregular, meandering shorelines, peninsulas and stands of willows along the shore. Maintain a wide buffer perimeter of riparian woodland around the central pool, not disturbed by periodic debris removal. Conceptual drawing attached as Page 3.

4. Strongly consider a meandering stream course created by sediment removal in more linear fashion above the reservoir/lake. Not all the sediment needs removal in the upper basin and can be left as terraces to the sides of a more natural stream channel or braided stream to recover naturally or be restored to riparian and alluvial scrub vegetation.

5. All sediment removal or construction work in and near riparian stands and other vegetation must, by law (California State Code 3503 and Federal Migratory Bird Treaty Act), avoid the bird nesting season. California Department of Fish and Game provides guidelines.

6. The losses of native riparian stands during sediment removal mitigated and restoration should be at ratio of at least 2 to 1. Agency consultation and input needed (U.S. Fish and Wildlife, Department of Fish and Game).

7. There are stands of emergent native wetland vegetation, cattails and bulrush, surrounding seasonal pools in the southwestern end of the basin near the dam. Impacts could occur to waters of the U.S., including wetlands, as a result of sediment removal in this area.

8. There remain stands of rare Alluvial Sage Scrub in the northern portion of the basin, and the recent sediment deposition does not destroy this community. Indeed, the plant community and the ecosystem it supports rests upon layers of alluvium deposited over millennia. This dynamic community depends on sediment movement and flooding to rejuvenate the vegetation. Terraces and banks supporting current and naturally re-establishing Alluvial Sage Scrub should be allowed to remain intact.

9. As briefly shown in the County slide presentation, the entire Hahamongna basin has high value on a daily basis as a passive recreation area, supporting hiking, horseback riding, nature study, birding, plant study, photography. This all should be an integrated component of the watershed management plan. Maintain or create new access points to the riparian woodlands and lake for the passive, low impact uses such as hiking, birding, and nature study.

Wildlife Lake-Reservoir design concept

Michael Long
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mlongbird@gmail.com

Public Comments – Devil's Gate Reservoir Sediment Removal Project and Management Project

Commenter: Mitzi Shpak, 2062 Lewis Ave., Altadena, CA 91001
Contact Info: email – msmshpak@gmail.com mshpak@caltech.edu
Phone – 626-825-9795

COMMENTS

- Project description is over-limited, truncated, and misleading and does not reflect the true scope of total actions necessary to maintain and manage this reservoir and does not address the larger issue of Best Management Practices (BMP) for flood control using the knowledge base that exists in 2011, watershed management according to the 2008 Strategic Plan of the Los Angeles County Department of Public Works, and reduction of Green House Gas (GHG) emissions as mandated by the State of California in AB 32. Any significant action taken in any part of the Los Angeles Drainage Basin affects the basin as a whole and **this EIR must encompass the sediment management plan for the entire watershed. At the very least it must include the currently proposed projects for Devil's Gate (4.0 million cu.yds.), Big Tujunga (4.4 million cu.yds.), Cogswell (3.31 million cu.yds.) Morris (unstated amount), and Pacoima (2.424 million cu.yds.) (a total of 14-17 million cu.yds.) that are scheduled to be removed in the near future---a million and a half truck trips---this constitutes a major environmental impact to the region and must be considered as a single project under CEQA.**
    - The California courts have consistently stated: "Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal…and weigh other alternatives in the balance"[1, 2]
    - The courts have repeatedly observed: "A narrow view of a project could result in the fallacy of division, that is, overlooking its **cumulative impact** by separately focusing on isolated parts of the whole.[3]
    - The 14 dams and 162 debris basins of the Los Angeles Flood control District were designed and built prior to NEPA and CEQA and an overall plan for their management has never been vetted through either the NEPA or CEQA process.
    - Neither the LACDPW's Strategic Plan nor the Los Angeles River Master Plan address (or even mention) the Arroyo Seco which feeds directly into the Los Angeles River.
    - LACDPW is currently in the process of developing an Integrated Regional Water Management Plan (IRWMP). The management of the Devil's Gate Reservoir should be informed by this IRWMP and the entire dam and debris basin system should be included in a comprehensive EIR that addresses sediment removal/management as a holistic

system as informed by the USEPA's memorandum and documents on Achieving Water Quality Through Integrated Municipal Stormwater and Wastewater Plans.[4]

- To effectively implement CEQA, NEPA and the USEPA's guidelines for IRWMP it is required that a comprehensive study of the larger environmental impact of continuing the current piecemeal, 'putting out fires', approach to stormwater and sediment management be conducted and as part of this comprehensive study, alternative, currently feasible, management practices be studied and compared.
    - There are 14 dams and 162 debris basins in the flood control district. In the next 20 years it is estimated that 82+ million cubic yards of sediment will need to be removed at a cost of $3-5 billion (($30-$60/cu. Yd.) (Arroyo Seco Foundation) .
- The sediment removal should use feasible, alternative technology wherever possible to mitigate human health risks from truck and equipment emissions[6], noise[5], traffic, dust, and other harmful outcomes. This should not be limited to mechanical and equipment considerations, but should include all 'least harmful' alternatives to sediment removal.
    - More than 30 human epidemiological studies have found that diesel exhaust increases cancer risks, and a 2000 California study found that diesel exhaust is responsible for 70 percent of the cancer risk from air pollution.[6] More recent studies have linked diesel exhaust with asthma.[7] Major air pollutants from diesel engines that can affect human health include particulate matter (PM), volatile organic compounds (VOCs), nitrogen oxides (NOx), and sulfur oxides (SOx).
    - The health effects of pollution from diesel exhaust may include asthma, other respiratory diseases, cardiovascular disease, lung cancer, and premature death. In children, these pollutants have been linked with asthma and bronchitis, and high levels of the pollutants have been associated with increases in school absenteeism and emergency room visits. In fact, numerous studies have shown that children living near busy diesel trucking routes are more likely to suffer from decreased lung function, wheezing, bronchitis, and allergies.[8,9,10]
    - A new study has linked pm 2.5 with obesity[11].
    - A new study has linked pm 2.5 with diabetes type II[12].
    - The cumulative impacts from the increased risk and adverse health impacts must be assessed for the region since increased emissions, traffic, noise and dust will affect the entire transportation corridor as well as the air basin as a whole, which already has the worst air pollution in the nation. The AQMD's current assessment of carcinogenic risk in the immediate area of the project is 508 per million[13] –a significant level of risk. Any additional pollution burden may increase that risk exponentially since air pollution levels are already high in this basin and the project is adjacent to is a major transportation corridor. A baseline study is required to assess current levels of emissions, noise, traffic, dust, etc. and to locate sensitive receptors[14] adjacent to the project and the entire truck route. Trucks should not operate during school hours.
    - Feasible alternative technology exists in the form of CNG (compressed natural gas) trucks and earth moving equipment. This equipment exists and is currently in operation at the Los Angeles International Airport (LAX) and the Port of Los Angeles (POLA). This

equipment was mandated by the LAX Community Benefits Agreement[15] for the expansion of LAX as well as the Clean Trucks Program and Memorandum of Understanding for the TraPac Expansion at POLA. POLA has already met 70% of its emissions goals for 2020 since implementation. As the LAX expansion project nears completion a significant amount of this equipment will become available. This equipment is fiscally advantageous with the fuel averaging $1.00/gal.

- A "No Idling" rule should be adopted[16]. Idling diesel fuelled vehicles emit higher concentrations of soot and fine particulate matter than when moving.

- Increased Greenhouse Gas (GHG) emissions must be taken into account when considering the environmental impact of this project[1,2,17].
- In considering the environmental setting of the project—it being immediately adjacent to the I-210 , which is also integral to the transporting of the sediment, the impact of increased traffic congestion on the I-210 must be assessed and mitigated. Caltrans spent $16.4 million on their recent FOOTHILL FREEWAY (I-210) CONGESTION RELIEF PROJECT to reduce traffic congestion between the Glendale freeway and the San Bernardino County line[18]. The sediment removal project would significantly increase large truck traffic in this same corridor, which is part of the busiest freeway system in the nation. In addition to increasing commute times and slowing goods movement, traffic congestion greatly increases the pollutants produced (stop-and-go, idling) and increases their concentration in the area where traffic is slowed.
    - Traffic congestion has a number of negative effects:
        - Wasted fuel increasing air pollution and carbon dioxide emissions owing to increased idling, acceleration and braking.
        - Wear and tear on vehicles as a result of idling in traffic and frequent acceleration and braking, leading to more frequent repairs and replacements.
        - Stressed and frustrated motorists, encouraging road rage and reduced health of motorists
        - Emergencies: blocked traffic may interfere with the passage of emergency vehicles traveling to their destinations where they are urgently needed.
        - Spillover effect from congested main arteries to secondary roads and side streets as alternative routes are attempted ('rat running'), which may affect neighborhood amenity and real estate prices
        - Wasting time of motorists and passengers ("opportunity cost"). As a non-productive activity for most people, congestion reduces regional economic health.
        - Delays, which may result in late arrival for employment, meetings, and education, resulting in lost business, disciplinary action or other personal losses.
        - Inability to forecast travel time accurately, leading to drivers allocating more time to travel "just in case", and less time on productive activities.
        - Inability to forecast travel time accurately, leading to drivers allocating more time to travel "just in case", and less time on productive activities.

- Sediment should be tested for pollutants (esp. fire retardants and supressants from the Station Fire and perchlorate from JPL) and results should be considered before placing sediment over another aquifer. The US Forest Service is currently producing a PEIR regarding the use of fire retardants and the harm they do to the environment[19] , esp. waterways. Sediment should also be tested for soil nutrients---if found to be free of chemical contaminants, sediment can be used to replenish soil fertility in farmland, landscapes, and gardens.

[1] *See* USEPA, State Inventory Guidance, at *http://www.epa.gov/climatechange/emissions/state_guidance.html* (describing various resources for estimating GHG emissions); *see also Planning and Conservation League v. Dept of Water Resources*, 83 Cal. App. 4th 892, 919 (200) ("CEQA does compel reasonable forecasting"). Compliance demonstrations for the Clean Air Act are based largely on emissions budgets that state and local agencies develop by predicting the likely emissions from individual projects. *See* 42 U.S.C. 7502(c)(4).

[2] Compare 14 Cal. Code Regs. Par. 15144-45 (stating that agencies need not "foresee the unforeseeable or address matters "too speculative for evaluation"). As described in detail in the numerous reports cited herein, the connection between GHG emissions and climate change are no longer unforeseeable or speculative.

[3] *See* San Luis Obispo County Air pollution Control District, *supra* note 152: SOLANO TRANSPORTATION AUTH. ET AL., *supra* note 152.

[4] http://cfpub.epa.gov/npdes/integratedplans.cfm

[5] World Health Organization (WHO), Guidelines for Community Noise, *http://www.who.int/docstore/peh/noise/guidelines2.html*

[6] California Air Resources Board, *Diesel Risk Reduction Plan*, October 2000.

[7] RJ Pandya, GM Solomon, A Kinner, JR Balmes, "Diesel exhaust and asthma: Hypotheses and molecular mechanisms of action," *Environmental Health Perspectives*, Vol. 110, Supplement 1 (2002):103-112.

[8]. B Brunekreef, NA Janssen, J de Hartog, H Haressema, M Knape, P van Vliet, "Air pollution from truck traffic and lung function in children living near motorways," *Epidemiology*, Vol. 8 (1997): 298-303.

[9] G Ciccone, F Fostastiere, N Agabati, A Biggeri, L Bisanti, E Chellini, "Road traffic and adverse respiratory effects in children," *Occupational and Environmental Medicine*, Vol. 55 (1998): 771-778.

[10] H Duhme, SK Weiland, U Keil, B Kraemer, M Schmid, M Stender, L Chambless, "The association between self-reported symptoms of asthma and allergic rhinitis and self-reported traffic density on street of residence in adolescents," *Epidemiology*, Vol. 7 (1996): 578-[11]

[11] X Xioahua, Y Zubin, "Effect of Early Particulate Air Pollution Exposure On Obesity in Mice", *Arteriosclerosis, Thrombosis, and Vascular Biology.* 2010; 30: 2518-2527.

[12] JF Pearson, C Bachireddy, "Association between Fine Particulate Matter and Diabetes Prevalence in the US", *Diabetes Care* 33:2196–2201, 2010

[13] SCAQMD, Multiple Air Toxics Exposure Study III, Model Estimated Carcinogenic Risk, interactive map, http://www2.aqmd.gov/webappl/matesiii/

[14] Potential Health Effects Related to Traffic Emissions, https://www.aqmd.gov/ej/school_traffic_advisory.htm ; Air Pollution from Nearby Traffic and Children's Health: Information for Schools http://www.oehha.ca.gov/public_info/facts/pdf/Factsheetschools.pdf .

[15] http://communitybenefits.org/downloads/LAX%20Community%20Benefits%20Agreement.pdf

[16] SCAQMD, "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis", http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html .

[17] http://ag.ca.gov/globalwarming/pdf/Port_of_Los_Angeles_Agreement.pdf

[18] Caltrans, http://www.dot.ca.gov/dist07/sync/cpimages/file/fact%20sheet(1).pdf .

[19] US Forest Service, http://www.fs.fed.us/news/2011/releases/05/fire-retardant.shtml . "In July 2010, a U.S. District Court in Montana directed the Forest Service to develop the environmental impact statement after an organization sued the agency claiming that fire retardant drops were harming waterways."

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

October 5, 2011

Mr. Ryan Butler, Project Planner
Los Angeles County Flood Control District
P.O. Box 1460
Alhambra, CA 91802-9947

Re: SCH#2011091084; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **"Devil's Gate Reservoir Sediment Removal and Management Project;"** located in the Pasadena area; Los Angeles County, California

Dear Mr. Butler:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were not identified** within the USGS coordinates identified. However, the absence of archaeological resources does not preclude their existence.

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Special reference is made to the *Tribal Consultation* requirements of the California 2006 Senate Bill 1059: enabling legislation to the federal Energy Policy Act of 2005 (P.L. 109-58), mandates consultation with Native American tribes (both federally recognized and non federally recognized) where electrically transmission lines are proposed. This is codified in the California Public Resources Code, Chapter 4.3 and §25330 to Division 15.

Furthermore, pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contacts
Los Angeles County
October 5, 2011

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino Tongva Nation
Sam Dunlap, Chairperson
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
3098 Mace Avenue, Aapt. D Gabrielino
Costa Mesa, , CA 92626
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address Gabrielino Tongva
,
tattnlaw@gmail.com
310-570-6567

Gabrielino-Tongva Tribe
Bernie Acuna
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(619) 294-6660-work
(310) 428-5690 - cell
(310) 587-0170 - FAX
bacuna1@gabrieinotribe.org

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
1875 Century Park East, Suite 1500
Los Angeles , CA 90067 Gabrielino
lcandelaria1@gabrielinoTribe.org
626-676-1184- cell
(310) 587-0170 - FAX
760-904-6533-home

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011091084; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Devil's Gate Reservoir Sediment Removal and Management Project; Los Angeles County Flood Control District; Los Angeles County, California.

Native American Contacts
Los Angeles County
October 5, 2011

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393
Covina , CA 91723
(626) 926-4131
gabrielenoindians@yahoo.com

Gabirelino Tongva

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

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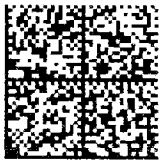
State of California
Native American Heritage Commission
915 Capitol Mall, Room 364
Sacramento, CA 95814



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From: Neal Turner [njjturner@yahoo.com]
Sent: Monday, November 07, 2011 4:58 PM
To: reservoircleanouts
Subject: Devil's Gate Reservoir Sediment Removal and Management Plan

Categories: Scoping Comments

Dear LA County Department of Public Works,

I wish to comment on the County's plan to remove up to four million cubic yards of sediment from behind Devil's Gate Dam in Hahamongna Watershed Park.

As described in the County's Initial Report, the basin would become a wasteland of bare rock and dirt, with few of the trees and shrubs that make the park worth visiting and attract the migratory birds that nest there. The enormous number of truck trips needed would make life unpleasant for nearby residents through noise, fumes and dust, six days a week over a span of about five years.

I urge you to develop a long-term plan that leaves most of the vegetation in place and keeps future alterations gradual, consistent with the park's multiple roles as debris control basin, river channel, nesting site and neighborhood park.

Yours sincerely,
-Neal Turner, 380 South Mentor Ave #3, Pasadena 91106, 626/793-8897.

From: Lilley, Keith
Sent: Wednesday, November 09, 2011 7:16 AM
To: Butler, Ryan
Subject: FW: HAHAMONGA SEDIMENT REMOVAL PROJECT & FUTURE...

Categories: Scoping Comments

Please add to the official comments

From: ninarose mayer [mailto:lifelongwalker@dslextreme.com]
Sent: Wednesday, November 09, 2011 7:14 AM
To: Lilley, Keith
Subject: rE: HAHAMONGA SEDIMENT REMOVAL PROJECT & FUTURE...

As a regular dog walker at the Devil's Gate Dam area, I am quite familiar with what's happening. So far I like the manner of sediment removal & placing it in "bowl" of Johnson's Rock to dry out. Then trucking it elsewhere.at a later date..

What I do NOT WANT to see happen is removal of trees in the stream bed North of the dam. The vegetation in that region is vital & serves extremely important uses to the animal life in region, be it bob cat, mountain lion (occasionally), coyote, birds, & humans.....

And I do not want to have more frisbee toss games in the stream bed region below Oak Grove Park. From my view, there are sufficient spots now in Oak Grove area for players to use. I've seen & watched them play over time....

These are just my thoughts on the issues due you by Nov. 11th., I am a 50 yr. resident/home owner in Altadena, and know this region well.

Ninarose Mayer
Altadena, Calif.

NORMAN H. BROOKS, Ph.D.
Civil Engineer
2521 N. Santa Anita Avenue
Altadena, California 91001
Tel: 626-798-5590 E-mail: normanbrooks@earthlink.net

TO: Los Angeles County Flood Control District
Attn.: Water Resources Division -- Reservoir Cleanouts

SUBJECT: **Devil's Gate Reservoir Sediment Removal and Management Project - Comments**

I appreciate the opportunity to submit some questions and comments for the abovementioned project. I was not able to attend either of the scoping meetings, but I did access internet postings regarding them. I have also downloaded and reviewed "Initial Study, Devil's Gate Reservoir Sediment Removal and Management Project ", prepared by Chambers Group, Sept. 2011.

My questions and comments should be taken as preliminary, because they might change as more information becomes available to me during the EIR process.

Introduction

I concur that there must be a program of sediment removal due to the inevitable geologic processes of erosion of the mountains, and the human occupancy of the adjacent alluvial fans. Managing the sediment yield has become a major problem for long-term sustainability of developments along the foothills of Southern California mountains; but at the same time many beaches and shorelines are suffering erosion from lack of sediment outflow from rivers.

At present I see no better way for removal of the sediments and organic debris than by trucking. For Devil's Gate Reservoir the volume of sediments to be trucked through the surrounding community is very large, with quantities of up to 4,000,000 cubic yards being proposed by the Los Angeles County Flood Control District for this Environmental Impact Report.

Questions and Comments

1. Explain the technical bases for the project goal of providing capacity for two DDE's (Debris Design Events), with more facts and figures relative to the Arroyo Seco watershed. Is there public access to the LA County DPW "Hydrology and Sedimentation Manuals", referred to on p. 7 of "Initial Study"? If not, can they be made available for review by interested individuals?

2. Why hasn't the project goal of two DDE's been adjusted to account for the large fire and post-fire flood and erosion events which have occurred recently? Another major fire cannot occur until there is regrowth of significant fuel, taking 20 years or more. And at five years or so after a fire, the erodability of the natural watershed drops several fold to near non-fire normal. The use of two DDE's instead of only one results in an increase of 2,000,000 cubic yards to be removed.

3. Please provide the maximum discharge and hydrograph(s) for the 50-year design flood used for this project. Also of interest would be the historical flood frequency data/graphs for the Arroyo Seco.

4. The EIR needs to deal with the rationale for the design criteria for both sediment volumes and predicted flood control benefits, rather than presenting project objectives as firmly fixed.

5. Present a clearer overall reservoir sediment and storage inventory: total storage; storage now occupied by sediment and debris; free water storage needed for flood control at various risk levels; and water storage presently available for flood control. Also of interest would be the cumulative historical record of sediment inflows and removals, to the extent that it exists. In addition, some data on sediment size distributions would be helpful.

6. Are there reports giving hydraulic analyses of flood control for various flood hydrographs and sediment volumes in the reservoir? They would be of value for review. What is the flow capacity of the existing downstream channel?

7. If 2,000,000 cubic yards of debris is removed, what is the remaining flood risk downstream? What level of damages might be expected during a 50 year design storm? Then what are the answers to the same question for removal of 3,000,000 or 4,000,000 cubic yards? Does the improvement in flood safety and reduction of flood risk justify the additional expenditure and community impacts for larger removal?

8. Explain why a limit of 4 million cubic yards is being sought when only 2.6 million cubic yards is the recent measurement of stored sediment?

9. The EIR analysis should present several alternative project goals for sediment removal and available flood control volumes with clear accounting of benefits, costs, and community impacts. The public can then have a clearer idea of choices, and express preferences.

10. Some long-term objectives need to be considered along with short-term project goals. For example, if it were found that only 2 million cubic yards needed to be removed for flood control now, the removal of the other 2 million would still have to be done sometime. So the question of timing should be opened up---e.g. if 4 million is to be removed, it might be scheduled in segments over say 10 or 12 years, rather than all at once in a single long multi-year effort. In the long run, a more uniform rate of removal might be preferred over the present situation with large amounts of "catch-up".

I will be glad to discuss or clarify these comments.

Submitted by:

Norman H. Brooks
Irvine Professor of Environmental and Civil Engineering,
Emeritus, California Institute of Technology, Pasadena CA
Registered Civil Engineer in California, No. CE 9823

From: Lilley, Keith
Sent: Monday, November 14, 2011 7:08 AM
To: Butler, Ryan
Subject: FW: Devil's Gate Sediment Removal Project

Categories: Scoping Comments

Please add to official comments

From: Pam Folgert [mailto:pamnchas@att.net]
Sent: Thursday, November 10, 2011 7:26 PM
To: Lilley, Keith
Subject: Devil's Gate Sediment Removal Project

Dear Mr. Lilley,

I am very concerned about the consequences of the above mentioned project.
The amount of sediment removed at this time should be kept to the minimum amount amount necessary for public safety so as to reduce the impact on the nature of this area and maintain quality of life for the residents.
Further study is needed to reduce the effect of transporting and relocating the sediment.
Yours respectfully,
Pamela Folgert

PASADENA AUDUBON SOCIETY
Founded April 1904
1750 N. Altadena Drive
Pasadena, CA 91107
WWW.PASADENAAUDUBON.ORG

November 8, 2011

Los Angeles County Department of Public Works
Water Resources Division—Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974

To the Water Resources Division of the LA County DPW:

Thank you for the opportunity to comment on the sediment removal project for Devil's Gate Dam in Hahamongna Watershed Park. As an organization that cares about birds and their habitats, we the members of the Board of the Pasadena Audubon Society have some serious concerns regarding this project, and we look forward to working with the County to find a solution that will benefit the birds while protecting the people.

Our first concern is that the sediment removal be done at times and in places that will not harm or disturb nesting birds, as specified by the Migratory Bird Treaty Act of 1918. We recognize the challenge this poses, as birds nest almost year-round in Hahamongna Watershed Park, but we need assurances that the work will be done at places and times that will not disturb the birds that nest there. We know a biologist will survey these areas, but we have some concerns about the thoroughness of previous biological surveys in Hahamongna, and so we would also like to offer our knowledge and expertise of dates and locations of when and where birds have nested in the past.

Another concern is that this project will cause serious loss of habitat. While we recognize that a project of this scope will lead to the loss and destruction of some habitat, we still insist that the value and quality of habitat in Hahamongna requires that this project be done with incredible sensitivity and respect. We ask that the work be done slowly and carefully, destroying as little habitat as possible, and providing for effective restoration of any habitat that is disturbed or destroyed. If the work is done this way, this will also make it easier to protect nesting birds.

Another concern we have is the location and quality of mitigation. Hahamongna is comprised of several types of habitats, including willow and alluvial scrub. These types of habitats are increasingly rare in Southern California, and Hahamongna is one of the few places where people and birds can find these habitats. Because the willow, alluvial scrub, and other habitats are so valuable in Los Angeles, we insist that the mitigation for this be done in Hahamongna or the Arroyo Seco, not some distant location. We ask that the habitats that are destroyed be restored properly, and that the County leave Hahamongna in better shape than it found it, with more of the land restored to its natural

PASADENA AUDUBON SOCIETY
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state. We know that the DPW would like to maintain some areas of the park as permanent working space for sediment removal, and while we see the possible wisdom of this plan, we urge the DPW to preserve and restore as much of the habitat as possible and to keep the footprint of the permanent work area as small and unobtrusive as possible.

We urge the County to see sediment not as a waste product but as a valuable resource. Not only can sediment be a commodity, but it can also be valuable to the environment. If we treat the Arroyo Seco like the watershed system that it is, then we can see that the sediment can have environmental value. We'd like to see a restored Arroyo Seco, with some of the sediment in the river where it belongs.

We also urge the County to continue researching to look for alternate ways to move sediment besides digging, trucking, and dumping. We insist that the County to revisit ideas like launching and sluicing, and to keep examining how other agencies around the country and the world have managed this process. We expect to see a full report of these alternates listed and described in the EIR, with complete explanations of their benefits and drawbacks.

Lastly, we ask that the Department of Public Works treat Hahamongna Watershed Park as part of a watershed system, one that stretches from the mountains to the ocean, and that the DPW continue to work on creating a system that will allow the watershed to function as naturally as possible. We need a "forever plan" for sediment and watershed, not one that is already obsolete. We thank you for your time and look forward to working with you.

On behalf of the Board of the Pasadena Audubon Society,

Laura Garrett (signed)
Conservation Chair

Scoping Suggestions; 15 Oct 2011 (Rev. 1)

A. Sediment source
    a. Keep cubic yards as small as possible – base totally on statistics of flooding plus consideration of how climate change might change those statistics over 50-100 years. Should not be a political decision. How high will you allow water to go? Is a spillway flow acceptable once in a long period?
    b. Make perimeter as small as possible. Avoid as many trees as possible – esp. old oaks
        i. Make as deep as possible. It can be even deeper upstream of the dam. A small permanent (or semi-permanent) lake would be a plus for habitat, hikers, and birders.
        ii. Assume people will want to hike down there.
    c. Assume you will never increase the cubic yards or perimeter
    d. Protect the perimeter – clean out new unwanted vegetation every year – include annual maintenance in scope
    e. Consider presorting sediment at the site.
    f. Include water settling ponds at the new lower level – to replace the existing ones you will be taking out.
    g. To respond to the comment by the child from Tom Sawyer Camp, I suggest you make a partnership with them to get them to help with the habitat monitoring before, during, and after the project. You could also let them examine the dam, learn about flood control, ground water resupply, sediment management, etc. Also consider a partnership with the local Audubon Society.

B. Transportation
    a. Consider all alternatives being developed by the 20 year study – you may get different answers – they have done most of the work for you
    b. Consider a conveyor belt to get sediment to trucks lined up on dam road or on Oak Grove Drive over the dam.
        i. If you load on the dam you will need to build a road to connect with Oak Grove South of Berkshire.
        ii. If you load on Oak Grove, you may need to shut down the North two lanes, and let traffic use the south two lanes – there is very little traffic on that road.
        iii. Either of these routes would allow you to use a route that gets off the 210 at Woodbury, and gets back on at Berkshire. This would NOT require any backing up and alleviate the buzzer noise problem discussed this morning.
    c. Avoid Windsor and other residential areas
    d. Avoid JPL rush hour traffic
    e. Use natural gas powered vehicles only – NO diesel.

i. Recommendation: Get DPW management to make and announce a decision NOW, that you will *only* hire trucks that use natural gas (or lower polluting) engines. The technology is here now, and such an announcement will allow plenty of time for them to convert existing trucks, or to order new trucks.
ii. Consider a similar requirement for the equipment that will operate in the basin.
iii. Such steps could substantially improve the DPWs reputation and make you a leader of green technology.

f. Make sure truck beds are well covered to reduce broken windshields

C. Destination
a. Consider all alternatives being developed by the 20 year study – you may get different answers
b. Irwindale/Azusa pit
c. Other pits
d. Not Tuna Canyon or any other place where trees would be destroyed
e. Transfer Tuna Canyon ownership or management to the Nature Conservancy or Santa Monica Mountain Conservancy (which manages Verdugo mountain property nearby.) Such a decision made now could also improve the reputation of the DPW.

R. Rhoads (Rody) Stephenson
4455 Rockland Place, Unit 10
La Canada, CA 91011
(818)248-7472

RAYMOND BASIN MANAGEMENT BOARD

725 North Azusa Avenue, Azusa, CA 91702 (626) 815-1300 FAX (626) 815-1303

November 9, 2011

Los Angeles County Flood Control District
Attn: Water Resources Division – Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974

RE: Devil's Gate Reservoir Sediment Removal and Management Project

Water Resources Division:

Thank you for furnishing the Raymond Basin Management Board (RBMB) with a copy of the document entitled, "Notice of Preparation and Initial Study (NOP/IS) – Devil's Gate Reservoir Sediment Removal and Management Project." It is RBMB's understanding the Los Angeles County Flood Control District (LACFCD) is proposing "...a comprehensive sediment removal project at Devil's Gate Reservoir that will restore flood control capacity...". The NOP/IS notes that during the 2009 Station Fire, approximately 68 percent of the watershed tributary to the Devil's Gate Reservoir was burned. Following the Station Fire, LACFCD experienced two wet seasons which increased sediment accumulation in the reservoir by approximately 1,300,000 cubic yards, reducing the available flood control capacity of the reservoir. The NOP/IS indicates LACFCD proposes to remove up to 4,000,000 cubic yards of sediment from behind the Devil's Gate Reservoir to restore the reservoir to its current design standard of the ability to contain two Design Debris Events (DDEs) below the spillway elevation of 1046.5 feet (LACFCD indicates each DDE is 2,000,000 cubic yards).

The RBMB is supportive of LACFCD efforts to enhance flood control protection. As the Court appointed entity to manage the Raymond Basin groundwater supplies, the RBMB has an interest in projects which may impact surface run-off and the ability to percolate such run-off water into the Raymond Basin. RBMB requests the following be addressed in the Draft Environmental Impact Report (DEIR).

- The DEIR should clearly address circumstances under which the sediment removal activities could impact the ability to percolate local run-off and include measures to mitigate those impacts. The RBMB recognizes sediment removal to promote flood control is very important, and would like the DEIR to carefully consider groundwater replenishment.
- Section 5.9 of the IS asks whether the proposed project could "substantially deplete groundwater supplies or interfere substantially with groundwater recharge..." The RBMB requests the DEIR address mitigation measures that will ensure the proposed project does not interfere with the ability to percolate local

runoff to replenish the groundwater basin. In the event this RBMB concern can be adequately addressed, the RBMB requests the response for Section 5.9 be changed from "No Impact" to "Less than Significant with Mitigation Incorporated".

Thank you for the opportunity to provide these comments. We look forward to the opportunity to review and comment on the DEIR as it becomes available. If you have any questions, please don't hesitate to contact me at (626) 815-1300.

Sincerely,

Anthony C. Zampiello
Executive Officer

cc: Stetson Engineers Inc.

RAYMOND BASIN MANAGEMENT BOARD
725 North Azusa Avenue
Azusa, CA 91702

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Los Angeles County Flood Control District
Attn: Water Resources Division – Reservoir
Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974

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10604 Walnut Drive
Shadow Hills, CA 91040
11 November 2011

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

Re: Devils Gate Reservoir Sediment Removal and Management Project Public Scoping Meeting

Dear Mr. Lilley:

Thank you for extending the comment period for the Devils Gate Reservoir Sediment Removal and Management Project. I attended the Scoping Meeting on October 15 at La Canada High School and addressed many issues there. My intent with this letter is primarily to reiterate these issues and make my comments available in written form for the betterment of the project.

Sediment Management needs to be an ongoing program. Not a 5-year plan, not a 20-year plan, but a forever plan. The upper parts of the watershed are highly erodable, and even once the predominantly chaparral vegetation has matured, there will still be sediment flow. Any management plan that contains at its core the transporting of sediment to a dump site is not a forever plan. Dump sites are finite, and almost all of the land in the Los Angeles basin has been developed.

(As a side note, one of the other speakers at the Scoping Meeting suggested modifying the vegetation in the upper watershed to reduce erosion. Mature chaparral is the best vegetation for retaining soil in this watershed, so the best management regime to minimize erosion is to minimize fire and other disturbances in the upper watershed. Any efforts to modify the vegetation will hamper the recovery of the chaparral and increase erosion)

There has been much learned in the fields of sediment and watershed management in the 90 or so years since the Devils Gate Dam was built. Let's incorporate some of that knowledge into the planning for this project and subsequent operation of the reservoir area. We want the Devils Gate Dam to be the first in a new generation of sediment management rather than the last of an old generation.

Rivers move sediment for free. The downstream channels may need to be modified or even redesigned to carry sediment. Let us take the opportunity to restore the streams, and improve flood protection and recharge our groundwater in the process. Let's value our water resources, rather than relegating them to a concrete ditch.

The downstream channel modifications that may be necessary to carry sediment are not free, but neither is the historical process of trucking sediment to a dump site. In addition to an accurate comparison of the financial costs among alternatives (specifically, hauling the sediment to a dump vs. outfit the river to carry it to the beach), please consider a full accounting of the environmental costs of each way of doing business, including the amount of carbon dioxide

released to the atmosphere by the burning of diesel or other fuel to power all of the heavy equipment involved in each process.

Please consider the broader issue of atmospheric pollutants. There is much sensitivity to particulate pollutants resulting from diesel fuels, but I'd like to encourage you to consider overall greenhouse gas emissions as well. Running vehicles on Compressed Natural Gas results in less carbon dioxide released to the atmosphere than using diesel fuel. Vehicles can be converted to run on CNG, and contractors can be required to operate their vehicles on CNG. The Port of Los Angeles provides a recent example of how to do this.

Realizing that there will be a need for revegetating areas disturbed in the process of removing sediment, and that the best plants with which to revegetate are those which were there before a disturbance, please consider setting up a nursery to propagate the plant material currently growing in the areas where sediment is to be removed. There is space in the Hahamongna Watershed Park that could be used for this purpose. I would like to suggest working with the City of Pasadena and possibly a nonprofit organization such as the Arroyo Seco Foundation to establish a native plant nursery for the benefit of this project and the local community. Taking a step such as this early in the current EIR process and starting the propagation efforts for the eventual revegetation portion of the project would be a refreshing and beneficial step in improving the Department's image with the greater environmental community.

As the project necessarily impacts the area, please consider a comprehensive program to minimize invasive exotic (plant) species. Weeds such as Castor Bean (from which the potent poison Ricin is derived) will show up, but bare and disturbed dirt can be managed to minimize such unwanted vegetation. Coarsely chipped organic material makes a good mulch to suppress weeds, and there will be plenty of material available for chipping once the sediment removal starts in earnest. Weeds are much easier to remove when they're small (and even easier to pull out when they grow through a generous layer of mulch), so with a little bit of thoughtful effort along the way, it's not too hard to keep these alien invaders from taking over. This issue is especially important in a habitat area such as the Hahamongna Watershed Park, which is already impacted by invasive non-native vegetation. Please pay attention to the weeds!

In closing, I'd like to recognize that sediment has accumulated in the Hahamongna basin and the local environment has adapted over the course of the 90+ years that the Devil's Gate dam has been here. Please don't insult the environment with a sudden traumatic wholesale cleanout of the basin, but rather take a longer time and work in smaller sections, revegetating as each phase of the work is completed, to achieve a more sustainable configuration with lower and more manageable impacts to the local and global environments.

Thank you for your attention.

Sincerely,

Roger Klemm

From: Giljum, Mark [MGiljum@lacsd.org]
Sent: Thursday, October 20, 2011 2:59 PM
To: reservoircleanouts
Subject: Devil's Gate Reservoir Sediment Removal and Management Project

Categories: Scoping Comments

The Sanitation Districts of Los Angeles County (Districts) have received the NOP of the Draft EIR for this project. Thank you for the opportunity to review and comment on the scoping effort. While we have no specific areas of environmental study/concern at this time, we would like to be considered an Interested Party during this process because our landfills (particularly the nearby Scholl Canyon Landfill) may be an appropriate location for removed sediment (i.e. either for disposal or beneficial use of the material as landfill cover). I will be the District's contact for this project.

Thank you,

Mark Giljum, P.E.
Civil Engineer
Facilities Planning Section
Phone (562) 908-4288 x2456
Fax (562) 695-1874

Devil's Gate Reservoir Sediment Removal and Management Project

COMMENT CARD

Name Claudette E. Budden Address 926 W La Canada Verdugo Rd

Email _____ City/ZIP Altadena Ca. 91001

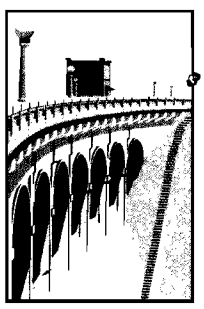
Organization, if any _____

I would like to provide the following comment:

with the removal of the sediment will it cause any contamination of diseases that will impact our health.

also the routes of the removal of the sediment on oak Grove to Berkshire to the 210 freeway.

we have alot of seniors & children on our neighborhood and walkers.



FOR MORE INFORMATION

Visit our website:
www.lasedimentmanagement.com/devilsgate

Send an email:
reservoircleanouts@dpw.lacounty.gov

or Write to:
Los Angeles County Department of Public Works
Attn: Water Resources Division - Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974

Devil's Gate Reservoir Sediment Removal and Management Project

COMMENT CARD

Name Takako Suzuki Address

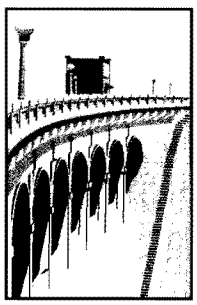
Email tsuzuki@cityofpasadena.net City/ZIP

Organization, if any

I would like to provide the following comment:

There was a major streambed restoration project just North of the Colorado Bridge that was destroyed by the surge of water from the storm.

What mitigation will be provided for work South of the dam and particularly around the Colorado bridge.



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P.O. Box 1460
Alhambra, CA 91802-9974

Devil's Gate Reservoir Sediment Removal and Management Project

COMMENT CARD

Name Markus Klemm Address 20604 Walnut Dr.

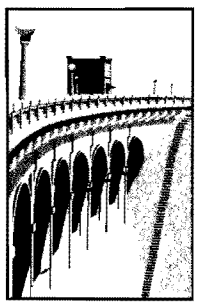
Email treehuggers@cairr.com City/ZIP Shadow Hills, CA 91040

Organization, if any

I would like to provide the following comment:

Every year, for 10 weeks in the summer, approximately 400 kids explore through the park, learning about nature. If all the sediment is removed, there will be a generation of children that will not get to experience natural habitat as they currently are experiencing it.

Perhaps the sediment should be removed in small portions, so that the park can still be used, and the sediment can still be removed. It will take longer, but be better for the habitat, and for the park users such as horse riders, frisbee golfers, hikers, geocachers, and bird watchers.



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Alhambra, CA 91802-9974

Devil's Gate Reservoir Sediment Removal and Management Project

COMMENT CARD

Name Jill Boddie Address 926 W. La Canada Verdugo Rd

Email 4moons2u@att.net City/ZIP Altadena, CA 91001

Organization, if any N/A

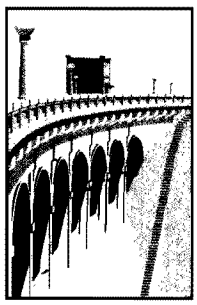
I would like to provide the following comment:

(1) The proposed hauling time is M-F 7am - 7pm & 8am - Sat.
Will you control the hauling times of the trucks in the peak hours of commuting?

(2) in the given timeframes of removal how much Sediment will be removed in a day?

(3) Will the hauling trucks use be low emission fuel since diesel fuel is hazardous to our health?

(4) What is the long term process of management of the sediment in the dam to prevent large deposits of build up?



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Alhambra, CA 91802-9974

Devil's Gate Reservoir Sediment Removal and Management Project

COMMENT CARD

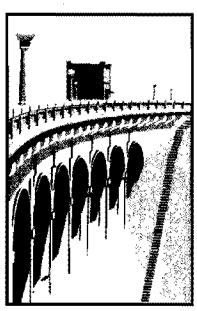
Name DIANNE PATRIZZI Address 564 N. Oakland Ave

Email thaddius.d.patrizzi@gmail.com City/ZIP 91101

Organization, if any

I would like to provide the following comment:

my comments will be submitted through US. MAIL, email, & by fax - submitted prior to November 11, 2011 deadline



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Attn: Water Resources Division - Reservoir Cleanouts
P.O. Box 1460
Alhambra, CA 91802-9974

Devil's Gate Reservoir Sediment Removal and Management Project

COMMENT CARD

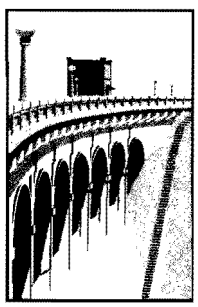
Name Doris L. Stewart Address 915 La Canada Verdugo Rd.

Email _____ City/ZIP Pasa. Ca. 91103-1016

Organization, if any _____

I would like to provide the following comment:

Heavy Trucks Coming through the area. Curving heavy Equipment. The street is to narrow. Windsor should be used. Trucks have had to back up go out Arwin to Windsor.



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P.O. Box 1460
Alhambra, CA 91802-9974

9/29/11

Hahamongna IDEAS For "LADWP Scoping" and Planning Meetings For EIR:

NO NO NO - DO NOT Scrape 50 Acres of Haha to relieve Sediment

NO - Do NOT Have 180 Trucks per Day Haul Out – Get Ride of Diesel; OK, CNG, Natural Gas Trucks

YES - SLUECE the Dam, Naturally, as much as possible. It Has been done, as in Aug. '11 Mini-Removal. 25K cubic yards was estimated, and only 16 K was needed. IT WORKED.

YES - Use a Conveyer Belt System to Extract Sediment and bring TO (Trucks) at Oak Grove Ave.

YES – CHANGE THE ENTIRE SYSTEM TO REMOVE SEDIMENT From Devil's Gate Dam. THIS ENTIRE PLAN IS UN-SUSTAINABLE. SLUECING IS A WAY !

YES - Preserve ALL the Trees and Habitats.

NO – Do Not Develop Haha.

YES – Delineate the Natural Haha River. Find out Where the Natural Flow is.

NO – Do NOT Remove 4.0 million Cubic Yards of Sediment.

YES – Maintain Devil's Gate Dam Inside Face, No. Face. Keep Windows clear, Keep Trash Rack Clear 100-200 Ft in front of dam.

YES – Place Sediment Outside Dam, South Face, in order that Water flow will Sluice Sediment Downstream

NO – Do NOT Build a Road for Trucks!!!! Use Conveyers Belts.

YES – Stream & Wetlands Restoration and is needed all along the Arroyo Seco

YES – LADPW Needs to Do Better Research!! They Need to KNOW Exactly What Animals, Birds, Trees live in Haha !! Original Study was a simple cursory visual, Not Well Done, very poor

YES – LADPW Needs to do More Preparation and Research in Advance of This Project. Typically, 10-15% of the Master Budget is spent on this. Now, they are spending Less than 0.1%

YES – The City of Pasadena Need to have Environmentally Educated Staff Overseeing

Devil's Gate Reservoir Sediment Removal and Management Project

COMMENT CARD

Name Marnie Gaede Address 5218 Donna Maria Lane

Email chacopress@earthlink.net City/ZIP La Cañada, CA 91011

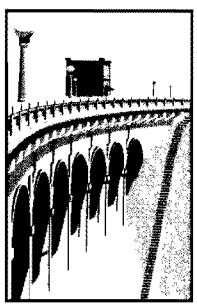
Organization, if any Fund for Wild Nature

I would like to provide the following comment:

The current project is unacceptable. There are far too few riparian habitats for wildlife. Hahamonga is unique and deserves the utmost protection. Removal of the sediment, as proposed, would scrape away most of the connections that support the fragile web of life. I have spent countless mornings appreciating this oasis of life in an urban setting — and see many families enjoying the wildlife.

There is another issue that impacts the schools, the equestrian centers, the local proximate community and the people that spend time in Hahamonga — the pollution from the trucks is damaging to health.

The current project represents an option that is so destructive that it eliminates future options. If the full amount of sediment is taken, then the natural integrity of Hahamonga will be permanently destroyed. Once this option is exercised, the natural community of plants and animals will expire or move on.



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PLEASE INCLUDE ALL ITEMS

Scoping Suggestions; 15 Oct 2011

A. Sediment source
   a. Keep Cubic yards as small as possible – base totally on statistics of flooding plus consideration of how climate change might change those statistics over 50-100 years.
   b. Make perimeter as small as possible. Avoid as many trees as possible – esp. old oaks
      i. Make as deep as possible. It can be even deeper upstream of the dam.
      ii. Assume people will want to hike down there.
   c. Assume you will never increase the cu yds or perimeter
   d. Protect the perimeter – clean out new vegetation every year – include in scope
   e. Consider presorting sediment at the site.
   f. Include water settling ponds at the new lower level – to replace the ones you will be taking out.

B. Transportation
   a. Consider all alternatives being developed by the 20 year study – you may get different answers – they have done most of the work for you
   b. Consider a conveyor belt to get sediment to trucks lined up on dam road or on Berkshire drive over the dam.
   c. Avoid Windsor and other residential areas
   d. Avoid JPL rush hour traffic
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   a. Consider all alternatives being developed by the 20 year study – you may get different answers
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   c. Other pit
   d. Not Tuna Canyon or any other place where trees would be destroyed
   e. Transfer Tuna Canyon ownership or management to Nature Conservancy or Santa Monica Mountain Conservancy (which manages Verdugo mountain property nearby.)

R. Rhoads (Rody) Stephenson
4455 Rockland Place, Unit 10
La Canada, CA 91011
(818)248-7472

SIERRA CLUB
FOUNDED 1892

Pasadena Group

November 11, 2011

Gale Farber, Director, Los Angeles County Department of Public Works
ATTN: Water Resources Division – Reservoir Management
PO Box 1460
Alhambra, CA 91802-9974

RE: Scoping Comments: Environmental Impact Report for Devils Gate Dam Reservoir Sediment Removal and Management Project

This appears to be first large-scale project to remove sediment resulting from the aftermath of the 2009 Station Fire from one of DPW's major reservoirs, and to address the topic of managing sediment from anticipated reservoir inflows that are expected in future years.

Your department has a once-in-a-generation opportunity to make a comprehensive study and evaluation of each and every environmentally and economically feasible alternative method of addressing this significant problem.

We therefore urge that the EIR for the Devils Gate Dam project do just that.

As a start, the EIR needs to address the source of the problem: the continued erosion of rock, soil, and debris that enters the reservoir from the dam's upstream watershed. We realize this watershed is primarily within the legal and management jurisdiction of Angeles National Forest, and therefore urge DPW's EIR consultant and its own staff to work collaboratively with the Forest Service in evaluating ways in which this sediment inflow might be better controlled. In this evaluative process we suggest that research staff of the Forest Service's San Dimas Experimental Forest (a separate jurisdictional unit, with a long history of studying sediment flow from the Forest's chaparral hillsides – contact the Glendora Ranger District office) be consulted in addition to staff at the Angeles National Forest Supervisor's office in Arcadia.

In addition, alternative methods of removing the existing sediment which impedes efficient functioning of the reservoir for flood control and water conservation purposes need to be comprehensively evaluated.

P.O. Box 94086, Pasadena, CA 91109-4086

Alternative methods of removing sediment that must be fully evaluated include:

Sluicing: According to information presented at scoping meetings for this project, this method was utilized in 1945 to remove sediment from the dam. The EIR should describe in detail the quantity of material sluiced, sluicing methods used, the time (days, hours) that it took to do the sluicing, as well as the results in terms of efficiency of the process, the downstream deposition locations of the material sluiced, the acceptability of the process and results to affected communities, and all direct and indirect costs.

Using this baseline information, the EIR should then evaluate this alternative as a possible means of removing some or all the sediment needed to restore Devils Gate Dam Reservoir to its intended function. Evaluation should address all aspects of this alternative, such as those mentioned in the paragraph above.

Slurry pipeline: During scoping meetings several speakers pointed out that Devils Gate Dam, like other dams on the southern side of the San Gabriel Mountains, interrupts sediment flow that otherwise would flow down to the Pacific Ocean, providing sand and other material to replenish the beaches there. The alternative of constructing a slurry pipeline to remove some or all the sediment needed to restore the reservoir to its intended function should be evaluated in detail.

This evaluation should carefully consider different lengths of pipeline that might be appropriate. It would not be necessary to construct such a pipeline all the way to the ocean; a pipeline that ended at the confluence of the Arroyo Seco with the Los Angeles River, or immediately downstream of the unpaved portion of the Los Angeles River, might be feasible alternatives that would deposit measured amounts of sediment at specific times during which the Los Angeles River was flowing at sufficient rates to move the sediment down to the ocean.

Discussion of this alternative needs to address the obvious topics of differing lengths of pipeline, pipeline size and material (concrete? metal?), construction and maintenance costs, seasons and conditions during which sediment would be conveyed down the pipeline, deposition locations, environmental and other impacts on these locations, and anticipated public acceptability to this process.

Both the short-term and long-term environmental and economic benefits and costs of the two alternatives discussed above must be fully evaluated in comparison to the environmental and economic costs of DPW's traditional methods of sediment removal via trucks. These two alternatives have the positive environmental benefit of moving sediment to the ocean where it would have naturally flowed had Devils Gate Dam not been constructed.

In comparison, trucking has several negative environmental impacts, including fuel consumption of increasingly expensive petroleum products, generation of undesirable air emissions (including particulate matter if diesel fuel is used),

generation of greenhouse gas emissions, annoying noise from both truck travel on streets through nearby residential and/or school neighborhoods and from the frequent movement of trucks in reverse gear (which generates a safety beeping required by state law), damage to the streets and roads over which trucks travel, and generation of pollutants spilled on the ground during truck operation which pollute both the ground and surface and subsurface water.

Trucking also involves forever ongoing costs to the County in terms of the purchase or rental of trucks to perform the work assigned, payment for truck drivers and staff who must coordinate their work, as well as indirect costs to nearby communities such as Pasadena and La Canada Flintridge which must monitor trucking operations in order to minimize impacts to their communities.

Trucking is not a sustainable method of dealing with sediment accumulation that will continue to occur, at varying rates, into the indefinite future. The reduction of sediment inflow, and the removal of sediment from county-owned reservoirs, as well as reservoirs owned by other entities, in the foothills of the San Gabriel Mountains requires a sustainable approach if ever-increasing costs of sediment removal are to be avoided.

Water conservation and water quality impacts: The EIR must address issues related to water conservation and water supply, including positive and negative impacts on the operation of spreading basins upstream and (potentially) downstream of the dam, impacts to the Raymond Basin Aquifer and other impacted aquifers, and impacts to surface and underground water quality.

Terrestrial, avian, riparian, and aquatic flora and fauna: The EIR must fully evaluate these impacts, including impacts on any endangered, threatened or sensitive species, and must propose mitigation measures for flora and fauna that would be impacted by the project.

Recreation: The land area immediately upstream of and surrounding Devils Gate Dam Reservoir is a heavily used recreation area known as Hahamongna Watershed Park. Short-term and long-term impacts on the numerous types and quantities of recreation use in this area need to be fully discussed and evaluated, and mitigation measures for these impacts need to be proposed.

Cumulative Impacts: The EIR must evaluate the cumulative impacts of this project along with proposed projects to manage and remove sediment from several other reservoirs in the foothills of the San Gabriel Mountains that are owned and operated by the Los Angeles County Department of Public Works. The Department's Watershed Division has initiated a Sediment Management Strategic Planning process that is currently preparing a 20-year plan to address this topic. Preparation of the EIR for the Devils Gate Dam Reservoir Sediment Management Project must be coordinated with, and incorporate information and analysis, prepared in and for that planning process.

In conclusion, we recognize that a limited amount of trucking may occasionally be necessary to remove sediment immediately adjacent to the upstream face of the dam. If and when such trucking is done, we strongly urge the Department to either purchase low-emission trucks for its own use, or require that the Department only issue contracts for rental vehicles which meet the highest low-emission standard available. By so doing, the Department, along with other public entities, can play a role in forcing low-emissions standards for trucks and other vehicles throughout the public works community.

In recognizing this limited role for use of low-emission trucks for the specific purpose noted above, we in no way want to minimize our strong belief that trucking is an outmoded means of dealing with sediment flow into foothill reservoirs. On the contrary, we want to re-emphasize the need for the Department to move to sustainable solutions such as sluicing and/or the use of slurry pipelines to facilitate the movement of sediment down to the ocean.

Please feel free to contact us should you have any questions regarding our comments.

Sincerely,

David Czamanske, Vice-Chair, Pasadena Group of Sierra Club

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

October 28, 2011

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

Notice of Preparation of a CEQA Document for the
Devil's Gate Reservoir Sediment Removal and Management Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis
The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as URBEMIS 2007 or the recently released CalEEMod. These models are available on the SCAQMD Website at: http://www.aqmd.gov/ceqa/models.html.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the

recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/prdas/aqguide/aqguide.html. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (http://www.aqmd.gov).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM
LAC110928-01
Control Number

South Coast
Air Quality Management District

Headquarters
21865 Copley Drive Diamond Bar CA 91765-4178

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DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-9140
FAX: (213) 897-1337

Flex your power!
Be energy efficient!

October 13, 2011

Mr. Ryan Butler
Los Angeles County Flood Control District
P.O. Box 1460
Alhambra, CA 91802-9947

Re: Devil's Gate Reservoir Sediment Removal and Management Project (NOP)
IGR/CEQA No. 111011/CS
Vic: LA-210-22.14, SCH# 2011091084

Dear Mr. Butler:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation (NOP) for the above mentioned project.. Based on the information received we have the following comments:

A traffic study will be necessary to evaluate the traffic impacts of construction haul trips to and from the project site during AM and PM peak periods. Please include the existing traffic volumes and level-of-service (LOS) on the mainline I-210 Foothill Freeway between Berkshire Drive and the Cities of Irwindale and Azusa, the mainline SR-134 Ventura Freeway between the I-210 and Figueroa Street, and the affected freeway on/off ramps and freeway ramp intersections. Also include project traffic volumes and level-of-service calculations for the affected freeway segments, freeway on/off-ramps and freeway ramp intersections.

If it is determined that the project will have a significant impact on freeway operating conditions, include mitigation measures to address the impacts that are caused by the additional truck trips on the I-210 and SR-134 freeways.

The NOP mentioned that return haul trips would travel westbound on I-210 and exit onto Berkshire Drive to the project site. The impact from construction related haul route truck trips will require the widening of the access road to Oak Grove Drive to accommodate truck traffic. Any impact to the freeway access control along Berkshire Drive may require a Caltrans Encroachment Permit.

Any work to be performed within the channel, downstream from the Devil's Gate Dam, will need a Caltrans permit due to the close proximity to the I-210 Freeway bridge structure.

Truck trips whenever feasible should be limited to off-peak commute hours. Caltrans requests that the contractor avoid bunching or platooning of truck trips on mainline freeways, on freeway on/off-ramps and at freeway ramp intersections.

Additionally, transport of over-size or over-weight vehicles on State highways will require a Caltrans Transportation Permit.

If you have any questions regarding these comments, you may contact Carl Shiigi, project coordinator at (213) 897-1726. Please refer to our internal record number 111011/CS.

Sincerely,

DIANNA WATSON
IGR/CEQA Program Manager
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

State of California
Department of Transportation
100 S. Main Street
Los Angeles, CA 90012

049J82034712
$00.44⁰
10/14/2011
Mailed From 90012
US POSTAGE

Mr. Ryan Butler
Los Angeles County Flood Control District
P.O. Box 1460
Alhambra, CA 91802-9947

STEVE LAMB RESIDENTIAL DESIGNS
P.O.BOX 333,ALTADENA CA. 91001 626 797 6464

7 October, 2011

To: Los Angeles County Department of Public Works

Re: Devils Gate Reservoir Sediment Removal and Management Project

To whom it may Concern:

First of all, allow me to express my thanks to the Department for finally taking up the issue of removing debris flow from behind the Devil's Gate Dam. As you know, the Joint Operating agreement between the City of Pasadena and the County of Los Angeles mandates the County remove all debris below the spillway line at Devils Gate. As you know, in the main this has never been done and debris dating from major floods of 1938, 1968, 1992 and the years between and since are still present behind the Devils Gate Dam.

Second, I cannot understand exactly how it is that the County of Los Angeles is being forced to do environmental documentation for this project. The County of Los Angeles has had a legal obligation to regularly remove the debris since the 1920's.The Obligation existed long before CEQA was even a glimmer in anyone's eye, let alone law. How can this legal obligation now be frustrated?

Third, there is absolutely no natural area behind the dam below the line of the spillway. There is no natural wild land habitat to protect here. Every bit of soil that the present vegetation is growing in is flood debris that where it not for the existence of the dam would not be present. All of the vegetation growing here, even the few native California species present, are in un natural locations where they would not grow were the soil not being retained by the dam. Most of the rodents, birds, lizards and small mammals, in the area behind the dam and below the spillway line would not be here were it not for the un naturally maintained flora. For some reason confused people who mistakenly believe they are supporting "The Environment" are rallying to "protect Hahamongna and Mother Nature." Nothing could be farther from the truth. Leaving the debris there is ruining the stream bed course, altering the species of vegetation present and altering the animal life present. Removing the debris will be the

most major first step to restoring the area behind the dam and below the spillway line to its natural condition.

Fourth there is legitimate concern that the route chosen for trucks removing debris do the least harm possible to residential neighborhoods, the quiet enjoyment of property, the local road beds and be conducted so as to use the least amount of fuel, resulting therefore in the least pollution possible. Oddly, again the people claiming to be “environmentalists” are rallying for the least environmentally reasonable, most damaging position, arguing that the route used should be one that leaves the East end of the Devils Gate Dam area and runs trucks through Altadena in the longest route possible to the freeway. Obviously, a temporary road exiting at the south western area of the Devils Gate basin would be the best plan, giving the shortest distance to a freeway, conserving fuel and the most area of road and directly disturbing no residents at all. The so called earth centric opposition to the South East exit makes no sense at all and is a mystery.

Fifth, many of these so called objections are organized through people working for not for profit groups that have City of Pasadena employees or Commissioners on their Boards of Directors. I for one cannot help but think that this organizing has something to do with organizational hatred between Pasadena and LA County Public Works and is related to some kind of attempt to force the County of Los Angeles to make some bargain with Pasadena not in it’s or the People’s interests, but I am at a loss as to what that could be. On the one hand Pasadena demands the debris be removed; on the other it frustrates the efforts to remove them. Bizarre behavior, to say the very least.

Finally, Please proceed with the removal of these flood debris with all deliberate speed. We have had recent fires that will pose a flood danger for another three years. Every cubic yard of debris still lying below the spillway line and behind the dam is a cubic yard the dam cannot take during a major flood. The dam’s usefulness and safety is thereby reduced. While I live far above the spillway line and not in line with the dam, as a citizen oft eh County of Los Angeles I am very concerned that the dam be safe and that people’s lives and homes not be endangered, especially by pretend, ridiculous, and either insincere or ignorant false environmental assertions that do damage to the entire Environmental Movement.

Sincerely,

Steven S. Lamb

Altadena Ca. 91001

From: Sylvia Stachura [sstach236@earthlink.net]
Sent: Friday, November 11, 2011 11:21 PM
To: reservoircleanouts
Subject: Devil's GateRes. Sediment Removal & Mgmnt. Plan

Categories: Scoping Comments

Dear Sirs: Please be aware of the great disruption you may cause to the wildlife and especially the Birds of the Hahamonga area. Please try and research environmentally sensitive ways to clean out the dam and save the habitats of so many wild birds, mammals, etc. Also it will help humans to be able to go to an area like Hahamonga to get in touch with the outdoors and the creatures that live there.

Sincerely, Sylvia Stachura
San Gabriel, CA

From: THOMAS HOLADAY [thomasholaday@sbcglobal.net]
Sent: Friday, November 11, 2011 2:50 PM
To: Lilley, Keith; reservoircleanouts
Subject: Devil's Gate Reservoir Sediment Removal and Management Project / Draft EIR

Categories: Scoping Comments

HAHAMONGNA WATERSHED SEDIMENT DRAFT EIR SCOPING COMMENTS /

DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Page 1 - November 7, 2011

To Whom It may Concern:

I am a local resident, avid hiker and seasoned lover of The Hahamongna Watershed / Devil's Gate Reservoir. I am committed to the preservation of the natural state of the Hahamongna Watershed.

I am opposed to the current Los Angeles County Dept. of Public Works plan to remove 2.6 or 4 million cubic yards of sediment from the Devil's Gate Reservoir / Hahamongna Watershed.

I am opposed to the disruption or destruction of any of the natural habitats of the Hahamongna Watershed, i.e. the flora and fauna.

According to the LADPW's plan for sediment removal, the Hahamongna Watershed would incur widespread and catastrophic destruction.

I am a proponent for new thinking, new ideas regarding how to deal with excess sediment and its abatement and removal.

I am a proponent for assuring downstream safety and flood protection in the entire Arroyo Seco and its tributaries.

PROPOSAL OF METHODS FOR SEDIMENT MAINTENANCE, DEVIL'S GATE RESERVOIR:

MINI-DIGS:

Maintain the integrity of Devil's Gate Dam by use of 'mini-digs', or what was used in Summer 2011 to do the 'Devil's Gate Reservoir Interim Measures Project'. Which was to remove sediment within 100 feet of the dam t keep the gates, valves, windows and trash rack clear of debris. At the time, approx. 13,000 cubic yards was removed.

Clear the face of the dam as needed. Keep the trash rack clear, and the gates and valves clear as needed. Perforı maintenance on a modest scale, to prevent this proposed destruction of our treasured Hahamongna natural habita This will also promote a method of 'natural' sluicing of sediment through and passed the dam.

Page 2 -

It is not necessary to do much more than this. If you did more, you create another grotesque basin, as is the basi below Eaton Canyon. You simply scrape it all out, and leave a huge lifeless scar.

SLUICING:

Create Methods of sluicing the sediment downstream. As a daily hiker in the Arroyo, I have witnessed natural sluicing down the Arroyo Seco for years.

Keeping the dam clear of obstructions, will promote sluicing.

Place sediment below the dam, via conveyer or such, and this will promote sluicing with the normal daily runoff

Without the destruction of habitat, allow the natural daily flow of water through Hahamongna to sluice the sediment among the trees and vegetation that exist there now. Thereby, sluicing through the watershed, and through a 'clean' Devil's Gate Dam, via 'mini-digs'.

Develop new ideas, ways and means to sluice the sediment out of the watershed.

Develop new ways and means to recycle the unwanted sediment. The ocean beaches are a viable resolve. The construction industry has a constant need for material.

Remove the sediment that was placed in Johnson Field for the "Devil's Gate Reservoir Interim Measures Project

MORE RESEARCH AND DEVELOPMENT:

Please consult independent expert sources (not LADPW) to gain real insight into dealing with sediment abateme and assuring protections for the environment, i.e.:

Hydrologists to maintain water health and downstream safety;

The Audubon Society to know what is there and what is threatened;

We can learn from Expert Naturalists and Environmentalists of Watersheds, the San Gabriel Mountains, and specifically, The Hahamongna Watershed.

Creative thinking is needed for dam maintenance for all 14 dams of the San Gabriel Mountains.

Creative and careful thinking of the impact on the much broader scheme of the systems above, as well as below t dam(s) is essential.

This current plan is unsustainable.

Page 3 –

Thank you for your time and consideration.

Sincerely,

Thomas Holaday

thomasholaday@sbcglobal.net

WINDSOR ARROYO

WINDSOR-ARROYO NEIGHBORHOOD ASSOCIATION

P.O. Box 354
Altadena, CA 91003

Tel: (626) 794-4666

email:
WindsorArroyo@charter.net

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

November 3, 2011

RE: Debris Removal from Devil's Gate Dam

The Windsor Arroyo Neighborhood Association supports the use of truck Route 2 for the Devil's Gate Dam debris removal. This route will travel from Oakgrove to Berkshire to the 210 Freeway.

Sincerely,
Tecumseh Shackelford
Vice-President
Windsor-Arroyo Neighborhood Association

WINDSOR-ARROYO

WINDSOR-ARROYO
NEIGHBORHOOD ASSOCIATION
P.O. BOX 354
Altadena, CA 91003-0354

SANTA CLARITA CA 913

05 NOV 2011 PM 2 L

USA FIRST-CLASS FOREVER

Los Angeles County Department of Public Works
Attn: (Water Resources Division) Reservoir Cleanouts
P.O. Box 1460
Alhambra.CA 91802-9974

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