

## **SECTION 9.0 – RESPONSE TO COMMENTS**

This section includes all comments received on the Draft EIR during the 90-day public review period between October 23, 2013 to January 21, 2014 (45-day minimum per CEQA, plus 30 days per LACFCD extension, and an additional 15 day LACFCD extension). No new significant environmental impacts or issues were raised during the public review period beyond those already identified in the Draft EIR for the Devil's Gate Reservoir Sediment Removal and Management Project. During this public review period a total of 251 comment letters were received.

LACFCD held three community meetings on November 6, 14, and 16, 2013 to discuss the Draft EIR analysis and alternatives. Formal written public comments were accepted at the meetings. Formal oral public comments were not taken at these meetings; however, a summary of topics and a response to these topics discussed are presented in Comment Letter 252.

As the lead agency under CEQA, LACFCD provided responses to the comments received on the Draft EIR. Pursuant to CEQA Guidelines §15088.5, none of the comments received during the comment period provide any basis to identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR.

### **9.1 LIST OF COMMENTERS**

The following individuals and representatives of organization and agencies submitted written comments on the Draft EIR.

#### **AGENCIES**

California Department of Fish and Wildlife (Comment Letter #171)

California Legislature Assembly member Mike Gatto (Comment Letter #250)

City of Azusa (Comment Letter #170)

City of La Cañada Flintridge (Comment Letters #57, 94)

City of Los Angeles Emergency Management Department (Comment Letter #166)

City of Pasadena (Comment Letter #177)

County of Los Angeles Fire Department (Comment Letter #29)

Native American Heritage Commission (Comment Letter #38)

La Cañada Unified School District (Comment Letters #48, 58)

Santa Monica Mountains Conservancy (Comment Letter #191)

South Coast Air Quality Management District (Comment Letter #230)

State Clearinghouse (Comment Letter #46)

United States Fish and Wildlife Service (Comment Letter #233)

**ORGANIZATIONS**

Altadena Heritage (Comment Letter #165)

Arroyo Seco Foundation (Comment Letter #216)

California Native Plant Society (Comment Letter #90)

Foothill Family of Water Agencies (Comment Letter #140)

Friends of Hahamongna (Comment Letter #179)

Friends of the Los Angeles River (Comment Letter #180)

La Cañada Flintridge Trails Council (Comment Letter #236)

Linda Vista-Annandale Association (Comment Letter #224)

Move a Child Higher (MACH) 1 (Comment Letter #41)

Pasadena Audubon Society (Comment Letter #189)

Pasadena Sierra Club (Comment Letter #211)

Rose Bowl Riders (Comment Letter #247)

San Gabriel Mountains Chapter of the California Native Plant Society (Comment Letter #90)

The Hillside School and Learning Center (Comment Letter #249)

Tom Sawyer Camps (Comment Letters #61, 62, 65)

West Pasadena Residents Association (Comment Letter #195)

Zanja Madre (Comment Letter #248)

**ALL COMMENT LETTERS**

Comment Letter #1 – Freddie Hughley

Comment Letter #2 – Evan A. Thompson

Comment Letter #3 – Bob Musselman

Comment Letter #4 – Erika Bennett (TTSI)

Comment Letter #5 – Loyd Kattro (Light Art Consulting)

Comment Letter #6 – Pam Dong (Pasadena Audubon Society Member)

Comment Letter #7 – Wilbur Dong (Pasadena Audubon Society Member)

Comment Letter #8 – Christle Balvin

Comment Letter #9 – Annette Peny

Comment Letter #10 – Elizabeth Bour

Comment Letter #11 – Dessi Sieburth (Pasadena Audubon Society Member)

Comment Letter #12 – Suzanne Martin

Comment Letter #13 – Dorothy Wong

Comment Letter #14 – Peter Pfeiffer

Comment Letter #15 – Icia Belchak

Comment Letter #16 – Richard Booker (Linda Vista Annandale Association)

Comment Letter #17 – Lance Benner

Comment Letter #18 – Virginia Kimball

Comment Letter #19- Timothy Callahan

Comment Letter #20 –Marah Lyvers (Tom Sawyer Camps)

Comment Letter #21 –Marah Lyvers

Comment Letter #22 –Constance Brines

Comment Letter #23 –Laurie Barlow

Comment Letter #24 – Antionette Devereaux

Comment Letter #25 –Marge Nichols

Comment Letter #26 – Janet Aird

Comment Letter #27 –Allen Decker

Comment Letter #28 –Joan Hearst (WPRA)

Comment Letter #29 – Los Angeles County Fire Department

Comment Letter #30 – Doris Finch

Comment Letter #31 – Grace Wong

Comment Letter #32 – Kathleen Warner

Comment Letter #33 – Kathi Ellsworth

Comment Letter #34 – Carolyn Otto

Comment Letter #35 – Sylvia Stachura (Pasadena Audubon Society Member)

Comment Letter #36 – Susan Gilliland

Comment Letter #37 – Frank Gilliland

Comment Letter #38 – Native American Heritage Commission

Comment Letter #39 – R. Stephenson

Comment Letter #40 – Cheryl Wysocki

Comment Letter #41 – Joy Rittenhouse (MACH 1)

Comment Letter #42 – Joyce Locatell (Pasadena Audubon Society Member)

Comment Letter #43 – Susan Gilliland

Comment Letter #44 – Petrea Sandel

Comment Letter # 45 – Thomas Parker

Comment Letter #46 – State Clearinghouse

Comment Letter #47 – Joanne Beckwith

Comment Letter #48 – La Cañada Unified School District

Comment Letter #49 – Madison Keogh (Tom Sawyer Camps Counselor)

Comment Letter #50 – Elizabeth Kotz

Comment Letter #51 – Jill Blaisdell

Comment Letter #52 – Wendy Crowley

Comment Letter #53 – Andrew Binder

Comment Letter #54 – Deni Sinnott (Pasadena Audubon Society)

Comment Letter #55 – Walter Tatum (La Cañada Unified School District)

Comment Letter #56 – Barbara Eisenstein (Friends of the Arroyo Seco)

Comment Letter #57 – City of La Cañada Flintridge

Comment Letter #58 – La Cañada Unified School District

Comment Letter #59 – Louise Carnevale (Tom Sawyer Camps Bookkeeper)

Comment Letter #60 – Kathy Garcia (Tom Sawyer Camps Staff)

Comment Letter #61 – Sarah Horner Fish (Tom Sawyer Camps Executive Director)

Comment Letter #62 – Michael Horner (Tom Sawyer Camps Director)

Comment Letter #63 – Eric Ikari (Tom Sawyer Camps Employee)

Comment Letter #64 – Laura Keen (Tom Sawyer Camps Employee)

Comment Letter #65 – Thomas Horner (Tom Sawyer Camps Co-Owner)

Comment Letter #66 – Robert Staehle, Lori Paul

Comment Letter #67 – Joan Probst

Comment Letter #68 – Brendan Crill

Comment Letter #69 – Marah Lyvers (Tom Sawyer Camps Employee)

Comment Letter #70 – Beatrix Schwarz

Comment Letter #71 – Sylvia Stachura

Comment Letter #72 – Genette Foster

Comment Letter #73 – Jeffrey Toland

Comment Letter #74 – Julie Thurston (La Cañada High School Track & Field Coach)

Comment Letter #75 – Katie Rayburn (Tom Sawyer Camps Counselor)

Comment Letter #76 – Louisa Van Leer (Highland Park Heritage Trust Board Member)

Comment Letter #77 – Marnie Gaede

Comment Letter #78 – Michael Long (Los Angeles County Natural Areas Administrator Retired)

Comment Letter #79 – Michael Olson

Comment Letter #80 – Nina Ehlig (SENECH Neighborhood Watch Association President)

Comment Letter #81 – Polly Wheaton (Pasadena Beautiful Foundation President)

Comment Letter #82 – Stephanie Strout

Comment Letter #83 – Trent Sanders

Comment Letter #84 – Alex Fore

Comment Letter #85 – Andy Carrico

Comment Letter #86 – Bill Burnett

Comment Letter #87 – Brenton Miller

Comment Letter #88 – Brett Godown

Comment Letter #89 – Brian Kernan

Comment Letter #90 – San Gabriel Mountains Chapter of the California Native Plant Society

Comment Letter #91 – Caraly Higuchi

Comment Letter #92 – Catherine Kelly

Comment Letter #93 – Charmain Sauro

Comment Letter #94 – City of La Cañada Flintridge

Comment Letter #95 – Clay Allen

Comment Letter #96 – Connie Branson

Comment Letter #97 – Craig Friedemann

Comment Letter #98 – Damien Baccaro

Comment Letter #99 – Dancingwater Taylor

Comment Letter #100 – Daniel Russell

Comment Letter #101 – David Boettcher

Comment Letter #102 – Dietrich Bartelt (DB Sediments GmbH)

Comment Letter #103 – Dwayne Miles

Comment Letter #104 – Francia DiMase

Comment Letter #105 – Henry Correa

Comment Letter #106 – Howard Tan

Comment Letter #107 – Jeff Nyerges

Comment Letter #108 – John Harris

Comment Letter #109 – John May

Comment Letter #110 – Jonathan Foreman

Comment Letter #111 – Lara Ramsey

Comment Letter #112 – Leigh Adams

Comment Letter #113 – Luis De La O

Comment Letter #114 – Luke A Meyer

Comment Letter #115 – Luke Meyer

Comment Letter #116 – Martyn Belmont (La Casita Foundation Board Member)

Comment Letter #117 – Maura Townley

Comment Letter #118 – Nahuel Zachary

Comment Letter #119 – Salvador Quiroz

Comment Letter #120 – Randy Strapazon

Comment Letter #121 – Richard Williams

Comment Letter #122 – Rick Yenofsky

Comment Letter #123 – Sarah Bales

Comment Letter #124 – Sarah Rodriguez

Comment Letter #125 – Sonja-Sophie Loeffler

Comment Letter #126 – Stephanie Cafiero

Comment Letter #127 – Steven Johnson

Comment Letter #128 – Susanna Dadd

Comment Letter #129 – Terrie Owen

Comment Letter #130 – Thomas Holaday

Comment Letter #131 – Thomas Joyce

Comment Letter #132 – Thomas Seelbinder

Comment Letter #133 – Tim Miranda

Comment Letter #134 – Timothy Callahan

Comment Letter #135 – William Fernandez (Network for a Healthy California)

Comment Letter #136 – D. Carl Ehlig

Comment Letter #137 – Susette Horspool (7<sup>th</sup> Principle Green Council)

Comment Letter # 138 – Hannah Petrie (Associate Minister of Neighborhood UU Church)

Comment Letter #139 – Christopher Brophy

Comment Letter #140 – Foothill Family of Water Agencies

Comment Letter #141 – Evan McDaniel (Tom Sawyer Camps Assistant Director Equestrian Division)

Comment Letter #142 – Kaitlin Spak

Comment Letter #143 – Jeffrey Heapy

Comment Letter #144 – Jose De La O

Comment Letter #145 – Karen Yenofsky

Comment Letter #146– Kristin McDaniel (Tom Sawyer Camps Assistant Program Director)

Comment Letter #147 – Mario Manzano

Comment Letter #148 – Miriam Fine

Comment Letter #149 – Philip Fitzpatrick

Comment Letter #150 – Raul Garibay

Comment Letter #151 – Thim Reed

Comment Letter #152 – Tom La Torre

Comment Letter #153 – Trevor Mutch

Comment Letter #154 – Bette Cooper (Pasadena Beautiful Foundation Past President)

Comment Letter #155 – Camron Stone

Comment Letter #156 – Ginny Heringer

Comment Letter #157 – John Favre

Comment Letter #158 – John Garsow

Comment Letter #159 – Laurel Beck

Comment Letter #160 – Lawren Markle

Comment Letter #161 – R. Marti

Comment Letter #162 – Teina Tuaiva

Comment Letter #163 – Thomas Owens

Comment Letter #164 – Tom Muccio

Comment Letter #165 – Altadena Heritage

Comment Letter #166 – City of Los Angeles Emergency Management Department

Comment Letter #167 – Al Cullen

Comment Letter #168 – Virginia Kimball

Comment Letter #169 – Joanne Watche

Comment Letter #170 – City of Azusa

Comment Letter #171 – California Department of Fish and Wildlife

Comment Letter #172 – Susanna Dadd & James Griffith

Comment Letter #173 – Rob

Comment Letter #174 – Dianne Patrizzi

Comment Letter #175 – Barbara Ellis

Comment Letter #176 – Christle Balvin

Comment Letter #177 – City of Pasadena

Comment Letter #178 – Cliff Towne

Comment Letter #179 – Friends of Hahamongna  
Comment Letter #180 – Friends of the Los Angeles River  
Comment Letter #181 – Hugh Bowles  
Comment Letter #182 – Jim Saake  
Comment Letter #183 – John Favre  
Comment Letter #184 – John Favre  
Comment Letter #185 – Judith Wright  
Comment Letter #186 – Laurie Barlow  
Comment Letter #187 – Linda Klibanow  
Comment Letter #188 – Michele Zack  
Comment Letter #189 – Pasadena Audubon Society  
Comment Letter #190 – Ross Plesset  
Comment Letter #191 – Santa Monica Mountains Conservancy  
Comment Letter #192 – Simon Penny  
Comment Letter #193 – Tracy Hirrel  
Comment Letter #194 – Vivian Geiseler  
Comment Letter #195 – West Pasadena Residents Association  
Comment Letter #196 – Asif Ahmed  
Comment Letter #197 – William Christian  
Comment Letter #198 – William Weisman  
Comment Letter #199 – Elizabeth Garrison  
Comment Letter #200 – Erick Lankey (Tom Sawyer Camps Counselor)  
Comment Letter #201 – Erik Hillard  
Comment Letter #202 – Gabrielle Johnston  
Comment Letter #203 – Geraldine Johnston

Comment Letter #204 – Gregg Oelker  
Comment Letter #205 – Joseph Evelyn  
Comment Letter #206 – Joseph Johnston  
Comment Letter #207 – Marietta Kruells  
Comment Letter #208 – Mark Hunter  
Comment Letter #209 – Markus Klemm  
Comment Letter #210 – Michael Johnston  
Comment Letter #211 – Pasadena Sierra Club  
Comment Letter #212 – Peter Kalmus  
Comment Letter #213 – Roger Klemm & Laura Newlin  
Comment Letter #214 – Ross Heckmann  
Comment Letter #215 – S. Robert Snodgrass  
Comment Letter #216 – Arroyo Seco Foundation  
Comment Letter #217 – Bev Huntsberger  
Comment Letter #218 – Dana Kennedy  
Comment Letter #219 – Dave Doody  
Comment Letter #220 – Edwina Travis Chin  
Comment Letter #221 – Grace Wang  
Comment Letter #222 – Joyce Dillard  
Comment Letter #223 – Kiley Akers  
Comment Letter #224 – Linda Vista - Annandale Association  
Comment Letter #225 – Lisa Frazier  
Comment Letter #226 – Lou Anne Insprucker  
Comment Letter #227 – Mignonne Walker  
Comment Letter #228 – Peter Kalmus

Comment Letter #229 – Richard and Chieko Rupp

Comment Letter #230 – South Coast Air Quality Management District

Comment Letter #231 – Susan Campisi

Comment Letter #232 – Peter Wohlgemuth

Comment Letter #233 – United States Fish and Wildlife Service

Comment Letter #234 – Darren Dowell

Comment Letter #235 – John West

Comment Letter #236 – Donna Rodriguez (La Cañada Flintridge Trails Council)

Comment Letter #237 – Lori Paul

Comment Letter #238 – Mary Beth Murrill

Comment Letter #239 – Mary Fitzpatrick

Comment Letter #240 – Patrick Phillips

Comment Letter #241 – Rebecca Latta

Comment Letter #242 – Robert Staehle

Comment Letter #243 – Sophia Hansen

Comment Letter #244 – Susan Rudnicki

Comment Letter #245 – Tim Martinez

Comment Letter #246 – Patty Sue Jones

Comment Letter #247 – Rose Bowl Riders

Comment Letter #248 – Zanja Madre

Comment Letter #249 – Hillside School and Learning Center

Comment Letter #250 – Assembly Member Mike Gatto

Comment Letter #251 – Robert Musselman

Comment #252 – Community Meetings Summaries

## **9.2 REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR**

Lead agencies are required to evaluate all comments on environmental issues received on the Draft EIR and prepare a written response pursuant to CEQA Guidelines §15088. Written responses should address the environmental issue(s) raised and provide a detailed response. Rationale must be provided when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. As long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines §15204), lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters.

CEQA Guidelines §15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. CEQA Guidelines §15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines §15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines §15088 also recommends that where the response to comments results in revisions to the Draft EIR, those revisions should be noted as a revision to the Draft EIR or in a separate section of the Final EIR. Section 8.0 Clarifications and Modifications outlines the revisions to the Draft EIR.

## **9.3 COMMENTS AND RESPONSE TO COMMENTS**

This section excerpts those comments received that specifically pertain to the scope and content of the Draft EIR. The full text of written comment letters received by the County is included at the beginning of each response.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11-6-13

Name: FREDDIE HUGHLEY Address: 2874 EL NIDO<sup>OR</sup>

Email: hughley@freddie@pusp.us City/Zip: ALTADENA 91001

Organization represented, if any: +

Comment: IS THE FOREST SERVICE  
GOING TO HELP WITH THE STATION  
FIRE WOOD CLEANING UP?  
STREAM.

Comment  
1-1

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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

Email  
reservoircleanouts@dpw.lacounty.gov

Fax  
(626) 979-5436

**Response to Comment Letter #1 (Freddie Hughley)**

**Response to Comment 1-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As noted in the Draft Environmental Impact Report (EIR), Section 4.10, Alternatives Considered but Not Selected for Analysis, Upstream Sediment Management was an alternative that was considered but not further analyzed as it does not meet the Proposed Project objectives and would result in greater/additional impacts than the Proposed Project. In addition, the areas upstream of Devil's Gate Reservoir, in the National Forest, are outside the jurisdiction of the Los Angeles County Flood Control District (LACFCD).



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/6/13Name: EVAN A. THOMPSON Address: 88 WAPELLO ST.Email: etchemist@earthlink.net City/Zip: ALTADENA CA 91001

Organization represented, if any: \_\_\_\_\_

Comment: I HAVE BEEN COMING TO THE GREATER OAK GROVE - HAYHAY MONZA AREA FOR MANY YEARS. NONE OF THE PLANS SEEM TO FOLLOW THE NATURAL CONTOURS OF THE AREA. WALKING THRU THE AREA ONE CAN SEE WHERE SEDIMENT HAS BEEN BUILT UP RECENTLY AND WHERE IT HAS BEEN MANY, MANY YEARS. WHY NOT TAKE OUT THE RECENT SEDIMENT - SAY 15 YEARS - AND LEAVE THE LONG TERM NATURE AREA?

THIS PROJECT IS BEING SOLD TO THE PUBLIC AS NEEDED BECAUSE OF THE STATION FIRE. THIS IS PURE B.S. IF THIS PROJECT IS COMPLETED IT WILL LOOK VERY DIFFERENT THAN IT LOOKED 5 years ago OR EVEN 20 YEARS AGO. WHY NOT TAKE IT BACK 10-15 YEARS NOT 80 YEARS? THIS WILL DESTROY SO MUCH BEAUTY AND REPLACE ~~IT~~ WITH GRASS (WHICH WILL USUALLY BE DEAD BECAUSE OF LACK OF WATER?)

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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

Email  
reservoircleanouts@dpw.lacounty.gov

Fax  
(626) 979-5436

## **Response to Comment Letter #2 (Evan A. Thompson)**

### **Response to Comment 2-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. While sediment has accumulated over many decades, sediment accumulation has increased dramatically over the past several years as a result of the 2009 Station Fire. 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 (cy), reducing the available capacity to less than one design debris event (DDE). Alternative 3, Configuration D closely resembles the natural contours within the reservoir, affecting the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final Environmental Impact Report [EIR]). Alternative 3, Configuration D, Option 1 provides a more natural configuration to the reservoir with two branches to carry water and sediment toward the face of the dam, and it avoids disturbing a significant portion of the existing vegetation. To further address your concerns, the Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and provide additional areas for wildlife movement.

### **Response to Comment 2-2:**

The LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries. A reservoir storage design capacity of two DDEs below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Additionally, as noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the

Proposed Project site between maintenance activities. After the sediment removal project, ground elevations within the reservoir will be in either present or historic levels and will have exposure to flowing stormwater. The habitat restoration plan will include and address monitoring and success criteria, as required by the regulatory agencies.

My name is Bob Musselman  
I live in Altadena

3935 CHAPMAN Ct  
ALTADENA, CA 91001

6 NOV 2013

I am an avid hiker, biker, and environmentalist. But I am also an engineer and my experience as a 27 year officer in the Navy nuclear submarine program teaches me that systems must be designed and maintained to perform their function not just in a normal environment but in the most extreme circumstances which test the maximum design parameters.

Comment 3-1

In the case of Devil's Gate that extreme design parameter is what has been called by meteorologists as an atmospheric river event which has occurred every 100 to 200 years along the California coast regularly for over a thousand years. The last event occurred about 150 years ago in 1861 causing megafloods from Sacramento to Los Angeles. This type of event was documented in a peer reviewed article in Scientific American this past January. On a probability adjusted basis, such a megaflood caused by constant rains for up to 6 weeks, poses a higher risk to infrastructure and the economy than an expected major earthquake in the next 50 years.

Comment 3-2

The most significant mitigating measure we can take against this expected event is to return the reservoir to its original function. While I understand the concern of many for the removal of trees, shrubs and animals from this 120 acre area, our leaders should be more concerned with the critical function of the dam and reservoir to protect lives and property. Simply put, this is a debris basin, and was not designed as a park and nature preserve.

Comment 3-3

Currently the dam has a capacity of less than one Design Debris Event which is a 50 year storm effect 4 years after a major fire, or about 2 million cy. This is far less than might be required for the kind of event which I have described. The original design capacity of the reservoir was something like 7 million cy; the current capacity is a fraction of that.

I can tell you that if the fighting capability of a Navy warship were to degrade unnecessarily to such a degree the captain would be fired immediately.

Comment 3-4

You will hear all kinds of arguments that the DWP has not been creative enough in finding a solution without removing leveling the intended 120 acres. I for one don't see a lot of room for creativity. It's a debris basin and we've let debris accumulate for decades. We have to remove it, not matter what might have grown on top over that time. Frankly, I would suggest returning to the original 178 acre removal plan.

I read a accusation that the DWP of complete "disregard of Nature." Let me tell you that not returning the reservoir to its original capacity would, in fact, be a higher disregard for what Nature can and will do in the future.

I know my opinion sticks in the craw of many, but I am facing the reality that the water and mud will come down those Canyons one day in the not too distant future. Unlike anything any of us have ever witnessed. We'd better be ready for it.

Recommendations

Comment 3-5

1. Remove at least 4,000,000 cy of sediment.
2. Accelerate the project to the extent possible.
3. Perform a study of flooding potential downstream of the dam in a 150 year flood (40 day "vapor river" event) in the event of a dam capacity of (a) 2,000,000 cy and (b) 4,000,000 cy. Include in final EIR.
4. Alt 3, Config D provides an unacceptably low amount of debris removal and unacceptably high risk of flooding in the Arroyo Seco. 

### **Response to Comment Letter #3 (Bob Musselman)**

#### **Response to Comment 3-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

LACFCD acknowledges that natural events in exceedance of those considered in LACFCD design standards are possible given the power and unpredictability of nature. LACFCD's goal and responsibility are to reduce the risk posed by natural hazards; however, designing and building to protect against all extreme events for all LACFCD infrastructure is not possible.

#### **Response to Comment 3-2:**

The commenter's preference for returning the reservoir to its original function is noted. As described in the Draft EIR, Proposed Project objectives include reducing flood risk and restoring reservoir capacity for flood control and future sediment inflow events. The commenter is correct; in order to remove the necessary amount of sediment from the reservoir some vegetation must be removed, as the vegetation sits atop many layers of accumulated sediment.

#### **Response to Comment 3-3:**

The commenter is correct; a design debris event (DDE) is characterized as the estimated amount of sediment that could flow into the facility during a Capital Flood event four years after the undeveloped portion of its tributary watershed is burned, and the capacity in Devil's Gate Reservoir is less than one DDE.

A reservoir storage design capacity of two DDEs below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1040.50 feet.

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Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

**Response to Comment 3-4:**

The commenter's preference for returning the reservoir to its original capacity is noted.

**Response to Comment 3-5:**

The commenter's recommendations for project design are noted.

The alternatives in the Draft EIR analyzed a range of sediment removal amounts (2,425,000 cy to 4,000,000 cy), obtaining or close to obtaining two DDEs, the standard acceptable level of risk at Devil's Gate Dam and Reservoir.

As described in the Draft EIR, Proposed Project objectives include 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. With sediment removal operations moving efficiently, it is reasonable to assume a project duration of no more than five years. It is possible that sediment removal may be achieved in under five years; however, acceleration of the removal beyond the parameters described in the Draft EIR, would be difficult to achieve due to limits associated with truck traffic and the rainy season. The Proposed Project and Alternatives 1, 2, 3, and 5 reflect the maximum efficiencies of removal that are reasonably possible.

See Response to Comment 3-3 regarding determination of acceptable reservoir storage capacity.

LACFCD notes the commenter's preference for the Proposed Project



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11-6-13

Name: Erika Bennett Address: 18735 S Ferris Pl, Rancho Dominguez

Email: erikab@ts-i.com City/Zip: 90220

Organization represented, if any: TTSI

Comment: regarding the air quality - for the trucking portion of the project are near zero or zero emission trucks being considered?

Comment 4-1

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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

Email  
reservoircleanouts@dpw.lacounty.gov

Fax  
(626) 979-5436

**Response to Comment Letter #4 (Erika Bennett - TTSI)**

**Response to Comment 4-1:**

Thank you for your input. The comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Lower emission trucks were considered for the Proposed Project; however, the availability of these trucks could not be guaranteed at the time the Draft Environmental Impact Report (EIR) was written. Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. Los Angeles County Flood Control District has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/5/13

Name: LOU KATRO Address: 5619 N. FIBROX

Email: LOU.KATRO@GMAIL.COM City/Zip: LA

Organization represented, if any: LIGHT AND CONSULTING

Comment: REMOVAL OF THIS MUCH WEIGHT IN A SHORT PERIOD OF TIME WILL INCREASE THE CHANCE OF THE FAULT AT THE NORTHERN END OF DEVIL'S GATE RESERVOIR. THE MAGNITUDE DISCUSSED 6.3 IS NOT THE REGIONAL PATTERN NOT THE SUNLAND TIJUNGA SECTION OF THE FAULT, IS CAPABLE OF PRODUCING A 7.3 MAGNITUDE QUAKE.

Comment 5-1

Comment 5-2

Raymond Fault

Comment 5-3

Comment 5-4

Removal of this much weight in a short period of time will increase the chance of a fault rupture at the northern end of the Devil's Gate Reservoir. The magnitude nearest fault line discussed in the EIR is not the closest. The Sunland Tijuanga Fault travels through the northern end of the reservoir, # the anticipated magnitude is a 7.3 event. These faults are shown on the Los Angeles County fault maps. The sediment should be available for use by the Army Corps of Engineers for the restoration of the Arroyo Seco.

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

<p>Mail</p> <p>County of Los Angeles Department of Public Works Water Resources Division Reservoir Cleanouts Program P.O. Box 1460 Alhambra, CA 91802-1460</p>	<p>Email</p> <p>reservoircleanouts@dpw.lacounty.gov</p>	<p>Fax</p> <p>(626) 979-5436</p>
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## Response to Comment Letter #5 (Lloyd Kattro – Light Art Consulting)

### Response to Comment 5-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The comment was rewritten below for readability purposes per the direction of the commenter. See Response to Comments 5-2, 5-3, and 5-4, below.

### Response to Comment 5-2:

Earthquakes tend to initiate in the earth's crust many miles below the ground surface. Given the relatively low weight of the sediment at the ground surface that will be removed and the rate at which it will be removed, it is extremely unlikely that such gradual change in weight could influence stress patterns at depths sufficient to cause fault rupture and earthquakes.

### Response to Comment 5-3:

Faulting was discussed in the Geotechnical Report (Appendix F of the Draft Environmental Impact Report [EIR]). In that report (Section 4.0 Geologic-Seismic Hazards, Section 4.1, Faulting), it is noted that the Raymond Hills Fault is the closest active fault to the reservoir that the State of California includes in an Alquist-Priolo Earthquake Fault Zone. The report then notes that the Tujunga Fault (referred to in the comment as the "*Sunland Tujunga Fault*") transects the inlet at the north margin of the reservoir. The commenter is correct that both of these faults are shown on maps included in the Seismic Safety Element of the Los Angeles County General Plan. Both of these faults were evaluated in the Geotechnical Report.

Although the commenter refers to the fault that extends through the northern margin of the Proposed Project site as the "*Sunland-Tujunga*" Fault, this is one of many names used for this fault in the geologic literature. The Geotechnical Report refers to the fault as the "*Tujunga Fault*," which is a segment of the larger Sierra Madre Fault that constitutes a portion of the frontal fault system of the southern margin of the Transverse Ranges Geomorphic Province in this area. For the analysis of the strong ground motion that could be induced at the site as a result of a regional earthquake, a probabilistic seismic hazard analysis was performed using the 2008 National Seismic Hazard Mapping Project's Probabilistic Seismic Hazard Assessment Interactive Deaggregation web site (see: <http://geohazards.usgs.gov/deaggint/2008/>). The Sierra Madre Fault was included in the program's database as "*Sierra Madre Connected*" to reflect the fact that the Sierra Madre Fault consists of various fault segments that could all rupture at the same time. The magnitude range that was assigned to the "*Sierra Madre Connected*" entry was 6.5 to 7.3 (see: [http://geohazards.usgs.gov/cfusion/hazfaults\\_search/disp\\_hf\\_info.cfm?cfault\\_id=105b\\_g](http://geohazards.usgs.gov/cfusion/hazfaults_search/disp_hf_info.cfm?cfault_id=105b_g)). The Geotechnical Report also concludes that the maximum magnitude earthquake that could be produced by the Sierra Madre Fault (referred to as the "*Sunland-Tujunga*" Fault in the comment) is 7.3.

As discussed in the Draft EIR (Section 3.8, Geology and Soils, Section 3.8.1, Introduction, second paragraph), in the Initial Study (Appendix A), impacts associated with Alquist-Priolo Earthquake Fault Zoning and seismic ground shaking were found to have no impact and thus are not discussed within the EIR.

**Response to Comment 5-4:**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in the Draft EIR in Section 2.0, Project Description.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11-6-13

Name: Pam Dong Address: 1205 Orange Grove Ave

Email: pdong@prodigy.net City/Zip: S. Pas, 91030

Organization represented, if any: Pas. Anderson

Comment: Why not get rid of the dam and let the reservoir flow naturally to "flush" the sediment?

Comment 6-1

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

Mail	Email	Fax
County of Los Angeles Department of Public Works Water Resources Division Reservoir Cleanouts Program P.O. Box 1460 Alhambra, CA 91802-1460	<a href="mailto:reservoircleanouts@dpw.lacounty.gov">reservoircleanouts@dpw.lacounty.gov</a>	(626) 979-5436

**Response to Comment Letter #6 (Pam Dong – Pasadena Audubon Society Member)**

**Response to Comment 6-1:**

Thank you for your input. The comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As discussed in Section 4.10.3 of the Draft Environmental Impact Report (EIR), removal of the Devil's Gate Dam was considered but rejected due to its inconsistency with Proposed Project objectives, as well as the potential safety concerns. This alternative would fail to meet the Proposed Project objectives and would result in greater additional impacts than the Proposed Project (geology, hazards, hydrology, and public services).

The scope of the Proposed Project is to restore capacity for Devil's Gate Reservoir. Removing the dam would remove the only flood attenuation mechanism that is in place along the Arroyo Seco. Areas downstream of the dam would be at high risk of flooding during storm events. Also, sediment would move downstream and accumulate within and adjacent to the channel due to the removal of the dam. Sediment accumulation in the channel would reduce the capacity of the channel in those areas and would further increase the likelihood of flooding. Additionally, flood control operations for the Los Angeles River rely on peak flow attenuations from Devil's Gate Dam.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/6/13

Name: Wilbur Dong Address: 1205 Orange Grove Ave

Email: pcdong@prodigy.net City/Zip: South Pasadena, CA 91030

Organization represented, if any: Member of Pasadena Audubon

Comment  
7-1

Comment: Could you post on-line and notify the public of the hydrology study that was used to determine the capacity needed and therefore the amount of debris removal.

Thank you

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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**Response to Comment Letter #7 (Wilbur Dong – Pasadena Audubon Society Member)**

**Response to Comment 7-1:**

Thank you for your input. The comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As described below, the methodology used to determine the required capacity for the Devil's Gate Dam and Reservoir is posted on the Los Angeles County Department of Public Works (LACDPW) website.

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries. A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 LACDPW Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: NOV 6

Name: CHRISTIE BALVIN Address: 195 S. CATALINA AVE

Email: GOBALVIN@GMAIL.COM City/Zip: CA 91106

Comment 8-1

Organization represented, if any: SEVERAL

NO ONE DISAGREES WITH NEED TO REMOVE SEDIMENT, THE PROBLEM IS AMOUNT BEING REMOVED

Comment 8-2

Comment: 1) A FEW PRINTED DRAFT DOCUMENTS SHOULD BE MADE AVAILABLE TO ORGANIZATIONS KNOWN TO CITY OF PAS FOR LONG INVOLVEMENT WITH DEVIL'S GATE / HANAHONGWA ISN'T GETTING PUBLIC INVOLVEMENT THE PURPOSE OF WHOLE EIR PROCESS SO SPEND SOME \$ ON NON-PDF DOCS TO FACILITATE COMMENTS. COMMUNITY MEMBERS RUNNING DRAFT 600 PAGES FOR DISCUSSION AT MEETINGS IS NOT ALWAYS POSSIBLE & PUTS COST ON GROUPS BEST QUALIFIED TO INTELLIGENTLY COMMENT.

Comment 8-3

2) IN PREVIOUS SCOPING MEETINGS, A KEY COMMENT WAS NEEDED FOR LONG RANGE PLAN & POSSIBILITY OF COMMITTEE WITH OUTSIDE EXPERTS ASSISTING COUNTY THIS & IMPORTANT OTHER COMMENTS BY PUBLIC WERE IGNORED.

Comment 8-4

3) GRADUAL WINTER-TIME SLUICING HAS REPEATEDLY BEEN RECOMMENDED IN EARLIER SCOPING SESSIONS BUT WITH A CAVEAT -- THERE WOULD BE A DOWNSTREAM DIVERSION WHERE SEDIMENT COULD BE REFINED OR SEPARATED (POSSIBLY NEAR CORNFIELD) WHERE IT COULD BE SENT BY RAIL TO VOLCAN PITS OR MADE AVAILABLE TO BEACH CITIES A LONG RANGE, COMPREHENSIVE PLAN WOULD/COULD DEAL WITH THIS

Comment 8-5

4) WE ARE NOW LEARNING HOW DUST TRAVELS. HAS THIS PROJECT, WHICH DEMANDS HUGE AMOUNTS OF SEDIMENT REMOVAL TRAVELING BY TRUCKS, BEEN CAREFULLY MONITORED OR REVIEWED FOR AIR QUALITY CONCERNS. DAVID DIVER'S SATELITE AIR MONITORING PROJECT MIGHT ASSIST WITH THIS AT JPL OR DIVER AVAILABLE AT (818) 354-6319 OVER AT JPL - Aerosol & Cloud Science

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. Correspondence should be postmarked by Monday, January 6, 2014. Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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Department of Public Works  
Water Resources Division  
Reservoir Cleanouts Program  
P.O. Box 1460  
Alhambra, CA 91802-1460

2) Email  
reservoircleanouts@dpw.lacounty.gov

3) Fax  
(626) 979-5436

4) AT  
PUBLIC MEETINGS

AT ONE TIME & NOW IT IS REMOVED.

5) IS IT POSSIBLE TO BASE THIS PROJECT ON ONE  
ODE + REMOVE LESS SEDIMENT + MORE SLUICING TO A  
DOWNSTREAM DIVERSION/TREATMENT/REMOVAL AREA

Comment  
8-6

**Response to Comment Letter #8 (Christle Balvin)**

**Response to Comment 8-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Various amounts of sediment and methods of removal were analyzed under the Alternatives Analysis of the Draft Environmental Impact Report (EIR) (see Chapter 4 of the Draft EIR).

**Response to Comment 8-2:**

Hard Copies of the Draft EIR were made available at several locations listed in the Draft EIR, including public libraries and the Los Angeles County Department of Public Works (LACDPW) headquarters, in compliance with Section 15087(g) of the California Environmental Quality Act (CEQA) Guidelines. Printed copies were made available for purchase at the LACDPW headquarters. In addition, the Draft EIR was posted on the Los Angeles County Flood Control District (LACFCD) website, and free copies of the Draft EIR on CD were available upon request.

**Response to Comment 8-3:**

The Draft EIR analyzes long range maintenance of the reservoir under the Reservoir Maintenance phase of the Proposed Project and Alternatives. Outside experts in the community, especially those on the Stakeholder Task Force, were consulted during the formation of the LACFCD's Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

**Response to Comment 8-4:**

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

As demonstrated in Section 4.7 and Appendix K of the Draft EIR, it is likely that sediment loads will fall out rapidly after leaving Devil's Gate Reservoir. As such, this sediment could not be diverted adjacent to a railroad yard or any other single convenient location downstream. Therefore, the commenter's suggested alternative would not be feasible and would not reduce impacts or achieve Proposed Project objectives.

**Response to Comment 8-5:**

Dust impacts from the Proposed Project were carefully evaluated as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices (BMPs) and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 8-6:**

The LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 LACDPW Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1040.50 feet.

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Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

See Response to Comment 8-4 regarding sluicing and downstream removal.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: \_\_\_\_\_

Name: Annette Pemy Address: 1493 Saena Dr

Email: lolanicoke@gmail.com City/Zip: Pasadena, CA 91103

Organization represented, if any: Resident

Comment 9-1

1) Study did not address truck traffic with construction of new JPL Garage construction impacts

Comment 9-2

2) Rose Bowl possible NFL(N)-EIR increase in volume attendance.

Comment 9-3

3) A phasing of any alternative should be studied addressed so as not to need to do it all at once. Give the area a "break" from noise/truck/pollution etc. It does not all need to be achieved at once.

Comment 9-4

4) Scholl Canyon Routes - service impacts on Glendale, Pasadena, LA trash collection Garbage pickups due to traffic delays, O.T hours pick up delays loss in revenue working schedules etc.

Comment 9-5

5) One water truck not enough, not enough mitigation on dust. Some soil and efforts have poisonous effects, air quality can have better mitigation measures

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**Fax**  
 (626) 979-5436

1/4



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: \_\_\_\_\_

Name: Annette Pemy Address: \_\_\_\_\_

Email: \_\_\_\_\_ City/Zip: \_\_\_\_\_

Organization represented, if any: Resident

Comment: (continued) → (Different from Rose Bowl course)

Comment 9-6

6) Annendale Golf Course - "dusting" due to debris dust, affect on greens, golf membership, revenue losses, track parking by

Comment 9-7

7) Rose Bowl Golf Course near Scholl Canyon. same as above

Comment 9-8

8) Schools buses, pick ups, parent drop off's affecting schedules of teachers, parents fire trucks, ambulances etc. affecting schools.

Comment 9-9

9) Asthma students who recreate outdoors, and non asthma because Phys Ed is a requirement. Affect on schools to have to change Phys Ed implementation. → Phys Ed is requirement in school, not an elective.

Comment 9-10

10) Affect on horses stalled nearby

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Fax  
(626) 979-5436

2/4



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: \_\_\_\_\_

Name: Annette Perry Address: \_\_\_\_\_

Email: \_\_\_\_\_ City/Zip: \_\_\_\_\_

Organization represented, if any: Resident

Comment 9-11: 11) Impact on home values during construction, potential losses in listings sales etc.

Comment 9-12: 12) Air quality affect of any hazardous/poisonous release in air to create cancer in the area

Comment 9-13: 13) study on such contamination in soil that when released in air not to create a disease to resident

Comment 9-14: 14) Since you already did emergency removal, why is such an amount even necessary, why was a reduced amount to double the emergency removal not studied?

Comment 9-15: 15) What is the affect on Lake like Super Antonovich requested the study in a meeting - you doubled in your study what was requested by Antonovich - why?

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Fax  
(626) 979-5436

3/4



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: \_\_\_\_\_

Name: Amette Peny Address: \_\_\_\_\_

Email: \_\_\_\_\_ City/Zip: \_\_\_\_\_

Organization represented, if any: Resident

Comment: 16) Truck trips 50 both ways 50 inbound, 50 outbound - totals 100 trucks per hour! plus construction traffic of JRL Gauge

Comment 9-16

↓ Not necessary to do all at once phase Project.

17) EIR, expansion, construction, other studies as related to 710 tunnel, 710 extension of 210 to 710 Route. Affect of trucking traffic etc ~~on~~ if 710 alternatives moves each 5 of forward. Alternatives to be talked about tolls affect from the 710.

Comment 9-17

18) Mitigation measures after completion weren't upheld by county by last management plan, what plan in place to ensure it happens this time?

Comment 9-18

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Fax  
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4/4

## **Response to Comment Letter #9 (Annette Peny)**

### **Response to Comment 9-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Jet Propulsion Laboratory (JPL) Parking Structure was analyzed as a cumulative project in the Draft Environmental Impact Report (EIR), as noted in Section 2.9, Cumulative Scenario, and in the Traffic Study, as noted in Section 4, Project Conditions-Year 2014, Project Trip Growth. In addition, the JPL Parking Structure project is currently under construction and will likely be completed prior to the start of the Proposed Project. Therefore, construction traffic from these two projects will not overlap.

### **Response to Comment 9-2:**

The temporary use of the Rose Bowl by a National Football League (NFL) team was analyzed as a cumulative project in the Draft EIR, as noted in Section 2.9, Cumulative Scenario, and in the Traffic Study, as noted in Section 4, Project Conditions-Year 2014, Project Trip Growth.

### **Response to Comment 9-3:**

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule. This approach supports dam safety to remove 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. Also, prolonged periods of high sediment levels in the reservoir increase the potential risk for downstream flooding. With sediment removal operations moving efficiently, it is reasonable to assume a project duration of no more than five years. Extending the project any further would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

### **Response to Comment 9-4:**

The Traffic Study took all current traffic, including trips to Scholl Canyon Landfill, into account. As discussed in the Draft EIR, Section 3.16.6, the Proposed Project's contribution to traffic in the Scholl Canyon Landfill area would result in a significant impact to the Figueroa Street/Scholl Canyon Road and State Route (SR)-134 westbound ramps intersection during the AM and PM peak hours. However, this impact would occur for only a few weeks during the first year of sediment removal and for only one week during subsequent years. While the speed of movement through this intersection would be temporarily reduced, traffic would not be restricted or prevented from accessing Scholl Canyon Road. In addition, this impact occurs only during the AM and PM peak hours. Trucking to the Scholl Canyon Landfill is not limited to these time periods. No significant impacts are expected during the MID-DAY peak period. Due to the short time period that the Proposed Project would increase traffic at this intersection, any impacts to trash collection would be very limited and short-term. Also, this impact occurs with the full rate of 50 trucks an hour directed to Scholl Canyon. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need.

**Response to Comment 9-5:**

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment.

Dust impacts from the Proposed Project were carefully evaluated as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 9-6:**

See Response to Comment 9-5.

**Response to Comment 9-7:**

See Response to Comment 9-5.

**Response to Comment 9-8:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Project Site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. In addition, the Proposed Project will not block access to any roadways, and impacts related to emergency access would be less than significant. Los Angeles County Flood Control District (LACFCD) will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

**Response to Comment 9-9:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality including those associated with health effects to sensitive uses, will be reduced to less than significant.

**Response to Comment 9-10:**

Potential effects to horses stalled near the Proposed Project site would be similar to the construction-related impacts from emissions and noise associated with sediment removal to nearby residents and recreational users of Hahamongna Watershed Park. See Response to Comment 9-9. As discussed in

Section 3.14 of the Draft EIR, implementation of the Mitigation Measures would reduce noise impacts to a level of less than significant. It should be noted that construction activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays); so the maximum construction noise impacts to the horse riding facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

**Response to Comment 9-11:**

Comment Noted.

**Response to Comment 9-12:**

See Response to Comments 9-5 and 9-9. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related impacts.

**Response to Comment 9-13:**

See Response to Comments 9-5, 9-9, and 9-12.

**Response to Comment 9-14:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Additional information concerning DDE determination methods has been added to the Final EIR, Section 2.3, Project Need and the Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cy was proposed. The volume of 1.67 million cy is the previously published DDE and this amount was considered justifiable as an emergency exemption to the CEQA. This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDE's. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project. Knowing that the EIR would take a considerable amount of time to complete, the County of Los Angeles Board of Supervisors also motioned for an Interim Measures Project to be implemented in order to help reduce the flood risk downstream of the dam until the ultimate sediment removal project commenced.

**Response to Comment 9-15:**

See Response to Comment 9-14.

**Response to Comment 9-16:**

See Response to Comments 9-1, 9-2, and 9-3. The Traffic Study considered the effects of the Proposed Project including approximately 50 round trips per truck per hour, as well as cumulative effects from other area projects that will be occurring concurrently. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project Site.

It should be noted that construction activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays).

**Response to Comment 9-17:**

The Draft EIR contained a cumulative impact analysis within each of the subsections of Section 3.0 Environmental Analysis. The cumulative analysis contains projects as determined by LACFCD and the surrounding cities and communities to have a potential cumulative effect due to overlapping time frames of the projects. Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130.

The Interstate 710 (I-710) project was not included in the Draft EIR as a cumulative project, as it was determined to be outside the area of influence. A cumulative growth factor was used in the Traffic Study that accounted for future traffic growth and its cumulative effects. The Devil's Gate Reservoir Sediment Removal and Management Project sediment removal phase is scheduled to be completed by 2020, prior

to the initiation of the I-710 tunnel project. At this time the I-710 Extension/Tunnel project is in the preliminary phases and a project schedule has not been established (Caltrans 2010). The growth factor considered in the analysis provided a conservative project condition volume that accounts for expansion and regional growth.

**Response to Comment 9-18:**

With the certification of the Final EIR, a Mitigation, Monitoring, and Reporting Plan (MMRP) will be submitted which will detail the terms of compliance with the mitigation measures. The MMRP will include the following information for each mitigation measure:

- the phase of the project during which the required mitigation measure must be implemented
- the phase of the project during which the required mitigation measure must be monitored
- the party responsible for carrying out the mitigation measure
- the party responsible for monitoring the implementation of the mitigation measure

The MMRP also includes a checklist to be used during the mitigation monitoring period. The checklist will verify the name of the monitor(s), the date of the monitoring activity, and any related remarks for each mitigation measure. This checklist will be available for review at the LACDPW headquarters.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11-6-13

Name: ELIZABETH BOUR Address: 328 E. CALAVERAS ST.

Email: bourel City/Zip: ALTADENA CA 91001

Organization represented, if any: \_\_\_\_\_

Comment 10-1

Comment: AREAS OF IMPACT THAT ARE ~~THE~~ UNDERSTATED° INCLUDE BIOLOGICAL RESOURCES AND NOISE. THERE ARE NUMEROUS SPECIES - SOME OF WHICH ARE PROTECTED THAT WILL PERMANENTLY ILLUMINATED FROM THE REGION. THIS AREA IS ALSO A WILDLIFE CORRIDOR AND THERE ARE NO MITIGATIONS MEASURES FOR COYOTES, BOBCATS, BEAR, HERON AND EGRETS

Comment 10-2

Comment: TRAFFIC MITIGATION IS STATED AS SIGNIFICANT AND UNAVOIDABLE. WHAT IS NOT ADDRESSED IS ALL THE CARS THAT WILL EXIT THE 210 FREEWAY AND DRIVE THROUGH NEIGHBOHOODS TO AVOID THE TUNNELS WHICH ARE SEVERLY CLOGGED NOW AND WILL BE UNUSEABLE DURING THE PROJECT.

Comment 10-3

Comment: NOISE WILL BE INTOLERABLE FOR THE RESIDENTS NEAR THE INBOUND SLIP LANE AND THERE ARE NO MITIGATION MEASURES.

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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

Email  
[reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov)

Fax  
 (626) 979-5436

**Response to Comment Letter #10 (Elizabeth Bour)**

**Response to Comment 10-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. These measures will also serve to protect and reduce any impacts to all other wildlife, including coyotes, bobcats, heron, egrets, and bear. Sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with night time wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 10-2:**

As shown in the Draft EIR, Section 3.16, the traffic volumes on Interstate-210 (I-210), the on/off ramps, and the local roadways within the Proposed Project area included those potentially impacted by the Proposed Project. The analysis provided a conservative project condition volume that accounts for expansion and regional growth within the Proposed Project area. These volumes account for redistribution of traffic.

**Response to Comment 10-3:**

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a one decibel (dB) increase on Berkshire Place east of the I-210 northbound ramps. A one dB increase is well below the three dB increase threshold of perception. The roadway noise impact analysis provided in the Draft EIR found that the Proposed Project would result in less than significant impacts for all analyzed alternatives.

Dear County Board,

Comment Letter #11

Comment  
11-1

My name is Dessi Sieburth, and I am 11 years old. I have been with the Pasadena Audubon Society for 3 years. I like to watch birds, especially in Hahamonga Watershed Park, and I have seen over 60 species of birds in Hahamonga. I also try to conserve the birds habitat. I am here to speak against the sediment removal project of LA County. If we removed the sediment, over 60 species of birds' habitat will be destroyed. An endangered species, the Bell's Vireo, was seen and might be nesting in Hahamonga. Many rare birds, including the Indigo Bunting, Lewis's Woodpecker, and Vesper Sparrow. If we destroy the habitat of Hahamonga, these birds will not come back. Please save the habitat of Hahamonga!

Sincerely,  
Dessi Sieburth

Dessi Sieburth 2644 Hermosa Ave, 91020 CA  
Montrose

LA-County Board  
County Flood Control District  
No Sediment Removal

**Response to Comment Letter #11 (Dessi Seiburth – Pasadena Audubon Society Member)**

**Response to Comment 11-1:**

Thank you for your input. The comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. Bird species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/14/13

Name: Suzanne Martin Address: 2717 Raymond

Email: smartinealum.exeter.edu City/Zip: Altadena, 91001

Organization represented, if any: (self)

Comment  
12-1

Comment: Preference for alternative 3.  
Reason: Meets safety & maintenance objectives while maintaining more habitat.

Comment  
12-2

Please keep recreation uses in mind.

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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

Email  
reservoircleanouts@dpw.lacounty.gov

Fax  
(626) 979-5436

**Response to Comment Letter #12 (Suzanne Martin)**

**Response to Comment 12-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's preference for Alternative 3. Alternative 3, Configuration D was determined to be the Environmentally Superior Alternative in the Draft Environmental Impact Report (EIR).

**Response to Comment 12-2:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays), and often will not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on non-working days.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/14/13

Name: DONOTHY WONG Address: 3034 OLIVE AVE

Email: DOT@SOCALCROSS.ORG City/Zip: ALTADENA, CA 91001

Organization represented, if any: ALTADENA, RESIDENT

Comment: PLEASE CONSIDER A LESS 'INVASIVE'  
ALTERNATIVE THAT ALLOWS A REAL WILDLIFE CORRIDOR  
AND TRUE ENJOYMENT FOR USERS, HABITAT PRESERVATION  
INCLUDING MIGRATING BIRDS THAT COME TO THE  
WATERSHED FOR BREEDING. EQUESTRIANS, RUNNERS,  
DOG WALKERS ~~USE THE~~ BICYCLISTS CAN ENJOY THIS  
SPECIAL PLACE. WHILE ALSO REMOVING SEDIMENT FOR  
FLOOD CONTROL. AND LET'S COME UP WITH A PLAN FOR  
THE FUTURE & SUSTAINABILITY. NEW

Comment: PLEASE CONSIDER BIO ~~TRUCKS~~ TRUCKS AND A SHORTER  
TIMEFRAME FOR REMOVAL ANNUALLY. PLEASE CONSIDER  
THAT DOES NOT COMPLETELY DISRUPT THE ECO-SYSTEM.

Comment: PLEASE ANALYZE AND CONSIDER RISK ASSESSMENT AND  
TRUE NUMBERS TO MINIMIZE IMPACT. THE LARGE AREA  
SOUTH OF "SOHNSON FIELD" HAS MOST OF THE HABITAT  
ESPECIALLY WILDLIFE. (OVER) →

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

<p>Mail</p> <hr/> County of Los Angeles Department of Public Works Water Resources Division Reservoir Cleanouts Program P.O. Box 1460 Alhambra, CA 91802-1460	<p>Email</p> <hr/> reservoircleanouts@dpw.lacounty.gov	<p>Fax</p> <hr/> (626) 979-5436
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------	---------------------------------

P.2

PLEASE CONSIDER TRAFFIC FLOW IN/OUT OF THE DIRECTLY AFFECTED COMMUNITIES W/ ALTADERA RESIDENTS W/ PASADENA HAVE THE CLOSEST IMPACT OF THIS PROJECT PLUS 3 SCHOOLS AND 5,000+ EMPLOYEES + 45,000 RESIDENTS PLUS ROSE BOWL ACTIVITIES OFF ARROYO/WINDSOR 210 FRWY. "YEAR ROUND"

Comment 13-4

How CAN YOU IMPLEMENT A PLAN WITH "UNMITIGATED" HEALTH RISKS??

Comment 13-5

IN THE END THIS IS A WILDLIFE/NATURE TREASURE. THE IMPACT WITH MASSIVE REMOVAL WILL BE PERMANENT. IT IS HARD TO BELIEVE OTHERWISE. THE MASSIVE AMOUNTS OF TRUCKS WILL BRING IN NEW IMPACT UNMEASURED.

Comment 13-6

WHY DONT WE APPROVE REGULAR MAINTENANCE TO MAKE A DIFFERENCE!

Comment 13-7

I'D LIKE TO SEE THE WORK SCHEDULE WITH ALL THE OTHER USERS SURROUNDING THE 'PARK' TO MINIMIZE OVER-ALL CONFLICTS OF USE.

Comment 13-8

ALTERNATIVES? THEY ARE TOO SIMILAR. I WOULD VOTE FOR NO REMOVAL IN MASS. ~~IF WE ARE LOOKING TO REMOVE~~ A REGULAR MAINTENANCE PLAN FOR THE FUTURE

RE. TRAFFIC IMPACT. HOW CAN WE BE SURE ARROYO/WINDSOR WILL NOT BE USED FOR TRUCK TRAFFIC OUT OF ALTADERA WHERE CURRENTLY THERE IS NOT ENOUGH ROOM FOR BICYCLES AND CARS (WINDSOR IS VERY POPULAR TRAVEL ROUTE FOR BICYCLISTS) TRUCKS WOULD BE MORE THAN DANGEROUS AS A MAIN THOROUGHFARE FOR CARS AND BICYCLES ADDING TRUCKS THERE WOULD INCREASE RISK.

Comment 13-9

HOW CAN WE BE SURE PASADENA'S HAHAMONGWA WATERSHED MASTERPLAN PROJECTS WILL BE COORDINATED? IT SEEMS LIKE THERE COULD BE SOME CONFLICTS HERE.

Comment 13-10

WHAT IS THE TRAIL CLOSER PLAN TO GET USERS ACROSS THE ARROYO WEST? HOW WILL RECREATIONAL USERS BE NOTIFIED?

Comment 13-11

HOW WILL IMPACTS BE LESSENED BY RECREATIONAL USERS? HOW WILL THE ~~THE~~ SUMMER CAMPS + EQUESTRIANS + ROUNDRIDERS BE NOTIFIED? WALKERS

## **Response to Comment Letter #13 (Dorothy Wong)**

### **Response to Comment 13-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Draft Environmental Impact Report (EIR) analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders including concerns for long-term habitat preservation and recreational usage. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, the Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

### **Response to Comment 13-2:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. Lower emission trucks were considered for the Proposed Project; however, the availability of these trucks could not be guaranteed at the time the Draft EIR was written. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule. Reducing the duration of sediment removal activities for each year or for each day would significantly increase the overall project duration and also substantially increase project cost and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. These measures will serve to reduce the disruption to the existing ecosystem.

**Response to Comment 13-3:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

With implementation of the mitigation measures described in Section 3.6.6 of the Draft EIR, impacts to biological resources would be reduced to less than significant.

**Response to Comment 13-4:**

Potential impacts due to the Proposed Project's added truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site. In addition, during the sediment removal phase, excavation is expected to occur only in the drier months (April to December, excluding holidays).

**Response to Comment 13-5:**

See Response to Comment 13-2. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**Response to Comment 13-6:**

See Response to Comment 13-3, 13-4, and 13-5.

**Response to Comment 13-7:**

Flow Assisted Sediment Transport (FASTing), a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the Proposed Project site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays.

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. LACFCD will notify recreational users of these temporary limitations by the placing of signs around the Proposed Project site at least one month prior to the commencement of sediment removal activities. Notifications identifying working locations within the reservoir will be updated on a regular basis, as feasible, to help minimize impacts to recreation users. The notifications will also direct recreational users to the other nearest recreational facilities. See Response to Comment 13-2 regarding reduced work schedule.

**Response to Comment 13-8:**

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route. The alternative closest to the alternative mentioned in the comment is the No Project Alternative, which includes the use of FASTing and IMP alone, which would not meet Proposed Project objectives. Other alternatives were not carried forward as they did not minimize impacts in relation to the Proposed Project and/or did not meet Proposed Project objectives.

**Response to Comment 13-9:**

As described in the Draft EIR, the proposed and alternative haul routes would briefly access Windsor Avenue between the Interstate-210 (I-210) on- and off-ramps and Oak Grove Drive. Both the proposed

and alternative haul routes use main thoroughfares and do not travel into the residential areas. Access or ingress to the Proposed Project site would be from Oak Grove Drive. Windsor Avenue would not be used for access or ingress to the reservoir. LACFCD will contractually obligate construction crews to use the defined truck routes. In addition, LACFCD will monitor Proposed Project activities for compliance including the proper use of defined truck routes.

**Response to Comment 13-10:**

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

**Response to Comment 13-11:**

See Response Comment 13-7 regarding notification of recreational users. Impacts to recreation were analyzed in the Draft EIR, Section 3.15. As noted above, the Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/14/2013  
 Name: Peter Pfeiffer Address: 389 W. Mendocino St,  
 Email: maybeman@earthlink.net City/Zip: Altadena, CA 91001  
 Organization represented, if any: \_\_\_\_\_

Comment 14-1

Comment: As a resident of Altadena, I am deeply concerned with the destruction of wildlife habitat. The removal of the yearly sediment accumulation should be done on a yearly basis with the least amount of truck traffic + habitat destruction.

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

Mail	Email	Fax
County of Los Angeles Department of Public Works Water Resources Division Reservoir Cleanouts Program P.O. Box 1460 Alhambra, CA 91802-1460	reservoircleanouts@dpw.lacounty.gov	(626) 979-5436

**Response to Comment Letter #14 (Peter Pfeiffer)**

**Response to Comment 14-1:**

Thank you for your input. The comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Alternative 3, Configuration D creates the least amount of truck traffic and habitat loss and is considered the Environmentally Superior Alternative. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement (see Section 4.6 of the Final Environmental Impact Report [EIR]). Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate after the sediment removal phase of the Proposed Project is completed. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that approximately 13,000 cubic yards (cy) of sediment will be removed by excavation annually. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11-14-13

Name: Icia Belchak Address: 1806 Camden Ave, S. Pas

Email: iciaebel@yahoo.com City/Zip: 91030

Organization represented, if any: Self Organized

Comment: Also a mitigation

Comment 15-1

We need sediment to make it to the ocean and down stream to replenish beaches,

Comment 15-2

People in L.A. are looking for drought tolerant landscaping - why not sell the sand to mitigate cost, slow the changes + impact of sediment removal, decrease trucking

Have a sand shop - make or have people who sell sand pay for it and move it themselves.

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Water Resources Division  
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P.O. Box 1460  
Alhambra, CA 91802-1460

Email  
reservoircleanouts@dpw.lacounty.gov

Fax  
(626) 979-5436

**Response to Comment Letter #15 (Icia Belchak)**

**Response to Comment 15-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Sluicing was analyzed as part of the Draft Environmental Impact Report (EIR) in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system to the ocean; this sediment would need to be mechanically removed and trucked out from numerous downstream locations. This alternative would also involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

**Response to Comment 15-2:**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in the Draft EIR in Section 2.0, Project Description.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

With the amount of sediment needing to be removed to improve the capacity of the reservoir, it is unlikely that a sand shop, as suggested in the comment, would remove enough of the sediment in a timely fashion. Thus, the suggested alternative would not meet the Los Angeles County Flood Control District (LACFCD) goals of restoring acceptable levels of flood protection to the downstream communities and removing sediment accumulated in the reservoir in a timely manner. It would also not eliminate the use of vehicles to transport the sediment off site.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11-14-13

Name: Richard Booker Address: \_\_\_\_\_

Email: Booker7429@sbcglobal.net City/Zip: PASADENA 91103

Organization represented, if any: LINDA VISTA ANNANDALE ASSN.

Comment: To mitigate the traffic congestion that will be caused by all the trucks hauling the sediment, have you considered using the goldline to help haul the sediment to Irwindale?

Comment 16-1

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

Mail

---

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

Email

---

reservoircleanouts@dpw.lacounty.gov

Fax

---

(626) 979-5436

**Response to Comment Letter #16 (Richard Booker – Linda Vista Annandale Association)**

**Response to Comment 16-1:**

Thank you for your input. The comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Metro Gold Line is designed for public transportation, not freight. In addition, the sediment would have to be transported from the reservoir to the nearest Metro Gold Line Station and then again from a Metro station to the sediment placement sites. As the significant traffic impacts occur either adjacent to the reservoir or one of the placement sites, these impacts would not be reduced by the use of the Gold Line.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/14/2013

Name: LANCE BENNETT Address: 2297 COUNTRY CLUB DRIVE

Email: lbenner@charter.net City/Zip: ALTADENA 91001

Organization represented, if any: \_\_\_\_\_

Comment: \_\_\_\_\_

Comment 17-1

① How much will each option presented COST? This is a crucial aspect of all this that was not discussed in the presentations nor mentioned in the Draft EIR's summary online.

Comment 17-2

② The discussion of flood risk tonight and in the executive summary is vague and it does not provide enough detailed information to justify the massive sediment removal options discussed in the presentations. Where can we read the detailed engineering study that must exist?

Comment 17-3

③ Parts of Hahamungna Watershed Park are an EPA Superfund site. How does that affect <sup>all</sup> the proposed options presented?

Comment 17-4

④ The biological survey mentioned in the executive summary is seriously flawed. Contrary to its statements, 210+ bird species have been recorded at Hahamungna. Least Bell's vireos were present in 2012 and 2013 and nested in ~~the~~ 2012. Yellow warblers nest in the willows annually. Yellow-breasted chats have been recorded in the spring in <sup>recent years</sup>.

Comment 17-5

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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	Bottom line: If this were a NASA proposal it would be summarily rejected because the EIR does not adequately justify <del>about</del> the sediment removal options it proposes.	

## **Response to Comment Letter #17 (Lance Benner)**

### **Response to Comment 17-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Under California Environmental Quality Act (CEQA), the lead agency is not required to analyze an economic impact associated with a Proposed Project in the Environmental Impact Report (EIR).

The estimated cost for the Proposed Project and for Alternatives 1, 2, 3, and 5 would range from \$80 million for the Proposed Project to \$65 million for Alternative 3. LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs. The remaining cost will be covered by Los Angeles County Flood Control District (LACFCD) Funds. Due to the variety of factors, including the indeterminate locations of the sediment fallout and requirements for removing sediment from these locations, the cost for Alternative 4 is unknown.

### **Response to Comment 17-2:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

### **Response to Comment 17-3:**

As discussed in the Draft EIR, Section 3.10, United States (U.S.) Environmental Protection Agency (EPA) included Hahamongna Watershed Park area on the National Priorities List (NPL) Superfund List due to the presence of detected volatile organic compounds (VOCs) and perchlorate in groundwater originating from the Jet Propulsion Laboratory (JPL) property. The impacted groundwater is at 200 feet below ground surface (bgs); and, as with the Proposed Project, the concentrations of VOCs, organochlorine pesticides, petroleum hydrocarbons (diesel and hydraulic/motor oil range and aromatics), and semi-

volatile organic compounds (SVOCs) detected in soil samples that were collected from Devil's Gate Reservoir are below regulatory thresholds. No perchlorates, the substance of concern from JPL, were found in the soil sample analysis. As discussed in the Draft EIR, Section 3.10, no significant impacts associated with the Proposed Project due to the inclusion of the Hahamongna Watershed Park area on the NPL Superfund List are expected, as the contamination is found in the local groundwater table, not in the sediment. Therefore, no significant impacts associated with the Proposed Project or Alternatives are expected.

**Response to Comment 17-4:**

The biological resources of the Proposed Project site are described in Section 3.6 of the Draft EIR. The bird species recorded during surveys conducted specifically for the Proposed Project are presented in the Biological Technical Report (BTR) in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records of occurrence were used as additional data; but since the California Natural Diversity Database (CNDDDB) is a positive-sighting database, this data was used only in support of the analysis from the previously identified factors. Based on the results of the BTR, additional protocol-level focused surveys were conducted, including for least Bell's vireo. Table 3.6-3 in the Draft EIR includes both least Bell's vireo and yellow warbler as present within the Proposed Project site. Yellow-breasted chats were observed during surveys for least Bell's vireo (see Appendix D of the Draft EIR). Table 3.6-3 of the Draft EIR has been updated to include this species.

**Response to Comment 17-5:**

See Response to Comment 17-2.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11-14-13

Name: VIRGINIA KIMBALL Address: 1685 LA VISTA PLACE

Email: vskimball@aol.com City/Zip: PASADENA 91103

Organization represented, if any: —

Comment: I recommend using sluicing as the first and primary sediment removal method over a 2-3 year period. There will probably be some large and intense storm events to clear out the sediment with much less harm to the environment and at much less expense.

Comment 18-1

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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

Email  
reservoircleanouts@dpw.lacounty.gov

Fax  
(626) 979-5436

**Response to Comment Letter #18 (Virginia Kimball)**

**Response to Comment 18-1:**

Thank you for your input. The comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Sluicing was analyzed as part of the Draft Environmental Impact Report (EIR) in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations. This analysis took into account historically typical storm events and associated flows. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/14/2013

Name: TIMOTHY P. CALLAHAN Address: 3771 ALZADA RD.

Email: bonolatin@dslxtreme.com City/Zip: ALTAVENA, CA 91201-3801

Organization represented, if any: \_\_\_\_\_

Comment: YOU SHOULD ONLY REMOVE 1.7 MILLION CUBIC YARDS OF SEDIMENT AS PER THE MOTION BY MICHAEL ANTONOVICH RATHER THAN 4 MILLION CUBIC YARDS. FURTHER, YOU SPREAD THE PROJECT OVER 20 YEARS, NOT 5 AND USE THAT AS THE BASIS FOR INSTITUTING AN ONGOING LOW LEVEL LOW IMPACT MAINTENANCE PROGRAM. THAT WAY, YOU WON'T HAVE TO ~~THE~~ CREATE AN ARTIFICIAL CRISIS AND TURN THE REGION INTO A MAN MADE DESERT

Comment 19-1

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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Water Resources Division  
Reservoir Cleanouts Program  
P.O. Box 1460  
Alhambra, CA 91802-1460

Email  
reservoircleanouts@dpw.lacounty.gov

Fax  
(626) 979-5436

## **Response to Comment Letter #19 (Timothy Callahan)**

### **Response to Comment 19-1:**

Thank you for your input. The comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

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Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cubic yards (cy) was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an Environmental Impact Report (EIR) for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing cost, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

The Proposed Project will provide a low impact sediment management program. The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

The Proposed Project site will not be turned into a “manmade desert.” As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/16/13

Name: MARAH LYVERS Address: 107 W. WOODBURY RD # F

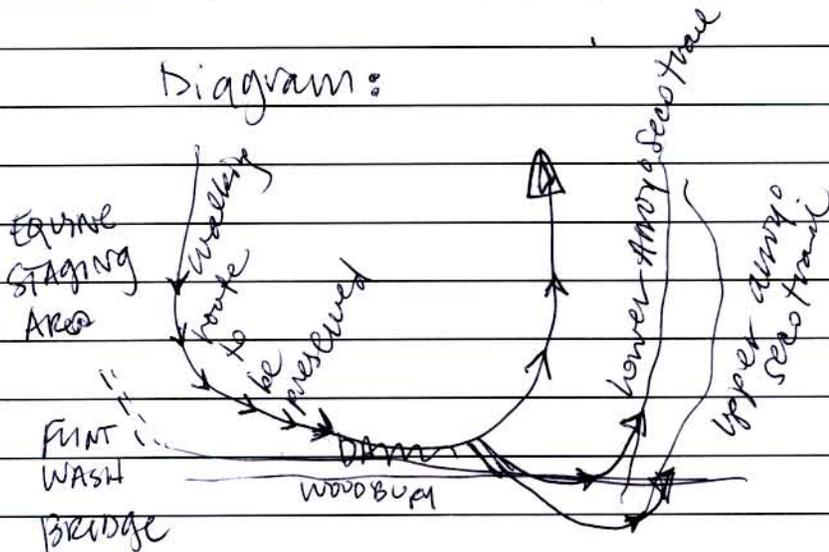
Email: marah@tomsawycamps.com City/Zip: Altadena CA 91001

Organization represented, if any: TOM SAWYER CAMPS

Comment:

① PLEASE ALLOW USE OF FUNT WASH BRIDGE & TOP OF DAM WALKWAY FOR CONTINUAL FOOT TRAFFIC TO ALLOW THE WALKING/HIKING LOOP TO BE PRESERVED EVEN DURING THE DAILY HAULING TOURS.

Diagram:



IS THERE AN ALTERNATIVE WALKING/HIKING TRAIL PROPOSED TO enable the whole loop to be accessed/Utilized?

Comment 20-1

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

Mail

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

Email

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reservoircleanouts@dpw.lacounty.gov

Fax

---

(626) 979-5436

**Response to Comment Letter #20 (Marah Lyvers – Tom Sawyer Camps)**

**Response to Comment 20-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft Environmental Impact Report (EIR), Section 2.5.1 Sediment Removal Phase, Project Schedule. In addition, it is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park.

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/16/13

Name: Marah Lyvers Address: \_\_\_\_\_

Email: marahlyvers@gmail.com City/Zip: \_\_\_\_\_

Organization represented, if any: Community / Hahamengwa<sup>W</sup> Park User

Comment 21-1

Comment: <sup>CONFIGURATION D</sup> "ALTERNATIVE 3" is most ideal

①

so the utility poles can remain in place.  
(East/West Crossing)

Comment 21-2

② put a traffic officer at Berkshire on ramp & to create a flow at peak traffic times.

* onramp	2*
offramp <del>both</del>	peak . 1 AM - 10 AM
In All	2pm - 7pm
directions.	

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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Email

reservoircleanouts@dpw.lacounty.gov

Fax

(626) 979-5436

**Response to Comment Letter #21 (Marah Lyvers)**

**Response to Comment 21-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's preference for Alternative 3, Configuration D.

**Response to Comment 21-2:**

Typically, traffic officers are placed at an intersection to guide traffic for special events or after a traffic accident. It is unlikely that the police force could accommodate dedicating an officer at this intersection for the entirety of the Proposed Project; however, LACFCD will implement a flagger as necessitated at the Project's ingress and egress ramps. Additionally, LACFCD will continue to work with local organizations and the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** Constance Brines [mailto:yconnie.brines@gmail.com]

Comment Letter #22

**Sent:** Friday, November 08, 2013 3:32 PM

**To:** reservoircleanouts

**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project

Dear Sirs

Comment 22-1

Sediment is a natural and valuable resource. Storm water can be managed without polluting the environment. Please do not move forward with your current plan to disrupt the rich riparian habitat at Hahamongna.

Comment 22-2

I have just returned from China. Through lack of foresight and impatient, heedless growth, they have fouled their land. We should be constantly thanking our environmental regulators for their persistence in trying to save ours. Please consider our air quality as you plan for our community.

Sincerely,

Constance Bidwell Brines

950 Laguna Road

Pasadena CA 91105

Home: 626-403-0727

Mobile: 703-626-0492

**Response to Comment Letter #22 (Constance Brines)**

**Response to Comment 22-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project. The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the reservoir will be transported to the sites listed in Section 2.0, Project Description in the Draft Environmental Impact Report (EIR).

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. These measures will serve to reduce the disruption to the existing riparian habitat found in the Devil's Gate Reservoir.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 22-2:**

Impacts to air quality were analyzed in the Draft EIR, Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

**From:** L Barlow [mailto:barlow.co@att.net]

Comment Letter #23

**Sent:** Saturday, November 16, 2013 10:08:39 AM (UTC-08:00) Pacific Time (US & Canada)

**To:** reservoircleanouts

**Subject:** Hahamongna Watershed input

Comment 23-1 | The "problem" here is that Hahamongna is a Watershed. It's basically all the silt behind the dam. There's an outflow pipe that's supposed to be used to allow the silt to flow from the bottom of the dam, but the County doesn't use it. The dam should be modified somewhat so that the silt & dirt flows when the water reaches a certain level in wet years. What that does ultimately is create a ravine formation into the backside of the dam at the outlet, and that's about it. County is not doing the necessary maintenance because then they can wait for an "emergency" to get the funds to scrape it all away at once, rather than managing the silt flow. Unfortunately that removes the riparian habitat that slows the water flow and helps the ground absorb the water, which is what that kind of dam is supposed to do; even out the water flow and recharge the aquifer. They've let it go because it doesn't produce power, so no loss of revenue, but it's headed for failure because it's starting to fill up.

Comment 23-2 | A big issue here is that managing the silt flow produces no truck emissions, whereas these proposed massive trucking operations probably violate AB 32 and air quality regulations. That in addition to the heavy particulate matter when summer activities are held at the Oak Grove area. And, finally, it's far cheaper in the long run just to manage the silt.

| Can the County participate in this kind of planning that could fund the management and minor improvement of the dam?

[http://www.water.ca.gov/sfmp/resources/Computer\\_View\\_Highlight.pdf](http://www.water.ca.gov/sfmp/resources/Computer_View_Highlight.pdf)



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:: design :: collaboration :: innovation

Laurie Barlow, AIA

<http://www.barlowcoweb.com/>

<http://greenswardcivitas.blogspot.com/>

## **Response to Comment Letter #23 (Laurie Barlow)**

### **Response to Comment 23-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Sluicing was analyzed as part of the Draft Environmental Impact Report (EIR) in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

Los Angeles County Flood Control District (LACFCD) has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average water year storm seasons. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

In early 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. Knowing that the EIR would take a considerable amount of time to complete, the Board also motioned for an Interim Measures Project to be implemented in order to help reduce the flood risk downstream of the dam until the ultimate sediment removal project commenced.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

Flow Assisted Sediment Transport (FASTing), a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

As stated in the Draft EIR, the Proposed Project will remove accumulated sediment deposits within the reservoir. This means the percolation characteristics of the reservoir will return to pre-Station Fire conditions if not improve; and the reservoir will still permit penetration of rainfall and percolation of local runoff to replenish the groundwater basin.

### **Response to Comment 23-2:**

See Response to Comment 23-1.

As discussed in the Draft EIR, Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method; this alternative would also have significant impacts associated with traffic and air quality.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

**From:** Toni Devereaux [mailto:toni\_devereaux@yahoo.com]

Comment Letter #24

**Sent:** Friday, November 15, 2013 5:43 PM

**To:** reservoircleanouts

**Subject:** Reservoir Cleanouts

I am writing in support of the sluicing alternative to removing the sediment from Hahamonga. If there is a reasonable chance of some progress being made by sluicing, rather than hundreds of trucks on the freeway for 3-5 years, I believe this alternative should be at least attempted before the truck proposal.

Thank you,

Antoinette Devereaux

Comment 24-1

**Response to Comment Letter #24 (Antionette Devereaux)**

**Response to Comment 24-1:**

Thank you for your input. The comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's preference for Alternative 4 Sluicing. Sluicing was analyzed as part of the Draft Environmental Impact Report (EIR) in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

**From:** Marge Nichols [mailto:marge@margenichols.com]

Comment Letter #25

**Sent:** Saturday, November 16, 2013 9:03 PM

**To:** reservoircleanouts

**Subject:** Devil's Gate Cleanout

Comment 25-1

I want to register my support for the project. It's natural that people don't like to see the riparian habitat disrupted, but the problem is that it hasn't been cleared in so long that it developed into a different kind of area - not usual for a dam.

Comment 25-2

It has to be cleared out. People don't remember the huge debris basin problems of 1977-78, when extended rains caused debris and sediment flow to rise to dangerous levels. I have been critical of the county for not clearing these areas on a more frequent basis - and now it's come to the point that it's an enormous problem.

Comment 25-3

Still, the work has to be done and should be done with an effort to maintain at least some natural parts of the area.

Marge Nichols

**Response to Comment Letter #25 (Marge Nichols)**

**Response to Comment 25-1:**

Thank you for your input. Los Angeles County Flood Control District (LACFCD) notes the commenter's support for the Proposed Project. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 25-2:**

LACFCD notes the commenter's support for sediment removal in light of potential debris events, such as those that have occurred in the past.

**Response to Comment 25-3:**

Many of the alternatives address configurations that allow for the preservation of some natural areas. Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

-----Original Message-----

From: Janet Aird [mailto:janet@janetaird.com]

Sent: Monday, November 18, 2013 11:05 AM

To: reservoircleanouts

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

Comment 26-1

Hello: I understand that it is necessary to remove the sediment from the existing reservoir. Does your plan add to the area of the reservoir? If so, by how much, and why? The current size has been sufficient for almost 100 years.

Comment 26-2

Have you thought of alternatives to enlarging the reservoir, such as techniques for allowing stormwater to infiltrate into the aquifer? Would it be possible to keep some of the dirt from the reservoir onsite for this purpose?

Thank you for your attention.

Janet Aird  
626-756-0386

**Response to Comment Letter #26 (Janet Aird)**

**Response to Comment 26-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Neither the Proposed Project nor any of the alternatives add any acreage to the reservoir. The Proposed Project will occur entirely within the easement for the Los Angeles County Flood Control District (LACFCD). The LACFCD Devil's Gate Dam and Reservoir Easement encompasses approximately 258 acres. The Proposed Project involves approximately 120 acres, all located within the easement. Alternative 3, Configuration D, the environmentally superior alternative, which involves approximately 76 acres under Option 1 and approximately 71 acres under Option 2, is also completely located within the easement.

**Response to Comment 26-2:**

See Response to Comment 26-1. Accumulated sediment does not contribute to groundwater recharge from stormwater. As stated in the Draft EIR, the Proposed Project will remove accumulated sediment deposits within the reservoir. This means the percolation characteristics of the reservoir will return to pre-Station Fire conditions if not improve, and the reservoir will still permit penetration of rainfall and percolation of local runoff to replenish the groundwater basin. Sediment removal will restore Devil's Gate Reservoir to its current design standard. As such, the reservoir will have the ability to contain more of the local runoff, which in turn could result in more runoff penetrating into the ground in the Proposed Project area and subsequently recharging the groundwater basin. In addition, by keeping the reservoir clear of future sediment deposits, the Proposed Project will reduce the potential for accumulated sediments to negatively impact the percolation rate.

-----Original Message-----

From: Migonne & Al [mailto:oldyeller@earthlink.net]

Sent: Tuesday, November 19, 2013 11:13 AM

To: reservoircleanouts

Subject: Devil.s Gate Reservoir Sediment Removal and Management Project public comment from Allen Decker, La Canada

Comment 27-1

My views on Proposed Project, I have attended the public meetings held in La Canada last week and wanted to give my opinion of the existing different plans. I feel the impacts that can't be mitigated should be changed to a more conservative debris removal plan. I realize the county funds already spent on the planning, but they are in need of major revisions. Your

Comment 27-2

alternatives are being carried out using too many diesel trucks that cause significant air pollution far too close to four schools in La Canada. The added burden will alter the time it takes to drive to the high school. The traffic is already heavy with no public bus service. The traffic will add greatly to the air pollution we are already experiencing. Kids are outside exercising within 100 yards of fully loaded trucks and empty trucks. I configuration with the center

Comment 27-3

island left mostly intact is the best. But the removal should be done after school is let out or done in such a manner that our community does not riot when faced with the traffic and new smog. This can be done with a new EIR that requires natural gas trucks that do not pollute and with much less in the way of trucks. The project will have to be a continuing project where each year we maintain with a smaller imprint. Double the time frame to seven years, and require future smog emission requirements that will lower the smog levels. This project will cause an uproar if the current plans are used. The end goals will be met but with a more community based solution. Please wait until school is out in June to start, then stop when

Comment 27-3  
continued

↑ school start again. Our La Canada school are the cornerstone of our community, and the  
current plans will not be accepted the current time frame, with smog creation near the many  
schools, and school exercising fields. La Canada really has no idea what is coming. Thanks  
for your considerations, Allen Decker, 4250 Beulah Dr., La Canada, Ca. 91011

**Response to Comment Letter #27 (Allen Decker)**

**Response to Comment 27-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter prefers a more conservative alternative for impacts that cannot be mitigated.

Air quality impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Section 3.5. Lower emission trucks were considered for the Proposed Project; however, the availability of these trucks could not be guaranteed at the time the Draft EIR was written. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency (EPA) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

As noted in the Draft EIR, Section 3.4, Aesthetics, the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

Impacts associated with all the other potential California Environmental Quality Act (CEQA) resource issues were found to be less than significant or mitigated to the level of less than significant.

**Response to Comment 27-2:**

See Response to Comment 27-1. As noted above, only a single intersection in the immediate vicinity of the Proposed Project site, which includes the nearby schools, will have a potentially significant impact. Other intersections in the immediate vicinity of the Proposed Project site will operate at acceptable levels of service. As noted above, LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

The project-related impacts on air quality in the immediate vicinity of the Proposed Project site, which includes the nearby schools, has been analyzed under Section 3.5.6, Impacts and Mitigation, AIR QUALITY-4, of the Draft EIR. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2,

impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**Response to Comment 27-3:**

See Response to Comments 27-1 and 27-2. Limiting sediment removal activities to only the period outside the school year would reduce the anticipated project duration each year from 9 months (April to December, excluding holidays) to 2.5 months (June to mid August), which would significantly increase the overall project duration from 5 years up to 15 years and substantially increase project cost. LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing cost, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/21/2013  
 Name: Joan Hearst Address: 570 S Arroyo Blvd.  
 Email: hearst@usc.edu City/Zip: Pasadena 91105  
 Organization represented, if any: WRA + self

Comment: It is time to develop a plan to recover water that falls from the sky rather than directing it to the sea!

Comment 28-1

This is a short-sighted plan that needs to be re-thought and whose proponents need to collaborate with City cities & citizens to work to save our water resources. This plan does none of this.

Comment 28-2

Why did you wait for a fire to pay attention to sediment?

Comment 28-3

Have you considered the incredible traffic impact? What will you do if the tunnel is closed (e.g. an accident)?

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

Mail	Email	Fax
County of Los Angeles Department of Public Works Water Resources Division Reservoir Cleanouts Program P.O. Box 1460 Alhambra, CA 91802-1460	reservoircleanouts@dpw.lacounty.gov	(626) 979-5436

*SUBMITTED TO K. PADILLA GARCIA @ LVAA MTC NOV 21, 2013 7PM*

**Response to Comment Letter #28 (Joan Hearst – WPRA)**

**Response to Comment 28-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The goal of the Proposed Project is to restore reservoir flood capacity and is not a water recovery project. Outside experts in the community, especially those on the Stakeholder Task Force, were consulted during the formation of the Los Angeles County Flood Control District's (LACFCD's) Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts, cities, and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

**Response to Comment 28-2:**

LACFCD has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. The average amount of sediment deposited in Devil's Gate Reservoir each year is approximately 130,000 cubic yards (cy). Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average water year storm seasons. This is five times the typical average per year. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

In early 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. Knowing that the EIR would take a considerable amount of time to complete, the Board also motioned for an Interim Measures Project to be implemented in order to help reduce the flood risk downstream of the dam until the ultimate sediment removal project commenced.

**Response to Comment 28-3:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site. In addition, the Proposed Project will not block access to any roadways, and impacts related to emergency access would be less than significant.

While the majority of the sediment disposal and associated truck traffic is expected to go to the disposal sites east of the Proposed Project, the Draft EIR also analyzed the use of disposal sites west of the Proposed Project. This will allow for flexibility in case one particular route is temporarily unavailable for use.



# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

November 14, 2013

Jemellee Cruz, Staff Member  
Reservoir Cleanouts Program  
Department of Public Works  
P. O. Box 1460  
Alhambra, CA 91802-1460

Dear Jemellee Cruz:

**DRAFT ENVIRONMENTAL IMPACT REPORT, SCH NO. 2011091084, "DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT," REMOVE SEDIMENT FROM DEVIL'S GATE RESERVOIR TO RESTORE CAPACITY AND TO PROTECT THE DAM AND ITS VALVES TO REDUCE THE RISK OF FLOODING IN THE COMMUNITIES LOCATED DOWNSTREAM, OAK GROVE AND WINDSOR DRIVE, PASADENA (FFER #201300183)**

The Draft Environmental Impact Report 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.

Comment  
29-1

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- |              |           |                  |                      |           |                      |                       |                  |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | DIAMOND BAR      | HIDDEN HILLS         | LA MIRADA | MALIBU               | POMONA                | SIGNAL HILL      |
| ARTESIA      | CARSON    | DUARTE           | HUNTINGTON PARK      | LA PUENTE | MAYWOOD              | RANCHO PALOS VERDES   | SOUTH EL MONTE   |
| AZUSA        | CERRITOS  | EL MONTE         | INDUSTRY             | LAKESWOOD | NORWALK              | ROLLING HILLS         | SOUTH GATE       |
| BALDWIN PARK | CLAREMONT | GARDENA          | INGLEWOOD            | LANCASTER | PALMDALE             | ROLLING HILLS ESTATES | TEMPLE CITY      |
| BELL         | COMMERCE  | GLENORA          | IRWINDALE            | LAWDALE   | PALOS VERDES ESTATES | ROSEMEAD              | WALNUT           |
| BELL GARDENS | COVINA    | HAWAIIAN GARDENS | LA CANADA FLINTRIDGE | LOMITA    | PARAMOUNT            | SAN DIMAS             | WEST HOLLYWOOD   |
| BELLFLOWER   | CUDAHY    | HAWTHORNE        | LA HABRA             | LYNWOOD   | PICO RIVERA          | SANTA CLARITA         | WESTLAKE VILLAGE |
| BRADBURY     |           |                  |                      |           |                      |                       | WHITTIER         |

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

Comment  
29-2

**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.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division, have been addressed.

Comment  
29-3

Jemellee Cruz, Staff Member  
November 14, 2013  
Page 3

**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. Based on the submitted documents, the Health Hazardous Materials Division has no objection to the proposed project.

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

Very truly yours,



FRANK VIDALES, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:jl

Comment  
29-4

**Response to Comment Letter #29 (Los Angeles County Fire Department)**

**Response to Comment 29-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the County of Los Angeles Fire Department Planning Division has determined that the Proposed Project does not appear to have an impact on the emergency responsibilities of the Department.

**Response to Comment 29-2:**

LACFCD notes that the County of Los Angeles Fire Department Land Development Unit has determined that the Proposed Project does not appear to have an impact that necessitates a comment from the Department.

**Response to Comment 29-3:**

LACFCD notes the responsibilities of the County of Los Angeles Fire Department, Forestry Division.

**Response to Comment 29-4:**

LACFCD notes that the County of Los Angeles Fire Department, Health Hazardous Materials Division has no objection to the Proposed Project, as stated in the comment letter.

**From:** Doris Finch [mailto:ifinchi@fabart.net]  
**Sent:** Wednesday, November 20, 2013 12:43 PM  
**To:** reservoircleanouts  
**Subject:** Hahamonga

Comment Letter #30

To all involved in the Hahamonga clearance project,

Comment 30-1

This has clearly become an explosive subject and needs further consideration [or reconsideration]. The park and water areas have become a valuable community asset while at the same time everyone in the area wants decent flood control. Both weigh heavily so serious and creative study needs to be done to accomplish the latter while not destroying the former. There is also the matter

Comment 30-2

of the number of trucks called for, making a huge number of trips per hour six days a week for a period of five years. It is hard to imagine a plan making life intolerable for affected residents for that period of time, plus destroying their property value for those years, even being considered viable.

Comment 30-3

Since the scope of the project seems to change, having become suddenly far larger, one is left to wonder if that is driven by necessity or desire to flatten or seriously wound the environmental protesters. Inundation maps show a far less dire situation that has been presented. A SLOW plan has been offered which does not seem to have received serious consideration. It may in fact be highly preferable. It offers both sustainability and far lower cost, both highly desirable. The attached video makes the case. [http://www.youtube.com/watch?v=F7wPWYl\\_8c8&feature=youtu.be](http://www.youtube.com/watch?v=F7wPWYl_8c8&feature=youtu.be)

There is no reason not to incorporate this thinking into the plans.

Respectfully, Doris Finch, Altadena

## **Response to Comment Letter #30 (Doris Finch)**

### **Response to Comment 30-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As noted in the Draft Environmental Impact Report (EIR), the purpose of the Proposed Project is to reduce flood risk by restoring reservoir capacity for flood control. The Draft EIR analyzes the effect the Proposed Project will have on the community, including recreation.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish (see Section 4.6 of the Final EIR).

### **Response to Comment 30-2:**

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1 Sediment Removal Phase, Project Schedule.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the Proposed Project site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

### **Response to Comment 30-3:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's

Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cubic yards (cy) was proposed. The volume of 1.67 million cy is the previously published DDE and this amount was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). This emergency project was not completed because in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** Grace Wong [mailto:gywseven7@gmail.com]

Comment Letter #31

**Sent:** Monday, November 25, 2013 9:00 AM

**To:** reservoircleanouts

**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project

To: Water Resources Division  
Reservoir Cleanouts Program

Problems with the project:

· The project is unsustainable. The County still does not have a plan for where to put all this sediment once these pits are full.

· This project will permanently destroy 50-120 acres of regionally significant willow and mulefat forest. This is a critical habitat for a wide variety of birds and wildlife.

· It is unacceptable for the neighboring community to endure the noise and pollution of 425 diesel trucks per day, six days a week and at least nine months per year for the next five years.

· The County DEIR never makes a science-based case for the need to remove 2-4 million cubic yards of sediment and the need to remove it within five years.

· The biological section of the DEIR does not list all wildlife species expected to occur, only report what few were seen. No contact or consultation was made with local organizations, like Pasadena Audubon Society, Arroyo Seco Foundation etc., who regularly conduct surveys in Hahamongna.

What The County Should Do :

· The County needs a “forever plan,” one that is sustainable and does not permanently

Comment 31-6  
continued

↑  
· destroy one of the most important open spaces in the region.  
· The county is focused only on safety and efficiency. We want safety and sustainability.

Comment 31-7

↑  
| My children grew up going to the Hahamongna Watershed Park. Many of their school nature field trips, summer camps were all conducted there. They are now ready to be parent and have children of their own. We cannot take away such precious nature playground for our future generation.

Sincerely,  
Grace Wong  
Altadena, CA

**Response to Comment Letter #31 (Grace Wong)**

**Response to Comment 31-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The disposal sites located to the east of the Proposed Project currently have sufficient capacity for the entire amount of sediment proposed to be removed. The disposal sites located to the west of the Proposed Project will provide additional capacity if needed. The available pits and disposal sites, as outlined in the Proposed Project Description, have enough capacity for the sediment that is planned to be removed.

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 31-2:**

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 31-3:**

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

**Response to Comment 31-4:**

The LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE

volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing cost, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

#### **Response to Comment 31-5:**

Many local organizations, including the Pasadena Audubon Society, Hahamongna Watershed Park Advisory Committee, the Urbanwild Network, and the Arroyo Seco Foundation, were contacted about the Proposed Project prior to the Draft EIR being prepared. In January 2012, a representative of the Pasadena Audubon Society was contacted for information the Society has concerning birds observed in the Proposed Project area. The information provided was used in preparing the biological resources section of the Draft EIR. Species with the potential to occur within the Proposed Project site and species that were identified during surveys are presented in the biological survey reports in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records and species lists of occurrence were used as additional data; but since these are positive-sighting databases, this data was used only in support of the analysis from the previously identified factors. Based on the results of the Biological Technical Report (BTR), additional protocol-level focused surveys were conducted for Proposed Project as described in Section 3.6.2, Special Status Plant Species and Special Status Animal Species of the Draft EIR.

#### **Response to Comment 31-6:**

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically

reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

See Response to Comment 31-4 regarding project duration.

**Response to Comment 31-7:**

See Response to Comments 31-2 and 31-6.

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP).

LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

**From:** Kathleen Warner [mailto:kmwarner3@earthlink.net]

Comment Letter #32

**Sent:** Saturday, November 23, 2013 6:53 PM

**To:** reservoircleanouts

**Cc:** kmwarner3@earthlink.net

**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project

Comment 32-1

I am writing to protest in the strongest possible terms the proposed project to alter the topography of Hahamonga Park in some misguided belief that the area is in need of "management." This is an environmentally sensitive area that needs protection not pavement. I am incensed that Pasadena's purported need for yet another soccer field and related additional parking takes precedence over the quality of life of La Canada residents. This is unacceptable.

Comment 32-2

As a resident of La Canada not that far from where this work is to take place, I strenuously object to the extremely negative impact this project will have on my family's quality of life not only from a traffic congestion, noise and air pollution standpoint, but I am deeply concerned about the safety of students in the area who while either walking or driving will have to dodge giant dump trucks day after day after day. Pick up and drop off at La Canada High School is already a nightmare. You add all the trucks to that mix and it will be Armageddon.

Comment 32-3

La Canada has only recently put out to bid a sound wall project to limit the amount of freeway truck noise to which we are currently exposed. This project will essentially nullify any anticipated benefit from the construction of any such sound walls.

Comment 32-4

I urge you to immediately stop this project in its tracks and prevent it from being undertaken at any future date.

Regards,

Kathleen M Warner  
La Canada, CA

**Response to Comment Letter #32 (Kathleen Warner)**

**Response to Comment 32-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The purpose and need for the Proposed Project is based on providing the flood control capacity necessary. The area behind the dam will not be paved. Only a small portion of the access roads entering and exiting the reservoir will be paved. In addition, this Proposed Project does not include any soccer fields or parking areas.

**Response to Comment 32-2:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft Environmental Impact Report (EIR), Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to roadway conditions by the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant. Los Angeles County Flood Control District (LACFCD) will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

**Response to Comment 32-3:**

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a 1-decibel (dB) increase on Berkshire Place east of the Interstate-210 (I-210) northbound ramps. A 1-dB increase is well below the 3-dB increase threshold of perception. Therefore, the Proposed Project would not have a significant impact on the anticipated benefit of the sound walls for I-210. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 32-4:**

LACFCD notes the commenter's objection to the Proposed Project.

**From:** Kathi Ellsworth [mailto:pandionsky@yahoo.com]

Comment Letter #33

**Sent:** Friday, November 22, 2013 12:41 PM

**To:** reservoircleanouts

**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project

## Devil's Gate Reservoir Sediment Removal and Management Project

### COMMENT CARD

Date: November 22, 2013

Name: Kathi Ellsworth  
Lane

Address: 448 Shadyglen

Email: [pandionsky@yahoo.com](mailto:pandionsky@yahoo.com)

City/Zip: San Dimas, CA

Comment:

It is my understanding that this Sediment Removal and Management Project will permanently destroy 50-120 acres of riparian willow-mulefat habitat in the Hahamongna Watershed Park.

I certainly take exception to this project. I have heard that the draft EIR is lacking in

Comment 33-1



science and the biological survey describing the impact on flora and fauna of the area north of Devil's Gate dam is misleading and insufficient.

It is my purpose here to define some scientific information that is lacking in the DEIR as it stands today.

My data is derived from a publication by the U.S. Fish and Wildlife Survey titled: The Ecology of Riparian Habitats of the Southern California Coastal Region: A community profile. This publication was extensive (152 pages) and addresses riparian habitats like the flood basin above Devil's Gate Dam. This is what we are dealing with – a riparian habitat; whether it has always been riparian or not is not pertinent, we have a riparian habitat now and must deal with that kind of habitat in all further considerations.

In the document, it states "Floodplains and alluvial fans of a number of watercourses flowing out of the San Gabriel, San Bernardino, and San Jacinto Mountain support a distinctive plant community, structurally and floristically diverse, consisting of an unusually large proportion of arborescent evergreen shrubs and a rich assemblage of subshrubs..."

It further describes "the modern riparian plant community of Southern California is derived from a southern madro-tertiary xeric element and a northern arcto-terial mesic element. Species distribution in this flood-prone habitat is closely tied to the water regime of streams, not only for water supply in a seasonally dry landscape but for a series of events important in plant establishment and succession. Common trees include white alder (a riparian indicator species), willow, cottonwood, and sycamore. The zone closest to the water is most frequently disturbed by storms and is dominated by alder and willow, while cottonwood, sycamore, and oak grow to large sizes on terraces above the river. This part of the riparian community is the most depleted. Species composition varies somewhat from north to south, coastal to inland, and low to high elevational gradients. There are only a few rare or endangered plants associated with riparian habitat, but the riparian community itself is an endangered community due to the activities of man".

It states that "Riparian zones usually have a high rate of recovery and develop a range of successional vegetation where the habitat is protected or appropriately managed."

The publication goes in depth to discuss not only the flora of riparian habitat but also the fauna, from aquatic and terrestrial insects (which have recently been used in some environmental impact reports), fish (both native and introduced), amphibians and reptiles, birds (including distribution, breeding, food & foraging, birds for insect control, changes in status, birds species of concern, expanding species, winter bird use and taxonomic indication), and mammals (riparian-associated mammals and status).

In light of the recent Station Fire, a certain portion of the Fish and Wildlife publication stands out as especially important today:

## "Role of Fire in Nutrient Cycling Between Eco-systems

A vast amount of the riparian habitat of Southern California intergrades with chaparral or coastal scrub communities. Chaparral vegetation is particularly prone to fire because of its dense, contiguous growth and lack of moisture. Often the chaparral community produces an abundance of fuel that accumulates faster than it decomposes because of resistance to decay or climatic factors. These plant accumulations are highly flammable; thus fire is a regular occurrence under natural conditions and infrequent but inevitable due to fire-exclusion policies, particularly near urban areas.

Comment 33-1  
continued

"R. Vogl (personal communication) suggests that the riparian community serves an important role in fire/flood sequences in Southern California, resulting in energy flows between plant communities. Fires reduce organic matter to a buoyant ash and charcoal. The flotsam component is usually transported in an emulsion that resists burial and assures widespread surface deposition. During winter rains and flood, charcoal and emulsified mineral products are carried into streams, where they are deposited onto the land by flood waters or carried downstream toward coastal wetlands. Nutrients bound in light, non-wettable fragments of charcoal and ash emulsion are buoyant and remain in the upper layers of flood-deposited sediments, readily available to new plant growth. Nutrients derived from a chaparral community in a fire/flood cycle may remain in the same community or be transported to the banks or floodplain of an adjacent coastal freshwater or saltwater marsh. The riparian corridor thus becomes a kind of circulatory system linking plant communities in the fire/flood model. In areas where riparian cover has been removed, leaf-litter levels are reduced or eliminated and soils are exposed. As a result, stream sediment loads from erosion are increased and water velocity increases, minimizing the energy-transfer potential of fire/flood cycles. Nutrient may then be transferred in fast-flowing water downstream and lost in the ocean."

Further "the degree of disturbance of riparian habitat is important, particularly where the understory is removed or altered. Where escaped exotics are invasive and dominant, habitat becomes less valuable to wildlife. In a study along the Santa Clara River, 24 species of birds were observed in a stand of riparian woodland trees with an undisturbed understory, in contrast to 6 species observed in a similar stand of riparian woodland trees with a disturbed understory (Smith, 1979). Nests in the open are more susceptible to predators, inclement weather, and other environmental factors."

The proposed DEIR describes 50 species utilizing the riparian corridor above Devil's Gate dam. It is a true shame to think that in five years that number would be decreased 75% to about 10 species due to the habitat destruction described in the plan.

In the scenario suggested by the current DEIR proposed by L.A. County, the natural riparian habitat will be continually removed and disturbed. The loss of natural successional growth by plants, insects, amphibians, reptiles, birds and mammals of the riparian habitat will be lost forever.

It is our choice to keep this from happening! Given that this quoted Fish and Wildlife

Comment 33-1  
continued

publication was written in 1989, artificial pressures from the expansion of human population are even greater today in 2013. Existing riparian habitat becomes exponentially more important with it's loss of energy, wildlife, and the human pleasure derived from its existence.

Comment 33-2

I make the case that L.A. County of Public Works make a "forever plan" that is sustainable and does not permanently destroy this important riparian region. A more limited removed of debris would suffice for the safety of the populations below the dam. Please consider the scientific facts and impact of what is proposed and not just the simple solution to arbitrarily remove everything. This is not a solution, it is a travesty being decried by even the humans who have intimate knowledge of that area; dog walkers, joggers, birders, horseback riders, hikers, biologists, etc.

Kathi Ellsworth  
448 Shadyglen Lane  
San Dimas, CA 91773  
(626) 524-0652

Suggested Citation:

Faber, P.A., C. Keller, A. Sands, and B.M. Massey, 1989. The Ecology of Riparian Habitats of the Southern California Coastal Region: A Community Profile. U.S. Fish and Wildlife Serv. Biol. Rep. 85(7.27), 152 pp.

"Only when the last tree has died, the last river has been poisoned, and the last fish has been caught will we realize we cannot eat money." old Cree saying

## **Response to Comment Letter #33 (Kathi Ellsworth)**

### **Response to Comment 33-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Draft Environmental Impact Report (EIR), Biological Technical Report (BTR), and focused surveys provide thorough and accurate existing conditions for biological resources (Draft EIR, Section 3.6; Appendix D, Biological Reports). Species with the potential to occur within the Proposed Project and species that were identified during surveys are presented in the biological survey reports in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records and species lists of occurrence were used as additional data; but since these are positive-sighting databases, this data was used only in support of the analysis from the previously identified factors. Based on the results of the BTR, additional protocol-level focused surveys were conducted for Proposed Project. The field surveys were conducted in 2010 and 2013 and included general biological surveys, focused sensitive plant surveys, focused least Bell's vireo surveys, and federal and state jurisdictional waters surveys, as described in Section 3.6 of the Draft EIR. The amount and location of riparian and mulefat habitat and impacts to these habitats vary between the Proposed Project and the action alternatives, as shown in the Draft EIR, Section 4.0 Alternatives Analysis.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

### **Response to Comment 33-2:**

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

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Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.



# Devil's Gate Reservoir Sediment Removal and Management Project

## COMMENT CARD

Date: 11/19/13

Name: Carolyn Otto Address: 4155 Cambridge Rd

Email: toofio@earthlink.net City/Zip: LAF - 91001

Organization represented, if any: \_\_\_\_\_

Comment 34-1

Comment: *As a neighbor of this proposed project I highly recommend that this be re-considered - The amount of truck traffic would be VERY detrimental to the high school and surrounding neighbors -*

Comment 34-2

*It's obvious that those who created this proposal do not live or work in the vicinity -*

Comment 34-3

*Please reconsider or abandon this project -*

*Carolyn Otto*

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCO. Correspondence should be postmarked by Monday, January 6, 2014. Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

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

Email  
reservoircleanouts@dpw.lacounty.gov

Fax  
(626) 979-5436

**Response to Comment Letter #34 (Carolyn Otto)**

**Response to Comment 34-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft Environmental Impact Report (EIR), Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. Los Angeles County Flood Control District (LACFCD) will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 34-2:**

Comment noted.

**Response to Comment 34-3:**

LACFCD notes the commenter's objection to the Proposed Project.

**From:** [Sylvia Stachura](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate  
**Date:** Monday, November 25, 2013 9:22:20 PM

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Dear Sirs: The plan to 'clean' the Hahamonga Wildlife area, part of the Devil's Gate Reservoir must be done on a more human and at a slower pace than the currently proposed plan. The area is so full of wildlife and has become a wonderful area for Birding and wild life advocates such as myself that I'm imploring you to take a slower & more considerate plan to clean out sediment. Please consider a plan that, although it may take more time, will be more compatible for humans and wildlife of the area.

Sincerely, Sylvia Stachura, Pasadena Audubon Society member  
236 S. De Anza St.  
San Gabriel, CA. 91776

Comment 35-1

**Response to Comment Letter #35 (Sylvia Stachura – Pasadena Audubon Society Member)**

**Response to Comment 35-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing cost, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

From: [Susan Gilliland](#)  
 To: [reservoircleanouts](#)  
 Subject: Hahamonga Watershed Park  
 Date: Wednesday, November 27, 2013 11:36:26 AM

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Dear Department of Public Works,

I am writing to express my deep concern and disapproval of the LA County's plan to remove sediment from the Hahamonga Watershed.

I hope that you will express your concern to this plan that is so extreme that I honestly cannot believe that it is a serious plan. Yet, it is.

1. I understand the plan to remove sediment from the Watershed; yet, this plan that is proposed is that it will permanently destroy 50 to 120 acres of willow and mulefat riparian forest. Perhaps the County has not heard that this area provides needed habitat for the Yellow Warbler that is a species of Special Concern in California and also in 2012, Least Bell's Vireo's nested there for the first time. Least Bell's Vireos are a federally endangered species. Many Audubon Societies are watching this project very carefully.

2. Another very serious issue is the air pollution that will be generated by this project. Surely you are aware that the County is proposing 425 trucks per day (that's 50 trucks per HOUR) to drive through local neighborhoods and on the 210 freeway. The trucks will operate for nine months or more per year, six days a week – for five years. It doesn't take a lot to understand that those diesel trucks will cause unacceptable levels of air pollution, noise, and odor. Please think about the health impact to citizens of Pasadena – and in fact many communities! The County says the air pollution, noise pollution and smell are unavoidable and there is nothing they can do to mitigate this. **Really?** Please do not carry out this plan as proposed.

What I am asking you to do is to carefully examine the proposal offered by Tim Brick of the Arroyo Seco Foundation: Go Slow (10-20 years instead of 3-5 years – the sediment has been building up for nearly 100 years and sediment will continue to flow into the basin), Go with the Flow (allow more sediment to flow through the dam – sluicing), Let the Habitat Grow, and Keep Costs Low. This plan will mean fewer trucks, less air pollution, less noise, less odor, less habitat destruction, and lower costs.

Please, go the Arroyo Seco Foundation website and learn more. <http://www.arroyoseco.org/index.htm>

Comment 36-4  
continued



Thank you for caring about making our County a wonderful, green place to live in harmony with Mother Nature.

Best Regards,

Susan S. Gilliland, PhD, MPH, RN

525 Avon Avenue

Pasadena, CA 91105

## **Response to Comment Letter #36 (Susan Gilliland)**

### **Response to Comment 36-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

### **Response to Comment 36-2:**

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species, including sensitive bird species, and to restore and enhance riparian and sensitive habitats. Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Bird species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

### **Response to Comment 36-3:**

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant. As discussed in the Draft EIR, Section 3.5, impacts related to odors were determined to be less than significant.

### **Response to Comment 36-4:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for

and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** [frank Gilliland](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamonga Watershed Park  
**Date:** Wednesday, November 27, 2013 12:43:50 PM

---

Dear Department of Public Works,

I am writing to express my deep concern and disapproval of the LA County's plan to remove sediment from the Hahamonga Watershed.

I hope that you will express your concern to this plan that is so extreme that I honestly cannot believe that it is a serious plan. Yet, it is.

1. I understand the plan to remove sediment from the Watershed; yet, this plan that is proposed is that it will permanently destroy 50 to 120 acres of willow and mulefat riparian forest. Perhaps the County has not heard that this area provides needed habitat for the Yellow Warbler that is a species of Special Concern in California and also in 2012, Least Bell's Vireo's nested there for the first time. Least Bell's Vireos are a federally endangered species. Many Audubon Societies are watching this project very carefully.

2. Another very serious issue is the air pollution that will be generated by this project. Surely you are aware that the County is proposing 425 trucks per day (that's 50 trucks per HOUR) to drive through local neighborhoods and on the 210 freeway. The trucks will operate for nine months or more per year, six days a week – for five years. It doesn't take a lot to understand that those diesel trucks will cause unacceptable levels of air pollution, noise, and odor. Please think about the health impact to citizens of Pasadena – and if fact many communities! The County says the air pollution, nosie pollution and smell are unavoidable and there is nothing they can do to mitigate this. ***This is a completely inadequate response and will be the basis for legal action if not responsively revised***

What I am asking you to do is to carefully examine the proposal offered by Tim Brick of the Arroyo Seco Foundation: Go Slow (10-20 years instead of 3-5 years – the sediment has been building up for nearly 100 years and sediment will continue to flow into the basin), Go with the Flow (allow more sediment to flow through the dam – sluicing), Let the Habitat Grow, and Keep Costs Low. This plan will mean fewer trucks, less air pollution, less noise, less odor, less habitat destruction, and lower costs.

Please, go the Arroyo Seco Foundation website and learn more. <http://www.arroyoseco.org/index.htm>

Sincerely;

Frank Gilliland MD

525 Avon Avenue

Pasadena, CA 91105

Frank Gilliland MD Ph.D.  
Hastings Professor  
Keck School of Medicine  
University of Southern California  
2001 N. Soto Street, MC 9237  
Los Angeles, CA 90089

For FEDEX deliveries use zip code 90032

office 323-442-1309

fax 323-442-3272

**Response to Comment Letter #37 (Frank Gilliland)**

**Response to Comment 37-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

**Response to Comment 37-2:**

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species, including sensitive bird species, and to restore and enhance riparian and sensitive habitats. Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Bird species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 37-3:**

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant. As discussed in the Draft EIR, Section 3.5, impacts related to odors were determined to be less than significant.

**Response to Comment 37-4:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for

and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

STATE OF CALIFORNIA

Edmund G. Brown, Jr. Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691  
(916) 373-3715  
Fax (916) 373-5471  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
Ds\_nahc@pacbell.net  
e-mail: ds\_nahc@pacbell.net



November 20, 2013

Mr. Christopher Stone

**Los Angeles County Flood Control District**

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

RE: SCH#2011091084; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **“Devil’s Gate Reservoir Sediment Removal & Management Project;”** located in the City of Pasadena, along the Arroyo Seco; Los Angeles County, California

Dear Mr. Stone:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the

Comment 38-1

Comment 38-2

Comment 38-2  
continued

↑ proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Comment 38-3

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

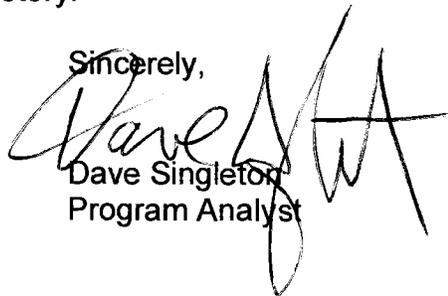
Comment 38-4

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Comment 38-5

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Dave Singleton  
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts  
Los Angeles County, California  
November 20, 2013**

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 Indians of California Tribal Council  
Robert F. Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490  
Bellflower , CA 90707  
Gabrielino Tongva  
**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, Co-Chairperson  
P.O. Box 180  
Bonsall , CA 92003  
Gabrielino  
(619) 294-6660-work  
(310) 428-5690 - cell  
(760) 636-0854- FAX  
bacuna1@gabrielinotribe.org

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

Gabrielino-Tongva Tribe  
Linda Candelaria, Co-Chairperson  
P.O. Box 180  
Bonsall , CA 92003  
Gabrielino  
palmsprings9@yahoo.com  
626-676-1184- cell  
(760) 636-0854 - FAX

Gabrielino /Tongva Nation  
Sandonne Goad, Chairperson  
P.O. Box 86908  
Los Angeles , CA 90086  
Gabrielino Tongva  
sgoad@gabrielino-tongva.com  
951-845-0443

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

**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 only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011091084; CEQA Notice of Completion; draft Environmental Impact Report (DEIR); located in the City of Pasadena; Los Angeles County, California.

**Native American Contacts  
Los Angeles County, California  
November 20, 2013**

Gabrielino-Tongva Tribe  
Conrad Acuna,  
P.O. Box 180  
Bonsall , CA 92003  
Gabrielino

760-636-0854 - FAX

Gabrielino /Tongva Nation  
Sam Dunlap, Cultural Resorces Director  
P.O. Box 86908  
Los Angeles , CA 90086  
samdunlap@earthlink.net  
909-262-9351  
Gabrielino 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.**

his list s only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011091084; CEQA Notice of Completion; draft Environmental Impact Report (DEIR); located in the City of Pasadena; Los Angeles County, California.

**Response to Comment Letter #38 (Native American Heritage Commission)**

**Response to Comment 38-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. A cultural resources literature review and records search was conducted for the Proposed Project at the South Central Coastal Information Center (SCCIC) located at California State University in Fullerton. The results of the records search are discussed in the Draft Environmental Impact Report (EIR), Section 3.7.5 and in the Cultural Resources Report (Appendix E of the Draft EIR). As discussed in the Draft EIR, Section 3.7 and in the Cultural Resources Report, Chambers Group conducted an archaeological survey of Devil's Gate Reservoir for the Los Angeles County Flood Control District (LACFCD). The survey was conducted pursuant to Section 15064.5 of the *California Environmental Quality Act (CEQA) Guidelines*, with respect to the identification and preservation of historic resources, and also in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470f and 470h-2), and its implementing regulations (36 CFR 800.4), as well as the 2004 Programmatic Agreement (PA) among the Federal Highway Administration, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer (SHPO), regarding compliance with Section 106 of the PA. The Draft EIR and Cultural Resources Report discuss the findings of the records search and field survey. In addition, the Draft EIR provides Mitigation Measures to reduce potentially significant impacts to less than significant.

**Response to Comment 38-2:**

The comment advises consultation with the Native American tribes and interested Native American consulting parties in order to determine if the Proposed Project might impinge on any cultural resources. The comment also references a list of Native American contacts in the Proposed Project area attached to the comment letter for consultation. The culturally affiliated tribes and interested Native American individuals provided by the Native American Heritage Commission (NAHC) have been provided pertinent project information as recommended and as documented in the Cultural Resources Report found as Appendix E of the Draft EIR.

**Response to Comment 38-3:**

As discussed in Section 3.7.6 of the Draft EIR, Mitigation Measures MM CUL-1 and MM CUL-2 are provided for the Proposed Project. These Mitigation Measures include monitoring of ground-disturbing activities if activities encounter native soils and provisions for the identification and evaluation of accidentally discovered archaeological and paleontological resources.

**Response to Comment 38-4:**

The comment recommends avoidance of Native American cultural resources sites that could be damaged or destroyed. As detailed in the Draft EIR for the Proposed Project, the likelihood of encountering significant subsurface archaeological materials within the Proposed Project area is low. The Proposed Project was found to have a less than significant impact on sacred or historic sites. Excavations in the reservoir will not exceed historic depths, as sediment to be removed from the reservoir is newly deposited above historic ground elevations. Additionally, please see Response to Comment 38-3 for more information.

**Response to Comment 38-5**

This comment provides citations of codes which provide provisions for inadvertent discovery of human remains outside a dedicated cemetery. As discussed in the Draft EIR, Mitigation Measure MM CUL-3 includes the following: "In the event human remains are discovered, all work in the area must be halted until the County Coroner identifies the remains and makes recommendations regarding their appropriate treatment pursuant to PRC Section 5097.98."

Comments on Devil’s Gate DEIR

12/1/2013

- Comment 39-1

  - 1. This project needs to be coordinated with four other activities going on in and around the Arroyo.
    - a. Pasadena’s West side project (Flint Canyon and the West trail).
    - b. Pasadena’s Arroyo water intake project (up the Arroyo near the ranger station.)
    - c. The reclamation of the JPL East Parking lot.
    - d. The JPL parking garage – including restoration of West side trail by the JPL fence.
    - e. The CEQA process requires looking at cumulative impacts.
- Comment 39-2

  - 2. Is 2.0 DDE of sediment removal really required? Try to minimize this.
    - a. 2.0 DDE seems to have been pulled out of the air without an analysis of flood probabilities.
    - b. Do a careful analysis of flood flow statistics and debris statistics and try to minimize the amount of sediment that must be removed. See Appendix A.
    - c. 1.0 DDE (or 1.5) would be better than 2.0
- Comment 39-3

  - 3. Limit the annual removal to 200,000 cu yards or less per year.
    - a. Take longer to get to the target reservoir capacity.
- Comment 39-4

  - 4. Hours of operation
    - a. Start trucks AFTER school starts for grades 7 and 8 and High School
      - i. An 8:30 AM start would be much better than 7 AM.
    - b. Consider JPL traffic patterns as well
    - c. Consider 12 hours days on Saturday and Sunday and shorter days during the week
      - i. You might survey residents on this.
    - d. Consider the timing of traffic jams on the 210 – especially the 2 lane connections both Eastbound in the afternoon (through the tunnel) and Westbound in the morning.
      - i. Travel times to Irwindale will be much longer after 3 PM
      - ii. The 210 doesn’t need any additional traffic during rush hours.
    - e. Question: What is the estimated round trip time at various times of the day? Consider doing an experiment.
    - f. Question: How many trucks will be required?
    - g. Question: Where will the trucks be parked at night?
    - h. Question: What will you do to prevent long queues of trucks waiting to be loaded? Prevent idling.
- Comment 39-5

  - 5. Use the Alternate Haul Route back across Woodbury
    - a. Do not allow trucks on Berkshire in either direction.
- Comment 39-6

  - 6. Use low-emission trucks
    - a. EPA 2007 is not good enough. Use at least EPA 2010.
    - b. Use latest EPA or CARB emissions standards – whichever is more stringent
      - i. Should include SCR and DPF at a minimum

Comment 39-6  
continued



- c. Or use the emission standards that have been implemented at the ports.
- d. Require Natural Gas or other Low emission fuels.

Comment 39-7

- 7. Noise considerations:
  - a. Ban Jake Brakes on the downhill road into the Arroyo
  - b. Plan routes in the Arroyo to avoid the need for the trucks to back-up
    - i. That will avoid the “beep” “beep” “beep” warnings

Comment 39-8

- 8. The mitigation measures are wholly inadequate. 6 of 7 items do zero mitigation.
  - a. Activities like “plan” “survey” “monitor” provide useful baselines but do not accomplish actual mitigation.
  - b. Use configuration C – with habitat left in the middle

Comment 39-9

- 9. Consider reducing the number of settling ponds on the East side in order to mitigate the loss of habitat from the sediment removal area.
  - a. Can you find 70 acres to offset the loss of habitat in the removal area?
  - b. Work with Pasadena to let some of the existing or new settling ponds revert to natural habitat.
  - c. Consider keeping the sediment in Johnson Field and letting it revert to natural habitat.

Comment 39-10

- 10. Consider a permanent shallow lake near the dam
  - a. This will greatly improve the aesthetics.
  - b. This will attract waterfowl.

Comment 39-11

- 11. Consider a conveyor system (horizontal transport) plus two lifting portions so that trucks can be loaded on the Woodbury Bridge.
  - a. This will reduce dust, noise, and air pollution going uphill.
  - b. Will keep most trucks out of the Arroyo
  - c. Will alleviate the invasive species problem on tires

Comment 39-12

- 12. Question: Will sluicing (FAST) damage the only soft bottom part of the Arroyo South of the Rose Bowl?
  - a. Isn't the rest of the channel to the LA River convergence all concrete?
  - b. Will sluicing result in the need for more sediment removal downstream?

Comment 39-13

13. For the Eastern access road into the Arroyo, try to save the large Oak trees on Woodbury

Comment 39-14

- 14. We have a choice of a small surface area and deep versus a large area and shallower.
  - a. I prefer small surface area and deep – 70 acres or less

Comment 39-15

15. Do not pump water from the Arroyo to Eaton Canyon. Pump the water into the Pasadena settling ponds and keep it in the Arroyo.

Summary:

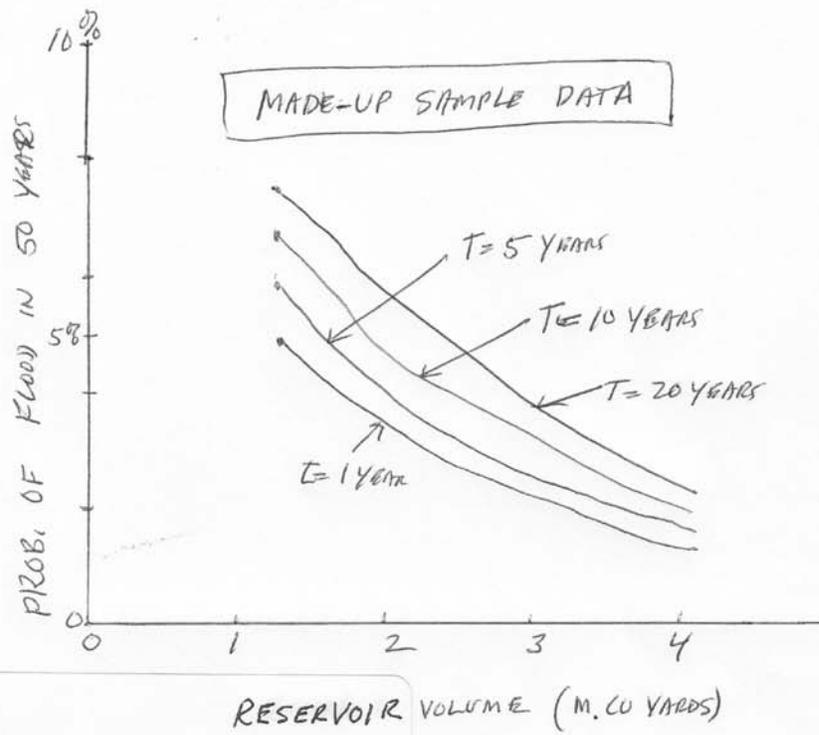
1. Reduce volume that must be removed
2. Reduce acreage that is denuded
3. Try to find areas that can be converted to native habitat – true mitigation
4. Use natural gas or other low emission trucks
5. Do not start trucks before 8:30 AM. Reduce hours of operation.
6. Stretch out removal period to 10 or 20 years.
7. Use alternative haul route – stay off Berkshire.
8. Use configuration C.

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

## Appendix A

- Comment 39-17 | 1. The whole purpose of the dam and this project is to reduce the probability of downstream floods.
- Comment 39-18 | 2. The Draft EIR does not present any analysis for the amount of reservoir capacity needed.
- Comment 39-19 | 3. 2.0 DDE was arbitrarily selected. You may be able to do with less removal.
- Comment 39-20 | 4. I suggest you do an in-depth analysis and prepare a graph similar to the attached sketch on Page 5.
- a. Y-axis – Probability of flood over the next 50 years.
  - b. X-axis – Reservoir capacity in million cu yards
  - c. Plot 4 different lines depending on how long you take to remove the sediment
    - i. One-year – as if the sediment could magically be removed in one year (2015).
    - ii. 5 years starting in 2015
    - iii. 10 years
    - iv. 20 years
  - d. A Monte Carlo simulation may be useful
  - e. The attached sketch is sample data – just a guess what the curves will look like.
    - i. Please replace with real statistical analysis results.
- Comment 39-21 | 5. Assumptions
- a. “Flood” should be defined as over-topping of the concrete channel somewhere between the dam and the LA River Convergence.
  - b. The target reservoir capacity will then define how much sediment needs to be removed.
  - c. You can include additional sediment additions from year to year.
  - d. Consider the UCLA regional climate study for future temperatures and precipitation projections.
- Comment 39-22 | 6. Pick an annual removal rate and then dig each year until you reach the target reservoir volume.
- Comment 39-23 | 7. This is the kind of data that the Board of Supervisors can use to determine the risk versus environmental impact trade-off.



## **Response to Comment Letter #39 (R. Stephenson)**

### **Response to Comment 39-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) has been and will continue to work closely with the City of Pasadena in coordinating Proposed Project activities with other area projects. The Draft Environmental Impact Report (EIR) contains a cumulative impact analysis within each of the subsections of Section 3.0 Environmental Analysis. The cumulative analysis contains projects as determined by LACFCD and the surrounding cities and communities to have a potential cumulative effect due to overlapping time frames of the projects. The list of these projects is included in Section 2.9 Cumulative Scenario and includes the JPL On-site Parking Structure, Arroyo Seco Canyon Project, and the Hahamongna Watershed Park (HWP) Multi-Benefit/Multi-Use Project (which includes the Westside Perimeter Trail and reclamation of the eastside surface parking lot). Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130.

### **Response to Comment 39-2**

The LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

### **Response to Comment 39-3:**

Assuming that no sediment flows into the reservoir over the course of the removal project, limiting the annual removal to 200,000 cy per year would increase the project duration as much as 12 to 15 years. Taking into consideration the sediment inflow that could happen during the Proposed Project, the project duration could be increased even further. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy

of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD. In order for the removal project to be efficient, and therefore reduce costs, the amount of sediment removed every year needs to exceed the amount of sediment deposited. Historically, an average of approximately 130,000 cy was deposited in Devil's Gate Reservoir annually since 1920. If a similar sediment influx occurred during the course of the Proposed Project, the project duration could increase even further.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing cost, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 39-4:**

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1 Sediment Removal Phase, Project Schedule.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the Proposed Project site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site. Also as discussed in the Draft EIR, Section 3.16, truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments, along any of the Haul Routes.

As discussed in the Draft EIR, Section 3.5, Air Quality, travel times will vary depending on the time of day and year. For the sediment disposal trucks, an aggregate average for vehicle speeds is expected to be 5 miles per hour (mph) to 45 mph for surface street mileage and 50 mph to 70 mph for highway mileage.

As discussed in the Draft EIR, Section 2.5, Proposed Project Description, the accumulated sediment will be excavated with construction equipment including but not limited to approximately four front loaders with 4-cubic-yard buckets, two bulldozers, one excavator, one grader, one water truck, and two tender trucks (for fuel and maintenance). The number of double dump semi-trucks that will be required to transport sediment to its final placement location will depend on daily construction operations, traffic, and disposal location. The maximum number of truck trips that will occur during one day is 425.

At the end of daily construction activities, sediment removal equipment will be left in a secure area within the Proposed Project site. Sediment hauling trucks be stored offsite nightly by their respective operators. This would include, as necessary, front loaders, bulldozers, excavator, grader, water truck, and tender trucks. All necessary BMPs will be implemented to protect against fuel and other liquid spills. Sediment transport trucks are typically operated by independent owners who will be responsible for offsite storage of the truck after the day's construction activities have ended.

During the sediment removal phase, excavators will be loading sediment into trucks for offsite disposal. All of the trucks will be loaded within the reservoir; and if a queue of trucks develops, the trucks will stage within the reservoir itself to lessen impacts on the adjacent streets. Long queuing and idling times will not occur during the Proposed Project. It is estimated that trucks will briefly idle during loading, but the average loading time per truck is estimated to be one minute. In addition, LACFCD typically requires equipment to shut down if idling time is expected to be more than five minutes.

**Response to Comment 39-5:**

LACFCD notes that the commenter prefers the haul route alternative that does not use Berkshire Place on ramp/off ramp.

**Response to Comment 39-6:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

**Response to Comment 39-7:**

The Proposed Project was designed to limit the need for trucks to back up by having trucks enter at one entrance road and exit at a separate road to encourage circular flow. The backup beeps on the trucks and equipment are an Occupational Safety and Health Administration (OSHA) requirement, with the priority being to protect the safety of both the workers on site and the general public. In addition, contractors will be required to comply with local noise ordinances as stated in the Draft EIR, Section 3.14 Noise and Vibration.

**Response to Comment 39-8:**

Table ES-1 of the Draft EIR, lists all 17 of the Mitigation Measures proposed for the Proposed Project. These Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW

and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

LACFCD notes that the commenter prefers Configuration C.

**Response to Comment 39-9:**

Mitigation locations will comply with the CDFW recommendations as follows: first, on site; second, off site within the Arroyo Seco Watershed; and third, off site within the greater Los Angeles River watershed. If offsite mitigation sites are needed, several offsite areas within the Arroyo Seco/Los Angeles River watershed are being considered for restoration. The spreading basins on the eastern edge of the reservoir are outside the jurisdiction of the LACFCD.

Sediment that was removed and stored at Johnson Field is required to be removed as a condition of permits issued for the Interim Measures Projects.

Once the sediment has been removed from Johnson Field, LACFCD will work closely with CDFW and the City of Pasadena to determine the availability and viability of using Johnson Field as a mitigation site for the Proposed Project.

**Response to Comment 39-10:**

Holding water behind the dam permanently, as a lake, is not a part of the Proposed Project objectives and is outside the scope of this project.

**Response to Comment 39-11:**

A conveyor belt system was considered in the Alternatives Analysis; see Section 4.10.1 of the Draft EIR. This alternative was rejected as it would not avoid or substantially reduce any significant environmental effects.

**Response to Comment 39-12:**

As discussed in the Draft EIR, Section 4.7, Sluicing Alternative, sluicing differs from Flow Assisted Sediment Transport (FASTing) operations in the amount and weight of sediment transported.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully

transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. As discussed in Section 4.7 and in the Sediment Transport Capacity Analysis (Appendix K), most of these downstream locations would be in the Arroyo Seco, with deposits primarily occurring in and around the two soft bottom areas. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

FASTing operations have been routinely used at Devil's Gate Reservoir and result in relatively small amounts of finer grained sediment passing through the reservoir. After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 39-13:**

As discussed in the Draft EIR, Section 3.6.6, LACFCD will avoid removal of oak trees if possible and will replace trees whose removal cannot be avoided. In addition, a biological monitor will implement measures to protect the root zone of oak trees that may be impacted immediately adjacent to the Proposed Project site and along access roads.

**Response to Comment 39-14:**

LACFCD notes that the commenter would prefer that a smaller surface area be used for removal.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. A footprint any smaller would decrease the volume removed and the ultimate capacity of the reservoir, which would fail to meet Proposed Project objectives.

**Response to Comment 39-15:**

The Proposed Project does not involve pumping water into Eaton Canyon. LACFCD notes that the commenter would prefer to keep the water in the Arroyo Seco.

**Response to Comment 39-16:**

See Response to Comments 39-1 through 39-15.

**Response to Comment 39-17:**

One of the objectives of the Proposed Project is to return the reservoir to a capacity to provide proper flood protection for downstream areas.

**Response to Comment 39-18:**

See Response to Comment 39-2.

**Response to Comment 39-19:**

See Response to Comment 39-2.

**Response to Comment 39-20:**

See Response to Comment 39-2.

LACFCD evaluates the required capacity behind dams for three functions: flood control operations, water conservation, and capturing debris. The required capacity for capturing debris is based upon a Design Debris Event (DDE). A DDE is characterized as the estimated amount of sediment that could flow into the reservoir four years after the undeveloped portion of the watershed has burned and a 50-year storm (based on a 24-hour duration) occurs. The 50-year storm and the DDE are defined by the County of Los Angeles Department of Public Works Sedimentation Manual (March 2006), which is available online. Each reservoir has its own unique DDE, and the DDE for Devil's Gate Dam is approximately 2 million cubic yards (mcy).

LACFCD's sediment removal criterion for dams providing debris control is to maintain reservoir capacity for two DDEs below a dam's spillway elevation. The reason the LACFCD has established the required capacity at two DDEs is to ensure that sufficient reservoir capacity is always available to maintain the level of downstream flood protection. By requiring two DDEs, the reservoir is likely to have sufficient capacity to experience a design level storm, or several smaller but significant debris events, and still maintain capacity of at least one DDE during the lengthy environmental and construction processes to remove the debris. In addition to requiring the two DDEs for debris control, some dams require additional storage capacity for providing Capital Flood regulation. Further, it should be noted that additional criteria in special circumstances related to dam safety may also dictate the need to remove sediment from a reservoir.

- Depending on the structural stability of the dam, the height of sediment against the dam may need to be limited (sediment weighs more than water and increases the forces on the dam during an earthquake).
- The volume of sediment accumulation may also be limited to prevent sediment from blocking valves/operations (if sediment or debris blocks the outlet valves, they cannot be used to regulate storm flows or to empty the dam during an emergency).

For Devil's Gate Dam, the required reservoir capacity is based on debris control and is 4.0 mcy (two DDEs) below the spillway elevation of 1,040.5 feet.

**Response to Comment 39-21:**

See Response to Comment 39-2 and 39-20.

**Response to Comment 39-22:**

See Response to Comment 39-3 and 39-20.

**Response to Comment 39-23:**

LACFCD notes that the commenter wants this information available to present to the Board. This information is included in this Response to Comments document, which will be a part of the Final EIR submitted to the Board of Supervisors.



# Devil's Gate Reservoir Sediment Removal and Management Project

Comment Letter #40

## COMMENT CARD

Date: Nov. 21, 2013

Name: Cheryl Wysocki Address: 131 N. Chester Ave.

Email: CherylWysocki@hotmail.com City/Zip: Pasadena, CA 91106

Organization represented, if any: \_\_\_\_\_

Comment: Please see the attached comments.

Multiple horizontal lines for additional comments.

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

Mail	Email	Fax
County of Los Angeles Department of Public Works Water Resources Division Reservoir Cleanouts Program P.O. Box 1460 Alhambra, CA 91802-1460	reservoircleanouts@dpw.lacounty.gov	(626) 979-5436

I am a resident of Pasadena and an employee at JPL. The Devil's Gate Reservoir Sediment Removal and Management Project, as outlined at the community meeting in La Canada, strikes me as a project that will cause major disruption to this area. I am particularly concerned about the air pollution issue and the impact to the environment and wildlife in this area. There are approximately 5,000 employees at JPL, as well as six schools and housing all around this area. Those of us who attend school, live, or work in this area will be exposed to the higher levels of diesel fumes. It was suggested at the meeting that you use clean burning trucks, but the response was that while that is a good idea, it might not be possible to get all of the trucks to conform to that standard.

I appreciate the attention paid to habitat restoration in your plan, but I believe that the best approach is to create a plan that is much more in line with the one proposed by the Arroyo Seco Foundation. This plan advocates a much slower plan that would result in a far less degradation to the environment and much less air and noise pollution.

It seems highly unlikely that we will see another situation like the one that occurred after the station fire. The vegetation has mostly grown back up in the mountains, so even if we were to have a big storm, the amount of sediment that would wash down would not be nearly as great as what came down after the station fire. I've worked at JPL for 30 years and walked out in the Arroyo. For all this time, even in years of high rainfall, the sediment came down in manageable amounts.

Given the extremely high cost of the proposed plan and the highly negative impacts to, land, wildlife, and people's health, I urge you to reconsider your plan.

## **Response to Comment Letter #40 (Cheryl Wysocki)**

### **Response to Comment 40-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Air quality impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality including those associated with health effects, will be reduced to less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

### **Response to Comment 40-2:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR selected Alternative 3 as the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint down of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**Response to Comment 40-3:**

See Response to Comment 40-2. Since the dam was built, several periods have occurred in which a large amount of sediment was deposited in the reservoir in a short time frame. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 12.0 million cy of sediment have come into the reservoir since the dam was constructed. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events.

In order for the removal project to be efficient, and therefore reduce impacts and costs, the amount of sediment removed every year needs to exceed the amount of sediment deposited. If the reservoir is left in its current state, the flood risk to downstream communities would be left at an unacceptable level.

**Response to Comment 40-4:**

See Response to Comments 40-1 and 40-2. LACFCD notes the commenter's objection to the Proposed Project.

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

**From: Joy Rittenhouse, MACH I  
 Joymach1@yahoo.com**

**RE: Comments: Draft Environmental Impact Report for Devil’s Gate Reservoir Sediment Removal and Management Project**

**Introduction:**

MACH 1 (Move A Child Higher) is a therapeutic horsemanship and horseback riding program that offers equine assisted activities to students with disabilities and is based at the Pasadena Equestrian Center in the Hahamongna Watershed Park in Pasadena. The program is a PATH Int’l Premier Accredited Center and has been in cooperation with the City of Pasadena for 17 years. MACH I is a non-profit 501 (c) (3) corporation that relies upon private contributions for the bulk of its funding as well as the many generous volunteers for assistance with clients and horses.

In cooperation with PATH Int'l's partnership with the Wounded Warrior Project, we also now offer therapeutic horsemanship activities for military veterans and active duty military personnel. Our horse-partnered activities are tailored to the unique needs of each person. This project offers a period of fully covered scholarship to participating veterans and other military personnel.

We currently conduct our therapeutic operations in the Hahamongna Watershed Park as a sub-tenant of Rose Bowl Riders. About eight years ago, with the support of the City of Pasadena we began development of a new therapeutic riding facility, also in the Hahamongna Watershed Park’s Pasadena Equestrian Center. We have already invested over \$125,000 with more to go and thousands of volunteer hours to build this new facility. It is almost complete and we anticipate beginning full operations there within the next few months.

**Concerns:**

Recently, MACH I became aware of the County’s project for Devil’s Gate sediment removal and management and the availability of the draft environmental impact report (DEIR). Although we support the need for flood management, we noticed that the impacts of the project on MACH I’s operations were not commented on, even though there was some discussion around activities at Rose Bowl Riders and Tom Sawyer Camp. It is important that our operations, which involve clients with special needs and sensitivities, be considered in your final environmental impact report. Our concerns relative to potential environmental impacts on our facility and operations are as follows:

- **Use of Facilities** - According to the DEIR, use of park facilities may be less desirable due to construction-related emissions, noise, dust, visual, and traffic impacts associated with sediment removal. It is suggested that while equestrian activities currently exist in the Hahamongna Watershed Park area, two alternative sites have been identified where equestrians can ride, train, board horses, and park trailers; San Pascual and Griffith Park. Although these facilities are suitable for boarding, they would not work for our program. We must go through a PATH Int'l certification process that involves inspection of our facility as well as our methods of operation.

Comment 41-1

Comment 41-2

Comment 41-3

Comment  
41-4

- Traffic - Although the truck traffic would enter and exit on the south end of the basin, it has been determined that there will be significant and unavoidable impacts to traffic on the 210 freeway, and at most of the streets and intersections surrounding the Hahamongna Watershed Park. It is our understanding from the DEIR that traffic would be significant all day, Monday through Saturday, April through mid-December. This could potentially limit our client's access to the program and significantly impact our hours of operation and instructor schedules, which are during weekdays and Saturdays, daylight hours. Many of our clients need ADA access with the ability to navigate in regards to mobility.

Comment  
41-5

- Air Quality - The impact to air quality has been determined to be significant and unavoidable due to project related increases such as emissions from on-road trucks (400+inbound and 400+outbound), off-road vehicles, employee vehicles, and fugitive dust. This will impact our clients as we have strict standards that apply to fugitive dust related issues, namely that we deal with many students that are immune compromised and have serious issues with breathing problems.

Comment  
41-6

- Noise – The impact from the noise resulting from heavy equipment, running diesel engines and the beeping that comes with trucks backing up may impact us as well, especially when excavation occurs near the north end of the proposed project site. It is possible that it would make communication to/with clients very difficult as many of our clients have hearing and communication problems.

Comment  
41-7

- MACH 1 is concerned that we may lose our PATH Intl certification if our program is in jeopardy of operating under the guidelines and standards of operation they require. Because we operate in the City of Pasadena and because we have completed our RFQ with the City we are required to be a PATH Intl therapeutic program. We are proud of our accomplishments and we are proud that we are an accredited premier center.

**Conclusion:**

Comment  
41-8

MACH I is very committed to our special needs clients and our co-operative effort with the City of Pasadena's adaptive recreation dept. It is important that impacts from this project be mitigated in order for our operation to continue in our current location since relocation is not financially feasible.

Please feel free to contact us with any questions you may have regarding our programs and/or facility.

Sincerely,



Joy Rittenhouse, Executive Director/Founder

MACH I

**Response to Comment Letter #41 (Joy Rittenhouse – MACH 1)**

**Response to Comment 41-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The information provided in this comment regarding the MACH 1 facility will be added to Final Environmental Impact Report (EIR), see Sections 2.1.6, 3.12.2, and 3.15.2.

**Response to Comment 41-2:**

The information provided in this comment regarding the MACH 1 facility will be added to Final EIR, see Section 3.15.6, Recreation/Public Services, Impacts and Mitigation and Section 4.0 Alternative Analysis, Sections 4.4.3, 4.5.3, 4.6.3, 4.7.3, 4.8.3, and 4.9.3.

**Response to Comment 41-3:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Therefore, the maximum impacts to the MACH-1 facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

**Response to Comment 41-4:**

Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact.

LACFCD also notes MACH-1's concerns with traffic impacts relating to MACH 1 participants traveling to and from their facility. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the Proposed Project site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. Additionally, construction traffic will not pass the Berkshire Place intersection with Oak Grove Drive and thus will not approach the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the MACH 1 facilities. LACFCD

will continue to work with local organizations and the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 41-5:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities including excavation, grading, material loading, and hauling would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 41-6:**

The Draft EIR, Section 3.14, analyzed the noise impacts from the Proposed Project's onsite activities within the Hahamongna Watershed Park, where the MACH-1 horse riding facility is located. As discussed in the Draft EIR, with implementation of Mitigation Measure MM N-1, temporary noise impacts would be reduced to a level of less than significant. In addition, the Proposed Project was designed to limit the need for trucks to back up; the trucks will enter at one access road and exit at a separate access road to encourage circular flow. Contractors will be required to comply with local noise ordinances as stated in the Draft EIR, Section 3.14 Noise and Vibration.

**Response to Comment 41-7:**

See Response to Comments 41-4 through 41-6. LACFCD understands MACH-1's concerns regarding their PATH Intl certification. As stated above, no significant impact to air quality or noise will occur. LACFCD will continue to work with local organizations and the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the Proposed Project site; construction traffic will not use the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the MACH 1 facilities; and LACFCD will provide notifications of working locations, as feasible, within the reservoir to MACH-1 to help minimize impacts to the riders.

**Response to Comment 41-8:**

See Response to Comments 41-4 through 41-7.



# Devil's Gate Reservoir Sediment Removal and Management Project

Comment Letter #42

## COMMENT CARD

Date: 1/27/13

Name: Joyce Kocottell Address: 1710 1/2 Whitefield Road

Email: jal4533@yahoo.com City/Zip: Pasadena, CA 91104

Organization represented, if any: Pasadena Audubon Society  
(new member)

Comment: The biggest problem with this project is that it permanently destroys 50-120 acres of regionally significant habitat (willow and mulefat forest). This habitat is important for a large amount of birds, including nesting Yellow Warbler and 'Least' Bells Vireo, which is federally endangered.

It also creates a 55 ft deep bare, steep sided pit near the dam and the DEIR states that there will be "temporary restricted access to portions of designated trails." This will be a problem for birders when they need to cross the basin. For at least nine months per year, and six days per week 425 diesel trucks will be creating pollution and a lot of noise. The county has no plans to mitigate this problem.

The project is unsustainable. The county still does not have a plan for where to put all of the sediment once these pits are full. This will cost \$100 million, \$3-5 billion county-wide.

Please submit any comments on the proposed project today by placing this card in the comment box or send to LACFCD. **Correspondence should be postmarked by Monday, January 6, 2014.** Comments should include "Devil's Gate Reservoir Sediment Removal and Management Project" in the subject line and the name of a contact person. Comments can be submitted in the following ways:

Mail	Email	Fax
County of Los Angeles Department of Public Works Water Resources Division Reservoir Cleanouts Program P.O. Box 1460 Alhambra, CA 91802-1460	reservoircleanouts@dpw.lacounty.gov	(626) 979-5436

What the county should do:

Tim Brick, Managing Director of the Arroyo Seco Foundation, has a four-part solution: Go slow, Go with the flow, let the habitat grow, and Keep costs low. To learn more, go to YouTube and search for "Recipe for a Sustainable Sediment Management Program for Hahamonga."

Thank you,

Joyce Kacatell

**Response to Comment Letter #42 (Joyce Locatell – Pasadena Audubon Society Member)**

**Response to Comment 42-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species, including sensitive bird species, and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Bird species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 42-2:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Alternative 3, the Environmentally Superior Alternative, will restore the bottom elevation of Devil's Gate Reservoir to its design elevation of 986 feet, which coincides with the sill elevation of the lowest valve on Devil's Gate Dam, the sluice gate. The final elevations of the reservoir after the sediment removal phase is completed will not exceed historic elevations. Additionally, all side slopes will be excavated at a 3:1 ratio or 3 feet horizontally for every 1 foot rise in elevation. The slope produced by this side cut is relatively shallow.

**Response to Comment 42-3:**

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required

to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

**Response to Comment 42-4:**

The disposal sites located to the east of the Proposed Project currently have sufficient capacity for the entire amount of sediment proposed to be removed. The disposal sites located to the west of the Proposed Project will provide additional capacity if needed. The available pits and disposal sites, as outlined in the Proposed Project Description, have enough capacity for the sediment that is planned to be removed.

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

The estimated cost for the Proposed Project and for Alternatives 1, 2, 3, and 5 would range from \$80 million for the Proposed Project to \$65 million for Alternative 3. LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs. The remaining cost will be covered by LACFCD Funds.

**Response to Comment 42-5:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

November 27, 2013

Dear Department of Public Works,

I am writing to express my deep concern and disapproval of the LA County's plan to remove sediment from the Hahamonga Watershed.

I hope that you will express your concern to this plan that is so extreme that I honestly cannot believe that it is a serious plan. Yet, it is.

1. I understand the plan to remove sediment from the Watershed; yet, this plan that is proposed is that it will permanently destroy 50 to 120 acres of willow and mulefat riparian forest. Perhaps the County has not heard that this area provides needed habitat for the Yellow Warbler that is a species of Special Concern in California and also in 2012, Least Bell's Vireo's nested there for the first time. Least Bell's Vireos are a federally endangered species. Many Audubon Societies are watching this project very carefully.

2. Another very serious issue is the air pollution that will be generated by this project. Surely you are aware that the County is proposing 425 trucks per day (that's 50 trucks per HOUR) to drive through local neighborhoods and on the 210 freeway. The trucks will operate for nine months or more per year, six days a week – for five years. It doesn't take a lot to understand that those diesel trucks will cause unacceptable levels of air pollution, noise, and odor. Please think about the health impact to citizens of Pasadena – and if fact many communities! The County says the air pollution, nosie pollution and smell are unavoidable and there is nothing they can do to mitigate this. **Really?** Please do not let them carry out this plan as proposed.

3. And finally, the cost of this project - \$100 million. Well, I am a docent volunteer at a County facility, and they have cut staff hours back to the bone.

What I am asking you to do is to carefully examine the proposal offered by Tim Brick of the Arroyo Seco Foundation: Go Slow (10-20 years instead of 3-5 years – the sediment has been building up for nearly 100 years and sediment will continue to flow into the basin), Go with the Flow (allow more sediment to flow through the dam – sluicing), Let the Habitat Grow, and Keep Costs Low. This plan will mean fewer trucks, less air pollution, less noise, less odor, less habitat destruction, and lower costs.

Please, go the Arroyo Seco Foundation website and learn more.

<http://www.arroyoseco.org/index.htm>

Thank you for caring about making Pasadena a wonderful, green place to live in harmony with Mother Nature.

Best Regards,

*Susan S. Gilliland, PhD*  
Susan S. Gilliland, PhD, MPH, RN

525 Avon Avenue

Pasadena, CA 91105

**Response to Comment Letter #43 (Susan Gilliland)**

**Response to Comment 43-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project; however, the Proposed Project is being undertaken to provide downstream protection from flooding potential.

**Response to Comment 43-2:**

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species, including sensitive bird species, and to restore and enhance riparian and sensitive habitats. Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Bird species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 43-3:**

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant. As discussed in the Draft EIR, Section 3.5, impacts related to odors were determined to be less than significant.

**Response to Comment 43-4:**

The estimated cost for the Proposed Project and for Alternatives 1, 2, 3, and 5 would range from \$80 million for the Proposed Project to \$65 million for Alternative 3. LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs. The remaining cost will be covered by Los Angeles County Flood Control District (LACFCD) Funds. Under California Environmental Quality Act (CEQA), the lead agency is not required to analyze an economic impact associated with a project in the EIR; as Section 15131(a) of the CEQA Guidelines states: "Economic or social effects of a project shall not be treated as significant effects on the environment." Moreover, CEQA allows economic analysis in the administrative record only if the basis for infeasibility, and thus rejection of a mitigation or alternative, is economic, as described in CEQA Guidelines Sections 15091(a)(3) and 15364. Economic and social factors can be considered by a lead agency when reaching a decision on a project; however, such an evaluation is separate from the process of preparing and certifying an EIR, which is concerned with evaluating the significant environmental

effects of a project. See also *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App. 4th 1184.

**Response to Comment 43-5:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs. While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** [Petrea Burchard](#)  
**To:** [reservoircleanouts](#)  
**Subject:** public comment on the Devil's Gate Dam sediment removal DEIR  
**Date:** Friday, December 06, 2013 10:50:10 AM

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Dear DPW,

Comment 44-1

The LA County DWP's DEIR for Devil's Gate Dam sediment removal does not sufficiently demonstrate reason for the draconian plans outlined in the DEIR.

No past or present storm or flooding justifies what Keith Lilley has told us will likely happen:

Comment 44-2

425 trucks per day  
12 hours per day (overtime pay)  
6 days per week (overtime pay again)

This means 1 truck every 1.69 minutes descending into the Hahamongna Basin. Perhaps a truck can be dumped every 1.69 minutes, but it is impossible to fill trucks that fast. This means trucks lining up, waiting in the neighborhoods, beeping and spewing diesel pollution and engine noise near homes and schools.

This is unacceptable. It is also unnecessary.

Comment 44-3

The Arroyo Seco Foundation has proposed a gentler plan for regular clean-out. Their advisors and scientists are knowledgeable about the Arroyo and their advice is well worth taking.

We all know the silt must be removed. But we are not in an emergency situation and to try to make the public think so is disingenuous, at best. There is no reason for the dam clean-up to be at the expense of property values, huge tax dollars, and children's lungs. Please look at Tim Brick's plan via the Arroyo Secon Foundation.

Thank you.

Sincerely,  
Petrea Burchard Sandel  
Pasadena

## **Response to Comment Letter #44 (Petrea Sandel)**

### **Response to Comment 44-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

As discussed in the Draft EIR, Section 2, due to the sediment deposited in the reservoir from winter storms after the 2009 Station Fire, the current available capacity for Devil's Gate Reservoir is less than one DDE. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing cost, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance.

### **Response to Comment 44-2:**

During the sediment removal phase, excavators will be loading sediment into trucks for offsite disposal, at the stated rate, which is obtainable. All of the trucks will be loaded within the reservoir; and if a queue of trucks develops, they will stage within the reservoir itself to lessen impacts on the adjacent streets. It is estimated that trucks will briefly idle during loading, but the average loading time per truck is estimated to be one minute. In addition, LACFCD typically requires equipment to shut down if idling time is expected to be more than five minutes.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed EPA's 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

**Response to Comment 44-3:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** [Ms Carol Parker](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils Gate Plan  
**Date:** Friday, December 06, 2013 8:56:41 PM

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Greetings:

Comment 45-1

I am a resident of La Canada and aware of the plans suggested for sediment removal from Devils' Gate.

I agree the current sediment deposits are a true threat to the safety and protection of public and private lands below the dam. I can see no rational good reason to accept such large risks.

Comment 45-2

Hopefully the various public and private insurance agencies with policies for the downstream areas have been informed so they can adjust their premiums and coverages for the communities and residents below the dam.

Comment 45-3

The totally artificial "natural" areas behind the dam are temporary and not of high quality value---in fact the area behind the dam should be returned to a more long lasting natural condition prior to recent years of sediment build up.

Comment 45-4

I recommend you engage in the most cost effective and rapid method of sediment reduction. My opinions are based on my decades of homeownership in La Canada and a career as a biologist engaged in environmental impact studies.

Sincerely

Thomas Parker  
367 Knight Way  
La Canada CA 91011  
[rockdale91011@yahoo.com](mailto:rockdale91011@yahoo.com)  
818-7908246

**Response to Comment Letter #45 (Thomas Parker)**

**Response to Comment 45-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The purpose and need for the Proposed Project is based on providing the flood control capacity necessary to protect downstream areas.

**Response to Comment 45-2:**

In preparation for the possibility of an imminent threat to residents downstream of Devil's Gate Dam, Los Angeles County Flood Control District (LACFCD) has been in close coordination with various emergency management agencies in the Cities of Pasadena, South Pasadena, and Los Angeles and with Caltrans to come up with an Arroyo Seco Channel Flood Hazard Warning and Contingency Plan.

Additionally, while LACFCD works regularly with the United States Federal Emergency Management Agency (FEMA), which designates the flood risk zones used by insurance agencies, the increased flood risk due to sediment impacts in Devil's Gate Reservoir will be reduced after successful completion of the Devil's Gate Reservoir Sediment Removal and Management Project; therefore, changes to flood risk zones around the Arroyo Seco are not anticipated to occur.

**Response to Comment 45-3:**

As noted in the Draft Environmental Impact Report (EIR), Biological Resources section, the habitat value is impacted by the presence of sediment in the reservoir. The sedimentation that has occurred as a result of the 2009 Station Fire, and is expected to continue to occur, has buried existing vegetation, reducing the size of vegetation communities and inhibiting their ability for succession. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

**Response to Comment 45-4:**

LACFCD notes that the commenter prefers the most cost-effective and rapid method of sediment removal.



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

December 9, 2013

Christopher Stone  
Los Angeles County Flood Control District  
P.O. Box 1460  
Alhambra, CA 91802-1460

Subject: Devil's Gate Reservoir Sediment Removal and Management Project  
SCH#: 2011091084

Dear Christopher Stone:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 6, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

Comment 46-1

**Document Details Report**  
**State Clearinghouse Data Base**

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**SCH#** 2011091084  
**Project Title** Devil's Gate Reservoir Sediment Removal and Management Project  
**Lead Agency** Los Angeles County Flood Control District

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**Type** EIR Draft EIR  
**Description** The Proposed Project will remove sediment from Devil's Gate Reservoir to restore capacity and to protect the dam and its valves to reduce the risk of flooding in the communities located downstream along the Arroyo Seco. This effort will include removal of approximately 2.9 million cubic yards of existing excess sediment in the reservoir in addition to any additional sediment that accumulates during construction. Sediment removal activities are expected to occur over the course of approximately 5 years beginning Summer 2015. Reservoir management is expected to start after 2020. The purpose of the proposed annual management is to reduce buildup of sediment in the reservoir management area and eliminate or substantially reduce the occurrence of another large-scale sediment removal project in the future.

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**Lead Agency Contact**

**Name** Christopher Stone  
**Agency** Los Angeles County Flood Control District  
**Phone** 626 458 6100 **Fax**  
**email**  
**Address** P.O. Box 1460  
**City** Alhambra **State** CA **Zip** 91802-1460

---

**Project Location**

**County** Los Angeles  
**City** Pasadena  
**Region**  
**Lat / Long** 34° 11' 09" N / 118° 10' 31" W  
**Cross Streets** Oak Grove Drive and Windsor Drive  
**Parcel No.** 5823031900  
**Township**

**Range**                      **Section**                      **Base**

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**Proximity to:**

**Highways** Hwy 210, 2  
**Airports**  
**Railways**  
**Waterways** Arroyo Seco  
**Schools** La Canada HS  
**Land Use** Open Space

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**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Landuse; Cumulative Effects; Aesthetic/Visual

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**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Central Valley Flood Protection Board; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Native American Heritage Commission

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**Date Received** 10/23/2013      **Start of Review** 10/23/2013      **End of Review** 12/06/2013

Clear  
12/06/13  
E

STATE OF CALIFORNIA

Edmund G. Brown, Jr. Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691  
(916) 373-3715  
Fax (916) 373-5471  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
Ds\_nahc@pacbell.net  
e-mail: ds\_nahc@pacbell.net



RECEIVED

NOV 21 2013

November 20, 2013

Mr. Christopher Stone

**Los Angeles County Flood Control District** STATE CLEARING HOUSE

P.O. Box 1460

Alhambra, CA 91802-1460

RE: SCH#2011091084; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"Devil's Gate Reservoir Sediment Removal & Management Project;"** located in the City of Pasadena, along the Arroyo Seco; Los Angeles County, California

Dear Mr. Stone:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine if a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s). The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the

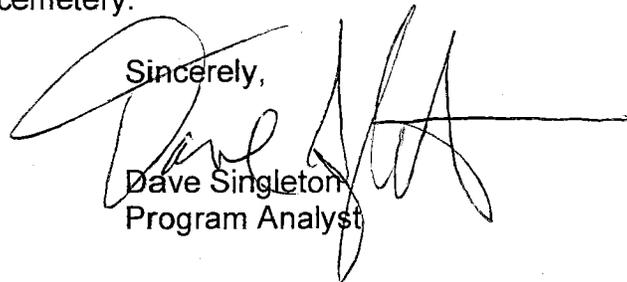
proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dave Singleton', with a long horizontal line extending to the right.

Dave Singleton  
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Response to Comment Letter #46 (State Clearinghouse)**

**Response to Comment 46-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The letter forwarded by the State Clearinghouse is a duplicate of the letter sent by the Native American Heritage Commission (see Comment Letter #38).

From: [Jo Beckwith](#)  
To: [reservoircleanouts](#)  
Subject: Devil's Gate Dam sediment removal  
Date: Thursday, December 19, 2013 10:58:39 AM

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To: LA County DPW  
From: Joanne Beckwith, 9822 Broadway, Temple City, CA 91780

I strongly oppose the County's proposal for sediment removal.

I support the comments made by Barbara Eisenstein, which are as follows:

I am strongly opposed to the Devil's Gate sediment removal project as proposed by the LA County Department of Public Works. A slower, long-term plan to gradually decrease the amount of sediment built up in the dam would allow for the development of sustainable flood-control and water management practices. The accumulation of sediment, though exacerbated by the 2009 Station Fire, is the result of inadequate management of the Devil's Gate Dam prior to the 2009 event. There is still enough capacity in the dam (17%) to move more deliberately to correct for this longstanding, inadequate maintenance. The existing project relies on early 20th Century engineering concepts that predominantly address flood control concerns with no consideration for the accompanying financial, environmental, and health burdens.

Sediment accumulation in dams along the front-range of the San Gabriel Mountains is the result of an ongoing process - erosion of a steep, young mountain range - being managed with short-term thinking, deferred maintenance, and reliance on outdated engineering solutions. Rivers were channelized and dams, spreading grounds and sediment basins were built to accommodate rapid development in Southern California, with little concern for the long-term consequences of these massive construction projects.

The repercussions of this type of thinking have become only too clear, and the continued management of our environment and resources as practiced when the dams were built threatens the viability of our region. We have learned that natural forces may be controllable for relatively short periods, but ultimately the only workable solutions are those that are compatible with natural processes and take a long-term, holistic perspective.

As such, plans to remove sediment using inefficient and polluting practices like trucking it away ("away" meaning not here, though room for dumping is finite and nearly exhausted) are truly baffling. This merely "kicks the can down the road" as the sediment keeps coming, habitat continues to decline, and resources are squandered with little concern about the continued release of greenhouse gases into the atmosphere.

Nevertheless, the need for flood protection and an adequate water supply cannot be denied. As such, it is critical to include the following considerations in plans to meet these important concerns.

1. A long-term, holistic approach that takes into account flood risk, health of

Comment 47-1

Comment 47-2

Comment 47-3

Comment 47-3  
continued

Comment 47-4

Comment 47-5

Comment 47-6

Comment 47-7

the watershed, diminishing resources, and impacts to habitat, wildlife and humans.

2. Proposals should make use of natural forces, such as sediment removal through sluicing, rather than going up against them.

3. The concept of “waste” is not applicable in sustainable systems. All materials and processes are resources and should be treated as such. Eroded materials that build up in the dams would normally be deposited along the rivers and at the beaches. Engineered solutions should incorporate the value of these materials.

4. Rather than a continued record of degrading the land and resources we rely upon, acceptable proposals should have the long-term goal of solving the more immediate problems while improving the condition of the watershed for the future.

Plowing ahead with an expensive “quick fix” that will disrupt and destroy functioning habitat needed by wildlife and humans for a healthy existence is not in the public interest. A slower, more deliberate and cautious approach could save money and resources while allowing time to develop innovative and effective ways to meet these challenges over the long-term.

## Response to Comment Letter #47 (Joanne Beckwith)

### Response to Comment 47-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

As noted in the Draft Environmental Impact Report (EIR), Section 2.2.1, LACFCD History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity. Extending the project duration would limit the amount of sediment removed annually. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cubic yards (cy) of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in suggested plans, such as the Arroyo Seco Foundation's four-point "Slow Program", are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

### Response to Comment 47-2:

See Response to Comment 47-1. As discussed in the Proposed Project Description and Purpose and Need (see Section 2.0 of the Draft EIR), Proposed Project objectives include reducing flood risk and

restoring reservoir capacity for flood control and future sediment inflow events. With the restored capacity, future regular maintenance, as discussed in Section 2.5.2 of the Draft EIR, is expected to prevent or significantly reduce the need for another large sediment removal project in the future. Per Section 3.9.6 of the Draft EIR, impacts to greenhouse gas emissions were found to be less than significant, and impacts to biological resources were found to be less than significant with mitigation incorporated as shown in Section 3.6.6 of the Draft EIR.

**Response to Comment 47-3:**

See Response to Comment 47-2. The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 47-4:**

Sluicing was analyzed as part of the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

As discussed above, FASTing, a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 47-5:**

See Response to Comment 47-4. The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse

opportunities. The sediment removed from the reservoir will be transported to the sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.

**Response to Comment 47-6:**

See Response to Comments 47-1 and 47-4.

**Response to Comment 47-7:**

See Response to Comments 47-1 and 47-2.

**LA CAÑADA UNIFIED SCHOOL DISTRICT  
RESOLUTION 17-13-14 OF THE GOVERNING BOARD  
OF LA CAÑADA UNIFIED SCHOOL DISTRICT  
ADDRESSING THE DISTRICT'S CONCERNS RELATED  
TO THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)  
FOR THE DEVIL'S GATE RESERVOIR SEDIMENT  
REMOVAL AND MAINTENANCE PROJECT**

WHEREAS, the La Cañada Unified School District (LCUSD) is aware of a proposed project by Los Angeles County Flood Control District to remove between 2.4 million and 4.0 million cubic yards of sediment and debris from the Devil's Gate Reservoir over a five or more year time period; and

WHEREAS, the LCUSD Governing Board and District staff have reviewed the Draft Environmental Impact Report (DEIR) for the subject project including alternatives, and has held at a public meeting a discussion on the matter; and

WHEREAS, the LCUSD Governing Board has numerous concerns related to potential impacts within the city and specifically near La Cañada High School; and

WHEREAS, the LCUSD Governing Board and District staff places the health and safety of its students and families as one of its highest priorities; and

WHEREAS, the LCUSD Governing Board wishes to eliminate or minimize potential adverse environmental, health, and traffic congestion impacts to its students and families.

THEREFORE BE IT RESOLVED that the Governing Board of the La Cañada Unified School District hereby requests that the following comments and concerns be addressed by the Board of Supervisors of the County of Los Angeles before proceeding with the Devil's Gate Reservoir Sediment Removal and Maintenance Project (see DEIR for any specific references):

1. The DEIR determined that there are significant and unavoidable impacts to air quality even after mitigations requiring equipment to meet EPA 2007 standards. This is due to the nature of the debris removal by heavy construction equipment that generates excessive daily NOx emissions. Short and long term health effects due to silica dust, fugitive dust clouds, diesel fumes, carbon monoxide and other pollutants were not fully assessed in the DEIR and students should not be exposed to health risks in the school environment. Student health and safety will be adversely affected. Ensuring student health and safety is a LCUSD Board priority as well as a community and civic responsibility. The Board has determined that the DEIR and the proposed project do not adequately address the severe and adverse impact on the health of our students that would be caused by the project. Furthermore, the Governing Board requests that the County specifically address how the project will ensure the health and safety of our students.
2. The LCUSD Governing Board supports the exclusive use of Alternate Haul Routes 1B and 1F (exiting and entering I-210 at Windsor Place) during the entire hauling operation because school congestion would not be worsened, thus avoiding negative impacts to attendance and tardy rates while protecting the integrity of the instructional day and supporting student achievement.

Comment 48-1

Comment 48-2

Comment 48-3

- Comment 48-4
3. Vehicle noise generated on haul routes near La Cañada High School will disrupt the learning environment and negatively impact student ability to concentrate and access curriculum.
- Comment 48-5
4. Implementation of the County's current Preferred Haul Routes 1D and 1H (exiting I-210 at Windsor Avenue and entering I- 210 at Berkshire Place) with a proposed starting time of 7:00 a.m. will cause a significant traffic impact on La Canada High School. The LCUSD Governing Board opposes the use of Haul Routes 1D and 1H.

PASSED AND ADOPTED by the La Canada Unified School District Governing Board December 17, 2013 by the following vote:

AYES: 5

NOES: 0

ABSENT: 0



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President of the Board of Education  
of the La Cañada Unified School District

**Response to Comment Letter #48 (La Cañada Unified School District)**

**Response to Comment 48-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 48-2:**

The Draft Environmental Impact Report (EIR) analyzed the air quality and health risk impacts of dust, diesel fumes, carbon monoxide, and other pollutants associated with the Proposed Project (see Draft EIR Section 3.5, Appendices B and C) as required by the California Environmental Quality Act (CEQA).

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related acute short-term and long-term impacts.

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 48-3:**

LACFCD notes the commenter's preference for the use of the Alternative Haul Routes 1B and 1F.

**Response to Comment 48-4:**

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a 1-decibel (dB) increase on Berkshire Place east of the Interstate 210 (I-210) northbound ramps. A 1-dB increase is well below the 3-dB increase threshold of perception and would therefore not be anticipated to disturb the learning environment. The roadway noise impact analysis provided in the Draft EIR found that the Proposed Project would result in less than significant impacts for all analyzed alternatives.

**Response to Comment 48-5:**

Although significant unavoidable impacts were determined for traffic, the only significant impacts in the immediate vicinity of La Cañada High School occurred at Berkshire Place and I-210 Eastbound ramps intersection during the AM peak period. Therefore, impacts would not be significant all day, and significant impacts would occur only at the intersection and on-ramp/off-ramp listed above. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations and the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the Proposed Project site. LACFCD notes the commenter's objection to Haul Routes 1D and 1H.

**From:** Madison Keogh  
**To:** [reservoircleanouts](mailto:reservoircleanouts)  
**Subject:** RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT  
**Date:** Saturday, December 21, 2013 12:51:04 PM

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December 21, 2013

Dear Department of Public Works, Water Resource Division,

Comment 49-1

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

My name is Madison Keogh and I was a camper at Tom Sawyer Camps 3 years and have been a camp counselor for 2 years. As a camper, Tom Sawyer gave me self-confidence to socialize with other campers and made a safe environment for me to explore and learn. Now as a counselor I am still learning and gaining from the Tom Sawyer Camp experience. This camp has taught me how to respect and appreciate life. My sister and I have been in love with this camp since we first started and we both hope to continue this fun-filled journey of camp. Through Tom Sawyer I have gained patience, understanding and leadership skills that I continue to use outside of camp.

Comment 49-2

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 49-3

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 49-4

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 49-5

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,

Madison Keogh

5125 Cloud Ave La Crescenta, CA 91214

8183317490

[madytown@sbcglobal.net](mailto:madytown@sbcglobal.net)

**Response to Comment Letter #49 (Madison Keogh - Tom Sawyer Camps Counselor)**

**Response to Comment 49-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 49-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

The Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 49-3:**

See Response to Comment 49-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single

intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 49-4:**

See Response to Comment 49-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 49-5:**

See Response to Comment 49-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Elizabeth Kotz](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [bbogaard@cityofpasadena.net](mailto:bbogaard@cityofpasadena.net) Bogaard  
**Subject:** "Devil"s Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, December 22, 2013 12:31:17 PM

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As a Pasadena resident I am deeply concerned about the DWP's current proposals for sediment removal at the Hahamongna Watershed Park.

Comment 50-1

ALL the current proposals will be destroy enormous areas of natural habitat and pose deeply disruptive and long-term impacts on local residents.

Given that most of this sediments has accumulated long before the 2009 Station Fire, the DWP has not provided sufficient justification for removing 2.4 to 4 millions cubic yards of dirt and debris. In addition, the county has failed to make a convincing case for why sediment removal needs to be done by truck, rather than far less disruptive forms of sluicing and flow-assisted sediment removal.

Comment 50-2

At the very least, the public comment period needs to be extended significantly.

Comment 50-3

All of my neighbors who attended meetings this fall expressed a great deal of frustration with them — particularly the DWP's refusal to permit actual discussion or questioning of the plans.

Comment 50-4

I am glad to see that the City of Pasadena is preparing to fight the county proposals.

The DWP needs to start over and work with the City of Pasadena and the Arroyo Seco Foundation to **develop long term, more effective and more natural ways to address the management of the Arroyo Seco watershed.**

Comment 50-5

Elizabeth Kotz  
1396 La Loma Road  
Pasadena CA 91105

## **Response to Comment Letter #50 (Elizabeth Kotz)**

### **Response to Comment 50-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's concern about the Proposed Project.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet the EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

### **Response to Comment 50-2:**

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cubic yards (cy) of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

The storms that occurred in the two wet seasons after the Station Fire increased sediment accumulation in the reservoir by approximately 1.3 million cy, reducing the available flood control capacity to less than one design debris event (DDE).

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two DDEs below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis. While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

FASTing, a passive method of transporting sediment downstream, is currently used when possible and as stated above, would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the ongoing Interim Measures Project (IMP), will not efficiently remove large amount of sediment. As discussed under Section 4.9, No Project Alternative, use of FASTing and IMP alone will not meet Proposed Project objectives.

#### **Response to Comment 50-3:**

The California Environmental Quality Act (CEQA) requires that the public comment period for a Draft EIR be at least 45 days (CEQA Guidelines § 21091). LACFCD extended this review period initially to 75 days and then further extended the review period to 90 days to allow for additional commenting time.

#### **Response to Comment 50-4:**

LACFCD held three community meetings to inform the public of the Proposed Project, Alternatives, and the results of the Draft EIR. The meetings included a presentation followed by a question and answer session, workshops where the public could ask specific questions about the project and potential impacts, and the ability to submit formal comments. Members of the public were able to ask questions or pose comments both in a group setting after the presentation or at the individual workshop stations.

#### **Response to Comment 50-5:**

LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the Hahamongna Watershed Park Master Plan (HWPMP). LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As

such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** [Jill Blaisdell](#)  
**To:** [reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov); [malexander@lcf.ca.gov](mailto:malexander@lcf.ca.gov); [ehitti@lcf.ca.gov](mailto:ehitti@lcf.ca.gov); [ezandvliet@lcf.ca.gov](mailto:ezandvliet@lcf.ca.gov)  
**Subject:** L.A. County Dept. Of Public Works, Reservoir Clean outs  
**Date:** Sunday, December 22, 2013 8:18:47 PM

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Attn. Water Resources Division  
P.P. Box 1460  
Alhambra Ca.  
91802-9974

Attn. Water Resource Board,

Comment 51-1

I am a resident and mother of school aged children living in La Canada, California. I have read in the local newspaper about the proposed Devil's Gate Dam Sediment Removal and Management Project. I am horrified at the scope of this project! How many children are going to have permanent respiratory ailments by the particulate your proposed project will put into the air they breath. The particulate I refer to comes from the sediment being removed and the particulate from the excessive number of trucks driving on our streets.

Comment 51-2

How do you propose to mitigate the traffic disruption to our community? These trucks will be spewing exhaust right next to our schools, athletic fields, and parks.

Comment 51-3

This proposed Public Works project will have great damaging impact on our community, and must be studied and mitigated before being implemented.  
Sincerely,  
Mrs. Blaisdell

**Response to Comment Letter #51 (Jill Blaisdell)**

**Response to Comment 51-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Air quality impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related impacts.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 51-2:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

See Response to Comment 51-2 regarding air quality impacts.

**Response to Comment 51-3:**

Potential impacts associated with the Proposed Project were analyzed in the Draft EIR. Where available, Mitigation Measures have been provided to reduce any significant impacts. Section 15021(d) of the CEQA Guidelines states: "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment." Prior to implementation of the Proposed Project, the County of Los Angeles Board of Supervisors must consider the EIR, must certify the EIR, and adopt the Findings of Fact, Mitigation Monitoring Program, and a Statement of Overriding Considerations.

**From:** [wendy.crowley](mailto:wendy.crowley)  
**To:** [reservoircleanouts](mailto:reservoircleanouts)  
**Subject:** Fwd: Devils Gate Reservoir Sediment Removal  
**Date:** Saturday, December 28, 2013 2:49:55 PM

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----- Forwarded message -----

From: **wendy crowley** <[bonapartemom@gmail.com](mailto:bonapartemom@gmail.com)>  
Date: Sat, Dec 28, 2013 at 2:41 PM  
Subject: Devils Gate Reservoir Sediment Removal  
To: [reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov)

Dear Sirs,

I am a resident of Pasadena would like to weigh in on your proposal:

1 The removal of the vegetation-trees etc will be harmful to the wildlife and their habitat.

2 The proposed number of trucks per day to be used for the sediment removal is unbelievable. You have done nothing for 20 years and I guess you want to play catch up.

3 The noise , pollution and freeway impact is unacceptable.

I hope you will go slow and remove the sediment over a 20 year period, leaving the Hahamonga Water Shed area as it stands for future generations of people and wildlife.

A concerned Citizen  
Wendy Crowley

**Response to Comment Letter #52 (Wendy Crowley)**

**Response to Comment 52-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 52-2:**

As noted in Section 2.2.1, Los Angeles County Flood Control District (LACFCD) History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity. Extending the project duration would limit the amount of sediment removed annually. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cubic yards (cy) of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

**Response to Comment 52-3:**

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. It was also determined that the increase in Proposed Project truck trips does not cause any major traffic impacts at the identified freeway segments. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 52-4:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in suggested plans, such as the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Andrew Binder](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, December 29, 2013 12:01:40 AM

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In regards to the Devil's Gate Reservoir Project,

I am opposed to the outcomes it would have to the Oak Grove Disc Golf Course. Not only is this course historical, it is loved by thousands of patrons and visitors that would be negatively affected by this project. Personally, I grew up playing at this course throughout my childhood. I have many of my fondest memories throughout the course and it would be devastating to lose a portion of it.

I am asking for the preservation of the land that is home to Oak Grove Disc Golf Course holes 13 and 14. This would roughly be described as minimally reducing the targeted area of sediment removal in the top third portion of the western border. It is important to maintain this small portion of land. Removal of this portion of land would be taking away a part of disc golf history. "Steady Ed" Headrick, the founder of the Professional Disc Golf Association, founded the first ever course in Oak Grove Park. Losing part of this course would be losing a portion of the sport.

Please reconsider the necessary portion of land that will be altered/removed in order to keep the early beginnings of the sport of Disc Golf in tact.

Sincerely,

Andrew Binder

Comment 53-1

**Response to Comment Letter #53 (Andrew Binder)**

**Response to Comment 53-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [denisinnott25@gmail.com](mailto:denisinnott25@gmail.com) on behalf of [Deni Sinnott](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamongna Public Comment Submission  
**Date:** Sunday, December 29, 2013 2:03:18 PM  
**Attachments:** [PAS Hahamongna letter.doc](#)

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Comment 54-1 | Below are my comments on the proposed sediment removal at Hahamongna Watershed. I have also attached the letter to this email. I look forward to hearing how the County addresses the public outcry against the project.

To whom it may concern:

Comment 54-2 | Hahamongna is the rare spot in the Arroyo Seco at the foot of the San Gabriel Mountains where the mountainous watershed meets the urban plain. Hahamongna contains five unique habitat zones that only exist in alluvial canyons near the mountains. Most sites like this in Southern California have been destroyed.

Comment 54-3 | I am writing to ask the County rethink their sediment removal plans in Hahamongna. What amazes me is that the County has done very little to address any of the sediment collection for many years and now have an “emergency” situation on their hands. It seems to me a slow approach to sediment removal is a more prudent solution that will serve the habitat and the neighboring community. Drastic removal of the riparian habitat will create new microclimates along the edges of the Arroyo, further threatening the surrounding ecosystem. Additionally, traffic from trucks, day in and day out, will disrupt the area with a new problem: noise and air pollution. Nature brought sediment down the Arroyo slowly and it can be removed slowly and methodically using sluicing instead of the current “landscape rape” in the plan.

Comment 54-4 | By permanently removing acres of habitat from the dam the impact to recreation will not be minimal, but catastrophic. The EIR incorrectly shows 50 bird species Hahamongna, when in fact 206 species have been documented by members of the Audubon Society. The plan will permanently destroy the habitat where the Least Bell's Vireo nested; this bird is on the endangered species list. Had the County done their homework this would have come to light in the EIR.

Comment 54-5 | The members of the Pasadena Audubon Society ask the County to rethink the current plan and move to a slower and less invasive solution removing sediment in a more natural manner that will protect the habitat and surrounding neighborhood. I hope you consider this in your plan as you move forward.

--

Deni Sinnott  
President  
Pasadena Audubon Society

**Response to Comment Letter #54 (Deni Sinnott – Pasadena Audubon Society)**

**Response to Comment 54-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The letter attached to the email included a copy of the same comments as below.

**Response to Comment 54-2:**

The types of habitats, including alluvial, found on the Proposed Project site are described in Section 3.6 of the Draft Environmental Impact Report (EIR). As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

**Response to Comment 54-3:**

As noted in Section 2.2.1, Los Angeles County Flood Control District (LACFCD) History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity. Extending the project duration would limit the amount of sediment removed annually. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cubic yards (cy) of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in plans such as the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project. As noted in the Draft EIR, Section 3.4, Aesthetics, the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for

and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**Response to Comment 54-4:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

The biological resources of the Proposed Project site are described in Section 3.6 of the Draft EIR. The bird species recorded during surveys conducted specifically for the Proposed Project are presented in the Biological Technical Report (BTR) in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records of occurrence were used as additional data; but since the California Natural Diversity Database (CNDDDB) is a positive-sighting database, this data was used only in support of the analysis from the previously identified factors. Based on the results of the BTR, additional

protocol-level focused surveys were conducted, including for least Bell's vireo. Table 3.6-3 in the Draft EIR includes least Bell's vireo as present within the Proposed Project site.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Bird species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 54-5:**

LACFCD notes the commenter's disapproval with the current plan and preference for a slower and less invasive solution. See Response to Comments 54-3 and 54-4.

**From:** [Walter Tatum](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [Wendy Sinnette](#)  
**Subject:** reservations about traffic, air quality, noise...  
**Date:** Monday, December 30, 2013 11:43:18 AM

---

Devil's Gate Sediment Removal Project

Sirs:

Being that the project is adjacent to the School District's largest campus, several of the issues that are easily identified include the impact to the health and safety of the students, the coming and going from school, and the learning environment.

Comment 55-1

The most obvious will be the increased truck traffic, intertwined with the traffic of both parents and students, at the beginning and end of the daily session. Also this is a joint use campus, generating an abundance of traffic after school hours and weekend. A majority of the traffic does flow south on Oak Grove to the freeway on ramps. The issue of hurried driver, both from the school and the construction site converging on the intersection and the freeway ramp speaks of an increase possibility that a sever mishap occurring.

Comment 55-2

Do to the proximity of the reservoir to the school campus, air quality concerns also arise as the amount of equipment for removal and transportation of the sediment impact the quality of the air. Besides vehicle emissions, dust and wind direction will play a significant role on the air quality for both students and athletes throughout the day and evening.

Comment 55-3

La Cañada High School is a high performance school. Teachers and staff share the concerned that the level of audible noise and the sub-audible vibrations will disturb a carefully orchestrated learning environment that has produced top API scores in the State.

Comment 55-4

Another concern deals with the impact on our routine and preventative maintenance programs at both the high school, the private school and the day care center which are all located at the site.

Regards,

Walter Tatum  
Maintenance and Operations Manager / La Cañada Unified School District  
1100 Foothill Blvd. La Cañada, CA 91011 / 818-952-8320

**Response to Comment Letter #55 (Walter Tatum – La Cañada Unified School District)**

**Response to Comment 55-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft Environmental Impact Report (EIR), Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to traffic conditions by the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 55-2:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 55-3:**

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a 1-decibel (dB) increase on Berkshire Place east of the Interstate 210 (I-210) northbound ramps. A 1-dB increase is well below the 3-dB increase threshold of perception and would therefore not be anticipated to disturb the learning environment. The roadway noise impact analysis provided in the Draft EIR found that the Proposed Project would result in less than significant impacts for all analyzed alternatives. The Draft EIR also analyzed the vibration impacts from the onsite equipment at the nearest sensitive receptors. The Draft EIR found that the Proposed Project would create less than significant vibration impacts with implementation of Mitigation Measure MM N-1.

**Response to Comment 55-4:**

LACFCD is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Project site.

1852 Monterey Road  
South Pasadena, CA 91030  
[barbara.eisenstein@gmail.com](mailto:barbara.eisenstein@gmail.com)

December 18, 2013

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

To Whom It May Concern:

I am strongly opposed to the Devil’s Gate sediment removal project as proposed by the LA County Department of Public Works. A slower, long-term plan to gradually decrease the amount of sediment built up in the dam would allow for the development of sustainable flood-control and water management practices. The accumulation of sediment, though exacerbated by the 2009 Station Fire, is the result of inadequate management of the Devil’s Gate Dam prior to the 2009 event. There is still enough capacity in the dam (17%) to move more deliberately to correct for this longstanding, inadequate maintenance. The existing project relies on early 20<sup>th</sup> Century engineering concepts that predominantly address flood control concerns with no consideration for the accompanying financial, environmental, and health burdens.

Comment  
56-1

Sediment accumulation in dams along the front-range of the San Gabriel Mountains is the result of an ongoing process - erosion of a steep, young mountain range - being managed with short-term thinking, deferred maintenance, and reliance on outdated engineering solutions. Rivers were channelized and dams, spreading grounds and sediment basins were built to accommodate rapid development in Southern California, with little concern for the long-term consequences of these massive construction projects.

The repercussions of this type of thinking have become only too clear, and the continued management of our environment and resources as practiced when the dams were built threatens the viability of our region. We have learned that natural forces may be controllable for relatively short periods, but ultimately the only workable solutions are those that are compatible with natural processes and take a long-term, holistic perspective.

Comment  
56-2

As such, plans to remove sediment using inefficient and polluting practices like trucking it away (“away” meaning not here, though room for dumping is finite and nearly exhausted) are truly baffling. This merely “kicks the can down the road” as the sediment keeps coming, habitat continues to decline, and resources are squandered with little concern about the continued release of greenhouse gases into the atmosphere.

Nevertheless, the need for flood protection and an adequate water supply cannot be denied. As such, it is critical to include the following considerations in plans to meet these important concerns.

Comment  
56-3

1. A long-term, holistic approach that takes into account flood risk, health of the watershed, diminishing resources, and impacts to habitat, wildlife and humans.
2. Proposals should make use of natural forces, such as sediment removal through sluicing, rather than going up against them.

Comment  
56-4

Comment  
56-5

3. The concept of "waste" is not applicable in sustainable systems. All materials and processes are resources and should be treated as such. Eroded materials that build up in the dams would normally be deposited along the rivers and at the beaches. Engineered solutions should incorporate the value of these materials.

Comment  
56-6

4. Rather than a continued record of degrading the land and resources we rely upon, acceptable proposals should have the long-term goal of solving the more immediate problems while improving the condition of the watershed for the future.

Comment  
56-7

Plowing ahead with an expensive "quick fix" that will disrupt and destroy functioning habitat needed by wildlife and humans for a healthy existence is not in the public interest. A slower, more deliberate and cautious approach could save money and resources while allowing time to develop innovative and effective ways to meet these challenges over the long-term.

Thank you,



Barbara Eisenstein

Founder and Volunteer

Friends of the Arroyo Seco - South Pasadena Woodlands and Wildlife Park

Cc: Supervisor Antonovich  
215 N. Marengo Ave., Suite 120  
Pasadena, CA 91101

## **Response to Comment Letter #56 (Barbara Eisenstein – Friends of the Arroyo Seco)**

### **Response to Comment 56-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

As noted in the Draft Environmental Impact Report (EIR), Section 2.2.1, LACFCD History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity. Extending the project duration would limit the amount of sediment removed annually. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cubic yards (cy) of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in suggested plans like Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

### **Response to Comment 56-2:**

See Response to Comment 56-1. As discussed in the Draft EIR in Proposed Project Description and Purpose and Need (see Section 2.0), Proposed Project objectives include reducing flood risk and

restoring reservoir capacity for flood control and future sediment inflow events. With the restored capacity, future regular maintenance, as discussed in Section 2.5.2 of the Draft EIR, is expected to prevent or significantly reduce the need for another large sediment removal project in the future. Per Section 3.9.6 of the Draft EIR, impacts to greenhouse gas emissions were found to be less than significant; and impacts to biological resources were found to be less than significant with mitigation incorporated as shown in Section 3.6.6 of the Draft EIR.

**Response to Comment 56-3:**

See Response to Comment 56-2. The Proposed Project is designed to be a long-term plan with the reservoir management phase providing management for future sediment inflows. After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 56-4:**

Sluicing was analyzed as part of the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

As discussed above, FASTing, a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 56-5:**

See Response to Comment 56-4. The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse

opportunities. The sediment removed from the reservoir will be transported to the sites listed in the Draft EIR in Section 2.0, Project Description.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.

**Response to Comment 56-6:**

See Response to Comments 56-1 and 56-3.

**Response to Comment 56-7:**

See Response to Comments 56-1 and 56-2.



CITY COUNCIL

Laura Olhasso, Mayor  
Michael Davitt, Mayor Pro Tem  
Jonathan C. Curtis  
David A. Spence  
Donald R. Voss

December 17, 2013

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

SUBJECT: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT  
DEIR PUBLIC COMMENT REVIEW PERIOD

To Whom It May Concern:

The City of La Cañada Flintridge requests that the public comment period on the Draft Environmental Impact Report (DEIR) for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT be extended beyond 75 days from the Notice of Availability on October 23, 2013. The voluminous report and numerous appendices coupled with the review period coinciding with four major holidays make it necessary to give involved agencies and its citizens additional time to read and fully understand the details of the project and its potential consequences to the surrounding community. It is not uncommon for larger projects with several alternatives and multiple affected jurisdictions to remain open for public comments for 90 to 120 days to allow for the responsible agency to show due diligence.

We ask that the County of Los Angeles immediately announce an extension to the review period. If you should have any questions or require additional information, please contact our Director of Public Works, Mr. Edward Hitti, P.E. at (818) 790-8882 or [ehitti@lcf.ca.gov](mailto:ehitti@lcf.ca.gov).

Sincerely,

Laura Olhasso  
Mayor

C: Supervisor Mike Antonovich  
Mr. Christopher Stone, P.E., Water Resources Division ✓  
City Council  
Mark R. Alexander, City Manager  
Edward Hitti, P.E, Director of Public Works  
Traffic Engineer

T:\Letters\Letter-LACDPW Devils Gate DEIR comment period.doc

Comment 57-1

**Response to Comment Letter #57 (City of La Cañada Flintridge)**

**Response to Comment 57-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Adequate time for public commenting was provided. The California Environmental Quality Act (CEQA) requires that the public comment period for a Draft EIR be at least 45 days (CEQA Guidelines § 21091). Los Angeles County Flood Control District (LACFCD) extended this review period initially to 75 days and then further extended the review period to 90 days to allow for additional commenting time.

**Wendy K. Sinnette**  
*Superintendent*

**Patricia S. Hager**  
*Associate Superintendent,  
Human Resources*

**Anais Wenn**  
*Assistant Superintendent,  
Curriculum & Instruction*

**La Cañada Unified School District**  
**...a learning community committed to personal growth  
and academic excellence**



December 20, 2013

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

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

To Whom It May Concern:

On December 17, 2013, the Governing Board of La Cañada Unified School District adopted Resolution 17-13-14 addressing the concerns related to the Draft Environmental Impact Report (DEIR) for the Devil's Gate Reservoir Sediment Removal and Maintenance Project.

A copy of the resolution is attached.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim Bergner".

Kim Bergner  
Executive Assistant to the Superintendent  
La Cañada Unified School District  
(818) 952-8381

**LA CAÑADA UNIFIED SCHOOL DISTRICT  
RESOLUTION 17-13-14 OF THE GOVERNING BOARD  
OF LA CAÑADA UNIFIED SCHOOL DISTRICT  
ADDRESSING THE DISTRICT'S CONCERNS RELATED  
TO THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)  
FOR THE DEVIL'S GATE RESERVOIR SEDIMENT  
REMOVAL AND MAINTENANCE PROJECT**

WHEREAS, the La Cañada Unified School District (LCUSD) is aware of a proposed project by Los Angeles County Flood Control District to remove between 2.4 million and 4.0 million cubic yards of sediment and debris from the Devil's Gate Reservoir over a five or more year time period; and

WHEREAS, the LCUSD Governing Board and District staff have reviewed the Draft Environmental Impact Report (DEIR) for the subject project including alternatives, and has held at a public meeting a discussion on the matter; and

WHEREAS, the LCUSD Governing Board has numerous concerns related to potential impacts within the city and specifically near La Cañada High School; and

WHEREAS, the LCUSD Governing Board and District staff places the health and safety of its students and families as one of its highest priorities; and

WHEREAS, the LCUSD Governing Board wishes to eliminate or minimize potential adverse environmental, health, and traffic congestion impacts to its students and families.

THEREFORE BE IT RESOLVED that the Governing Board of the La Cañada Unified School District hereby requests that the following comments and concerns be addressed by the Board of Supervisors of the County of Los Angeles before proceeding with the Devil's Gate Reservoir Sediment Removal and Maintenance Project (see DEIR for any specific references):

1. The DEIR determined that there are significant and unavoidable impacts to air quality even after mitigations requiring equipment to meet EPA 2007 standards. This is due to the nature of the debris removal by heavy construction equipment that generates excessive daily NOx emissions. Short and long term health effects due to silica dust, fugitive dust clouds, diesel fumes, carbon monoxide and other pollutants were not fully assessed in the DEIR and students should not be exposed to health risks in the school environment. Student health and safety will be adversely affected. Ensuring student health and safety is a LCUSD Board priority as well as a community and civic responsibility. The Board has determined that the DEIR and the proposed project do not adequately address the severe and adverse impact on the health of our students that would be caused by the project. Furthermore, the Governing Board requests that the County specifically address how the project will ensure the health and safety of our students.
2. The LCUSD Governing Board supports the exclusive use of Alternate Haul Routes 1B and 1F (exiting and entering I-210 at Windsor Place) during the entire hauling operation because school congestion would not be worsened, thus avoiding negative impacts to attendance and tardy rates while protecting the integrity of the instructional day and supporting student achievement.

Comment 58-6

3. Vehicle noise generated on haul routes near La Cañada High School will disrupt the learning environment and negatively impact student ability to concentrate and access curriculum.

Comment 58-7

4. Implementation of the County's current Preferred Haul Routes 1D and 1H (exiting I-210 at Windsor Avenue and entering I- 210 at Berkshire Place) with a proposed starting time of 7:00 a.m. will cause a significant traffic impact on La Canada High School. The LCUSD Governing Board opposes the use of Haul Routes 1D and 1H.

PASSED AND ADOPTED by the La Canada Unified School District Governing Board December 17, 2013 by the following vote:

AYES: 5

NOES: 0

ABSENT: 0



\_\_\_\_\_  
President of the Board of Education  
of the La Cañada Unified School District

**Response to Comment Letter #58 (La Cañada Unified School District)**

**Response to Comment 58-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

This letter is a duplicate of the letter sent by La Cañada Unified School District, with the exception of the cover letter (see Comment Letter #48).

Dec. 20, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

I have been the bookkeeper at Tom Sawyer Camps for 4 and a half years. I am impressed by how much Tom Sawyer cares for the general health of the arroyo. I know they sincerely want whatever is best for the area. Their lively hood is also affected, as is that of other groups that use the arroyo, and it would be a shame to do too much too soon for no good reason.

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on

Comment 59-1

Comment 59-2

Comment 59-3

Comment 59-3  
continued

↑ the program, the campers and the staff.

Comment 59-4

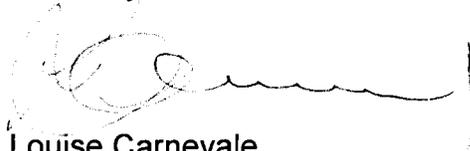
Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 59-5

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,



Louise Carnevale  
312 El Nido Avenue  
Monrovia, CA 91016  
loujocar@gmail.com

**Response to Comment Letter #59 (Louise Carnevale – Tom Sawyer Camps)**

**Response to Comment 59-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 59-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

The Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 59-3:**

See Response to Comment 59-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 59-4:**

See Response to Comment 59-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 59-5:**

See Response to Comment 59-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the Proposed Project site.

December 20, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

Comment 60-1

My name is Kathy Garcia and I have enjoyed Hahamongna Watershed Park and the Devil's Gate Dam area for 25 years as a staff member of Tom Sawyer Camps. Through my experiences at camp I have come to truly love the area from Devil's Gate Dam to all the up the Gabrileno Trail. One of my favorite things to do in the park is bird watch. I see birds in the park that I have not seen anywhere else. Both of my children attend Tom Sawyer Camps and they to have come to love exploring the natural area's that park and wash provide.

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 60-2

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day

Comment 60-3

Comment 60-3  
continued

camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 60-4

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 60-5

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,



Kathy Garcia  
3719 Maxson Rd  
El Monte, CA 91732  
626-794-1156  
kathy@tomsawycamps.com

**Response to Comment Letter #60 (Kathy Garcia – Tom Sawyer Camps)**

**Response to Comment 60-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 60-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

The Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

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**Response to Comment 60-3:**

See Response to Comment 60-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant

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**Response to Comment 60-4:**

See Response to Comment 60-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 60-5:**

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# TOM SAWYER CAMPS, INC.

707 W. Woodbury Road, Ste. F • Altadena, CA 91001  
(626) 794-1156 • [www.tomsawycamps.com](http://www.tomsawycamps.com)

December 17, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
[reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov)

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

Comment 61-1

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on our camp families and our business and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 61-2

Tom Sawyer Camps is our family business and has been in operation since 1926. We have been using Hahamongna Watershed Park as our campsite for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on our business as well as the children and families that have come to rely on our programs.

Comment 61-3

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride

Comment 61-4



*Tom Sawyer Camps creates lifelong memories by providing fun-filled days where children feel happy and safe.*



Comment 61-4  
continued

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Comment 61-5

We are a small business and our request could easily go unnoticed but we believe the impact we have on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing us the opportunity to share our concerns and needs. Please let us know if we can be of any assistance.

Sincerely,



Sarah Horner Fish  
Executive Director  
Tom Sawyer Camps  
sarah@tomsawycamps.com



**Response to Comment Letter #61 (Sarah Horner Fish – Tom Sawyer Camps)**

**Response to Comment 61-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 61-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

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**Response to Comment 61-3:**

See Response to Comment 61-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single

intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

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**Response to Comment 61-4:**

See Response to Comment 61-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 61-5:**

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# TOM SAWYER CAMPS, INC.

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December 17, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Comment 62-1

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

Comment 62-2

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on our camp families and our business and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 62-3

Tom Sawyer Camps is our family business and has been in operation since 1926. We have been using Hahamongna Watershed Park as our campsite for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on our business as well as the children and families that have come to rely on our programs.

Comment 62-4

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Comment 62-4  
continued

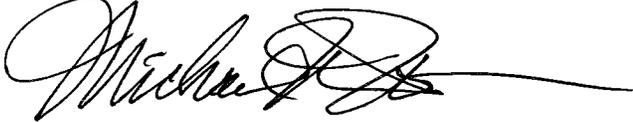
horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamonga is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge.

Comment 62-5

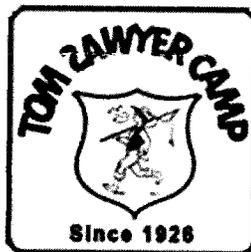
We are a small business and our request could easily go unnoticed but we believe the impact we have on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing us the opportunity to share our concerns and needs. Please let us know if we can be of any assistance.

Sincerely,



Michael Horner  
President  
Tom Sawyer Camps  
mike@tomsawycamps.com



**Response to Comment Letter #62 (Michael Horner – Tom Sawyer Camps)**

**Response to Comment 62-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 62-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

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**Response to Comment 62-3:**

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**Response to Comment 62-4:**

See Response to Comment 62-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 62-5:**

See Response to Comment 62-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

(12/20/13)

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

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Comment 63-1

My name is Eric Ikari and I have worked in the arroyo for the pas 15 years, I currently work for TSC. If it was not for companies Like Tom Sawyer I would never found what I was good at. Growing up in areas that did not have so much untouched nature I never had opportunities to feel what it was like to play outdoors. I went from playing out behind a target to hiking and exploring and being in nature. I met my wife at camp I have my kids running around there, most of my Family has worked down there at some part. If it not for places like this I may be a much different man Today.

Comment 63-2

While we support the sediment clean up in general, we are concerned about the impact as defined in the DEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 63-3

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Approximately 1250 of our campers and 150 staff use this site each summer,

which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,

Eric Ikari  
908 Bouquet Ct #F  
Azusa CA, 91702  
(626)794-1156  
Eric@tomsawycamps.com

**Response to Comment Letter #63 (Eric Ikari – Tom Sawyer Camps)**

**Response to Comment 63-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 63-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

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The Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, the LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 63-3:**

See Response to Comment 63-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 63-4:**

See Response to Comment 63-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 63-5:**

See Response to Comment 63-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

December 20, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Comment 64-1

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

My children have both attended Tom Sawyer Camps since they were three years old. I am currently a year round staff member and have been for the past 5 years and my husband also worked operations back in the early 1980's. Hahamongna is a very special place for our whole family and has been for many years.

Comment 64-2

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 64-3

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 64-4

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride

↑ horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

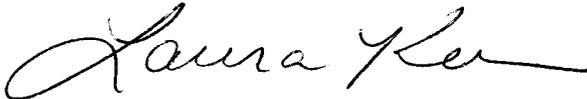
Comment 64-4  
continued

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Comment 64-5

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,



Laura Keen  
842 Ridge Drive  
Glendale, CA 91206  
(818) 244-5435  
laurakeen@sbcglobal.net

**Response to Comment Letter #64 (Laura Keen– Tom Sawyer Camps)**

**Response to Comment 64-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 64-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

The Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, the LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 64-3:**

See Response to Comment 64-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 64-4:**

See Response to Comment 64-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 64-5:**

See Response to Comment 64-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.



# TOM SAWYER CAMPS, INC.

707 W. Woodbury Road, Ste. F • Altadena, CA 91001  
(626) 794-1156 • www.tomsawycamps.com

December 20, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

I was a camper, counselor, director and am now co-owner of Tom Sawyer Camps along with my sister, Sarah Horner Fish and my parents, Mike and Sally Horner. My first summer as a camper was 1967.

While TSC supports the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 65-1

Comment 65-2

Comment 65-3



*Tom Sawyer Camps creates lifelong memories by providing fun-filled days where children feel happy and safe.*



Comment 65-4

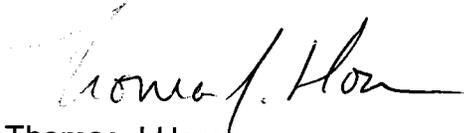
Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 65-5

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,



Thomas J Horner  
876 W Altadena Dr  
Altadena CA 91001  
626-296-4040  
tom@catalinaislandcamps.com

**Response to Comment Letter #65 (Thomas Horner – Tom Sawyer Camps)**

**Response to Comment 65-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 65-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

The Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, the LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 65-3:**

See Response to Comment 65-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 65-4:**

See Response to Comment 65-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 65-5:**

See Response to Comment 65-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [gaboon](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [Michael D. Antonovich](#); [Sussy Nemer](#); [Edel Vizcarra](#)  
**Subject:** Request for extension of comment period on Draft EIR for Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, December 31, 2013 12:34:35 PM

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Dear Department of Public Works Personnel--

Comment 66-1 | We hereby request an extension of the deadline for comments on the subject draft EIR. While we have reviewed some of the massive draft, appendices, and associated material, we have found the following:

Comment 66-2 | --There has been seriously inadequate posting of notifications and other public outreach to park users, local residents and other stakeholders;

Comment 66-3 | -- The comment period for the Draft EIR began and concludes during the holiday season which reduces input from the public and other important stakeholders;

Comment 66-4 | -- The Draft EIR is a massive document not easily read in the few libraries where hard copies exist and not easily downloaded by the public and others on home computer systems.

Comment 66-5 | -- A December 30 email from DPW notes that "...additional resources such as the overlays on the Hahamongna Watershed Park Master Plan have been posted" earlier in December, thus not being available until late in the comment period, even though this new information would appear to clarify some important aspects of the the environmental impact in a manner that is not clearly portrayed in the material originally released as part of the Draft EIR.

Comment 66-6 | On five different occasions in November and December, one of us walked extensively through the proposed project area asking other park users who happened to be there if they were aware of the proposed project, the Draft EIR, and the comment period. Nearly all indicated total surprise, being completely unaware of the proposed project, even though most were frequent visitors to the area. This, combined with the paucity of signage about the proposed project, plus the points made above, convince us that the level of notification does not meet the spirit of the California Environmental Quality Act (CEQA), and may not meet the letter of the law, either.

Comment 66-7 | We join the cities of Pasadena and La Canada Flintridge in requesting that the 6 January 2014 deadline for comments on the Draft EIR be extended. We also urge the DPW to improve public outreach and notification, especially within Hahamongna Watershed Park and to neighboring adversely impacted schools and residents.

We look forward to your reply.

Thank you,  
Robert L. Staehle  
Lori L. Paul

[gaboon@sbcglobal.net](mailto:gaboon@sbcglobal.net)  
626.798.3235

153 Jaxine Drive  
Altadena, California 91001 USA

**Response to Comment Letter #66 (Robert Staehle, Lori Paul)**

**Response to Comment 66-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The California Environmental Quality Act (CEQA) requires that the public comment period for a Draft Environmental Impact Report (EIR) be at least 45 days (CEQA Guidelines § 21091). The Los Angeles County Flood Control District (LACFCD) extended this review period initially to 75 days and then further extended the review period to 90 days to allow for additional commenting time.

**Response to Comment 66-2:**

Per CEQA Guidelines Section 21902 (b)(3), notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:

- publication in a newspaper of general circulation in the area affected by the Proposed Project
- posting of notice by the lead agency on and off site in the area where the Proposed Project is to be located
- direct mailing to the over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll

The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the Los Angeles County Department of Public Works (LACDPW) website

Therefore notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

**Response to Comment 66-3:**

See Response to Comment 66-1. The public commenting period began October 23, 2013, before the holiday season, and ended January 21, 2014, after the holiday season.

**Response to Comment 66-4:**

The document was made available at eight local libraries, the County Public Works headquarters, and online. In addition, CDs with the documents were made available upon request, and printed copies were made available for purchase at County Public Works headquarters for interested parties.

**Response to Comment 66-5:**

The information that was posted on the site was information already available to the public that was provided as a courtesy. Some of this information was referenced in the Draft EIR, so documents were made available on the website in case the public was interested. The Proposed Project and Alternatives boundaries are shown in the Draft EIR, Sections 2 and 4, respectively, and the Hahamongna Watershed Park Master Plan is described in Section 2.1.5. Overlays of the Proposed Project and Alternatives boundaries on the Hahamongna Watershed Park Master Plan were provided LACFCD's website as a quick reference for the public. No new information was posted on the website that was not already available to the public.

**Response to Comment 66-6:**

See Response to Comment 66-2.

**Response to Comment 66-7:**

See Response to Comments 66-1 through 66-5.

From: [Joan Probst](#)  
 To: [reservoircleanouts](#)  
 Subject: Devil's Gate Reservoir Sediment Removal & Management Project  
 Date: Tuesday, December 31, 2013 2:39:55 PM

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To Whom It May Concern:

I live near Ave 64 and Colorado and have boarded my horses for the past 17 years on Mountain view in Altadena. Nearly every day I ride my horse across Windsor St and down into the Hahamongna Watershed Park area. Sometimes we cross over the middle of the reservoir area to Rose Bowl Riders where I have been a member for 17 years also. Sometimes we take the trails along Flintridge stables and/or through the Park over to the trail that winds along to Cherry Canyon. We ride the road along the front of Rose Bowl Riders, the Frisbee Golf course and around throughout the area. On the opposite side, we ride the road along Johnson's Field and up to the damn to access the tunnel to the trails along the Rose Bowl and down to San Pasqual. Other days we ride down through the middle, under the JPL bridge and up the Arroyo as far as we can go, or up Brown Mountain.

Comment 67-1

During these rides I have enjoyed the sight of the Great Blue Herons that nest near the holding ponds, Red tailed and red shouldered hawks, bobcats, deer, woodpeckers, egrets, coyotes, once a mountain lion; and in the evening the bats and owls. I have seen bear tracks.

Comment 67-2

We enjoy an unusually promising and cooperative atmosphere of multi use trails unlike any other area - birders, daily walkers, dog walkers, weekend families and group hikers, campers, mountain bikers, and equestrians all share these beautiful peaceful spaces while coexisting with the flora and fauna.

Comment 67-3

The County's project for Devil's Gate sediment removal and management will impact the recreation in this area to be nearly nonexistent. the Draft Environmental Impact Report underestimates these impacts. The stated "less desirable" emissions, noise, dust, visual, and traffic impacts will make the area unusable for equestrians. There are no other alternatives for equestrians. Stabling facilities are limited. I am concerned about the health of all of the horses and people at Rose Bowl Riders, Flintridge Stable, Altadena Stables and all of the backyard horses in the impact zone.

Comment 67-4

There are days when it is too smoggy to exercise a person or a horse.

Comment 67-4  
continued

↑ How can the horses and people live in the dust and emissions as described in the DEIR, let alone exercise and play? There MUST be a way to mitigate the impacts on recreation in this area other than merely cease and desist!

Sincerely

Joan Probst  
PO Box 41504  
Los Angeles, CA 90041

323 855 0827

**Response to Comment Letter #67 (Joan Probst)**

**Response to Comment 67-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Los Angeles County Flood Control District (LACFCD) recognizes that this is an important area for equestrians, as noted in the Draft Environmental Impact Report (EIR), Section 3.15, Recreation/Public Services.

**Response to Comment 67-2:**

LACFCD recognizes that the area is an important area for recreation, as outlined in Section 3.15, Recreation/Public Services.

**Response to Comment 67-3:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Potential effects to horses stalled near the Proposed Project site would be similar to the construction-related impacts from emissions and noise associated with sediment removal to nearby residents and recreational users of Hahamongna Watershed Park. Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than

significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

Additionally, as noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 67-4:**

See Response to Comment 67-3.

Brendan Crill  
1800 Coolidge Ave  
Altadena CA 91001

December 31, 2013

**Regarding: Devil's Gate Reservoir Sediment Removal and Management Project**

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

Dear Sir or Madam:

Comment 68-1

I am a member of the community who lives and works close to Devil's Gate Dam and I am writing to comment on the Draft Environmental Impact Report (DEIR) on the sediment removal project at Devil's Gate Dam. I regularly (3 or 4 times per week) use Hahamongna park and the trails close to the dam for recreation; I enjoy running the trails and also greatly enjoy birding in the exquisite wildlife habitat. In particular the Least Bell's vireo is just barely maintaining a foothold in the area - having nested in 2012 but not in 2013.

Comment 68-2

I understand the need for removing the sediment from behind the dam to help protect us from future flood and debris flow events, and I accept that some vegetation removal must occur. However, my main concerns about the project are:

1. All of the options listed in the DEIR show removal of a huge portion of the willow-mulefat forest.
2. Most of the options call for a massive amount of truck traffic in the neighborhood for many years, if not permanently.

Comment 68-3

Comment 68-4

First of all, the willow-mulefat forest is what makes the wildlife habitat here so unique in the area. It is hard to overstate just how important it is to have this large area of lush riparian habitat in the very developed foothills of the San Gabriels.

I do not understand why the report doesn't consider more creative options that could provide both the removal of sediment and protection of more habitat. It seems that a clever re-engineering of the water and debris flow could actually take advantage of the presence of the forest. It's a well-known fact that mangrove forests protect tropical coasts from hurricane storm surges, and the same physics apply to a debris flow.

Comment 68-5

Another worry of mine is that the major truck traffic that will be created by the project is a big problem for the quality of life of us who live and work in the area. Air quality will certainly suffer, there will be noise pollution and increased traffic all the time. The different options don't seem to take this into account in a reasonable way.

For these two reasons, I ask that you consider other options than those presented in the DEIR. I am certain there is a solution that truly minimizes the habitat destruction and the local environmental impact while also meeting most of the goals of the project. The willow-mulefat forest near Devil's Gate dam is a unique resource and should be considered an essential part of the Arroyo Seco watershed.

Yours,

Brendan Crill

**Response to Comment Letter #68 (Brendan Crill)**

**Response to Comment 68-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The biological resources and recreational opportunities found at and around the Proposed Project site were documented in the Draft Environmental Impact Report (EIR), Section 3.6 Biological Resources and Section 3.15, Recreation/Public Services.

**Response to Comment 68-2:**

As discussed in Section 3.6.6 of the EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 68-3:**

The addition of truck traffic associated with sediment removal would occur for, at the most, over a five-year period. In addition, this truck traffic will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1 Sediment Removal Phase, Proposed Project Schedule. Truck traffic associated with the reservoir maintenance phase would be reduced in comparison to the sediment removal phase and would be limited to a few weeks per year.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 68-4:**

See Response to Comments 68-2.

The Draft EIR analyzes six alternatives, including the No Project Alternative. Of those, Alternative 3, Configuration D is considered to be the Environmentally Superior Alternative (see Section 4.6 of the Final EIR). As discussed above, Alternative 3 carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint.

**Response to Comment 68-5:**

See Response to Comment 68-3. Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

**Response to Comment 68-6:**

See Response to Comments 68-3 through 68-5.

December 23, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

Comment 69-1

I currently work for Tom Sawyer Camps as year-round, full time employee. I spend every working day of my summer at Hahamongna. This will be my 21<sup>st</sup> summer spending my days at Hahamongna with Tom Sawyer Camps. Additionally, as a local resident, my husband and I (along with our dog) run the loop nearly each morning of the year. We know the park well as it is our primary place to work rest and recreate.

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 69-2

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding

Comment 69-3

Comment 69-3  
continued

↑ the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 69-4

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 69-5

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,



Marah Lyvers  
2722 Mayfield Ave  
La Crescenta, CA 91214  
626-794-1156  
marah@tomsawycamps.com

**Response to Comment Letter #69 (Marah Lyvers – Tom Sawyer Camps)**

**Response to Comment 69-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 69-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

The Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 69-3:**

See Response to Comment 69-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single

intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 69-4:**

See Response to Comment 69-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 69-5:**

See Response to Comment 69-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Beatrix Schwarz](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils gate , hahamagna water shed  
**Date:** Tuesday, December 31, 2013 7:12:00 AM

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Comment 70-1

I am against the Devils gate project suggested by LA county. I support the approach the Arroyo secco foundation (Tim Bricks)suggests to to the project over 20 Years with only removing a small portion of the habitat at the time.

Comment 70-2

Reasons: the endangered bird bells vireo was found , and over 200 bird species,and other animals were found. Rosebowl riders, Tom Sayers camp and golf frisby are using the water shed for recreation. Traffic of 400 trucks a day causes a major harm to neighborhoods: pollution , traffic stress level.

Beatrix Schwarz

2644 Hermosa ave

Montrose, 91020

phone:

8182499676

e-mail: schwarzbeatrix2009@hotmail.com

## **Response to Comment Letter #70 (Beatrix Schwarz)**

### **Response to Comment 70-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

### **Response to Comment 70-2:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species, including sensitive bird species, currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

As discussed in the Draft EIR, Section 3.15, Recreation/Public Services, the Oak Grove Disc Golf Club, the Rose Bowl Riders, and the Tom Sawyer Camps are among the many groups that regularly use the Oak Grove area of Hahamongna Watershed Park. The Oak Grove area of Hahamongna Watershed Park and the associated facilities, including Oak Grove Disk Golf Course, will remain open during sediment removal and will continue to provide active recreational facilities to the area. Sediment removal activities will not limit the use of the Oak Grove area of Hahamongna Watershed Park by individuals or by organizations such as the Oak Grove Disc Golf Club, the Rose Bowl Riders, or the Tom Sawyer Camp.

Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Sylvia Stachura](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate  
**Date:** Monday, December 30, 2013 6:26:53 PM

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Comment 71-1

Please do not make a mistake like the Army Corps did in Sepulveda dam area and destroy the habitat a some of the world's few remaining birds by wiping out their habitat at Devil's Gate. There are more than one way to deal with that area. Please review them and find an acceptable alternative.

Thank you, Sylvia Stachura, resident of the San Gabriel Valley and environs.

**Response to Comment Letter #71 (Sylvia Stachura)**

**Response to Comment 71-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Bird species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**From:** [gfoster102@sbcglobal.net](mailto:gfoster102@sbcglobal.net)  
**To:** [reservoircleanouts](mailto:reservoircleanouts)  
**Cc:** [mlmorales@cityofpasadena.net](mailto:mlmorales@cityofpasadena.net); [FifthDistrict@lacbos.org](mailto:FifthDistrict@lacbos.org)  
**Subject:** Draft EIR Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Thursday, January 02, 2014 4:13:20 PM

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January 2, 2014

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

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

Comment 72-1

I attended the November 14, 2013 public meeting and was shocked to learn that the only alternative which had been analyzed in any detail was Configuration D for which disastrous impacts were simply discounted as "unavoidable". In spite of repeated questioning at this meeting, staff refused to discuss any less drastic alternatives. Table ES-1: Summary of Potential Significant Impacts consistently found no reason to pursue a less drastic plan, pretending instead that terrible impacts on the natural and human environments were unavoidable, or less than significant. The Draft EIR virtually ignored the Hahamonga Watershed Park Master Plan.

Comment 72-2

Configuration D should be abandoned and the County should start over in order to identify the least harmful alternative which would remove only the amount of sediment absolutely required and have the least impact on natural habitat and affected neighborhoods. Virtually no value was attributed to the valuable riparian habitat which would be destroyed or the impact from 425 daily trips by double dump trucks which would make the surrounding communities virtually uninhabitable to say nothing of the air pollution generated by this activity. No scientific rationale was offered for why this sediment must be removed and why it needs to be removed within a 5-year timeframe. At one point, a staff member commented that "the County has plenty of money for this project from the annual Flood Control Assessment on property tax". It appears that staff simply wants to spend these funds quickly and prefers huge capital projects to responsible annual maintenance programs.

Abandon the current plan and start over with a "least impact" approach developed in close collaboration with staff from the City of Pasadena, neighborhood organizations, the Arroyo Seco Foundation, the Sierra Club, the Audubon Society and other interested groups.

Sincerely,

Genette Foster  
1748 Monte Vista  
Pasadena CA 91106

cc: L.A. County Supervisor Antonovich

City of Pasadena District 2, Councilperson Margaret McAustin

## **Response to Comment Letter #72 (Genette Foster)**

### **Response to Comment 72-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Los Angeles County Flood Control District (LACFCD) analyzed six separate alternatives in detail, as discussed in Section 4.0 of the Draft Environmental Impact Report (EIR). Each alternative has a discussion on potential impacts. Alternative 3, Configuration D is the Environmentally Superior Alternative. Alternative 3, Configuration D, affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

As discussed in the Draft EIR, the Proposed Project and Alternatives, except for the No Project Alternative, comply with the Hahamongna Watershed Park Master Plan.

### **Response to Comment 72-2:**

See Response to Comment 72-1.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** [jptoland](#)  
**To:** [reservoircleanouts](#)  
**Subject:** "Devil's Gate Reservoir Sediment Removal and Management Project"  
**Date:** Thursday, January 02, 2014 1:09:41 PM

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To Whom it may concern;

Comment 73-1 | I am a 10 year resident homeowner in La Canada Flintridge and have been playing disc golf at Oak Grove Park "Hahamongna" since 1978. I have watched the City and county have their way with the Historical 1st ever disc golf course since it was set up. There are now over 5,000 courses world wide and Disc Golf is rising fast in popularity. This is like "The Old Course" in Scotland. If you don't play disc golf you would never know that it will someday soon become a mainstream sport. This course should be protected as it will be a historical piece of history for not only Los Angeles County but also for Pasadena and La Canada.

In looking at the proposed plans for the sediment removal I can only say that had the East Branch been maintained there would be no problem.

Comment 73-2 | It seems to me that taking the time to remove all of the proposed west branch area would only require more money while exposing more surface area to potential erosion. Why not just channel out the East Branch and make sure it is properly maintained.

If you make a west branch then you will have twice the maintenance and potential silt build -up.

It seems to me that this has not been well thought out.

Let the water dictate the path and help it to get down to the Dam.

Several holes were simply taken away from the course in the past and we are not ready to let that happen again.

Sincerely,

Jeffrey Toland

**Response to Comment Letter #73 (Jeffrey Toland)**

**Response to Comment 73-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, the LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, with a project footprint of approximately 71 acres, would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities will remain open during sediment removal and will continue to provide active recreational facilities to the area.

**Response to Comment 73-2:**

Alternative 3, Configuration D, Option 1, presents an opportunity for two channels: one that would be maintained yearly and another that would be allowed to adapt to the natural movement of the water flow.

The commenter's preference to excavate only the east branch of Alternative 3, Configuration D has been noted. As discussed above, Alternative 3, Configuration D, Option 2, would avoid excavation of the western branch.

**From:** [Julie Thurston](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir  
**Date:** Thursday, January 02, 2014 2:17:46 PM

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Dear Water Resources Division, Reservoir Clean Out Team,

Regarding the: Devil's Gate Reservoir Sediment Removal and Management Project, scheduled to remove 2.4 to 4 million cubic yards of sediment from the dam over a five-year period.

Please consider the following:

La Canada Unified school students will suffer adverse health effects and/or need to limit outdoor team sports. Imagine all four years of high school being a noisy, polluted environment. All decisions as to quantity of removal and hours of operation need to be carefully considered. My banner slogan would read, "Less is more, please."

Thank you for your consideration,

Julie Thurston  
LCHS Track & Field Coach, Resident, Business owner.

email: [jumpgirl12@gmail.com](mailto:jumpgirl12@gmail.com)

Comment 74-1

**Response to Comment Letter #74 (Julie Thurston – La Cañada High School)**

**Response to Comment 74-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. The Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant. Also as discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related impacts.

December 20, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

Comment 75-1

I have been a part of Tom Sawyer Camps for 11 years (6 as a camper and 5 as a counselor). This park is not only my job, but also my safe place. TSC is where I became who I am today and a major part of that process is the environment we are so fortunate to have. I work with the first grade girls and many of them have never been on a real hike before. I have the pleasure to experience this with them. Not only that, but by helping the push out of their comfort zones (many of them are nervous going down steep hills, etc), I earn a sense of trust that is crucial in our camper-counselor dynamic. Also, since Hahamonga is such a home to me, when camp is not in session, I take my boxer puppy running there every afternoon and play disc golf all the time.

Comment 75-2

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 75-3

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 75-4

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self-reliance and self-esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 75-5

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyfu! manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean-up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,

Katie Rayburn  
4819 Oakwood Avenue  
La Canada, CA 91011  
(818) 371-3751  
katherinerayburn@gmail.com

**Response to Comment Letter #75 (Katie Rayburn – Tom Sawyer Camps)**

**Response to Comment 75-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 75-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

The Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 75-3:**

See Response to Comment 75-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 75-4:**

See Response to Comment 75-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 75-5:**

See Response to Comment 75-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Louisa Van Leer](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [scott@arroyoseco.org](mailto:scott@arroyoseco.org)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Thursday, January 02, 2014 2:37:55 PM

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Jan. 2, 2014

To: Gail Farber, Director  
Los Angeles County Department of Public Works  
Attn: Water Resources Division - Reservoir Cleanouts

Dear Ms. Farber,

Please record my email as a response to the EIR prepared for Devil's Gate Reservoir Sediment Removal and Management Project (public comment period ending Jan 6, 2014). In planning and scheduling the sediment removal from the Devil's Gate Reservoir, I strongly advocate for alternate approaches not contained in the EIR. The Hahamonga Watershed Park, it's wildlife and habitat would be unnecessarily destroyed by the sediment removal project as proposed in the EIR. Please consider implementing the recommendations proposed by the Arroyo Seco Foundation to go SLOW with the sediment removal in order to conserve habitat. The SLOW Approach has merit and is a reasonable compromise to address all parties legitimate concerns about cost, schedule, safety and habitat.

Sincerely,

Louisa Van Leer, Architect  
Highland Park Heritage Trust, Board Member  
6113 Piedmont Avenue  
Los Angeles, CA 90042  
323-633-0497

Comment 76-1

## Response to Comment Letter #76 (Louisa Van Leer – Highland Park Heritage Trust)

### Response to Comment 76-1:

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2, drastically reduces the project's footprint from 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

Marnie Gaede  
5218 Donna Maria Lane  
La Canada, CA 91011

Gail Farber, Director  
County of Los Angeles Department of Public Works  
Water Resource Division  
Attention: Reservoir Cleanouts Program  
P.O. Box 1460  
Alhambra, California 91802-1460  
CC: Mark Petrella  
CC: Keith Lilley

January 1, 2014

Comments on Devil's Gate DEIR

**General Comment:**

The DEIR is inadequate because of the following reasons: it failed to document and address the flood threat, it failed to consider environmentally responsible alternatives, it failed to address air quality and noise impacts on the neighboring community, and it failed to document the potential wildlife habitat destruction and incorporate measures that would reduce those impacts.

Comment 77-1

The goal of the Devil's Gate Sediment removal project, removal of sediment, is not balanced by the concerns of stakeholders and environmental impact. The public is expected to accept the fact that there will be no way to mitigate a 100% certainty of aesthetic, traffic and air quality pollution. The stakeholders are expected to accept a weak argument that there is some unknown probability of a flood that will damage named and unnamed areas below Devil's Gate Dam.

**My first question to this proposal is what is the probability that such flooding will occur and what is the scientific evidence that it will occur?** There is no such data in the DEIR.

Comment 77-2

**The Project:**

The initial project, before the DEIR, was 1.67 million cubic yards. The current proposed project is 2.95 million cubic yards, almost double. None of the alternatives under consideration reflect the lower, original estimate.

**Why was the project expanded?**

**Does it have something to do with doubling the DDE to two 50-year events?**

Comment 77-3

In the grant application entitled Devil's Gate and Eaton Stormwater Flood Management Project, a component of which is the removal of sediment from behind Devils Gate dam, described in the application as follows:

**"To restore reservoir capacity to address the post-Station Fire sediment impacts at Devils Gate Dam, the Devil's Gate Reservoir Sediment Removal and Management Project will remove an estimated 2,000,000 cubic yards of sediment from the reservoir."**

Comment 77-3 continued  
The reason for the urgency of this project has been pinned on the Station Fire. It is difficult to believe that the same conditions that created the Station Fire, decades of fuel build up and record hot, dry temperatures could be repeated in the next 3-5 decades, and certainly not in the 5-year duration of this project. There is no way such fuel could build up in five years, especially with the current, persistent drought. The estimate for Station Fire sediment is 900,000 cubic yards.

Comment 77-4  
**Why is the County determined to limit sediment removal to five years when the urgency has not been defined? It took 93 years for 3-4 million cubic yards to be deposited, so why is it necessary to remove that amount in just 5 years? Why can't the sediment be removed over 20 to 25 years without all the damaging impact to the stakeholders and the habitat?**

Comment 77-5  
Looking at the inundation maps provided by the DEIR, the Rose Bowl is not considered vulnerable to flooding. **Why is the Rose Bowl included in the dialog by the county at the meetings for the public?** I believe that reference of flooding the Rose Bowl, along with the 110 Freeway flooding, are scare tactics. Areas that may be vulnerable to flooding are in the flood plain. **Why isn't there a specific, mathematical and scientifically generated risk assessment for downstream flooding?**

Comment 77-6  
None of the 5 alternatives answer the question of urgency. The so-called "emergency" was created for the expediency of this project. There is also no mention that the DPW has failed to conduct ongoing maintenance in recent decades, compounding the current problem.

Comment 77-7  
I attended the hearings presented by the Los Angeles County Department of Public Works DPW, aka LA County Flood Control District (LACFCD) in Altadena and La Canada. In both presentations the public was told there would be no way to mitigate the diesel pollution, the noise, the aesthetic damage, the traffic and the ecological destruction to the project area.

Comment 77-8  
The stakeholders include, but are not limited to 10 schools, residences, stables, camps, JPL, hikers, bikers, family recreation, commuters, biology field camps, and wildlife. They are being asked to accommodate diesel pollution that is a known carcinogen and can cause heart & lung disease, traffic congestion, noise, and habitat destruction.

**Why weren't the stakeholders adequately notified?** I personally contacted each of the schools in La Canada, their principals and boards, and was repeatedly told they hadn't been notified and that my letter was their official notice. Every stakeholder expressed dismay that they had little to no time to investigate the DEIR, seek advice or adequately respond to the DEIR.

## Air Pollution

Diesel pollution contains more than 40 toxic air contaminants. These include many known or suspected cancer-causing substances such as benzene, arsenic and formaldehyde. It also contains other harmful pollutants, including nitrogen oxides (a component of urban smog). The American Lung Association states, "Those spending time on or near roads and freeways, truck loading and unloading operations, operating diesel-powered machinery or working near diesel equipment face exposure to higher levels of diesel exhaust and face higher health risks."

Comment 77-9

The proposal states that it will encourage contractors to abide by EPA 2008 standards for trucks. It doesn't say it will, nor does it say it will strive to keep up with changing standards.

The EPA is currently studying "Near-Road Exposures to Urban Air Pollution" (NEXUS) to measure the impact of diesel burning trucks on children, the elderly and at-risk population. The results will be available for Federal, State and local governments to make better public health decisions for stakeholders near heavy truck traffic areas.

Comment 77-10

This project is a good example of heavy truck traffic: 425 tandem disposal trucks (with a 16-20 yard squared) a day, along with four front loaders, 2 D-8 dozers, an excavator, a grader, a water truck, a sorters/crushers and employee trucks. **Is the excavating equipment on the site going to run all night preparing for hauling the next day?**

Comment 77-11

**My question is if the EPA changes standards during the duration of the project, and determines a specific net reduction in diesel pollution, will the county comply or will it stick to the 2008 specifications?** The California Air Resource Board Diesel Reduction plan, when fully implemented will result in a 75 percent reduction in particle emissions from diesel equipment by 2010 (compared to 2000 levels), and an 85 percent reduction by 2020. **Do the standards referenced the DEIR reflect this trend?** I don't believe they do.

Comment 77-12

Also, the graphs and statistics included in the DEIR Appendix B Air Quality Report state that the pollution from the project would not be above a designated threshold. **Does this threshold take into account that the 10 schools and diverse recreational activities are already impacted because they are adjacent to the 210 Freeway? Do the figures presented include the existent pollution? Do they take into account that the geographical characteristics of the project site and surrounding neighborhoods include a narrow valley surrounded by slopes and hillsides, a condition that tends to trap pollution from the project and the freeway? Do the figures combine on-site excavation pollution, the possibility of night pollution, the hauling and idling pollution, and the 210-Freeway pollution?**

**What limitation will there be on idling, as in when the trucks are waiting in line to be loaded, or entering and exiting the project site? Idling trucks emit the diesel pollutants, and if several trucks are idling, there will be more pollution. What happens if there is an accident on the Freeway or the access roads and this extensive truck traffic gets backed up?**

Comment 77-13

On a personal note, if my son, who had chronic asthma as a child, had been adjacent to this project, he would have had persistent health problems and would have been unable to attend La Canada High School, Hillside School, Tom Sawyer Camp, or hike in Hahamongna Watershed Park. As a concerned citizen, it would be unconscionable for me to recommend a project that would harm youth, elderly and at-risk population.

Comment 77-14

### **Traffic**

Appendix J describes the impact of traffic. Approximately 50 double trucks per hour will haul and estimated 7.6 thousand cubic yards a day. There is no way to mitigate the impact of this truck traffic. It will create major impacts to the adjacent schools, especially La Canada High School and Hillside, as well as impact JPL, the residences along the route, and the 210 Freeway traffic.

Comment 77-15

During the La Canada City Council meeting, there was a determination on behalf of the city council members that this impact, especially on Berkshire, was unacceptable. During the Altadena presentation, citizens of Altadena and the adjacent schools that will be impacted from truck travel on Windsor also found the impact as unacceptable.

**How will the County DPW resolve the fact that La Canada and Altadena will be impacted by the traffic from over 420 trucks per day want the other city to bear the brunt of this imposition?**

Comment 77-16

All 10 schools in the area will have traffic in the morning and the afternoon. JPL has a work schedule that will also be impacted. **Is there a plan for when there is an accident or an impediment for traffic to move? Will truck idle while waiting to move? How much diesel pollution could this cause?**

Comment 77-17

### **Noise**

In Appendix I there is a restatement of the project's purpose:  
The Los Angeles County Flood Control District (LACFCD) must remove sediment that has accumulated behind the dam in order to restore the flood control capacity of Devil's Gate Reservoir and minimize the level of flood risk to downstream communities along the Arroyo Seco. In its current condition, the reservoir no longer has the available capacity to safely contain another major debris event; and the outlet works have a risk of becoming clogged and inoperable.

Comment 77-18

Again, just for emphasis, the risk described is not quantified, while the pollution, traffic and noise are a certainty.

The Federal Transit Administration regulates noise. Local administration is concerned with regulations of nuisance abatement ordinances and land use planning. **Will the LACFCD comply with the Pasadena and La Canada noise and dust ordinances? Are the noise standards depicted in this Appendix project specific? Does the county combine the on-site noise of dozer and crusher activity with the movement of trucks and the adjacent noise of the freeway?**

The length of this project as depicted will doom a succession of school children and residents to constant, distracting noise. The DPW admits that there is no way to mitigate the noise factor.

**Economic Gain or Conflict with Project**  
**Why are there crushers in this project? Is the sediment going to be sold? Are the taxpayers paying for a project that includes economic benefits? If so, who benefits?**

A grant for 28 million from the state has allegedly been approved for flood control work in Hahamongna by the Department of Power and Water. A substantial portion of this involves constructing a pipeline from Hahamongna across Altadena to divert water to the Eaton Canyon spreading grounds. **What connection does the pipeline that moves water from Hahamongna Watershed to Eaton Canyon have to do with the time line in this project? Who benefits from this transfer of water? Has there been an EIR for this project? How will it affect water rights in the Raymond Basin?**

There are several possible conflicts with the county's proposal. **How does this project work with the 710 Freeway Extension? How does it work with the JPL Superfund cleanup of perchlorates? What impact will moving water from Hahamongna to Eaton Canyon have on this cleanup? Where will people go for recreation if the Rose Bowl is modernized during this five-year project? All of these projects are related projects and should have been evaluated by the DEIR. Why are they not included in the DEIR analysis?**

**Is it true that the California Regional Water Quality Board denied a permit for a similar, but smaller project in March of 2011? Does this proposed project have a permit from the California Regional Water quality Board?**

### **Environmental/Habitat Concerns**

The 120 acres in the proposed project represent a wildlife corridor, prime riparian habitat, breeding habitat for diverse bird, reptile and mammal species. Appendix D, the Biological Report, includes a biological survey along with impacts from the project are included. There are 27 species of birds, eight mammal species and several reptile and amphibian species. Some species are state and federally listed as endangered or species of concern. Included in this list are the Least Bell's Vireo, Coast Range Newt, Southwestern Pond Turtle, Two-Striped Garter Snake, and the Yellow Warbler and they have all been identified as part of the proposed site

↑ habitat. Although there is ample documentation of the Least Bell's Vireo, the survey did not observe this species during the brief and inadequate time period that the survey took place.

Comment 77-25  
continued

The scorched earth policy of this project will destroy 120 acres of this habitat, along with known nesting sites, territories, breeding grounds, and prime migratory habitat. The mitigation proposed in this report does not take into account that the displacement of wildlife can't be recovered at the level of disturbance proposed or when the annual required maintenance is factored in. Furthermore, the analysis of biological impact is based upon removal of 1.67 million cubic yards (Appendix D, Project Description 1.2. page 6) rather than the much larger alternatives contained in this DEIR.

↑ **If the project had been doubled from the 1.67 million cubic yards to nearly 4 million cubic yards, then why doesn't the Biology Report reflect twice the impact? If habitat destruction is doubled, how do any of the mitigations proposed remain effective, especially with the areas designated for constant maintenance?**

Comment 77-26

If the project could be changed to a slower project that didn't scrape away the trees and wildlife habitat, the impact on wildlife would be greatly reduced.

↑ **Does the DPW believe that mitigation of this impact is possible?**

### **The Big Picture**

↑ Los Angeles has been moving towards a different approach the LA River, beach sediment, riparian habitat, and restoration of natural systems. Mayor Garcetti advocates tearing up the concrete and restoring the river to a more natural state. Currently the Army Corps of Engineers is supporting a river restoration plan that costs under \$500 million, but the Mayor wants a more comprehensive plan. Friends of the LA River is a non-profit organization founded in 1986 to protect and restore the natural and historic heritage of the Los Angeles River and its riparian habitat through inclusive planning, education, and wise stewardship. **Are DPW projects endeavoring to protect and restore the natural heritage with inclusive planning, education and wise stewardship?**

Comment 77-27

↑ The Devil's Gate Reservoir Sediment Removal and Management Project is one of four DPW projects that include Big Tujunga, Cogswell, Morris, and Pacoima. These plans are focused on sediment removal, not flood control and not habitat restoration. They are one-dimensional, old-thinking plans that do not integrate water resources, wildlife habitat, and recreational opportunities. With their near-exclusive reliance on sediment trucking, they do not even adequately address flood protection, the primary charge of LACFCD.

Comment 77-28

Flood protection is not adequately addressed due to a lack of statistical and practical data that can quantify a risk of flooding. Flood control is a tool for scare tactics and to justify an antiquated proposal model.

**How does the DPW justify a project that is not in step with the preferred trend of natural restoration?**

A more sustainable, responsible and forward thinking plan would recognize that sediment removal should not be the focus. Sediment should be removed, but not in the manner or amount proposed.

**Would the DPW consider a slower project that steadily removes sediment over twenty years?** Twenty years would be a more reasonable time line for removing sediment from Devil's Gate and all the other areas under the Sediment Removal Project. It has taken almost 100 years to build up. Instead of 800,000 to 1.2 million cubic yards a year as in the DPW proposal, a more reasonable plan would be to remove 167,000 cubic yards each year for ten years, and after that remove the base amount of inflow into the basin. This slow, ongoing program would illuminate most, if not all of the stakeholder and environmental concerns. It would also better represent ecological, long-rang plans for restoration of Los Angeles River and drainage systems. In a slower, more sustainable approach there would be less traffic, pollution, dust, noise and habitat destruction.

**Would the DPW consider a more natural, slow process of moving sediment?** Sluicing, or flow assisted sediment transfer (FAST) has been the main method of sediment maintenance. A slow sediment removal program allows more periods of critical flushing flows needed to move sediment. Allowing FAST instead of the proposed sediment removal project will also lesson the impacts of traffic, noise, pollution and habitat destruction. It maintains rather than destroys habitat.

**Would the DPW consider far less habitat destruction for sediment removal?** There is no need for permanent large-scale removal of habitat, and no need to have specific, large-scale maintenance areas that are denuded of wildlife riparian habitat. The cost of this project could be as high as \$100 million for Devil's Gate and \$3-4 billion for the entire county sediment program. This money will be spent trucking sediment from one part of the basin to another, with all the impacts of diesel pollution, traffic and noise.

**Has this slower, more cost-effective program ever been considered?** It is, by far, the most favored among those that have become engaged with this misguided, poorly conceived DPW Sediment Removal Project.

It is my hope that DPW will reconsider this massive project and provide the stakeholders and wildlife with a reasonable alternative that takes twenty not five years, has less impact of traffic, pollution, noise and habitat destruction, and is not as costly. There also needs to be a more scientifically driven evaluation of how much sediment should be removed and how much urgency there is to remove it.

Comment 77-34  
continued

↑ The DPW also needs to apply at least the most current EPA standards for diesel pollution, and needs to also apply a progressive compliance during the course of the project.

↓ **Would this be possible?**

## **Response to Comment Letter #77 (Marnie Gaede)**

### **Response to Comment 77-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

As discussed in the Draft EIR, Section 2.3, 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. Since the dam was built, several periods have occurred in which a large amount of sediment was deposited in the reservoir in a short time frame. Approximately 1.3 million cubic yards (cy) of sediment came into the reservoir in just two storm seasons after the 2009 Station Fire. If the reservoir is left in its current state, the flood risk to downstream communities would be left at an unacceptable level.

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, "[a]n EIR is not required to consider alternatives which are infeasible" (CEQA Guidelines Section 15126.6(a)) or "which could change the fundamental nature of the proposed project." (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.* (1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project's

significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency (1991)* 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council (1991)* 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. Alternative 3 was determined to be the Environmentally Superior Alternative in the Draft EIR. Alternative 3, Configuration D, Option 2, drastically reduces the project's footprint from 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project. Other alternatives were not carried forward as they did not minimize impacts in relation to the Proposed Project and/or did not meet Proposed Project objectives.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Habitat loss was analyzed in the Draft EIR, Section 3.6, Biological Resources. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Additionally, as noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities. Also as discussed in Draft EIR, Section 4.9.1, under Alternative 6, the No Project Alternative, aesthetic resources of the reservoir will likely degrade due to continuous sediment deposition.

**Response to Comment 77-2:**

For LACFCD facilities, including major open channels, dams, and debris basins, the “Capital Flood” level of protection applies and has been analyzed for those facilities. The Capital Flood is the runoff produced by a 50-year frequency design storm falling on a burned (for undeveloped area), saturated watershed. A 50-year frequency design storm has a probability of 1 in 50 (2 percent) of being equaled or exceeded in any year. The Capital Flood inflow to Devil’s Gate Dam is 13,969 cubic feet per second (cfs). The method for calculating the Capital Flood is described in the County of Los Angeles Department of Public Works Hydrology Manual (January 2006) which is available online at the link listed above.

**Response to Comment 77-3:**

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cy was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to the CEQA. This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil’s Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil’s Gate Sediment Removal and Management Project.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, and between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil’s Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of the LACFCD’s responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur.

**Response to Comment 77-4:**

As discussed above, historically, several periods have occurred in which large amounts of sediment were deposited in the reservoir over a short time period. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir, and approximately 8.0 million cy was removed by LACFCD.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 77-5:**

Constructed in 1920, Devil's Gate Dam was the first dam built by the LACFCD. The dam allowed for the channelization of and development along the Arroyo Seco. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway, also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam. Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. During a single design event sized storm, the Rose Bowl is not expected to be impacted by flows from the dam; however, if sediment from each storm event is not removed from the downstream floodplain, each subsequent storm would increase the flood risk. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website.

Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and Caltrans to execute any necessary evacuations or freeway closures.

**Response to Comment 77-6:**

See Response to Comments 77-1 through 77-5, above. As discussed in the Draft EIR, Section 2.3, Project Need, 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. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As noted in Section 2.2.1, LACFCD History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity.

**Response to Comment 77-7:**

See Response to Comment 77-1, regarding air quality, noise, aesthetic, traffic, and biological resources impacts.

**Response to Comment 77-8:**

See Response to Comment 77-1, regarding air quality, traffic, noise, and habitat impacts. In addition, as discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related impacts.

Per CEQA Guidelines Section 21902 (b)(3), notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:

- publication in a newspaper of general circulation in the area affected by the Proposed Project

- posting of notice by the lead agency on and off site in the area where the Proposed Project is to be located
- direct mailing to the over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll

The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the LACDPW website

Therefore notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

**Response to Comment 77-9:**

See Response to Comment 77-1. As discussed above, the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. The haul trucks will be subject to the On-Road Heavy-Duty Vehicles (In-Use) Regulations which require diesel trucks that operate in California to be upgraded to reduce emissions. The air quality analysis purposely used the older standards to estimate emissions from on-road trucks to achieve a worst-case scenario. As fleets become cleaner through regulations and attrition, impacts will decrease.

**Response to Comment 77-10:**

As described in the Draft EIR, Section 2.5.1 Sediment Removal Phase, Proposed Project Schedule, the maximum hours of operation of equipment are as follows: Monday through Friday between the hours of 7:00 a.m. and 6:00 p.m. Standard Time and between 7:00 a.m. and 7:00 p.m. Daylight Savings Time and on Saturday between 8:00 a.m. and 5:00 p.m. The excavating equipment would not run outside these hours.

**Response to Comment 77-11:**

See Response to Comments 77-1 and 77-9.

**Response to Comment 77-12:**

The purpose of CEQA is to analyze the impacts that a project contributes to the existing environment, which is adequately addressed in the Draft EIR. As discussed in the Draft EIR, Section 3.5, Air Quality, the air quality analysis takes into account the existing air quality environmental conditions, the location of nearby populations considered sensitive to air pollution, and discusses the consequences to air quality related to implementation of all Proposed Project activities. Also as discussed in Section 3.5, SCAQMD air quality standards were set to protect the health of sensitive individuals (i.e., elderly, children, and the sick). In developing the locally significant thresholds (LST) methodology, SCAQMD used meteorological data from sites throughout the basin to develop area specific LSTs for 37 different Source Receptor Areas (SRAs). Meteorological data included hourly winds, temperature, atmospheric stability, and mixing heights. See Response to Comments 77-1 and 77-9 regarding air quality. See Response to Comment 77-10 regarding project hours. The excavating equipment would not run outside these hours.

**Response to Comment 77-13:**

During the sediment removal phase, excavators will be loading sediment into trucks for offsite disposal. All of the trucks will be loaded within the reservoir; and if a queue of trucks develops, the trucks will stage within the reservoir itself to lessen impacts on the adjacent streets. Long queuing and idling times will not occur during the Proposed Project. It is estimated that trucks will briefly idle during loading, but the average loading time per truck is estimated to be one minute. In addition, LACFCD typically requires equipment to shut down if idling time is expected to be more than five minutes. Estimated project idling times were included in the air quality analysis and health risk assessment for the Draft EIR, Section 3.5, and Appendices B and C.

While the majority of the sediment disposal and associated truck traffic is expected to go to the disposal sites east of the Proposed Project, the Draft EIR also analyzed the use of disposal sites west of the Proposed Project. This will allow for flexibility in case one particular route is temporarily unusable.

**Response to Comment 77-14:**

See Response to Comments 77-1, 77-8, and 77-12.

**Response to Comment 77-15:**

See Response to Comment 77-1.

**Response to Comment 77-16:**

See Response to Comment 77-1.

**Response to Comment 77-17:**

See Response to Comments 77-1 and 77-13.

**Response to Comment 77-18:**

See Response to Comments 77-1 and 77-2.

**Response to Comment 77-19:**

As detailed in the Draft EIR, Section 3.14 Noise and Vibration, and Appendix I, Noise Impact Analysis, the Proposed Project would be required to comply with all applicable noise and dust ordinances, including the Cities of Pasadena and La Cañada Flintridge Noise Ordinances. The noise standards in the Draft EIR Appendix I, Noise Impact Analysis, are city-specific, not project-specific; however, as detailed above, the Proposed Project would be required to comply with all applicable noise standards. The Draft EIR analyzed the onsite sources of noise separately from the offsite roadway noise since onsite noise sources are controlled by the applicable noise ordinances, while noise from public roadways is exempt from local noise ordinances; however, it may be controlled through land use planning. The offsite roadway noise impacts were analyzed in context of the existing noise environment.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with SCAQMD's fugitive dust regulations.

**Response to Comment 77-20:**

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a 1-decibel (dB) increase on Berkshire Place east of the Interstate 210 (I-210) northbound ramps. A 1-dB increase is well below the 3-dB increase threshold of perception and would therefore not be anticipated to disturb the learning environment. The roadway noise impact analysis provided in the Draft EIR found that the Proposed Project would result in less than significant impacts for all analyzed alternatives.

**Response to Comment 77-21:**

Due to fine gradation or particle size of the majority of sediment that entered the reservoir since the Station Fire, crushers are not expected to be used with frequency during the project; however, crushers have been included in the air quality analysis in the Draft EIR in the event that they are needed to break down larger sized rocks for transport.

The material has a very fine gradation or consistency and, therefore, is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment will be transported to the sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

**Response to Comment 77-22:**

See Response to Comment 77-3. The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

**Response to Comment 77-23:**

The Draft EIR contained a cumulative impact analysis within each of the subsections of Section 3.0 Environmental Analysis. The cumulative analysis contains projects as determined by LACFCD and the surrounding cities and communities to have a potential cumulative effect due to overlapping time frames of the projects. Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130.

The JPL Groundwater Cleanup Project is an ongoing project and considered to be part of existing conditions. As discussed in the Draft EIR, Section 3.10, no significant impacts associated with the Proposed Project due to the inclusion of the Hahamongna Watershed Park area on the NPL Superfund List are expected, as the contamination is found in the local groundwater table, not in the sediment.

The temporary use of the Rose Bowl by a National Football League (NFL) team was analyzed as a cumulative project in the Draft EIR, as noted in Section 2.9 Cumulative Scenario, and in the Traffic Study, as noted in Section 4 Project Conditions-Year 2014, Project Trip Growth.

The Interstate 710 (I-710) project was not included in the Draft EIR as a cumulative project, as it was determined to be outside the area of influence. A cumulative growth factor was used in the Traffic Study that accounted for future traffic growth and its cumulative effects. The Devil's Gate Reservoir Sediment Removal and Management Project sediment removal phase is scheduled to be completed by 2020, prior to the initiation of the I-710 tunnel project. At this time the I-710 Extension/Tunnel project is in the preliminary phases, and a project schedule has not been established (Caltrans 2010). The growth factor considered in the analysis provided a conservative project condition volume that accounts for expansion and regional growth.

See Response to Comment 77-22 for the Devil's Gate Water Conservation Project.

**Response to Comment 77-24:**

The California Regional Water Quality Control Board denied without prejudice a permit for the emergency project, with the understanding that LACFCD would be initiating an EIR process for a project which would restore the required level of protection. As part of Project approval, LACFCD will obtain the necessary permits from the California Regional Water Quality Control Board.

**Response to Comment 77-25:**

The biological resources of the Proposed Project site are described in Section 3.6 of the Draft EIR. The bird species recorded during surveys conducted specifically for the Proposed Project are presented in the Biological Technical Report (BTR) in Appendix D of the Draft EIR. Based on the results of the BTR, additional protocol-level focused surveys were conducted, including for least Bell's vireo. Table 3.6-3 in the Draft EIR includes the least Bell's vireo as present within the Proposed Project site.

Initially, a smaller amount of sediment removal was proposed as an emergency project. One of the studies in Appendix D – Biological Reports was completed for the emergency project, which was scoped for 1.67 million cy of sediment removal. The information in the biological report completed for the emergency project is still relevant to the Proposed Project, and additional analyses were completed for the Proposed Project and for each alternative as shown in the Draft EIR.

**Response to Comment 77-26:**

Habitat loss was adequately addressed in the Draft EIR, Section 3.4, Biological Resources to account for the impacts to biological resources caused by the Proposed Project. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

**Response to Comment 77-27:**

The main function of Devil's Gate Dam is to protect downstream areas from flooding. Alternative 3, Configuration D, the Environmentally Superior Alternative, affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. A maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 77-28:**

Any projects at Big Tujunga, Cogswell, Morris, and Pacoima reservoirs would be separate and are not part of the Proposed Project or alternatives. Removal of sediment deposited in the Devil's Gate Reservoir will directly increase flood protection.

As discussed in the Draft EIR, Section 2.4, Project Goals and Objectives, Proposed Project objectives include reducing flood risk and restoring reservoir capacity for flood control and future sediment inflow events. See Response to Comments 77-2 through 77-5 and 77-27.

LACFCD goes to great lengths to lessen project impacts. LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**Response to Comment 77-29:**

See Response to Comments 77-1 through 77-5 and 77-27 through 77-28.

**Response to Comment 77-30:**

LACFCD notes the commenter's objection to the Proposed Project. See Response to Comment 77-27. As discussed in the Draft EIR, Section 2.4, Project Goals and Objectives, Proposed Project objectives include supporting sustainability by establishing a reservoir configuration more suitable for routine maintenance activities including reservoir management.

**Response to Comment 77-31:**

See Response to Comment 77-3 and 77-4.

**Response to Comment 77-32:**

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

FASTing, a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 77-33:**

See Response to Comments 77-1 through 77-5 and 77-27.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond

Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

The estimated cost for the Proposed Project and for Alternatives 1, 2, 3, and 5 would range from \$80 million for the Proposed Project to \$65 million for Alternative 3. As stated above, a portion of the cost will be funded by a State grant. The remaining cost will be funded by LACFCD . Due to the variety of factors, including the indeterminate locations of the sediment fallout and requirements for removing sediment from these locations, the cost for Alternative 4 cannot be calculated.

As discussed previously, the limited maintenance area for Alternative 3 further reduces habitat impacts by allowing for site replanting and mitigation to take place within the reservoir footprint.

The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft EIR, not to other debris basins.

**Response to Comment 77-34:**

See Response to Comments 77-1 through 77-33.

December 31, 2013

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

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

Comment 78-1 | This serves to provide my comments on the Devil's Gate Reservoir Sediment Removal and Management Project, Draft Environmental Impact Report and the Project of sediment removal itself. I am Field Biologist by training with over 45 years' experience in Los Angeles County and Southern California and have performed environmental assessments and floral and faunal surveys inside Los Angeles County Flood Control Basins over the years. I have read through much of the Draft EIR and am familiar with all of the alternatives proposed. I do not support any of the alternatives as I believe the entire project is too large and attempts to remove too much sediment in an antiquated manor.

Comment 78-2 | All the alternatives permanently remove most of the ecologically valuable Willow Woodlands and understory in the basin. The proposed project is entirely within a Los Angeles County Significant Ecological Area (proposed "Altadena Foothills SEA") which was analyzed and added to this system by the County Department of Regional Planning. This clearly indicates the Hahamongna basin is of high, County-wide ecological importance and should not be disturbed by a massive cleanout project that fails to address the natural resource values.

Specific comments on the Draft EIR.

Comment 78-3 | 1. Despite requests during the scoping process, from a number of conservation organizations, the proposed project fails to consider maintaining a permanent lake at the south end of the basin, with design during sediment removal aimed at creating a more natural, contoured and uneven-edged body of water that benefits wildlife while providing flood protection. This lake could be designed with one or more islands of vegetation and peninsulas jutting out to provide more edge for vegetation and wildlife. As proposed, all the alternatives call for creating a very deep (approximately 50 ft. deep), steep-sided pit in the wake of sediment removal, and such a pit is both hazardous to hikers and much less effective as functioning wildlife habitat.

Comment 78-4 | 2. BIO-7 in the Mitigation Measures, and elsewhere, suggests to "replace all trees 1:1 by acreage." Virtually all projects in Southern California that disturb riparian habitat are required by Resource Agencies to apply a 3:1 to 5:1 replacement ratio to ensure effective mitigation for the significant losses. The project proponents must work with the State and Federal Fish & Wildlife agencies to mitigate any loss in the most effective way. The lack of a detailed mitigation plan, including where on-site and off-site mitigation will be conducted, makes it virtually impossible to evaluate the projects impacts.

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

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

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



5. Recreational Impacts: My form of recreation and relaxation is to regularly walk the Hahamongna basin throughout the trail system both around and through the Willow Woodlands. I record birds, herps and plants seen and I photograph them for teaching presentations and

Comment 78-7  
continued

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

Comment 78-8

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

Sincerely,

Michael C. Long  
Los Angeles County Natural Areas Administrator (Retired)  
6128 No. Reno Ave.  
Temple City, California 91780

Cc: Sup. Michael D. Antonovich  
City of Pasadena  
Scott Harris, California Department of Fish & Wildlife  
Christine Medak, U.S. Fish & Wildlife Service

**Response to Comment Letter #78 (Michael Long – Retired Los Angeles County Natural Areas Administrator)**

**Response to Comment 78-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objections to the Proposed Project and alternatives.

**Response to Comment 78-2:**

The Proposed Project is not located in a currently adopted Significant Ecological Area (SEA). The Los Angeles County Department of Regional Planning is currently in the process of updating the SEA Program. The Proposed Project is located within the Proposed Altadena Foothills and Arroyos SEA. Regional Planning's SEA updates including the Proposed SEAs have not been adopted, nor are they covered under the current Hillside Management Area and SEA Ordinance.

The SEA Program is a component of the Los Angeles County Conservation/Open Space Element. This program is a resource identification tool that indicates the existence of important biological resources. SEAs are not preserves; rather, they are areas where the County deems it important to facilitate a balance between limited development and resource conservation. Limited development activities are reviewed closely in these areas where site design is a key element in conserving fragile resources such as streams, oak woodlands, and threatened or endangered species and their habitat.

The Proposed Project does not involve developing the Proposed Project site. The Proposed Project involves returning the reservoir to a capacity to provide proper flood protection for downstream areas.

**Response to Comment 78-3:**

While holding water behind the dam permanently is outside the scope of this project, Alternative 3, would provide a more natural configuration for the reservoir and a greater habitat buffer on the west side of the reservoir, allowing for habitat to reestablish and providing additional areas for wildlife movement. In addition, Alternative 3 will restore the bottom elevation of Devil's Gate Reservoir to its design elevation of 986 feet, which coincides with the sill elevation of the lowest valve on Devil's Gate Dam, the sluice gate. The final elevations of the reservoir after the sediment removal phase is completed will not exceed historic elevations. Additionally, all side slopes will be excavated at a 3:1 ratio or 3 feet horizontally for every 1 foot rise in elevation. The slope produced by this side cut is relatively shallow.

**Response to Comment 78-4:**

The Proposed Project's Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work

closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws.

A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

**Response to Comment 78-5:**

Many local organizations, including the Pasadena Audubon Society, Hahamongna Watershed Park Advisory Committee, the Urbanwild Network, and the Arroyo Seco Foundation, were contacted about the Proposed Project prior to the Draft EIR being prepared. In January 2012, a representative of the Pasadena Audubon Society was contacted for information the Society has concerning birds observed in the Proposed Project area. The information provided was used in preparing the biological resources section of the Draft EIR. Species with the potential to occur within the Proposed Project and species that were identified during surveys are presented in the biological survey reports in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records and species lists of occurrence were used as additional data; but since these are positive-sighting databases, this data was used only in support of the analysis from the previously identified factors. Based on the results of the Biological Technical Report (BTR), additional protocol-level focused surveys were conducted for Proposed Project as described in Section 3.6.2, Special Status Plant Species and Special Status Animal Species of the Draft EIR.

As shown in Table 3.6-3 in the Draft EIR, both least Bell's vireo and yellow warbler are listed as present within the Proposed Project site. Additional sightings will not affect their status as present, which was accounted for in the Draft EIR within the Proposed Project site, and do not add any additional constraints to those mentioned in the analysis in the Draft EIR. The current Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 account for these species being present and will serve to protect and avoid impacts to these species and other breeding birds, and will reduce impacts to less than significant.

**Response to Comment 78-6:**

Species names used in the Draft EIR were consistent with the Hahamongna Watershed Park Master Plan (HWPMP) for Hahamongna Watershed Park by request of the City of Pasadena to maintain consistency with the HWPMP. Species names have been updated, and duplications of species have been eliminated (see Section 3.6 of the Final EIR). Status listings for sensitive species have been updated, as appropriate.

**Response to Comment 78-7:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It

is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 78-8:**

See Response to Comments 78-2 and 78-3. LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

Flow Assisted Sediment Transport (FASTing), a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

## MICHAEL E. OLSON

2319 Henrietta Avenue  
La Crescenta, California, 91214  
Phone: (818) 248-1532  
Fax: (818) 248-2666  
Email: [mtnelect@earthlink.net](mailto:mtnelect@earthlink.net)  
Account Number: 891743874

1/3/2014

Los Angeles County  
Department of Public Works  
Attention: Water Resources Division  
Reservoir Cleanouts  
Post Office Box 1460  
Alhambra, California, 91802-9974

ATTENTION: Water Resources Division

This letter is in response to the Comment Period, Wednesday, October 23, 2013 to Monday, January 6, 2014.

I would like to add a new level of concern, "Public Safety" to the Environmental Impact Report.

As a child living on Viro Road, adjacent to Devils Gate Dam between January 1, 1945 to January 1, 1950, I often rode by bike to the dam. It was a wonderful place to play with my friends. Unfortunately for one, it was a dangerous place. The silt was so fine it was called "Quicksand". I do not have the official record, but one child did die from it.

This dam should be posted and patrolled to protect the public against the inherent life threatening hazards of silt. And other dams, that are also adjacent to public access should also be watched. Removing "Silt" is not only important for dam operation, but public safety is also important.

Sincerely,

Michael E. Olson

Comment 79-1

**Response to Comment Letter #79 (Michael Olson)**

**Response to Comment 79-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. During the Proposed Project activities, and as noted in the Draft EIR, Section 3.8.6, excavation, grading, and sediment placement activities will adhere to guidelines, permits, and regulations and also follow best management practices to insure stability of soil within the Proposed Project site. Additionally, the active work area will not be accessible to the public to insure safety.

Currently, quicksand-like conditions are not present within the reservoir, but anywhere that loose soil and sediment is mixed with water, a hazardous situation has the potential to arise. While all recreational uses of the area are under the purview of the City of Pasadena, Los Angeles County Flood Control District (LACFCD) encourages recreational users to utilize designated trails when within the vicinity of the dam and reservoir.

**From:** [Nina Koumachian Ehlig](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils Gate  
**Date:** Thursday, January 02, 2014 10:42:34 AM

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DWP,

We here in our small community of West Altadena do not support this project.

We here in our small neighborhood watch association, "S.E.N.C.H." do not support this project.

The decimation and disrespect for the environment and sacred hallowed ground of the Tongva Tribe is deplorable.

Thanking You in advance,  
Nina E. Koumachian Ehlig  
Member & President of SENCH Neighborhood Watch Association  
626~840~7733

Comment 80-1

**Response to Comment Letter #80 (Nina Ehlig – SENCH Neighborhood Watch Association)**

**Response to Comment 80-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objections to the Proposed Project, including the objections of the SENCH Neighborhood Watch Association.

As noted in the Draft Environmental Impact Report (EIR), Section 3.7 Cultural Resources, the Tongva were identified as an important ethnographic group in the region. The Native American Heritage Commission (NAHC) was contacted, and a search of the Sacred Lands Inventory found that no Sacred Lands or other cultural resources in the vicinity of Devil's Gate Reservoir were documented. In addition, as discussed in Section 3.7.6 of the Draft EIR, Mitigation Measures MM CUL-1, MM CUL-2, and MM CUL-3 are provided in case sediment removal and reservoir management activities exceed the depth of historic flood deposits and encounter native soils or in the event human remains are discovered. In general, most of the sediment to be removed from the Proposed Project site consists of recently accumulated sediment; and, therefore, no significant impacts to cultural resources are expected.

**From:** [Polly Wheaton](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal  
**Date:** Thursday, January 02, 2014 9:01:32 AM

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Comment 81-1 | The Board of Directors of Pasadena Beautiful Foundation, having attended many meetings and listened to your proposals,

| has the following concerns regarding the proposed sediment removal from Devil's Gate Reservoir:

Comment 81-2 | 1. The removal of all vegetation from the Hahamongna Water Shed.

Comment 81-3 | 2. The impact on the wildlife and their habitat in this area.

Comment 81-4 | 3. Air quality during soil removal in an area of many schools.

Comment 81-5 | 4. The traffic impact on the 210 freeway during this 5 year period.

Comment 81-6 | We encourage you to drastically slow down the sediment removal so as not to cause harm, disruption and disturbance

| to the city of Pasadena, surrounding areas and their residents.

Comment 81-7 | At the same time, we would strongly urge that the trees, shrubs and all vegetation

remain undisturbed for future generations of people and wildlife.

Respectfully submitted,

Polly Wheaton  
President of Pasadena Beautiful Foundation

**Response to Comment Letter #81 (Polly Wheaton – Pasadena Beautiful Foundation)**

**Response to Comment 81-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 81-2:**

As discussed in the Draft Environmental Impact Report (EIR), removal of vegetation will occur only within the Proposed Project boundary and will not include the whole Hahamongna Watershed Park or the full reservoir easement boundary. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-6, MM BIO-7, and MM BIO-8 provide mitigation to restore and enhance riparian and sensitive habitats.

The Draft EIR concluded that Alternative 3, Configuration D is the Environmentally Superior Alternative. Alternative 3 affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives. This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 81-3:**

See Response to Comment 81-2. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 provide mitigation to protect and avoid impacts to sensitive species. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed. With implementation of the mitigation measures described in Section 3.6.6 of the Draft EIR, impacts to biological resources would be reduced to less than significant.

**Response to Comment 81-4:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

**Response to Comment 81-5:**

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule.

As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments, along any of the Haul Routes.

**Response to Comment 81-6:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 81-7:**

In order to remove the necessary amount of sediment from the reservoir, some vegetation must be removed, as the vegetation sits atop many layers of accumulated sediment. LACFCD goes to great lengths to balance flood control needs and reductions in impacts to habitat. See Response to Comment 81-2.

From: [Stephanie Strout](#)  
 To: [reservoircleanouts](#)  
 Cc: [Bill Bogaard, Mayor](#); [Vice Mayor Jacque Robinson](#)  
 Subject: Devil's Gate DEIR Comments  
 Date: Thursday, January 02, 2014 12:04:38 PM

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Comment 82-1

I have read the Draft EIR and attended a community meeting on this project, and I am against the alternatives presented and preferred. My husband and I live on North Arroyo Blvd, and the 210 runs about a block away from our backyard. Here are my comments:

**Alternative to the Alternatives**

Comment 82-2

Why won't the idea of using sluicing to downstream channels work as an alternative? This would accomplish the objective without the destruction nor the high costs, plus allow sediment to flow out to the ocean where it can replace beach erosion there. 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. Alternatives such as conveyor belts, sluicing, launching, and other techniques should be considered. Look at options regarding fewer trucks.

**Pollution and Noise**

Comment 82-3

Why aren't the vehicles that will be used to transport removed sediment mandated to be low-polluting? Especially considering the number of hours they will be spewing pollution at us. 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. 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.

**Habitat**

Comment 82-4

Why must so much of the habitat be removed and destroyed? The cultural and biologic entities impacted are too great not to find a way to reduce it. Remove only the amount of sediment needed to maintain downstream safety. Preserve as much of the surrounding woodland environment as possible. 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.

**Human Mitigation**

Comment 82-5

How will we nearby residents be mitigated for the air pollution/negative health effects inflicted on us by all these trucks going by? At minimum, reduce the amount of sediment to be removed each year, and extend the length of time for removal to a decade or two. In

Comment 82-5  
continued

↑ addition to that, what else can be done to protect us? Are there going to be more or higher freeway noise walls built? How are we going to be mitigated for this mismanagement of sediment, as we suffer the effects not only of the traffic, noise, and disruption, but more importantly, the negative effects to our health from all the dust and the noxious particulates and fumes from a 5-year, 6-day-a-week, 12-hour-a-day, project schedule?

Comment 82-6

┌ I'll look forward to your responses to address these comments.

Sincerely,

Stephanie Strout  
1870 N. Arroyo Blvd.  
Pasadena, CA 91103  
626-298-6556

## **Response to Comment Letter #82 (Stephanie Strout)**

### **Response to Comment 82-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objections to the Proposed Project and alternatives.

### **Response to Comment 82-2:**

Sluicing was analyzed as part of the Draft Environmental Impact Report (EIR) in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project, including impacts to traffic and air quality. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

Other alternatives were considered in Section 4.0 Alternatives Analysis within the Draft EIR. Alternatives such as the conveyor belt alternative, slurry pipeline alternative, and dam removal alternative were not carried forward for further analysis, as they would either fail to meet Proposed Project objectives or would not avoid or substantially lessen impacts.

### **Response to Comment 82-3:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As noted in Response to Comment 82-2, the conveyor belt alternative was not carried forward for further analysis as it would not avoid or substantially lessen impacts.

As described in the Draft EIR, the proposed and alternative haul routes would briefly access Windsor between the Interstate 210 (I-210) on- and off-ramps and Oak Grove Drive. As noted in the Draft EIR, Section 2.5 Proposed Project Description trucks will utilize two access roads (one existing and one upgraded) at the southern portion of the reservoir. Only a small portion of the access roads entering and exiting the reservoir will be paved. Both the proposed and alternative haul routes use main thoroughfares and do not travel into residential areas. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations. SCAQMD Rule 403

implementation will require all haul trucks to have tarps or other suitable enclosures and all loads should have at least 6 inches of freeboard space.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. Additionally, the Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 82-4:**

In order to remove the necessary amount of sediment from the reservoir, some vegetation must be removed, as the vegetation sits atop many layers of accumulated sediment. LACFCD goes to great lengths to balance flood control needs and reductions in impacts to habitat. For example, the Draft EIR concluded that Alternative 3, Configuration D is the Environmentally Superior Alternative. Alternative 3 affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

As noted in the Draft EIR, Section 3.7 Cultural Resources, Mitigation Measures MM CUL-1, MM CUL-2, and MM CUL-3 are provided to avoid significant impacts to cultural resources.

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that approximately 13,000 cubic yards (cy) of sediment will be removed by excavation annually. A maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available

for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the reservoir will be transported to the sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.

**Response to Comment 82-5:**

See Response to Comment 82-3.

Also, as discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related impacts.

As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. In addition, the Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the Proposed Project noise impacts to I-210 are too low to quantify and would be well below the thresholds of perceptibility.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 82-6:**

Responses to all comments received on the Draft EIR will be incorporated into the Final EIR.

**From:** [Trent Sanders](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils Gate Dam comment  
**Date:** Thursday, January 02, 2014 7:29:21 AM

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My comment is about a conversation with my 93 year old neighbor who has lived in La Canada for 65 years and who told me about how he watched a wall of water nearly 5 feet high going over the top of the dam in 1969.

If the debris basin behind the dam isn't cleaned out you can kiss the Brookside Golf Course and the structures downstream good-bye in the next big flood.

Trent Sanders  
La Canada



This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

Comment 83-1

**Response to Comment Letter #83 (Trent Sanders)**

**Response to Comment 83-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) is undertaking this project to protect downstream areas from flooding. LACFCD notes the commenter's acknowledgement of this potential threat.

**From:** [Alex Fore](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Saturday, January 04, 2014 5:06:41 AM

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As someone who lives, works, and plays within or very close to the Arroyo Seco I will be heavily impacted by the sediment removal programs. I live at 3124 Ridgeview Dr, Altadena, 91001, work at JPL, and I am an avid disc golfer.

Comment 84-1

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Comment 84-2

Beyond this impact, the plans are gargantuan in scale. I think a more measured approach needs to be taken, that will remove the sediment more slowly and with less impact to the park and communities surrounding it. Why does it have to be all or nothing?

-Alex Fore

## Response to Comment Letter #84 (Alex Fore)

### Response to Comment 84-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint from 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. The Oak Grove area of Hahamongna Watershed Park and the associated facilities will remain open during sediment removal and will continue to provide active recreational facilities to the area.

### Response to Comment 84-2:

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As described above, Alternative 3 drastically reduces the footprint of the Proposed Project and limits the maintenance area. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Andy Carrico](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Comments on Devil's Gate Dam DEIR  
**Date:** Friday, January 03, 2014 8:24:28 AM

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Comment 85-1 | I live on North Arroyo Blvd. and will therefore be significantly impacted by the project to remove the sediment at Devil's Gate dam. I have reviewed the DIER and have the following 6 questions:

Comment 85-2 | 1. Regardless of the chosen alternative, has consideration been given to lengthening the project? For example, make the project 20 years rather than 5 years? This would reduce the number of truck trips daily, reducing dirt, noise and diesel pollution.

Comment 85-3 | 2. At this time there is a proposed expansion of the 710 freeway between Alhambra and Pasadena. This could involve boring a 4+ mile tunnel, necessitating removal of massive amounts of debris, using the same 210 freeway between Pasadena and Irwindale to dispose of the debris. What consideration was given to this potential overlap in truck traffic, and the associated pollution?

Comment 85-4 | 3. Air Quality mitigation seems to focus on pollution generated by trucks and earth moving equipment. What about dust blowing from trucks as they move down the freeway and on the ingress and egress roads?

Comment 85-5 | 4. The DEIR identifies traffic impacts at specific intersections. Currently the I-210 eastbound traffic is extremely slow from 2:30 p.m. to 7:00 p.m. between the Hill St. exit and the Ca-57 intersection Monday through Friday. This seems to be unidentified in the DEIR. How will the project remain on schedule (50 trucks hourly) given the certain lengthening of truck travel times during the hours of 2:30 p.m. to 7:00 p.m. daily?

Comment 85-6 | 5. Alternative 3, Configuration D appears to be a clearly better alternative. Why is that not the selected alternative?

Comment 85-7 | 6. Section 3.5.6 has the statement "the actual vehicles/equipment used may not reach the levels required to reduce the NOX emissions to a level of less than significant for the sediment removal phase." Does that mean vehicles that fail to meet the Tier 4 Interim Equipment standards could be used to remove sediment?

Comment 85-8 | I look forward to your responses to these questions.

Andy Carrico  
1870 N. Arroyo Blvd.  
Pasadena, CA 91103  
626-298-6556

**Response to Comment Letter #85 (Andy Carrico)**

**Response to Comment 85-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 85-2:**

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 85-3:**

The Interstate 710 (I-710) project was not included in the Draft Environmental Impact Report (EIR) as a cumulative project, as it was determined to be outside the area of influence. A cumulative growth factor was used in the Traffic Study that accounted for future traffic growth and its cumulative effects. The Devil's Gate Reservoir Sediment Removal and Management Project sediment removal phase is scheduled to be completed by 2020, prior to the initiation of the I-710 tunnel project. At this time the I-710 Extension/Tunnel project is in the preliminary phases, and a project schedule has not been established (Caltrans 2010). The growth factor considered in the analysis provided a conservative project condition volume that accounts for expansion and regional growth.

**Response to Comment 85-4:**

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 85-5:**

As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments along any of the Haul Routes. While the majority of the sediment disposal and associated truck traffic is expected to go to the disposal sites east of the Proposed Project, the Draft EIR also analyzed the use of disposal sites west of the Proposed Project. This will allow for flexibility in case one particular route is temporarily unusable.

**Response to Comment 85-6:**

LACFCD recognizes Alternative 3 as the Environmentally Superior Alternative. Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on

the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

The information in the Final EIR will be provided to the County of Los Angeles Board of Supervisors for their consideration in selecting a project alternative.

**Response to Comment 85-7:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2 (involving use of EPA's emission standards for Tier 3 equipment), impacts to air quality will be reduced to less than significant.

**Response to Comment 85-8:**

Responses to all comments received on the Draft EIR will be incorporated into the Final EIR.

**From:** [Bill Burnett](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Don't Wipe Out Devil's Gate!  
**Date:** Friday, January 03, 2014 11:06:03 AM

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Comment 86-1

The proposed sediment removal at Hahamongna's Devil's Gate Dam is too far reaching and will be too damaging to an environment that is home to much wildlife and many humans cherish. I believe there are less invasive measures to achieve similar goals. Please explore them and adopt a better policy.

Sincerely  
Bill Burnett  
2375 Catherine Rd.  
Altadena, CA 91001  
818-489-7882

**Response to Comment Letter #86 (Bill Burnett)**

**Response to Comment 86-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

The goal of Los Angeles County Flood Control District (LACFCD) is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2, drastically reduces the project's footprint from 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

**From:** [Brenton Miller](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Friday, January 03, 2014 3:44:52 PM

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Hi,

My name is Brenton. I live in Montrose California.

I've looked up all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact our disc golf course alternative 3 is the best plan, but the western branch will remove two playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Thank you.

Sent with AquaMail for Android

<http://www.aqua-mail.com>

Comment 87-1

**Response to Comment Letter #87 (Brenton Miller)**

**Response to Comment 87-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, the LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint from 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities will remain open during sediment removal and will continue to provide active recreational facilities to the area.

**From:** [Brett Godown](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project Comments  
**Date:** Thursday, January 02, 2014 9:58:04 PM

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Devil's Gate Reservoir Sediment Removal and Management Project

I support the need to accomplish sediment removal in the Devil's Gate Reservoir but I request coordination be made with the Oak Grove Disc Golf Club following the public comment period. The Club can provide beneficial recommendations in a manner that is not detrimental to the overall course use, aesthetics, and layout. The Oak Grove Disc Golf Course is a historic landmark because it was the first Disc Golf Course ever constructed. Thousands of disc golfers like myself travel to the course and induce tax dollars to the local area while visiting the course. Disc golfers are one of the current prominent uses in the park. The course, the users, and the disc golf club deserves to be involved following the comment period. If due to the sediment removal, provided this is consistent with the club's recommendation, if holes are removed, alternatives holes should be provided. Options should be provided to install holes in the general vicinity or other locations in the park.

Sincerely,

Brett Godown  
Salinas, Ca 93901

Comment 88-1

**Response to Comment Letter #88 (Brett Godown)**

**Response to Comment 88-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, LACFCD will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft EIR, carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, the LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint from 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities will remain open during sediment removal and will continue to provide active recreational facilities to the area.

**From:** [Brian Kernan](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils Gate Reservoir Sediment Removal and Management Project  
**Date:** Friday, January 03, 2014 6:30:15 PM

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>

> Hi,

> My name is Brian Kernan. I live at 1815 N. Avon St. Burbank, CA 91505

> I have looked at all of the sediment removal plans sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove two of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that doesn't impact the Disc Golf Course.

> The Oak Grove Disc Golf Course is unique because it's the first of its kind. The course was established in 1975. When the sport was originated by a JPL employee named Edward Headrick. He made Oak Grove it's birthplace. He also started the PDGA which as of today has more than 62,000 plus members. These members all know that Oak Grove Disc Golf Course is the birth of this fast growing sport. Many of whom make yearly adventures to Pasadena to visit this Great Disc Golf Course. Please take another look at plans for this sediment project to avoid disturbing a Historical place.

>

> Thank you,

> Brian Kernan PDGA# 62052

>

>

Comment 89-1

Comment 89-2

**Response to Comment Letter #89 (Brian Kernan)**

**Response to Comment 89-1:**

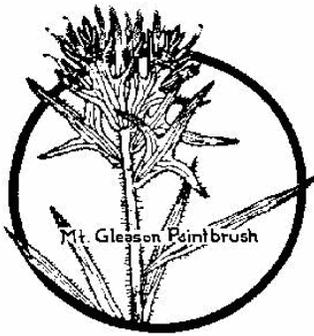
Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, the LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint from 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities will remain open during sediment removal and will continue to provide active recreational facilities to the area.

**Response to Comment 89-2:**

See Response to Comment 89-1.

As discussed in the Draft EIR, Section 3.15, Recreation/Public Services, the Oak Grove Disc Golf Club is among the many groups that regularly use the Oak Grove area of Hahamongna Watershed Park. The Oak Grove area of Hahamongna Watershed Park and the associated facilities, including Oak Grove Disk Golf Course, will remain open during sediment removal and will continue to provide active recreational facilities to the area.



# SAN GABRIEL MOUNTAINS

CHAPTER OF THE CALIFORNIA NATIVE PLANT SOCIETY  
1750 North Altadena Drive  
Pasadena, CA 91107-1046

December 31, 2013

To: Gail Farber, Director  
Los Angeles County Department of Public Works, Flood Control District  
Re: Devil's Gate Reservoir Sediment Removal and Management Project,  
Draft Environmental Impact Report

Dear Ms. Farber,

The California Native Plant Society, San Gabriel Mountains Chapter, is an organization of 275 members in the greater San Gabriel Valley and a Chapter of the Statewide California Native Plant Society. We are very concerned about the size and impacts of the proposed sediment removal project at Devil's Gate basin, better known as Hahamongna Watershed Park. We have reviewed the Draft EIR and are opposed to each of the alternatives proposed as they all would permanently remove most of the current Willow woodlands in the basin.

Based on the project description presented in the EIR the project would take five years and would require 425 trucks per day, 50 trucks per HOUR, driving through local neighborhoods and on the 210 freeway. The trucks would operate for nine months or more per year, six days a week. Between 50-120 acres of Riparian Willow-Mulefat habitat would be permanently destroyed.

The unique community of Alluvial Fan Sage Scrub, which has developed in the upper north end of the basin, is a State-recognized sensitive community, and must be protected and allowed to *expand* into the newly-deposited sediment. Contrary to statements in the DEIR this community is not buried under sediment which has "permanently inhibited its ability for succession", but thrives on sediment, as its name suggests. Alluvium, whether in place for decades or in shifting deposits, is the only substrate on which various forms of this community grow. Why was this community not avoided in project alternatives in the DEIR?

Due to the large amount of sediment proposed for removal, there will be very limited on-site space for mitigation planting, and much of the mitigation will take place off-site. This leaves a large net loss of these communities in the Hahamongna Watershed Park. Where will mitigation for all project impacts occur?

The habitat mitigation for the loss of native vegetation and wildlife communities proposed in the EIR is preliminary and incomplete, to be determined in consultation with the Resource Agencies, but what is revealed is unacceptable. Riparian woodlands are communities of highest priority to Resource Agencies and losses are routinely required to be replaced at a ratio of between 2:1 and 5:1; NOT “up to 1:1” as proposed in the DEIR. Typically offsite mitigation for riparian resources is preserved at a 5:1 ratio or greater. Onsite mitigation for *temporary* loss of riparian resources may be less. What complete level of mitigation is proposed?

We propose a rethinking of the scope of the sediment removal to greatly reduce the amount removed annually, and to retain most of the Willow Woodlands as an integral component of the basin and future management plans. We see no justification in the EIR for the project to remove 2 to 4.1 million cubic yards of sediment in such a short timeframe. Any incremental reduction in sediment, and allowing newly transferred sediment to flow as it comes into the basin, will make the dam that much safer. Using sluicing (or “FASTing”: Flow-Assisted Sediment Transport) to the maximum extent, whenever water flows are available, would reduce all impacts to the habitat, truck traffic, air quality and pollution, noise, aesthetics, and costs. The wet sediment would not cause particulates, including ash and dust in the sediment, to become airborne and threaten health and safety throughout the area. This technique, used by the County in a very limited way currently, mimics the natural system of the watershed and transports sediment downstream of the dam where it is needed. This can be done in a way to utilize adaptive management as we monitor the sediment deposition downstream and allow it to provide sand bars and edge habitat in a more natural way.

We believe that the alternatives presented in the current EIR do not meet the requirements of CEQA for alternatives that meet the “Rule of Reason,” in this case the alternatives analyzed do not differ substantially enough to really be considered alternatives. They do not contain an alternative that has a substantially reduced environmental effect as required. The CEQA Guidelines state that “an EIR must describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” We would like to see a revised EIR that contains revised project alternatives that meet these criteria and incorporate those features described above, or contains mitigation measures that incorporate those features. What new alternatives will be offered to meet these required criteria?

Finally, we witnessed the destruction of 12 acres of old-growth Oak and Sycamore woodlands in Arcadia by the County Flood Control Division, to provide a sediment dumping ground. This action later proved to be unnecessary and the unused site is now a barren wasteland. As a result, we have little confidence in the statements and proposals by Los Angeles County Flood Control.

Thank you for the opportunity to provide comments on this project and Draft EIR. Our organization urges a greatly-reduced project of sediment removal that utilizes a methodology approach much more attuned to watershed ecology to be truly sustainable in the long term.

Sincerely,

Orchid Black, President

Cc: Sup. Michael D. Antonovich  
City of Pasadena  
City of La Canada  
Scott Harris, California Department of Fish & Wildlife  
Christine Medak, U.S. Fish & Wildlife Service

## **Response to Comment Letter #90 (San Gabriel Mountains Chapter of California Native Plant Society)**

### **Response to Comment 90-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's disapproval with the Proposed Project, especially the removal of willow woodland.

The Draft Environmental Impact Report (EIR) identifies the impacts associated with the removal of riparian habitat. The Draft EIR also identifies habitat restoration Mitigation Measures which will reduce these impacts to less than significant. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-6, MM BIO-7, and MM BIO-8 provide mitigation to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

### **Response to Comment 90-2:**

See Response to Comment 90-1. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

### **Response to Comment 90-3:**

Expansion or spreading of sediment does not occur in a relative horizontal direction. With the dam and basin structure, the accumulation of sediment occurs in a more vertical manner, and as much as 20 feet of sediment buildup has occurred in one rainy season, burying existing vegetation.

As noted in the Draft EIR, Biological Resources section, the habitat value is impacted by the presence of sediment in the reservoir. The sedimentation that has occurred as a result of the 2009 Station Fire, and is expected to continue to occur, has buried existing vegetation, reducing the size of vegetation communities and inhibiting their ability for succession; however, it is possible that the community will continue to survive, therefore, the Final EIR, Section 3.6.2, has been revised, removing the phrase "permanently" from the community's description.

As discussed in the Draft EIR, Section 3.6.6, Mitigation Measure MM BIO-6 has been provided to reduce impacts to Riversidean Alluvial Fan Sage Scrub to a level of less than significant. As described in Section 4.0, reduced impacts to Riversidean Alluvial Fan Sage Scrub community was achieved under Alternatives 1, 2, and 3.

**Response to Comment 90-4:**

Mitigation locations will comply with the California Department of Fish and Wildlife (CDFW) recommendations as follows: first, onsite; second, offsite within the Arroyo Seco Watershed; and third, offsite within the greater Los Angeles River watershed. If offsite mitigation sites are needed, several offsite areas within the Arroyo Seco/Los Angeles River watershed are being considered for restoration. As mentioned above, Alternative 3 will allow for the largest area of site replanting and mitigation to take place within the reservoir easement.

**Response to Comment 90-5:**

Table ES-1 of the Draft EIR lists all Mitigation Measures proposed for the Proposed Project. These Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. As with any project that involves CDFW, United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

**Response to Comment 90-6:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project, including those associated with habitat, truck traffic, air quality, noise, aesthetics, and costs. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system to the ocean; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. This alternative would also involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

Flow Assisted Sediment Transport, or FASTing, operations have been routinely used at Devil's Gate Reservoir and result in relatively small amounts of finer grained sediment passing through the reservoir. After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that approximately 13,000 cubic yards (cy) of sediment will be removed by excavation annually. A maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

Dust, including ash, impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 90-7:**

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which

would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” However, “[a]n EIR is not required to consider alternatives which are infeasible” (CEQA Guidelines Section 15126.6(a)) or “which could change the fundamental nature of the proposed project.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.*(1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project’s significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route. As discussed in Section 4.10 of the Draft EIR, other alternatives were not carried forward as they did not minimize impacts in relation to the Proposed Project and/or did not meet Proposed Project objectives.

Therefore, the Draft EIR did meet the CEQA criteria for analysis of alternatives.

**Response to Comment 90-8:**

Comment noted.

**From:** [Caraly Higuchi](#)  
**To:** [reservoircleanouts](#)  
**Subject:** sediment removal has to be done  
**Date:** Saturday, January 04, 2014 4:57:50 PM

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We want to be heard and on record as in favor of the county removing sediment from the Devil's Gate Dam so that the dam can function as it was designed to.

It is very important that the Rose Bowl Stadium and the homes downstream not be destroyed by flooding water.

It would be a terrible waste of resources in the Brookside Recreation Area --- Kidspace, Aquatic Center, the handicap playground, tennis courts, Jackie Robinson Field, etc--- if floodwater destroyed all the city has developed recently.

We are **for** the removal of the 2.7 million cubic yards of soil that has built up around the dam since 1994 and the additional 1 million cubic yards of debris that came down off the foothills after the 2009 Station Fire.

We believe that "the reservoir no longer has the capacity to safely contain another major debris event. The outlet works have a risk of becoming clogged and inoperable," as the EIR states.

Caraly and Dave Higuchi  
860 Seco Street  
Pasadena CA 91103

[higuchi860@gmail.com](mailto:higuchi860@gmail.com)

Comment 91-1

**Response to Comment Letter #91 (Caraly Higuchi)**

**Response to Comment 91-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter is in favor of removing sediment from the reservoir so that the dam can function as it was designed.

**From:** [Catherine Kelly](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate reservoir sediment removal and management project  
**Date:** Monday, January 06, 2014 1:22:10 PM

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my name is Catherine Kelly I live at 2935 Santa Carlotta Street La Crescenta California 91214.

I have looked at all the plans for the settlement removal project sponsored by the county and all the plans we have an impact on a disc golf course. alternative 3 is the best plan but the Western Branch will remove 2 of our playable positions. please revisit the sediment removal plans on making alternative plans that will not impact the disc golf course.

Thank you  
Catherine Kelly

[Sent from Yahoo Mail on Android](#)

Comment 92-1

**Response to Comment Letter #92 (Catherine Kelly)**

**Response to Comment 92-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities will remain open during sediment removal and will continue to provide active recreational facilities to the area.

**From:** [Bill Sauro](#)  
**To:** [reservoircleanouts](#)  
**Subject:** "Devil"s Gate Reservoir Sediment Removal and Management Project"  
**Date:** Monday, January 06, 2014 3:01:02 PM

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To Whom It May Concern,

My name is Charmain Sauro and I have been a resident in La Canada for over 30 years. I am very concerned about this proposed project that may begin in the Hahamongna Park area. My concerns are that I have horses boarding at the Flintridge Riding Club. This private club has been around for over 90 years and is partially what make our area so grand for me and my family. This project would not be good at all for the club members as well as the health of our horses. Horses have very sensitive respiratory systems and I am afraid of all the dust and pollution that would be stirred up if this project was approved. The area is beautiful at its current state. My family enjoys riding and using all the trails throughout the wash. I ride my horses, walk our dogs, and ride bikes in that area. Without the use for all the people, it would be a shame to say the least. I am concerned for my nieces and nephew that attend the high school right across the way and their affects to the pollution. My daughter will also be attending there during this project. The amount of trucks and traffic in the area would be atrocious! I really just don't see the point in this project. After the fires and rain there was no flooding. There was debris and such from the fire, but it has been cleaned out and fine. There seems to be no point is such a huge dig out project. At its current state seems more safe where rain water can just soak into the ground. It seems to be just a waste of money. The last thing we need is to waste anymore money. If this project is approved it will affect the club in such a way that may cause it to close the doors which would be an absolute shame. Members will move out their horses including myself. No more horses. No more club. This would hugely affect Rosebowl Riders as well. Please do not approve this project. We have so few areas like this around here. It would be such a shame and waste. Thank you!!

Charmain Sauro

## **Response to Comment Letter #93 (Charmain Sauro)**

### **Response to Comment 93-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Potential effects to horses stalled near the Proposed Project site would be similar to the construction-related impacts from emissions and noise associated with sediment removal to nearby residents and recreational users of Hahamongna Watershed Park. Air quality impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

### **Response to Comment 93-2:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Additionally, as noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous

vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

See Response to Comment 93-1 regarding air quality.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

### **Response to Comment 93-3:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

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The Sedimentation Manual (March 2006) can be viewed here:

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Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of the LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur. A small Interim Measures Project has been implemented annually since 2011 to clear accumulated sediment near the face of Devil's Gate Dam. Under 10,000 cy total has been removed since 2011. This effort will not efficiently remove the large amounts of sediment necessary to provide adequate downstream flood risk reduction.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

**Response to Comment 93-4:**

See Response to Comment 93-2.



**City Council**  
Laura Olhasso, Mayor  
Michael T. Davitt, Mayor Pro Tem  
Jonathan C. Curtis  
David A. Spence  
Donald R. Voss

December 30, 2013

Mr. Christopher Stone, P.E., Assistant Deputy Director  
Water Resources Division  
County of Los Angeles Department of Public Works  
Attn: Reservoir Cleanouts Program  
P.O. Box 1460  
Alhambra, CA 91802-1460

**SUBJECT:     DEVIL’S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT  
                  CITY COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT**

To Whom It May Concern,

On behalf of the City Council of the City of La Cañada Flintridge, this letter reflects our primary comments and concerns regarding the Draft Environmental Impact Report (DEIR) for the Devil’s Gate Reservoir Sediment Removal and Management Project. These comments are based on the City Council’s obligation to protect the health and welfare of our residents, students and businesses. The City reserves the right to submit further comments and objections.

Comment  
94-1

The project’s scope and magnitude is especially important to us because of its proximity to eight (8) public and private schools, two churches, several joint use or private sports facilities, Flintridge Riding Club and JPL (See attached map). These are sensitive receptor locations, where children study, play outside and are dropped off/picked up every day. The project location will affect more people and streets in the City of La Cañada Flintridge than in any other city, with significant disturbance to traffic, noise, air quality, and recreational uses.

Comment  
94-2

While we are fully cognizant of the need to clean out the reservoir, and understand the attraction of ‘doing it all at once”, we believe it is vitally important to fully weigh the advantages of extending the project from 5 to 10 years or more. All of the significant impacts cited in the DEIR will be reduced or eliminated simply by taking a kinder-gentler approach to the sediment removal. (See Attachment 1 - Summary of Comments.)

Comment  
94-3

The City Council appreciates this opportunity to comment on this large project with long-term impacts, and the chance to be a partner in minimizing those potential impacts. If you should have any questions or require additional information, please contact our Director of Public Works, Mr. Edward Hitti, P.E. at (818) 790-8882.

Comment  
94-4

Sincerely,

Laura Olhasso  
Mayor

cc:     Supervisor Michael D. Antonovich (500 West Temple Street, Room 869. Los Angeles, CA 90012)  
          City Council  
          City Manager  
          Public Works Director

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**Attachment 1  
City of La Canada Flintridge**

**SUMMARY OF CITY COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT**

**PROJECT LOCATION AND SETTING**

1. The Draft EIR's description of the project location and setting is inadequate and fails to recognize the environmental setting and uses in the area. In particular, there are eight (8) public and private schools, two churches, several joint use or private sports facilities, the Flintridge Riding Club and JPL. In essence, this area is a highly active school and recreational area. The potential impacts are not just traffic impacts at the beginning and end of the school day, but also the continuing daily athletic uses and practices that start early in the day through the evening. These sensitive uses, including for very young children, will be highly impacted by the project's noise, traffic and air quality impacts, especially if the proposed Berkshire Place/I-210 ramp haul route is utilized at all. In turn, these same type of sensitive uses are not present along the proposed Windsor/Arroyo haul route, which the Draft EIR has not recognized in its evaluation.

Comment  
94-5

**PROJECT INTENSITY**

2. The Draft EIR should be expanded to include study of a project extended from 5 years to 10 years during the initial sediment removal phase to reduce the expected environmental impacts generated by intense truck hauling operations, particularly during the school year. This "Kinder-Gentler" alternative reduces the intensity of the hauling to more manageable levels, and opens up three options: Truck hauling can be limited to summer months only, the number of trucks per hour can be reduced, or the hauling operation hours can be modified to avoid school arrival and dismissal times. By doubling the number of years to complete the project, the annual export amount would be cut in half, which could be accomplished in one of three ways: 1) half the annual days, 2) half the hours per day, or 3) half the hauling frequency. A comparison of the reduced intensity debris removal alternatives is shown below:

Comment  
94-6

**Reduced Intensity Alternatives Comparison**

Option/Description	Proposed Project (Alt. 3, Config. D)	Reduced Intensity Summer Only	Reduced Intensity Reduced Hours	Reduced Intensity Reduced Rate
Project Duration (Yrs)	5	10	10	10
Hauling Months	June-October (5 months)	<b><i>*June-August (2.5 Months)</i></b>	June-October (5 Months)	June-October (5 Months)
Hauling Hours	7am-7pm M-F (12hr) 8am-5pm Sat (9hr)	7am-7pm M-F (12hr) 8am-5pm Sat (9hr)	<b><i>*9am-2pm M-F (5 hr) 9am-2:30pm (5.5)</i></b>	7am-7pm M-F (12hr) 8am-5pm Sat (9hr)
Total Volume Removed (Million Cubic Yards)	2.43 M	2.43 M	2.43 M	2.43 M
Annual Debris Removal (Cubic Yards)	486,000	243,000	243,000	243,000
Max. Daily Removal (Cubic Yards)	7,650	7,650	3,850	3,850
Max. Hauling Frequency (Trips/day)	425	425	<b><i>*213</i></b>	<b><i>*213</i></b>
Hourly Hauling Rate (Trips/hour)	50	50	50	<b><i>*25</i></b>

***\* City's Recommended Alternatives***

It should be noted that any hauling operation during school arrival or dismissal times in any of the above alternatives must still be rerouted away from Berkshire Place and the I-210 freeway ramps, in order to mitigate school related congestion. Of these options, the City favors the "Reduced Intensity-Summer Only" option, which would result in fewer overall traffic impacts to the City, especially during sensitive times.

### **AESTHETICS**

3. The City urges the County of Los Angeles to pursue the development of a year-round recreational reservoir at the foot of the dam to mitigate the appearance of the excavated land. The water could be recharged from natural drainage flows, ground water, and even a planned Foothill Metropolitan Water District project to generate approximately 1 million gallons per day of recycled water from effluent water in its district.

### **AIR QUALITY**

4. Short and long term health effects due to silica dust, fugitive dust clouds, diesel fumes, carbon monoxide, NOx emissions and other pollutants were not fully assessed in the DEIR, and should be evaluated to determine the health risk assessment to the neighboring community and sensitive receptors, such as the schools identified in the attached map. Greater use of alternative fuel vehicles for hauling is needed and should be required as mitigation measures. Based on the expected significant adverse impact due to construction and hauling vehicles, clean-air low-emissions trucks that meet current EPA low emissions criteria should be required for all hauling operations to minimize expected air quality impacts.

### **NOISE AND VIBRATION**

5. While loud construction noise will be mitigated near residences by restriction on operation of off-road construction equipment with a 200+ horsepower engine within 180 feet of residences, further analysis should be made of haul vehicle noise generated on the haul routes, particularly near schools and churches. There should be limitations on the use of warning alarms on construction vehicles over certain decibels when used in the reservoir.

### **RECREATION**

6. While minor disruption to recreation and trail use is to be expected, the project should be required to provide alternate routes or open the existing trails during non-operational hours and Sundays. Also, trail crossings can be intermittently opened between hauling trips. The project should be required to provide alternate trail connections or provide crossing assistance during hauling operations (See Recreation-1 in the DEIR.)

### **TRAFFIC**

7. Hauling on Berkshire Place - There are several reasons why hauling should be prohibited on Berkshire Place:
  - a. Hauling conditions assume start time of 7am, which will conflict with school traffic on Berkshire Place. The City objects to Haul Routes 1A, 1C, 1D, 1E, 1G and 1H, particularly during school times.
  - b. The proposed haul routes will utilize Oak Grove Drive to Berkshire Place to the I-210 ramps, which are in close proximity to over a dozen sensitive receptors, such as schools, sports fields and churches.
  - c. The Berkshire Place/Eastbound I-210 Ramps are expected to be significantly impacted from LOS-D to E in the AM peak hour under existing conditions, and degrade to LOS-F under 2014 conditions if Haul Routes 1A, 1D, 1E, and 1G.
  - d. Berkshire Place is currently congested between Oak Grove Drive and I-210 Freeway

during weekday mornings and afternoon school pick-up. Trucks will be delayed in reaching the freeway ramps during peak times, block intersection flow, and exacerbate congestion.

- e. I-210 Westbound on-ramp is severely congested in morning peak hour. Truck acceleration is too slow for proper merging. This ramp must not be used during AM and PM peak school hours.

Based on the above, the Final EIR should include a mitigation measure to prohibit trucks on Berkshire Place and on Oak Grove Drive north of Berkshire Place.

- 8. Hauling During School Hours - Notwithstanding the above comment, if the project is approved with hauling on Berkshire Place, then the Project should be required to fully implement the potential impact reduction measure in Section Transportation-2 of the DEIR (Page 463), as follows: "Proposed project haul trucks would avoid using the Berkshire Place and I-210 eastbound ramps intersection during AM peak period by instead using the Windsor/Arroyo and I-210 ramps. This mitigation would require the painted median on Oak Grove Drive to be restriped to a two-way left turn lane (TWLTL). The changes to Oak Grove Drive would require the approval of the City of Pasadena."

The DEIR states that "The optional measures of this intersection are beyond the scope of the project." However, there are at least two mitigation measures available: prohibit truck trips on Berkshire Place during school peak hours and use Haul Routes 1B and 1F, and/or construct a traffic signal at Berkshire Dr/I-210 Ramps.

For these reasons, the City urges the hauling operation to be limited to Haul Routes 1B and 1F during the entire project to avoid the use of Berkshire Place. In addition, the Final EIR should include a mitigation measure to prohibit trucks on Berkshire Place or Oak Grove Drive north of Berkshire Place during school arrival and dismissal times. This is a feasible mitigation measure within control of the project. Flaggers can be used to assist haul trucks to cross a painted median on Oak Grove, so restriping is not mandatory.

- 9. Trucks on Berkshire Place Freeway Ramps – The DEIR states that there will be a significant impact at Berkshire Place/I-210 eastbound ramps during the AM peak hour. In addition, the existing stop controls at I-210 ramps and Berkshire Place will not have sufficient capacity for the projected traffic volumes. The existing turn pockets are too short to handle the proposed truck volumes. In particular, the slower acceleration rates and large turning radii will severely impact the stop sign-controlled ramp intersections.

The study failed to conduct a traffic signal warrant study at the intersection of Berkshire Place and I-210 eastbound and westbound ramps. The Final EIR should evaluate both intersections to determine whether the volume, delay or other warrants for traffic signalization are met at either location during the sediment removal phase or ongoing maintenance. The analysis should also include an analysis of queue lengths for all approaches, and stopped delay to accommodate additional project truck traffic.

- 10. The Traffic Impact Analysis (TIA) failed to include adjacent freeway ramp volumes and conditions in its ramp merging analysis in its Freeway Ramp HCM Analysis for Ramps #1- I-210 at Berkshire Place WB Off-ramp, and #2 - I-210 at Berkshire Place EB On-ramp (TIA-Appendix J). Both ramps are in close proximity to the Foothill Boulevard ramps to the west. The Traffic Impact Analysis needs to revise the HCM calculations at both ramps for all scenarios to include

Comment 94-14  
continued

↑  
Foothill Boulevard on/off ramp conditions. It is expected that the EB ramp congestion is worsened due to insufficient merging and ramp storage at Foothill Boulevard.

Comment 94-15

11. Due to potential noise and traffic congestion impacts of idling trucks, truck queuing should not be allowed on public streets. All hauling trucks need to be radio-dispatched to prevent queuing on city streets.

Comment 94-16

12. The existing bike lanes along Oak Grove will be adversely impacted during hauling operations. The DEIR should propose remedial measures in Transportation-3 to provide uninterrupted bike lanes along Oak Grove Drive during hauling operations.

**ROAD CONDITION**

Comment 94-17

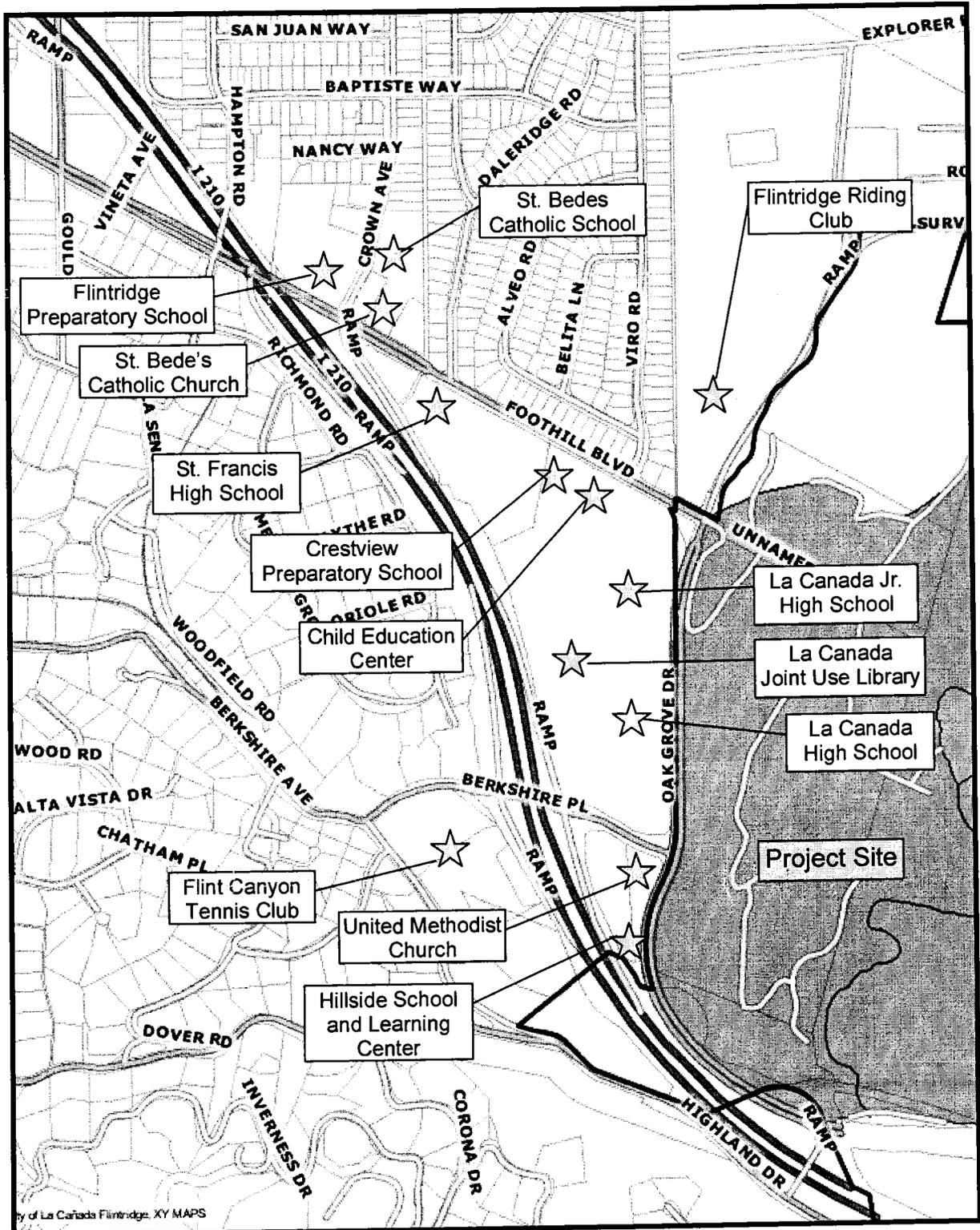
13. The massive hauling volume will significantly and prematurely degrade the pavement on Berkshire Place and Oak Grove Drive along the haul route. Neither street was constructed to handle heavy truck traffic or at the proposed frequency. In addition, ongoing maintenance of the reservoir will require higher truck volumes on both streets on an annual basis. The County should be responsible for reconstructing and/or overlaying the street segments (full width) to meet the future Traffic Index (TI) subsequent to initial debris removal and before maintenance operations begin.

**CONCLUSION**

Comment  
94-18

Overall, the City supports the removal of built-up sediment from the Devil's Gate reservoir to restore flood protection for the surrounding community. However, the City strongly urges the County to (1) take a "kinder-gentler" approach and minimize the amount of sediment removed, (2) extend the project to reduce the potential environmental impacts further, and (3) not utilize Berkshire Avenue/I-210 ramps as a result of all of the schools and other sensitive receptors and rather utilize the Winsor/Arroyo haul route. The City feels that all of the goals of the project are attainable even if it takes a little longer to accomplish.

**Attachment 2**  
**City of La Canada Flintridge**  
**SENSITIVE RECEPTOR LOCATIONS**



## **Response to Comment Letter #94 (City of La Cañada Flintridge)**

### **Response to Comment 94-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

### **Response to Comment 94-2:**

Air quality and noise impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Sections 3.5 and 3.14, respectively. The Draft EIR analyzed impacts to sensitive uses, including residents, recreational uses, and schools, adjacent to the Proposed Project site and along the proposed haul routes. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities La Cañada Flintridge and Pasadena, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

### **Response to Comment 94-3:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs,

minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 94-4:**

LACFCD will continue to work with the City of La Cañada Flintridge.

**Response to Comment 94-5:**

As described in the Project Description, Section 2.1.6, Surrounding Land Uses, the Draft EIR describes the land uses found adjacent to the Proposed Project site, including residential areas, recreational uses (including equestrian) and schools. As discussed above in Response to Comment 94-2, the Draft EIR analyzed impacts to sensitive uses, including residents, recreational uses, and schools, adjacent to the Proposed Project site and along the proposed haul routes. Extending the description of surrounding uses to a greater area would not result in changes to the analysis, as impacts to the nearest uses would be considered the greatest. Therefore, the Project Description contains adequate information for evaluation and review of the environmental impact.

See Response to Comments 94-2 regarding noise, traffic, and air quality impacts.

**Response to Comment 94-6:**

See Response to Comment 94-3 regarding project duration.

As discussed in Response to Comment 94-2, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays.

LACFCD notes that the commenter prefers a “Reduced Intensity-Summer Only” option.

**Response to Comment 94-7:**

As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics. Holding water behind the dam permanently, as a lake, is not a part of the Proposed Project objectives and is outside the scope of this project; but, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

**Response to Comment 94-8:**

See Response to Comment 94-2. As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were

detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related impacts.

**Response to Comment 94-9:**

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a 1-decibel (dB) increase on Berkshire Place east of the Interstate 210 (I-210) northbound ramps. A 1-dB increase is well below the 3-dB increase threshold of perception and would therefore not be anticipated to disturb the learning or church environment. The roadway noise impact analysis provided in the Draft EIR found that the Proposed Project would result in less than significant impacts for all analyzed alternatives.

Contractors will be required to comply with local noise ordinances as stated in the Draft EIR, Section 3.14 Noise and Vibration. Warning alarms on the trucks and equipment are an Occupational Safety and Health Administration (OSHA) requirement, with the priority being to protect the safety of both the workers on site and the general public.

**Response to Comment 94-10:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 94-11:**

LACFCD notes the multiple reasons the City states that hauling should be prohibited on Berkshire Place. See Response to Comments 94-2 and 94-6. LACFCD will continue to work with local organizations, the Cities of La Cañada Flintridge and Pasadena, and the community of Altadena to minimize traffic impacts around the project site.

**Response to Comment 94-12:**

See Response to Comments 94-2, 94-6 and 94-11. Even with the use of flaggers, restriping would be required for use of the alternative haul routes. Additionally, no haul routes listed in the Draft EIR have truck traffic on Oak Grove Drive north of Berkshire Place.

**Response to Comment 94-13:**

Potential impacts due to the Proposed Project's truck trips, including double dump trucks, were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. The capacity analysis considers what is called a Heavy Vehicle Factor. A heavy vehicle, such as a truck or recreational vehicle, utilizes more roadway capacity than a passenger vehicle. Other considerations include the size, slower start-up times, and maneuverability restrictions of the heavy vehicles. Per the Highway Capacity Manual, the Heavy Vehicle Factor is calculated using the percentage of heavy vehicles and adjusts the saturation flow rate of the roadway. Thus, the analysis of traffic impacts did consider a Heavy Vehicle Factor that took slower start-up times and maneuverability restrictions into consideration and, therefore, adequately analyzed the impacts of slower acceleration rates and larger turning radii on local intersections.

Additionally, restriping of the Berkshire Place/I-210 eastbound ramps intersection has been recommended as part of the Draft EIR. LACFCD will continue to work with local organizations, the Cities of La Cañada Flintridge and Pasadena, and the community of Altadena to minimize traffic impacts around the project site.

**Response to Comment 94-14:**

See Response to Comment 94-13. The Traffic Report (Appendix J of the Draft EIR) followed the Los Angeles County Congestion Management Program (CMP) Guidelines, California Department of Transportation's (Caltrans') Guide for the Preparation of Traffic Impact Studies, the Highway Capacity Manual (HCM), and Intersection Capacity Utilization (ICU) methods. Each methodology is a governing guideline in preparing a Traffic Impact Analysis set forth by each jurisdiction within the project area as applicable to the intersections, on- and off-ramps, and freeway facilities. The methods used are derived from the 2010 Highway Capacity Manual and 2003 *Intersection Capacity Utilization* (ICU) methods for Synchro for consistency across jurisdictions. This is a generally accepted methodology and compliant with CEQA requirements; therefore, impacts to freeway ramps were adequately analyzed. LACFCD will continue to work with local organizations, the Cities of La Cañada Flintridge and Pasadena, and the community of Altadena to minimize traffic impacts around the project site.

**Response to Comment 94-15:**

All of the trucks will be loaded within the reservoir; and if a queue of trucks develops, they will stage within the reservoir itself to lessen impacts on the adjacent streets. It is estimated that trucks will briefly idle during loading, but the average loading time per truck is estimated to be one minute. In addition, LACFCD typically requires equipment to shut down if idling time is expected to be more than five minutes.

**Response to Comment 94-16:**

The Proposed Project would not result in changes to the existing bike lanes along Oak Grove Drive.

The bike lanes on Oak Grove Drive will remain open for the duration of the Project. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to roadway conditions by the Project will consist of roadway restriping; however, these changes would not alter existing roadway use nor substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant.

**Response to Comment 94-17:**

Hauling permits will be obtained as necessary from the appropriate localities, and all conditions of said permits will be followed accordingly.

**Response to Comment 94-18:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Clay Allen](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Another voter against sediment removal  
**Date:** Thursday, January 02, 2014 8:11:56 PM

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Dear Dept of Public Works,

I am against the proposed plan to remove sediment from the Devil's Gate Dam. The removal of trees and vegetation and the disruption of wildlife habitat is not acceptable. The project does not provide enough benefit to the county to balance out its many costs.

Thank you,

Clay Allen  
1810 Alta Wood Dr, Altadena Calif 91001

Comment 95-1

## Response to Comment Letter #95 (Clay Allen)

### Response to Comment 95-1:

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter does not support the Proposed Project.

The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Connie Branson](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Dam Project  
**Date:** Monday, January 06, 2014 1:55:41 PM

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I wish to voice my serious concerns about the clean out program. I strongly criticize the methods you have planned--- too much, too dirty, too noisy and too destructive to the wildlife habitats. A slower, less aggressive method would provide a better chance to do the job in a more careful, considerate way. I am a resident locally, I have horses across the street at the riding club, and the noise, air pollution and traffic of the dump trucks hauling would be overwhelming. Of even more

concern is the disruption of the wildlife that call the area their home, would be extremely destructive. A slower, less aggressive program would allow wildlife to adjust with less panic, move their habitats to safer areas and be safer for residents and traffic since when animals panic, they run, and can cause more disruption to traffic, local residents and surely, be injured or killed. Also, local pets would be upset by the wildlife crossing into residential areas nearby. As far as the riding club

goes, the heavy truck traffic roaring and grinding along the roads is very disruptive to the horses and they become frightened, spooky and that is when both horses and riders get hurt.

Another thought is that a longer, slower program would provide stable jobs for the truck drivers and crew working on the project for a much longer time, and that helps the economy. Please slow this project down to a more careful, considerate level, and get the job done slowly and carefully. Thank you  
Connie Branson

## **Response to Comment Letter #96 (Connie Branson)**

### **Response to Comment 96-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter does not support the Proposed Project's methods.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project. This alternative would also provide a habitat buffer on the west side of the reservoir that would allow for the movement of wildlife.

### **Response to Comment 96-2:**

Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 provide mitigation to protect

and avoid impacts to sensitive species. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed. With implementation of the mitigation measures described in Section 3.6.6 of the Draft EIR, impacts to biological resources would be reduced to less than significant.

**Response to Comment 96-3:**

Existing recreational users of the Hahamongna Watershed Park currently coexist with truck traffic on the surrounding roads and from the Interim Measures Project. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 96-4:**

LACFCD notes the commenter's preference for an alternative that would take longer than the Proposed Project. See Response to Comment 96-1.

**From:** [Craig Friedemann](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, January 05, 2014 5:37:46 PM

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Hello,

My name is Craig Friedemann and though I live in Burbank I frequently use the disc golf course at Hahamongna Watershed Park. I hear that there are potential changes afoot.

I have looked at all the plans for the sediment removal project sponsored by the County. All the plans will have an impact on our disc golf course. Alternative 3 is the best plan, but the western branch will remove two of our playable positions. Please revisit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

I realize that disc golf might still reside in the fringe sport category in most people's view, but this course is, as it is frequently stated, "where it all began". This course really belongs in the state, if not national, register. It is constantly used. I've rarely been there when it isn't in constant use. I usually go at daybreak and I'm not always the first golfer there. Even when I'm there later in the day, it's hard for me to play a round as a single without waiting an inordinate amount of time—and that's OK with me. I'd rather that my sport of choice be popular, than to see it relegated to history as a "funny thing people used to do". The "desert" hole and the "gorge" hole as we golfers know them might not be part of the original course, but I consider the "gorge" as Oak Grove Disc Golf course's signature hole. The desert and gorge are the two positions noted above that will be affected.

In February Oak Grove/Hahamongna will host its 36<sup>th</sup> annual tournament. The Wintertime Open is an event on the pro tour for our sport that attracts internationally known talent. One of the great attractions in the Final 9 for the leaders of the tourney is the throw across the gorge. It would be sad to eliminate such a well-known part of the finals. It might not be the same view we get of the playoff holes of the Masters in South Carolina or the unbelievable views of the playoff holes at Pebble Beach, but to we disc golfers, it is as spectacular.

Our sport requires very little maintenance and it complies easily with our Presidents' requests for us to get out and get moving—not to mention our past Governor. You don't want to anger the Terminator do you? (that was said with humor implied). Since disc golf is so easy to do and as affordable as soccer, I would hope the County of Los Angeles and the City of Pasadena would want to promote people to get out and get moving as well. All that soccer really requires is a ball. On the same lines, all that disc golf really requires is a disc. How much simpler can it be to get people out and moving? I myself, look at my time on the course not so much as practice to overwhelm my competitor, as I do that it is a beautiful walk in the park among some majestic oaks and wildlife. Why do we as a society have to take more of that away from us?

Thank you for your time and consideration.

Sincerely,  
Craig Friedemann

**Response to Comment Letter #97 (Craig Friedemann)**

**Response to Comment 97-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities will remain open during sediment removal and will continue to provide active recreational facilities to the area.

**From:** [Damien Baccaro](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils Dam clean out  
**Date:** Friday, January 03, 2014 11:07:20 AM

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La Public Works,

I don't believe you have given enough time and thought into removing the sediment from Hahamonga. I live right next to the Dam, and all the neighbors I have spoken to have no clue what you are proposing. I feel La Publics Works is proposing the most severe method of removal , with out any regard to the environmental impact, ethical respect, etc.

Was there any thought into putting large underground pipe at the top of Hahamonga (near JPL bridge) and ending at the Dam, therefore leaving most of the habitat un scathed?

This project is selfish and greedy.

-Damien Baccaro

Sent from my iPad

## **Response to Comment Letter #98 (Damien Baccaro)**

### **Response to Comment 98-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter does not support the Proposed Project. A great deal of time and thought was put into conceiving the Proposed Project and each of the Alternatives analyzed and into the preparation of the environmental documentation for the Proposed Project.

Per California Environmental Quality Act (CEQA) Guidelines Section 21902 (b)(3), notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:

- publication in a newspaper of general circulation in the area affected by the Proposed Project
- posting of notice by the lead agency on and offsite in the area where the Proposed Project is to be located
- direct mailing to the over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll.

The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the Los Angeles County Department of Public Works (LACDPW) website

Therefore notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

The environmental documentation for the Proposed Project, including the Initial Study and the Draft Environmental Impact Report (EIR) were made available at eight local libraries, the County Public Works headquarters, and online. In addition, CDs with the documents were made available free upon request; and printed copies were made available for purchase at County Public Works headquarters for interested parties.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

**Response to Comment 98-2:**

Using a pipe to bypass the reservoir would effectively circumvent the flow attenuations that Devil's Gate Dam provides and would thus increase potential downstream flooding.

**From:** [DT](#)  
**To:** [fifthdistrict@lacbos.org](mailto:fifthdistrict@lacbos.org)  
**Cc:** [reservoircleanouts](#)  
**Subject:** DEVIL'S GATE RESERVOIR CLEANOUT PROJECT OPPOSITION  
**Date:** Friday, January 03, 2014 3:18:33 PM

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Dear Los Angeles County Board of Supervisors, and Department of Public Works

We cannot afford to have this project go forward, it is not a project for a day, it is an ongoing project that will devastate the health of the area residents, and ecological environment. Please do not permit this project to move forth. We will suffer traumatically with respiratory, cardio, and circulatory devastation.

Thank you, for your attention in this matter.

Sincerely,  
Dancingwater Taylor  
(626) 797-8857

Comment 99-1

## **Response to Comment Letter #99 (Dancingwater Taylor)**

### **Response to Comment 99-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter does not want the Proposed Project to go forward.

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft Environmental Impact Report (EIR), Section 2.5.1, Sediment Removal Phase, Project Schedule.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. Wildlife species currently found in the Proposed Project area would be expected to either remain in the Proposed Project area or to reestablish once sediment removal activities have been completed.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance.

**From:** [Daniel Russell](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Friday, January 03, 2014 4:59:11 PM

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Hi,

My name is Daniel Russell I live at 4423 Brookhaven Dr

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

When I flew out to California I always heard how amazing your disc golf courses were. So the first thing I wanted to do was play and this field was the one I went to and I loved it. I have so many great memories from that trip but that made it that much better.

Comment 100-1

**Response to Comment Letter #100 (Daniel Russell)**

**Response to Comment 100-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities will remain open during sediment removal and will continue to provide active recreational facilities to the area.

**From:** [David Boettcher](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 4:07:15 PM

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Hi,

My name is David Boettcher. I live at 628 Durwood Dr. La Canada, Ca 91011

Comment 101-1 | I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Comment 101-2 | Oak Grove Disc Golf Course is the first permanent disc golf course in the world. This is a every special course to the disc golf community, everyday there are hundreds of people & families playing the course. Right now disc golf is the fastest growing sport in the world & everyday more & more people pick up the sport. I've only be playing for a few years, this is home course & play 3-4 times a week. This past week I've meet people from Northern California, Michigan' Alabama & Florida playing the course. They came in for the Rose Bowl games, made time to play the course, everyone talked about how beautiful the course & park is. The 2 basket positions we may loss are 2 of the most popular holes to play on the course. There is so much wildlife in those areas that would be displace or killed with moving the sediment there.

Thank you,  
David Boettcher.

**Response to Comment Letter #101 (David Boettcher)**

**Response to Comment 101-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**Response to Comment 101-2:**

See Response to Comment 101-1. As discussed in Section 3.6.6 of the Draft (EIR, Mitigation Measures MM BIO-1 through MM-BIO-8 provide mitigation to restore and enhance riparian and sensitive habitats. Wildlife currently found in the project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

**From:** [Dietrich Bartelt, DB Sediments](#)  
**To:** [reservoircleanouts](#)  
**Subject:** "Devil's Gate Reservoir Sediment Removal and Management Project"  
**Date:** Sunday, January 05, 2014 4:00:22 PM  
**Attachments:** [63DBC6C8-5DBF-474A-947C-0154803E7D6E\[1\].png](#)  
[161D290E-3FC9-4767-803B-92FFCF361A04\[1\].png](#)

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Dear Ladies and Gentlemen,

by chance and through people who addressed us a couple weeks ago, we did get aware of the "Devil's Gate Reservoir Sediment Removal and Management Project" and the proposed solution.

We want comment and to give input to the draft environmental impact report for the Devil's Gate Sediment Removal and Management Program (and if applicable to further rehabilitation projects), which are sponsored by LACFCD, and are now out for public review with comments closing on January 6, 2014 or at a future date.

We very much appreciated the valuable study and especially the video describing the situation about sediment cycle and the situation with flood protection and reservoirs.

It is following the following video: <http://www.youtube.com/watch?v=H8rt8Zrb8ps>

Everything in that movie is right up to the minute: 3.35, when it is proposed to take sediments out of the river and the ecosystem.

The use and storage of water is eventually resulting in sedimentation and siltation of the storage capacity of the reservoir.

Comment:

Not only in the case of storage for drinking water purposes, the operators often think that every drop of water should be used for just that purpose. It is true that water should not be wasted. It should be used efficiently and caringly. But due to the use of water, there is an impact to the ecosystem that needs to be compensated. Besides storing water, some water should be giving back to the river for guaranteeing minimum flow in the riverbed. Reservoirs that are intended to serve the flood protection and serve, as retention volumes could be equipped with small turbines that can run the electric driven machines to perform the continuous sediment management.

The sediment management should address two main targets:

1st at least keeping the current stage of the volume of the storage capacity

2nd rehabilitating the storage capacity by further measures, including an increase of transferred sediment volume that still meets the framework conditions of a system sensitive approach.

To reach both targets is very challenging. For many cases, we are ready to provide a study (sometimes in parallel to the ongoing studies) to determine the feasibility of continuous sediment

Comment 102-1

transfer for the silted dam.

Comment 102-1  
continued

It should therefore be the question:

“What is the most effective and most efficient way to compensate the impact of using and storing water?” and which method is most efficient for the rehabilitation of the lost storage capacity? and which method has the least (additional) impact when applying the solution?

Current attempts to solve the problem of sedimentation and siltation

Within the current environmental impact report it is proposed to dig or dredge reservoir sediment and dispose it a a far distant site. This is extremely expensive and has a strong impact to the environment and to the community. It is the most expensive method to try to solve the problem of sedimentation. In addition stored or extracted sediment which is missing downstream of reservoirs leads to erosion damages, substrate deficits and ground water problems. Even coast erosion on the beaches is effected indirectly.

When removing the sediments or even reducing the sediment volume in reservoirs for the storage of water for drinking water or irrigation, the facilities plant operators are faced with exorbitant costs; we talk several million US Dollars range even for small reservoirs. In the case of LA County they want to run 450 trucks constantly to a dump at a distance of 20 to 30 miles away for 5 years or more to remove about 2 to 4 million m3. Can you imagine the impact of this measure to public and environment?

The ConSedTrans-Method of DB Sediments

We are ready to propose the ConSedTrans-Method, as an alternative and innovative technical approach of DB Sediments that makes reservoirs penetrable for sediment avoiding above-mentioned secondary effects. Incoming as well as already settled sediment is continuously transferred through the reservoir and fed over long time spans in morphologically and ecologically compatible concentrations and with a necessary quantity of rest-water (minimum flow requirements) downstream by applying newly developed equipment. In the eyes of the operator of the reservoir this rest-water-quantity might be lost, but it enables the sustainable and continuous use of the reservoir.

Reservoir management and turbidity is not affected when properly applied and the approach is performed during daily reservoir operation. It is applicable to almost any range of plants, small to large drinking water and irrigation water reservoirs - or reservoirs for hydro power generation.

This approach does not only restore the overall sedimentation process to a near to natural state, but also fulfills the requirements of the Water Framework Directive 2000/60 of the European Community as well as the US Sediment Acts. Moreover, as the equipment can be fully automated, it

Comment 102-1

is also economically very competitive, even without considering the avoided costs of the secondary effects. Furthermore continuous sediment transfer can have positive effects with respect to the characteristics of wave dynamics that is also affecting river flows (and floods).

Our invention has received the PLATTS-Award of Excellence as “Leading Global Sustainable Technology-Innovation of the Year 2011” by Platts and Fortune Magazine, has been recently nominated for the Platts Global Energy Award for the third time in a row (2011, 2012, and 2013), was nominated for the Zayed Future Energy Prize, and furthermore has most recently received the Initiative Prize for renewable energies and environment in the state of North-Rhine Westfalia in Germany.

When applying our approach, it is usually one of the first steps that we offer a study, that - scientifically sound - will address the individual framework conditions and finalize on quantifying the overall cost of applying the patented approach. Besides the Global Water System Project - as a network of global researchers in the field of water, we work together with a number of well know German (Excellence) universities, including the RWTH Aachen - technical university of Aachen. Furthermore, just a couple weeks ago, we established closer contacts with Purdue University, University of Illinois and University of Wisconsin (Milwaukee and Madison). Looking at the individual framework conditions, I am very positive to see that there are times when there is enough excess water that could be used for continuous sediment management i.e. without harming the necessary supply of drinking water, irrigation water or water for hydro power generation. Furthermore, the retention volume is kept at the necessary level. The efficient and effective use of this water could extend the lifetime of a reservoir from “just a couple years” to “many years” and besides creating a sustainable use of water, it gives benefits to the overall ecosystem.

Further to the information there is a link to the English brochure on our approach:

[http://www.db-sediments.com/tl\\_files/db\\_layout/Broschueren/DBS\\_English.pdf](http://www.db-sediments.com/tl_files/db_layout/Broschueren/DBS_English.pdf)

The following link has some information about the Mississippi and how held back sediments in the Mississippi River is effecting the existence of the Louisiana delta (what has been build up in thousands of years, is about to disappear within about 100 years after building dams and/or locks on the Mississippi):

<http://www.nola.com/speced/lastchance/multimedia/flashlandloss1.swf>

In November 2013, we had a meeting with representatives of the American Association of State Floodplain Managers (<http://www.floods.org>) in Madison, as well as at MWH Global Offices in Chicago. Our method was very well received! We are currently setting up a project with the Global Water System Project ([www.gwsp.org](http://www.gwsp.org), it will be presented at the Water-Energy-Food Nexus conference in May 2014 <http://24488.seu.cleverreach.com/m/6997901/>) quantifying the overall benefits of the continuous sediment management for the overall ecosystems (sustainable storage, prevention of bed load erosion, prevention of groundwater levels from falling, enabling irrigation, sustainable flood management, prevention of coast erosion and prevention of a decrease of ground water quality in the delta areas of the rivers). There are a number of other large and small-scale projects that we are currently preparing. For March, we are preparing to have a third round of presentations for experts of the World Bank and international organizations in Washington D.C.

Here is the link to the scientific paper, that was presented at the ACWUA Water Conference in 2012 in Oman:

[http://www.db-sediments.com/tl\\_files/db\\_layout/images/120524%20ACWUA%205th%20BP%20conference%20-%20Paper%20Bartelt,%20Bundemann,%20Sevis.pdf](http://www.db-sediments.com/tl_files/db_layout/images/120524%20ACWUA%205th%20BP%20conference%20-%20Paper%20Bartelt,%20Bundemann,%20Sevis.pdf)

and a presentation, held with a Water Technology Seminar of the German American Chambers of Commerce in October and November 2013:

[http://www.gaccmidwest.org/fileadmin/ahk\\_chicago/2013\\_EVENTS/2013\\_Water\\_Roundtable\\_WI/O2\\_Dietrich\\_Bartelt.pdf](http://www.gaccmidwest.org/fileadmin/ahk_chicago/2013_EVENTS/2013_Water_Roundtable_WI/O2_Dietrich_Bartelt.pdf)

Resume:

LA County is proposing the "cleaning the reservoirs" in order to rehabilitate lost retention volume for flood protection.

We would like to support LA County with setting up a joint and more system sensitive, more cost effective and sustainable approach with continuous sediment management.

Due to the Christmas break, we were not able to set up a project team with participating organizations or companies, but we would be ready to contribute to the success of your project. We had a personal conversation with the Director of NREL - National Renewable Energy Laboratory on Dec 12th, and addressed him for cooperation on the issue of continuous sediment management just before Christmas. Besides, we are waiting for response of further organizations and companies.

Please let us know what you think. Would you be interested to know more? At the cost of travel expenses, we are ready to provide a presentation or a lecture, if asked for, even on short notice.

We want to wish you and your colleagues a good and successful New Year 2014.

Best regards,

Dietrich Bartelt

Dr. Dietrich Bartelt, Dipl.-Ing.

**DB Sediments GmbH**

Bismarckstr. 142, 47057 Duisburg, Germany

T +49-2065 8399 300 (Home Office)

M +49-1522 9888321

T +49-203-306-3626

T +49-203-306-3629

mailto: [d.bartelt@db-sediments.com](mailto:d.bartelt@db-sediments.com)

[www.db-sediments.com](http://www.db-sediments.com)

Geschäftsführung: Dipl.-Ing. Reiner Bundesmann

Sitz der Gesellschaft: Duisburg

Eingetragen beim Amtsgericht Duisburg

Handelsregister-Nr. HRB 21143

USt-IdNr. DE815063955



[www.db-sediments.com](http://www.db-sediments.com)



[www.germanwaterpartnership.de](http://www.germanwaterpartnership.de)

**Response to Comment Letter #102 (Dietrich Bartelt – DB Sediments GmbH)**

**Response to Comment 102-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Los Angeles County Flood Control District (LACFCD) does not store water in the Devil's Gate Reservoir for drinking water purposes. As noted in the Draft Environmental Impact Report (EIR), the purpose of the Proposed Project is to reduce flood risk by restoring reservoir capacity for flood control. The ConSedTrans Method relies on water held behind the dam for sediment transport operations. On average, Devil's Gate Reservoir does not receive inflow for many months out of the year and is often dry. Therefore, holding water behind the dam permanently would entail having standing water in the reservoir most of the year. Holding water behind the dam permanently is not a part of the Proposed Project objectives and is outside the scope of this project.

**From:** [Dwayne Miles](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [yellowd100@gamil.com](mailto:yellowd100@gamil.com)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 3:18:09 PM

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Hi,

My name is Dwayne Miles. I live at 1270 Cordova St. Pasadena.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

This is the first Disk Golf Course ever built for one of the most rapidly growing sports in the world. The loss of these two "Holes" (two of the most challenging) would be a great loss. Please reconsider changing anything in this part of the Watershed Park.

Thank you,  
Dwayne Miles

Comment 103-1

**Response to Comment Letter #103 (Dwayne Miles)**

**Response to Comment 103-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Francia DiMase](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, January 05, 2014 8:48:02 PM

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Dear LACDPW,

I am writing to urge that another solution be researched to solve the issue of excess sediment that has built up behind Devil's Dam. The current proposal, trucks hauling non stop for over a five year time period, is completely unacceptable on so many levels. The expense and resources involved in such a gigantic undertaking are illogical.

I stand with my family, my neighbors and the surrounding, tax-paying communities to say this project must NOT go forward as is.

Thank you for your time.

Francia DiMase  
818-790-7244

Comment 104-1

**Response to Comment Letter #104 (Francia DiMase)**

**Response to Comment 104-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

The goal of Los Angeles County Flood Control District (LACFCD) is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities.

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft Environmental Impact Report (EIR), Section 2.5.1 Sediment Removal Phase, Project Schedule. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays.

Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

**From:** [Henry@yahoo](mailto:Henry@yahoo)  
**To:** [reservoircleanouts](mailto:reservoircleanouts)  
**Subject:** Oak Grove Disc Course  
**Date:** Sunday, January 05, 2014 11:16:36 AM

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County of Los Angeles Department of Public Works Water Resources Division,

Comment 105-1 | Please consider any decision that will impact Oak Grove Disc Golf Course. this course is a historical place to play, any alterations to it may change the feel of it for the worse. I urge any of you on this project to play a round of disc golf here to see for yourself...how special this course really is, especially the holes that would be impacted by this project. There are so much the government needs to fix, start with the bigger issues and leave this course be, stop trying to take people's fun away.

Thanks,

Henry Correa

Sent from my iPhone

**Response to Comment Letter #105 (Henry Correa)**

**Response to Comment 105-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [howard.tan@gmail.com](mailto:howard.tan@gmail.com) on behalf of [Howard Tan](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 2:46:42 PM

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Hi,

My name is Howard Tan. I live at 2884 Sterling Pl, Altadena, CA 91001.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Take care,  
Howard

Comment 106-1

**Response to Comment Letter #106 (Howard Tan)**

**Response to Comment 106-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Jeff Nyerges](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Friday, January 03, 2014 2:36:43 PM

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Hi,

Comment 107-1 | My name is Jeffrey Nyerges. I am a long time user of the disc golf course in Hahumunga Watershed Park. I serve on the Board of Directors for the Southern California Disc Golf Association. I live at 6233 1/2 Temple City Blvd. Temple City, CA 91780

Comment 107-2 | I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Oak Grove Disc Golf Course is The **1st EVER** permanent disc golf course **IN THE WORLD**. The course should be recognized as a historical Landmark, and we (Oak Grove Disc Golf Club, Southern California Disc Golf Assoc.) will be filing our application for such.

Thank you,  
Jeff Nyerges  
PDGA #39323

**Response to Comment Letter #107 (Jeff Nyerges)**

**Response to Comment 107-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 107-2:**

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [John Harris](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Saturday, January 04, 2014 9:25:29 PM

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Dear Sirs,

Comment 108-1

While we all realize something must be done to manage the sediment in Devil's Gate Reservoir, the plan put forward by the LA County Flood Control District will adversely impact the lives of thousands of people who live in the neighborhood and/or who visit Hahamongna Park for recreational purposes.

Comment 108-2

I strongly urge you therefore to consider the slow and sustainable sediment removal program put forward by the Arroyo Seco Foundation—a plan that will maintain flood protection for downstream communities, reduce negative impacts on the surrounding neighborhoods, take advantage of the natural geological processes that transport sediment, and protect the rich habitat and recreational opportunities in Hahamongna Watershed Park.

Sincerely,

John M. Harris, Ph.D.  
1515 Washburn Road  
Pasadena, CA 91105  
(323) 257-3351  
jharris@nhm.org

**Response to Comment Letter #108 (John Harris)**

**Response to Comment 108-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The goal of Los Angeles County Flood Control District (LACFCD) is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities.

Impacts to recreation were analyzed in the Draft Environmental Impact Report (EIR), Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

**Response to Comment 108-2:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. As discussed above, Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** [John May](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Thursday, January 02, 2014 6:39:14 PM

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Dear Los Angeles County Flood Control District Team,

I live in Altadena very near to the Hahamogna Watershed Park and I visit the park and play disc golf at the historic Oak Grove Disc Golf Course several times a week. It was brought to my attention by the other members of the Oak Grove Disc Golf Club that all of the plans in the recent draft environmental impact report would result in the destruction of two of the current holes on the course. In our option the best of the proposed plans is alternative 3, but the western branch of alternative 3 still significantly impacts the course. We would prefer that the LACFCD implement another alternative that can preserve the existing disc golf course.

Best,

John P. May, Ph.D  
880 Mountain View St.  
Altadena, CA

Comment 109-1

**Response to Comment Letter #109 (John May)**

**Response to Comment 109-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Alternative 3, Configuration D, Option 1 would not result in the destruction of any holes, as suggested by the commenter. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [jon foreman](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's gate reservoir sediment removal and management project  
**Date:** Sunday, January 05, 2014 3:13:11 PM

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Hello my name is Jonathan Foreman ,

I have seen the plans for the sediment removal project and I feel the plans will have a large impact on the disc golf course. I hope you can revisit the plans and change things up.

Thank you, Jonathan

Comment 110-1

**Response to Comment Letter #110 (Jonathan Foreman)**

**Response to Comment 110-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. The Proposed Project and Alternatives would not have a “large impact” on the disc golf course as suggested in the comment. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Quiet Alias](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Friday, January 03, 2014 4:39:35 PM

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Hi,

My name is Lara Ramsey. I live at 4802 N 34th DR, Phx, AZ.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will impact the disc golf course.

In honesty, I've never actually been on the course. The course, however... It means a lot to my cousin and a couple of friends of ours. She seems distraught about all of this, and I just want to do everything I can to help her. Due to the fact that I can't even console her at this moment - since we are separated. A lot of people actually do have some kind of connection to this course. Perhaps, you could really re-visit the sediment removal plans and really make an alternative that will not interfere with, well, anyone. Seems like the courteous thing to do, from my point of view, anyway. If you actually can do something different, myself and probably hundreds of other people with sentimental attachment to said course would be forever grateful. I know you probably busy and everything, but if you **can** do something - just please.

Thank you,  
Lara Ramsey

Comment 111-1

**Response to Comment Letter #111 (Lara Ramsey)**

**Response to Comment 111-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Leigh Adams](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [Monica Hubbard](#)  
**Subject:** Devil's Gate Reservoir  
**Date:** Friday, January 03, 2014 10:29:19 PM

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Comment 112-1

Hello Public Works, I am a twenty year resident of Altadena and an avid user of the riparian path of the Hahamonga watershed. I enjoy hiking there, walking my dog, hanging out and reading a book, wandering the trails and bird watching. In addition, I have ridden both bikes and horses through those dusty pathways and I remember back when it wasn't so dusty and was much more verdant.

Comment 112-2

I am extremely disturbed by your plan to excavate the Reservoir. I do not believe this is in the best interest of the environment, the wildlife, the domestic life, the eco-system or any other system. In fact, quite the opposite. In this time of drought and global warming, and yes, it's real, the removal of trees is a major step in the process of DESERTIFICATION! The trees are removed, the ground warms up, less rain falls, fewer trees grow.....and it gets hotter and drier. It is simple science; we teach it to kindergartners, can we teach it to county agencies?

It seems to me that we can spend our time, tax dollars and expertise to solve this issue in some way other than the diesel solution that is being proposed. Even the Army Corps of Engineers thinks the current plan is a dreadful idea!

Comment 112-3

Hmmm, who benefits by the destruction of habitat, the use of massive expensive equipment? Who hands out those contracts? Would the old adage "follow the money" bring us closer to an answer as to why other ideas have not been pursued? Do the stakeholders living around the Arroyo have any say in whether or not they are inundated with diesel noise, tractors, trucks and dust for months, many, many loud, dusty months?

Comment 112-4

I understand sediment is an issue. So is the loss of habitat for our native species!!! And the loss of valuable recreation area. We are the taxpayers whose work funds these projects. We demand a say in how OUR problems are solved. Do not move forward with this ill conceived plan!

Leigh Adams

With all due respect,

## **Response to Comment Letter #112 (Leigh Adams)**

### **Response to Comment 112-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes, as described in the Draft Environmental Impact Report (EIR), the many recreational opportunities in the reservoir, including hiking, passive recreation, and bird watching.

### **Response to Comment 112-2:**

Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Also per Section 3.9.6 of the Draft EIR, impacts to greenhouse gas emissions were found to be less than significant.

Additionally, air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet the EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders, including concerns for long-term habitat preservation and recreational usage. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities. The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

The United States Army Corps of Engineers (USACE) Arroyo Seco Watershed Ecosystem Restoration Study was prepared in partnership with the Los Angeles County Department of Public Works (LACDPW). LACFCD has been and will continue to work closely with USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws.

**Response to Comment 112-3:**

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 goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance.

LACFCD uses a formally advertised sealed bid process for public works construction contracting. The goal of the process is to award a contract to the lowest cost "responsive" and "responsible" bidder. California Public Contract Code mandates the use of an advertised bid process for construction contracting. Contractors and service providers must meet certain qualification requirements to be considered by the County for selection and contract award.

More detailed information on the County's construction bidding process can be found in the *County of Los Angeles Countywide Construction Policy Guidelines* available online at the following location: [http://dpw.lacounty.gov/aed/construction\\_manual.pdf](http://dpw.lacounty.gov/aed/construction_manual.pdf)

LACFCD actively encouraged stakeholder involvement at the two scoping meetings, during the scoping period, during the 90-day Draft EIR public review period, and at the three community meetings. Additionally, three information meetings regarding the Proposed Project will be held in the near future. See Response to Comment 112-2 regarding other alternatives analyzed.

**Response to Comment 112-4:**

See Response to Comments 112-2 and 112-3.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months, as mentioned above. It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir

ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

LACFCD notes the commenter's objection to the Proposed Project.

**From:** [Luis Mistero](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 5:05:53 PM

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Hi,

My name is Luis De La O. I live at 729 N. Garfield ave pasadena ca 91104.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

(I grew up playing here, and now I have a son that is loving the game of DISC GOLF)

Thank you,  
Luis De La O.

Comment 113-1

**Response to Comment Letter #113 (Luis De La O)**

**Response to Comment 113-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Luke Meyer](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 3:54:52 PM

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Hi,

My name is Luke Meyer. I live in Claremont, CA.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Seeing that this is sacred place for disc golfers (first permanent course ever), I think our input should be valued.

Thank you,  
Luke Meyer

Comment 114-1

**Response to Comment Letter #114 (Luke A Meyer)**

**Response to Comment 114-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) recognizes the importance of the Oak Grove Disc Golf Course to the community. Community and agency input during preparation of the Draft Environmental Impact Report (EIR) was valued by LACFCD and used for decision making purposes. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, LACFCD will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Luke Meyer](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Saturday, January 04, 2014 9:07:18 PM

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Comment 115-1

Your alternatives are not good enough. **Please** make another alternative without the western branch trenching in Alternative 3.

Thank you,  
Luke Meyer

**Response to Comment Letter #115 (Luke Meyer)**

**Response to Comment 115-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). To further address your concern, Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**From:** [MartynBelmont@aol.com](mailto:MartynBelmont@aol.com)  
**To:** [reservoircleanouts](mailto:reservoircleanouts)  
**Cc:** [pollywheaton@att.net](mailto:pollywheaton@att.net)  
**Subject:** Hahamonga Project  
**Date:** Thursday, January 02, 2014 6:53:49 PM

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I am very worried that the proposed project to remove ALL THE SILT as well as ALL THE CHAPPAREL AND NATIVE PLANTS is one of the worst cases of over-kill I have ever seen. I am the past President of the Pasadena Garden Club. The Garden Club of America has many position papers on just this kind of "project over-kill."

The silt has been accumulating for many years. We do not have to get rid of ALL OF IT by having a truck every 10 minutes every day for six years on the 210 fwy. And, we should never consider removing all the plant material surrounding Hahamonga as that growth is necessary to prevent floods after we have fires.

Please, reconsider this NAPALM ASSAULT on the Dam area and consider much less invasive cures.

Martyn Belmont  
Past President, Pasadena Garden Club  
Past President, La Casita Foundation  
Member of the Board, La Casita Foundation

Comment 116-1

## **Response to Comment Letter #116 (Martyn Belmont – La Casita Foundation)**

### **Response to Comment 116-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's concern about the Proposed Project, especially the removal of vegetation; however, some vegetation must be removed in order to remove the many layers of sediment that have been deposited.

Approximately 1.3 million cubic yards (cy) of sediment came into the reservoir in just two storm seasons after the 2009 Station Fire. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If the reservoir is left in its current state, the flood risk to downstream communities would be left at an unacceptable level.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

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The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule.

The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders, including concerns for long-term habitat preservation and recreational usage. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

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

**From: Maura Townley  
mauratownley@sbcglobal.net**

**RE: Comments: Draft Environmental Impact Report for Devil's Gate Reservoir  
Sediment Removal and Management Project**

**Introduction:**

My husband and I have lived in Altadena for 29 years and we walk our dogs at least 320 days per year in the Hahamongna Watershed Area, of which Devil's Gate is the dam/reservoir section. We enjoy the wildlife in the park; birds; mammals, and varied plant life that the park offers as well as the people we meet in Hahamongna. We enjoy its natural beauty, peaceful surroundings, and wide-open spaces. It represents a unique ecosystem and captures the beauty of the greater Arroyo Seco. The numerous oaks and mature trees provide shaded walking areas for people, pets, and other animals. We have made friends with people who ride their horses on the trails that are shared with people and dogs. It is also a healthy outlet for younger people who play soccer, walk, and play with frisbees. It has adequate and secure bathrooms and parking that other park areas/trails do not offer.

**Concerns:**

Recently, we became aware of the County's project for Devil's Gate sediment removal and management and the availability of the draft environmental impact report (DEIR). In addition, we have been advised that the County is planning a pipeline to pull water from Devil's Gate to Eaton Wash at essentially the same time. We believe that the impacts recreation has been understated and that mitigation measures need to be considered. We also believe that impacts to traffic, while determined to be significant and unavoidable around the reservoir, do not accurately reflect or attempt to mitigate negative impacts in the surrounding communities, especially along the proposed pipeline. It is important that impacts to passive recreational users be accurately stated and remedies toward mitigation be considered. Some of the concerns we have are as follows:

Recreation - According to the DEIR, use of park facilities may be less desirable due to construction-related emissions, noise, dust, visual, and traffic impacts associated with sediment removal. It is stated in the DEIR that "*recreational users may choose to visit other area parks, recreational facilities, or trails due to the temporary access restrictions or the indirect effects of construction-related activities during reservoir management activities*". The DEIR fails to recognize that there are no other parks that offer the special features that this park has to offer. Recreation uses such as horse-back riding, disc golf, and nature walks cannot relocate. There are no mitigations proposed for recreation impacts. **Why is the determination of recreation impacts determined to be less than significant when the are many uses that cannot continue during the construction phase and possibly beyond and that cannot relocate to other parks in the region? Do planners realize that the other parks do not have the same ample parking as Hahamongna or relative security? Why are there no mitigation measures beyond temporary and / or permanent displacement for all of these activities?**

Traffic - We are concerned about the traffic impacts along the Woodbury Corridor and New York Drive in Altadena as a result of this project and the related pipeline project. The impacts to Altadena have not been addressed beyond the immediate project area. However, traffic will exit

Comment 117-5 continued  
the likely to be congested freeways and attempt to bypass the freeway traffic by driving through northern Pasadena and Altadena. This will have a tremendous impact on the quality of life for Altadena residents.

**Why aren't the traffic impacts to alternate routes to the freeways being addressed and mitigated? Why is there no mention in this DEIR of the pipeline project that is described in the March 2013 Devil's Gate and Eaton Storm Water Flood Management Project Proposition 1-E grant funding request?**

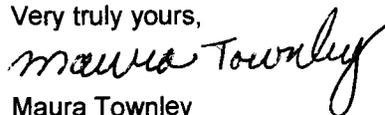
**Conclusion:**

Comment 117-6  
I respectfully submit that the DEIR has overlooked some critical issues that may be involved with this project. Can the County do a risk assessment to see what the projected risk of flooding in the Arroyo might be? In addition the impact to traffic of trucks lining up to transport dirt is probably enormous, to say nothing of the possible pollution that could accrue from the diesel trucks. The population of birds, mammals, frogs, and other creatures that make up this complex ecosystem could be changed or damaged irreparably without a comprehensive plan. The dust and particulate matter discharged into the air could make the enjoyment of Hahamongna only a memory unless better and realistic mitigation is designed and the impact on traffic in La Canada, Pasadena, and Altadena is addressed—has this been adequately done in your estimation?

Comment 117-7  
Hahamongna increases the quality of life of those who use it as well as adding economic value to the surrounding communities, and allows hikers, bikers, and horse lovers to keep away from traffic and allow them and drivers to stay safe. In Altadena there are no uniform sidewalks, for example, so it is very difficult for horsemen and horsewomen to ride on its streets in a safe manner. It is a place of tranquility, harmony, and decompression.

Thank you for your careful consideration of this very important issue. Lets hope that Hahamongna will continue to exist as a "flowing water, fruitful valley" for the generations to come.

Very truly yours,



Maura Townley  
429 East Pine Street  
Altadena, CA, 91001

**Response to Comment Letter #117 (Maura Townley)**

**Response to Comment 117-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes, as described in the Draft Environmental Impact Report (EIR), the many recreational opportunities in the reservoir including hiking, passive recreation, and bird watching.

**Response to Comment 117-2:**

The Devil's Gate Water Conservation Project is a separate project from the Devil's Gate Reservoir Sediment Removal and Management Project. The Devil's Gate Water Conservation Project is still in a conceptual design phase and is not currently scheduled for construction; however, this project was included in the cumulative analysis, as noted in the Draft EIR in Table 2.9-1: Cumulative Projects.

**Response to Comment 117-3:**

See Response to Comment 117-2. The Proposed Project does not involve construction of a pipeline. The traffic impacts associated with the Proposed Project were accurately analyzed as described in the Draft EIR, Section 3.16 Transportation and Traffic. The Draft EIR, Section 3.16 Transportation and Traffic included the Devil's Gate Water Conservation Project in the cumulative analysis. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

The impacts to recreation are outlined in the Draft EIR, Section 3.15 Recreation, and note the importance of passive recreation in the area. No significant impacts to recreation were found; therefore, no mitigation measures are required. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 117-4:**

See Response to Comment 117-3. LACFCD recognizes that the area is an important area for recreation, as outlined in Section 3.15, Recreation/Public Services.

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule. Therefore, the maximum impacts to recreation would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, LACFCD will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft EIR, carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**Response to Comment 117-5:**

See Response to Comments 117-2 and 117-3. The Devil's Gate Water Conservation Project, which will include the pipeline, is a separate project from the Proposed Project or alternatives; and since it is still in a conceptual design phase, no environmental report is available for public review at this time. The Proposed Project analyzed cumulative impacts from other projects that may be occurring in the vicinity at the same time, including the Devil's Gate Water Conservation Project. As shown in the Draft EIR, Section 3.16, the traffic volumes on Interstate-210 (I-210), the on-/off-ramps, and the local roadways within the Proposed Project area included those potentially impacted by the Proposed Project. The analysis provided a conservative project condition volume that accounts for expansion and regional growth within the Proposed Project area. These volumes account for redistribution of traffic. None of the freeway segments analyzed in the traffic report would be significantly impacted. LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

**Response to Comment 117-6:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

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Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

All of the trucks will be loaded within the reservoir; and if a queue of trucks develops, the trucks will stage within the reservoir itself to lessen impacts on the adjacent streets. Long queuing and idling times will not occur during the Proposed Project.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCDD conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 117-7:**

Comment noted.

**From:** [nahu zachary](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's gate reservoir sediment removal and management project  
**Date:** Friday, January 03, 2014 4:43:16 PM

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Hi,my name is nahuel.

I have looked at all the plans for the sediment removal Project sponsored by the county,and all the plans will have an impact on our disc golf course.Alternative 3 is the best plan,but the western branch will remove 2 of playables positions.Please re-visit the sediment removal plans and make an Alternative plan that will not impact the disc golf course

Comment 118-1

**Response to Comment Letter #118 (Nahuel Zachary)**

**Response to Comment 118-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Noemi Zamudio Quiroz](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Friday, January 03, 2014 6:23:21 PM

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Hi,

My name is Salvador. I have looked at all the plans for the sediment removal project sponsored by the country, and all the plans will have an impact on our disc golf course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Thank You,  
Salvador

Comment 119-1

**Response to Comment Letter #119 (Salvador Quiroz)**

**Response to Comment 119-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Randy Strapazon](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Dam reservoir sediment and management project  
**Date:** Saturday, January 04, 2014 11:43:45 PM

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I strongly urge you to reconsider the scope of this project. I have attended the presentation by County representatives and were shocked that they admitted that the level of air polluting toxins could not be mitigated. That the use of clean fuel burning trucks could not be guaranteed. The sediment contains toxins from the station fire, disturbing the dust five days a week, eight hours a day for years is inexcusable.

Comment 120-1

There are school children and two day care centers( where babies and young children spend 8-10 hours a day) within the target area. These are the most vulnerable members of our society, they will experience lifelong chronic diseases and in many cases death. Weigh this devastating consequence against the possibility of, as the County spokesperson admitted, two once in 50 years storm happening together. Can you really take such a responsibility? Would you proceed with this project if your children were exposed? I hope not.

Comment 120-2

In addition to the destruction of a very important ecosystem and wildlife habitat, there are surely to be unforeseen impact on the surrounding community that will bring criticism and citizen outrage. There will be financial loss for homeowners and businesses resulting in lack of confidence in the County and the Supervisors. Do not let this project be Supervisor Antonovich's legacy. He has done too much good for District 5 to be remembered as the person who sponsored so much unnecessary destruction. Be reasonable and prudent. Reduce the size of the project and extend the timeline. While removing the sediment is necessary the current project's cost to residents, wildlife, and habitat is too high.

Sincerely,  
Randy Strapazon  
444 Georgian Rd  
La Canada. 91011

## **Response to Comment Letter #120 (Randy Strapazon)**

### **Response to Comment 120-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft Environmental Impact Report (EIR), Section 2.5.1, Sediment Removal Phase, Project Schedule.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. The Draft EIR analyzed impacts to sensitive uses, including residents, recreational uses, and schools, adjacent to the Proposed Project site and along the proposed haul routes. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related acute short-term and long-term impacts.

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

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The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

**Response to Comment 120-2:**

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Comment regarding economic impacts to surrounding homeowners and businesses has been noted.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Dick Williams](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, January 05, 2014 2:27:08 PM

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I support sediment removal behind Devils Gate Dam, but in more moderation than any of the current plans. Your plan should provide accommodation for current recreational users, including disc golfers, hikers, horses, and bird watchers. Significant quantities can be removed within these parameters, restoring some of the safety the basin was intended for. I advocate that work start immediately in the less sensitive areas, but leave all of current recreational facilities, and some of the current wildlife habitat, perhaps in islands.

Thank you for your consideration.

Richard and Jill Williams  
5303 Crown Ave  
La Canada Flintridge, CA  
818-952-5508

Comment 121-1

**Response to Comment Letter #121 (Richard Williams)**

**Response to Comment 121-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

Jan 2, 2014

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

**RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT**

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial

Comment 122-4  
continued

scrub areas for these experiences, along with other areas of the park.  
Hahamongna is home to generations of staff and campers whose lives have  
been directly and dramatically enriched by this natural refuge, including mine.

Comment 122-5

Tom Sawyer Camps is a very important program and my request could easily go  
unnoticed but I believe the impact that camp has on the children of tomorrow is  
significant. Summer in the watershed is a rare and unique opportunity for children  
to be away from noise and disruption and engage with nature and outdoor  
adventure in a safe, peaceful, and joyful manner. We hope you will see the value  
of camp and make every attempt to minimize the impact the sediment clean up  
will have during the summer months and for the generations of children to use  
the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs.  
Please feel free to contact me if you have any questions.

Sincerely,



Rick Yendofsky  
628 W NORMAN AVE  
ARCADIA, CA 91007

RYendofsky@GMAIL.COM

**Response to Comment Letter #122 (Rick Yenofsky)**

**Response to Comment 122-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 122-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 122-3:**

See Response to Comment 122-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Berkshire Place intersection with Oak Grove Drive and thus will not approach the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 122-4:**

See Response to Comment 122-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 122-5:**

See Response to Comment 122-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Sarah Bales](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Friday, January 03, 2014 8:21:20 PM

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Hi,

My name is Sarah Bales. I live at 21050 Vanowen St., Woodland Hills, CA 91303.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact our Disc Golf Course.

I have been coming here for as long as I can remember with my family. It means a great deal to me that it doesn't get damaged or ruined in any way. I know that you have important things you need to do, but memories and the simple things like a Disc Gold Course are what keep a community real. And to lose it, any part of it, is a tragedy. I know you can understand that. The joy and love you will be taking away by causing parts of this course to become fragmented is representative of fragmenting our best memories. Please don't.

Thank you,  
Sarah Bales

Comment 123-1

**Response to Comment Letter #123 (Sarah Bales)**

**Response to Comment 123-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [SARAH RODRIGUEZ](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, January 05, 2014 7:34:40 PM

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To Whom It May Concern:

I am writing to express my concern regarding the flood control project intended to take place in Hahamongna Watershed Park. I am specifically concerned about the plan to remove all or nearly all of the sediment form the site in a project that will involve 425 diesel trucks per day, nine months a year for the next five to seven years, going into Hahamongna Watershed Park and exiting on Berkshire.

Such an expansive and unnecessary project will cause significant traffic, noise and pollution, not to mention extraordinary cost to taxpayers. The Los Angeles County Department of Public Works has made false and exaggerated statements to justify this outrageous project and have consistently denied that it was high risk.

However, it would be impossible to execute a project this stature without such risks and the reasoning that such a project is necessary to prevent another forest fire in an area so recently exposed to one is preposterous.

Such a project is not only unnecessary, but will have adverse health affects on residents and visitors to the area, especially the elderly, the pregnant and the young, of whom there are so many due to the number of schools and recreational facilities in the area. The practice of scraping the basin clean with earthmovers, will unleash micro ash particles originally rendered by the Station Fire, forcing us to revisit some of the most dangerous and offensive elements of that unfortunate event everyday, for nine months a year, for five to seven years.

There are alternative methods of sediment removal that are slower, less disruptive, less dangerous and less expensive. I sincerely hope that the Department of Public Works and the LA County Board of Supervisors will consider these alternatives and reject the current plan.

Thank you for your time and attention to this very important matter.

Sincerely,  
Sarah Rodriguez

## **Response to Comment Letter #124 (Sarah Rodriguez)**

### **Response to Comment 124-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. With sediment removal operations moving efficiently, it is reasonable to assume a project duration of no more than five years. Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft Environmental Impact Report (EIR), Section 2.5.1, Sediment Removal Phase, Project Schedule.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's

Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

The Proposed Project is not being undertaken to prevent forest fires. The goal of the Proposed Project is to restore it to its current design standard to provide adequate flood control and establish a reservoir configuration more suitable for routine maintenance activities, including sediment management.

**Response to Comment 124-2:**

See Response to Comment 124-1. Air quality impacts were analyzed in the Draft EIR in Section 3.5. The Draft EIR analyzed impacts to sensitive uses, including residents, recreational uses, and schools, adjacent to the Proposed Project site and along the proposed haul routes. Also as discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related acute short-term and long-term impacts.

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 124-3:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120

acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Sonja-Sophie Loeffler](#)  
**To:** [reservoircleanouts](#)  
**Subject:** No on Devil"s Gate Project  
**Date:** Friday, January 03, 2014 11:36:32 AM

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To whom it may concern,

I would ask you DENY the proposed clearance of sediment in the area in question. Sometimes the long term consequences of actions that seem to fit in our human thinking pattern are far greater when we consider we do not live in a bubble, but in a living, breathing planet. Not only the heavy machinery needed for excavation create much noise and unnecessary air pollution, it would undeniably destroy the natural habitat in the Hahamongna Water Shed Park for generations to come. We are continuously destroying the planet we rely on for living, and here we have a chance to make a statement and say "We can find another way to address the problems AND keep a wonderful, only once in the world existing ecosystem intact for our selves and our children." With a little out-of the box thinking, I am sure we can accomplish this. The first proposed solution to a problem is not always the best one. We have to begin to look ahead and see the destruction we are causing by our short-term-quick-fix thinking.

I am asking you to put the project to a STOP for now and truly seek and consider other options.

Regards,  
Sonja-Sophie and MArkus Loeffler and Jonathan Castillo (11)  
Direct: 323-873-6442

Comment 125-1

## **Response to Comment Letter #125 (Sonja-Sophie Loeffler)**

### **Response to Comment 125-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As discussed in the Draft EIR, Section 2.3, 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. LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Air quality and noise impacts associated with the Proposed Project were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders, including concerns for long-term habitat preservation. The

alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns, while adequately reducing flood risk to downstream communities. The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [stephanie.cafiero](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils Gate Dam Sediment Removal  
**Date:** Friday, January 03, 2014 2:00:50 PM

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The obliteration of the land behind the dam will not ensure the safety of those down stream. How will the loss of vegetation slow the flow of the rain and accumulated water?

How will the water that enters the park area be manage if there is nothing to contain it? What will slow the flow in the event of a rainstorm?

Stephanie A. Cafiero

Comment 126-1

**Response to Comment Letter #126 (Stephanie Cafiero)**

**Response to Comment 126-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The dam will contain the flows when water enters the reservoir, and the removal of sediment is necessary to provide the necessary capacity to safely contain flows. The vegetation in the reservoir area does not provide flood protection. For more information on dam operations, please go to: <http://dpw.lacounty.gov/lacfd/sediment/dam.aspx>

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

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Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

December 23, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs, and as a staff member for five years I feel that heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride

↑horses, build secret forts, observe wildlife, play games, sing songs, build self-reliance and self-esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine. For me personally, the camp has been not only my first employer, but a family of individuals who have dedicated their lives to the positive development of children.

Comment 127-4  
continued

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean-up will have during the summer months and for the generations of children to use the park in the years to come.

Comment 127-5

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,



Steven Johnson  
1001 Paloma Dr.  
Arcadia, CA 91007  
(626) 353-7518  
swjohns@ucdavis.edu

**Response to Comment Letter #127 (Steven Johnson)**

**Response to Comment 127-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 127-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 127-3:**

See Response to Comment 127-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Berkshire Place intersection with Oak Grove Drive and thus will not approach the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 127-4:**

See Response to Comment 127-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 127-5:**

See Response to Comment 127-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Susanna Dadd](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamongna sediment removal  
**Date:** Friday, January 03, 2014 2:21:55 PM

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Dear Sirs:

Comment 128-1

I have read all the alternative plans for sediment removal. I think all of the alternatives are too destructive and much too expensive. I am a taxpayer and I resent the use of my tax dollars for this irresponsible and unaudited project.

Comment 128-2

What is wrong with the DPWs earlier plan from at least ten years ago? Why was that plan not implemented.

Thank you,

--

Susanna Dadd  
[www.realgardens.net](http://www.realgardens.net)

**Response to Comment Letter #128 (Susanna Dadd)**

**Response to Comment 128-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Draft Environmental Impact Report (EIR) analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders including concerns for long-term habitat preservation and recreational usage. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities. The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

**Response to Comment 128-2:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Additional information concerning DDE determination methods has been added to the Final EIR, Section 2.3, Project Need and the Sedimentation Manual (March 2006) and can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

As noted in Section 2.2.1, LACFCD History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity.

**From:** [Sparrow Organics](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamonga watershed park , please save,  
**Date:** Saturday, January 04, 2014 10:42:06 AM

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Hello,

I would like to direct my comments to whom it may concern:

Comment 129-1 | Please reconsider the alternatives when it comes to bulldozing precious resources. Sand, gravel and rock is a resource, not trash, to be excavated and dumped after bulldozing up to 120 acres of trees and riparian habitat extending from the face of the dam north to JPL. The DPW's plan will cost up to \$100 million, a staggering amount of money, but will not solve any long term sediment management problems. Trails will be lost in the park. Double trailer diesel truck convoys will operate every minute (6 days per week, 12 hours per day) for 5+ years, driving in and out of the park on new access roads carved into the park across existing trails. Truck convoys will pass through local neighborhoods and onto the 210 freeway, causing massive traffic congestion.

Comment 129-2 | In addition to deisel truck fumes, scraping the entire basin in the park, operating earth movers, rock crushers and other noisy industrial equipment will cause dust and abrasive ash pollution that will harm not only park visitors and local horse stables, but nearby schools, residences, and JPL. A permanently denuded basin will be maintained after the major destruction. Birds and wildlife dependent upon the basin will lose their homes or be killed (crushed when they flee into their burrows) when the basin is bulldozed and excavated. Blue herons and egrets, ducks, coveys of quail, hawks, and numerous songbirds... rabbits, squirrels, salamanders, lizards and bobcats... butterflies and hummingbirds... species too numerous to list here that depend upon the natural habitat in the basin, will die or become nuisance "refugees"; in surrounding neighborhoods. Endangered species, such as the Bell's Least Vireo, a rare songbird that has been documented in the basin, will disappear and never return.

Comment 129-4 | It is not necessary to destroy Hahamongna Watershed Park to protect property downstream of the dam. There are alternatives to the DPW's costly plan. Please, I urge you to reconsider . Kind regards,

Terrie Velazquez Owen  
1828 n . Michigan ave.  
Pasadena ca.

## **Response to Comment Letter #129 (Terrie Owen)**

### **Response to Comment 129-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft Environmental Impact Report (EIR).

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

Los Angeles County Flood Control District (LACFCD) strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. The estimated cost for the Proposed Project and for Alternatives 1, 2, 3, and 5 would range from \$80 million for the Proposed Project to \$65 million for Alternative 3. LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs. The remaining cost will be covered by LACFCD funds.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 129-2:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. The Draft EIR analyzed impacts to sensitive uses, including residents, recreational uses, and schools, adjacent to the Proposed Project site and along the proposed haul routes. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, and compliance with the South Coast Air Quality Management District's (SCAQMD's) Rule 403 has been determined to be sufficient to adequately address the concerns. As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with SCAQMD's fugitive dust regulations.

**Response to Comment 129-3:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed. In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a

buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 129-4:**

LACFCD notes the commenter's objection to the Proposed Project.

See Response to Comment 129-1. The Draft Environmental Impact Report (EIR) analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders, including concerns for long-term habitat preservation and recreational usage. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns, while adequately reducing flood risk to downstream communities.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). As discussed above in Response to Comment 129-1, Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

## **Comments: Devil's Gate Reservoir Sediment Removal and Management Project - Draft EIR**

**To:** LACFCD / County of Los Angeles Department of Public Works  
[reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov)

**Attn:** Water Resources Division – Reservoir Cleanouts  
Keith Lilley, Principal Engineer

**From:** Thomas Holaday, Concerned Citizen of Altadena

**Date:** December 23, 2013

**Re:** Los Angeles County Department of Public Works Sediment Removal in Hahamongna Watershed Park / Devil's Gate Reservoir – Draft Environmental Impact Report

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Dear Mr. Lilley,

Comment 130-1

**Why is The Los Angeles County Department of Public Works** planning a massive five-year sediment removal project at Hahamongna Watershed Park that will cause enormous impacts to the City of Pasadena? The scope of these impacts is so severe that the Public Health and the Health of the Environment are at extreme risk. This is a massive trucking project that offers no sustainability for the future of flood control.

Comment 130-2

**Hahamongna Watershed Park**, situated above Devil's Gate Dam, is a rare and unique environmental resource for water and biological resources that must not be destroyed. This beautiful and treasured alluvial canyon with its rich riparian habitat must be protected. The DWP's plan as spelled out in this Draft EIR is destructive and detrimental to the future of Hahamongna Watershed Park. Once it is destroyed, it cannot be recreated.

Comment 130-3

There are problems with the project. With the proposed plan, there will be significant air and noise pollution: 425 trucks per day, that is 50 per hour, for 6 days per week, for 9 months, for five years. Why must the Project take 3 to 5 years to complete? Why not do the sediment removal Project in 10 to 20 years? Why is it necessary to proceed with this highly aggressive and destructive plan? We will Lose Our Park. This Aggressive Plan is Unnecessary and Unacceptable.

Comment 130-4

**The Health Risks are disastrous.** Significant increases in Traffic locally and regionally. It would create a real danger to the many Students, who attend the five nearby Schools, and all the Residents of Pasadena, Altadena, La Canada, and the SGV region. Permanent loss of Habitat would occur by scraping out 120 acres of the Park, leaving a ‘Moonscape’ scar.

Why does The LACDPW offer No Mitigation to its plan?  
 Why does The DPW claim that all the destruction and risks are unavoidable?

We will lose our Park. This is Unacceptable.

Comment 130-5

**There are significant problems with the Draft EIR.** Why is there offered no scientific rationale to remove 2.4 to 4 million cubic yards of sediment? The Board of Supervisors authorized the DPW to analyze and develop methods to remove 1.67 million cubic yards, with no specified schedule for completion. Why now does the DPW claim they need to remove 2.4 to 4 million cubic yards without saying why the amount has increased? And, why does the DPW make no case for the need to remove it in five years?

Why does the DPW provide no rationale for the Permanent Destruction of Habitat?  
 Why does the DPW have reason to Clear-Cut 50 to 120 acres of this beautiful green space?  
 This goes against the Hahamongna section of the Arroyo Seco Master Plan, Pasadena.

Comment 130-6

**Consider the Collateral Damages.** Visitors to the Park will lose restorative qualities of life via programs and adventures within this natural beauty of rare riparian habitat: The Mach 1 Program- Horse Riding Therapy for Disabled Children, The Tom Sawyer Children’s Camps utilize this Park as their main area, The Rose Bowl Riders and Stables, who ride daily, Hikers and dog walkers utilize the many important and wonderful Trails daily, Bird Watchers from everywhere have regular walks here, with remarkable findings.

Under the proposed DPW project, all of this would come to an end.

Comment 130-7

**The Health Risks to the public,** the nearby Schools, as well as all the Residents of Pasadena and the SGV Region, from airborne pollutants, such as fugitive dust and diesel exhaust, cannot be overstated. Air and noise pollution, traffic congestion, destruction of habitat leads to the destruction of the Recreational Benefits the Hahamongna has always offered to the public.

Why does the DEIR indicate that Increases in Diseases among people of Pasadena are Acceptable, and Unavoidable consequences of the project?  
 Why does the DEIR Ignore Recreation impacts? How could The DEIR state that Recreation impacts are found to be less significant?

Comment 130-8

The County project would Overburden the Flood Easement, as well as Overburden Outside their Easement. This is Comprehensively Unacceptable.

**Solutions**

Comment 130-9

I agree that sediment needs to be removed to ensure the Public Safety Downstream. But, it should be done in a way that is much less impactful on the public, and much less destructive to the environment. This Hahamongna Watershed Park is a treasured jewel that must not be abused, but protected. Why does the DPW show no reason to protect it? Once it is destroyed, it cannot be recreated.

Comment 130-10

The County needs a long term “Forever Plan” to deal with Flood control. One that is sustainable and does not permanently destroy one of the most important open spaces in the region. This project could serve as a model for other such projects in the region. I believe that the various methods of Sluicing are an important part of the solution. The County has relied on Sluicing for years. Why not continue to use Sluicing methods, flow assisted sediment transport? Instead of spending all this money on trucking, why not repair and improve those few areas that risk overtopping in a severe storm, along the Arroyo Seco River between Devil’s Gate Dam, and the LA River confluence??

Comment 130-11

Can The County adopt the proposal offered by Tim Brick, Managing Director of the Arroyo Seco Foundation? Go Slow, Go with the Flow, Let the Habitat Grow, and Keep Costs Low. This plan will mean fewer trucks, less dust, less air pollution, less noise, less habitat destruction, and lower costs. I urge the County to purpose this plan.

**Go Slow:** The County makes no case for removing the sediment in three-five years. This sediment has been building up for almost 100 years, and the basin has never been fully cleaned out. We would like them to take a longer time, ten-twenty years, which would eliminate the need for the Big Dig approach. The Go Slow approach would allow the sediment to be removed in less destructive ways. Instead of removing 800,000-1,200,000 cubic yards of sediment per year, the County should remove 167,000 cubic yards per year, and then annually remove what is necessary based on the amount of inflow. As long as the County removes more than what flows in, they will increase the capacity of the dam.

**Go with the Flow:** The County should allow more of the sediment to flow through the dam. This is called sluicing or FASTing (Flow-Assisted Sediment Transport). The County has been sluicing sediment through Devil’s Gate Dam for years, and we would like to see more. If they proceed slowly, then they may utilize large storms more effectively to sluice sediment, and can coordinate with the Army Corps of Engineers on its plans to restore habitat in the Los Angeles River. They can conduct pilot programs to determine the effects of increased sluicing downriver. Sluicing returns sediment to where it belongs: the river. This sediment is not a waste product but can be used as an integral part of the restoration of the Arroyo Seco and the Los Angeles River.

**Let the Habitat Grow:** The County makes no case for keeping 50-120 acres of riparian habitat permanently denuded. This rich riparian habitat should be allowed to grow so it can continue to provide a home for local flora and fauna.

**Keep Costs Low:** This \$100 million project can cost a lot less if the County uses the SLOW method. By sluicing more sediment through the dam and working with nature instead of against it, the costs of this project can be greatly reduced. If the County removed more of the sediment with sluicing, that means they will need fewer trucks, which will save money. If the cost is spread out over ten or twenty years, this provides the County and the City an opportunity to reexamine the process and promote best practices from an economic, engineering, and environmental standpoint. More importantly, this project can serve as a model for other projects, and perhaps the County can find ways to work with nature on the other projects, thereby reducing the costs of sediment removal countywide. The County has estimated costs the range of at \$3-5 billion over the next 20 years, but as this has become an ongoing maintenance expense, the county needs to find ways to reduce this cost permanently.

**Conclusion:**

As the City of Pasadena has the responsibility as the property owner of Hahamongna Watershed Park, and is the Responsible Agency to protect the HWP, I urge that the EIR be consistent with the City of Pasadena Plan that is in place, The Master Plan for Hahamongna Watershed Park. As is needed, why cannot the City of Pasadena and The County DPW work together to develop the City's preferred alternative plan?

Please be consistent with the Hahamongna Master Plan to preserve habitat and wildlife, to improve opportunities for recreation, to improve water conservation, and to minimize air and noise pollution impacts. Most importantly, to create a feasible project and maintain a long-term management program that keeps us safe, and green.

**PLEASE SAVE HAHAMONGNA WATERSHED PARK !**

Thomas Holaday  
Concerned Citizen of Altadena  
[thomasholaday@sbcglobal.net](mailto:thomasholaday@sbcglobal.net)

Comment 130-11  
continued

Comment 130-12

## **Response to Comment Letter #130 (Thomas Holaday)**

### **Response to Comment 130-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As discussed in the Draft Environmental Impact Report (EIR), Section 2.3, Project Need, the Los Angeles County Flood Control District (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. LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

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Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related acute short-term and long-term impacts.

### **Response to Comment 130-2:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently

found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). Alternative 3 affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 130-3:**

See Response to Comment 130-1. Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 130-4:**

See Response to Comments 130-1 through 130-3. Various mitigation measures are provided throughout the Draft EIR to reduce impacts to the community and the environment.

Table ES-1 of the Draft EIR lists all Mitigation Measures proposed for the Proposed Project. These Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans.

**Response to Comment 130-5:**

See Response to Comments 130-1 through 130-3.

As discussed in the Draft EIR, Section 2.2.1, LACFCD History, in 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cy was proposed. The volume of 1.67 million cy is the previously published DDE and this amount was considered justifiable to the California Environmental Quality Act (CEQA) as an emergency exemption. This emergency project was not completed because in March 2011 the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of

the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project. Knowing that the EIR would take a considerable amount of time to complete, the County of Los Angeles Board of Supervisors also motioned for an Interim Measures Project to be implemented in order to help reduce the flood risk downstream of the dam until the ultimate sediment removal project commenced.

**Response to Comment 130-6:**

See Response to Comment 130-3. As noted in the Draft EIR, Section 3.15, the Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation will occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1 Sediment Removal Phase, Project Schedule.

**Response to Comment 130-7:**

See Response to Comments 130-1 through 130-3. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

The Draft EIR does not claim that "increases in diseases among people of Pasadena are acceptable and unavoidable consequences," as suggested in the comment. As noted above, an HRA was performed for the Proposed Project that found that both cancer-related and non-cancer-related impacts would be less than significant. In addition, recreational impacts were addressed in Section 3.15 Recreation, of the Draft EIR and were determined to be less than significant.

**Response to Comment 130-8:**

LACFCD notes the commenter's disapproval with the Proposed Project; however, the scope of the Proposed Project and Alternatives is entirely within LACFCD's easement. The Proposed Project will not overburden the easement; it will restore the reservoir to the design capacity necessary for flood control storage or to safely contain future sediment inflow (volume for two DDEs below the spillway elevation of 1,040.5 feet).

**Response to Comment 130-9:**

See Response to Comments 130-1 through 130-4.

**Response to Comment 130-10:**

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed

and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. As discussed in Section 4.7 and in the Sediment Transport Capacity Analysis (Appendix K), most of these downstream locations would be in the Arroyo Seco, with deposits primarily occurring in and around the two soft bottom areas. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

Flow Assisted Sediment Transport, or FASTing, operations have been routinely used at Devil's Gate Reservoir and result in relatively small amounts of finer grained sediment passing through the reservoir. After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. A maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

As noted in the Draft EIR, the purpose of the Proposed Project is to reduce flood risk by restoring reservoir capacity for flood control.

**Response to Comment 130-11:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. As discussed above, Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained above, FASTing will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**Response to Comment 130-12:**

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

See Response to Comments 130-1, 130-2, 130-3, and 130-11. As stated in the Draft EIR, the Proposed Project will remove accumulated sediment deposits within the reservoir. This means the percolation characteristics of the reservoir will return to pre-Station Fire conditions if not improve; and the reservoir will still permit percolation of rainfall and local runoff to replenish the groundwater basin.

**From:** [Tom Joyce](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Clean out  
**Date:** Friday, January 03, 2014 9:40:56 AM

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Comment 131-1 [ Be reasonable and prudent in this matter as many enjoy the way it currently exists!

Thomas T Joyce. Resident of Altadena

Sent from my iPad

**Response to Comment Letter #131 (Thomas Joyce)**

**Response to Comment 131-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Tom S](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 3:19:08 PM

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My name is Thomas Seelbinder. I live in the city of Rancho Santa Margarita, CA a small suburb at the far eastern side of Orange County.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

I must say that the Oak Grove Disc Golf Course is a staple in the history of Disc Golf. Not only was this the first disc golf course, it is a beautiful course. I have to travel over an hour to reach your city to play at this course, and I don't mind doing so. We usually make a small day out of it.

Thank you,  
Thomas Seelbinder

Comment 132-1

**Response to Comment Letter #132 (Thomas Seelbinder)**

**Response to Comment 132-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [chaosinmynd@aol.com](mailto:chaosinmynd@aol.com)  
**To:** [reservoircleanouts](#)  
**Subject:** DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT  
**Date:** Thursday, January 02, 2014 7:50:36 PM

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To whom it may concern,

The Western Branch of Alternative 3 will impact the Oak Grove Disc Golf Course in La Canada Flintridge/Pasadena, California.

There are two holes that will be effected which would compromise the integrity of the course. Oak Grove Disc Golf Course was the first permanent disc golf course and has a rich and endearing history.

I earnestly ask that you reconsider your decision and leave the course alone.

Thank you,  
Tim Miranda

Comment 133-1

**Response to Comment Letter #133 (Tim Miranda)**

**Response to Comment 133-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [bonolatim@dslextreme.com](mailto:bonolatim@dslextreme.com)  
**To:** [reservoircleanouts](#)  
**Subject:** Draft EIR Comments  
**Date:** Friday, January 03, 2014 9:10:56 AM

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Comment 134-1

Let me see if I understand the position of the Department of Public Works (DPW):  
In what appears to be one of the driest years in L.A. County history, the DPW is insisting that a massive project to remove sediment (along with trees and an entire riparian ecosystem) must be enacted immediately to avoid flooding.

Comment 134-2

The DPW also contends that it is necessary, in order to protect adjacent neighborhoods, to enact a plan that would subject those same neighborhoods to trucks rumbling through their streets and and considerable dust pollution for a period of at least five years.

Comment 134-3

At a time when funds are tight for schools and other public projects, the DPW proposes a massive, costly, environmentally disruptive project, as opposed to a lesser project that, spread over a greater number of years, would be far less disruptive.

Comment 134-4

Did I miss anything?  
Please reject this destructive boondoggle.

Timothy D. Callahan  
3771 Alzada Rd.  
Altadena, CA 91001-38-1

**Response to Comment Letter #134 (Timothy Callahan)**

**Response to Comment 134-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries. A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of the LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

**Response to Comment 134-2:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 134-3:**

See Response to Comment 134-1. LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

**Response to Comment 134-4:**

LACFCD notes that the commenter does not support the Proposed Project.

**From:** [Will Fernandez](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamonga sediment removal  
**Date:** Sunday, January 05, 2014 10:55:57 AM

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Comment 135-1 | Please consider the least impactful alternative 3 proposal for Hahamonga. As an avid disc golfer I am greatly concerned with the original proposal to dredge a rich and biodiverse area, home to countless birds and animals who have no voice. A few weeks ago while playing a round of disc golf I spotted a bobcat on the desert hole where the county is proposing to dredge the dam. I implore you to please consider the ramifications of your actions on wildlife and disc golfers that regularly inhabit the area.

Thank you for your consideration.  
William Fernandez  
Network for a Healthy California

Sent from my iPod

**Response to Comment Letter #135 (William Fernandez)**

**Response to Comment 135-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

**From:** [Carl Ehlig](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils Gate Dam  
**Date:** Wednesday, January 08, 2014 8:21:44 AM

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Dear DWP,

I am infavor of clearing a portion of the built up material behind the dam - yet not infavor of removing the entire habitate. Removing and deepening the area directly behind the dam to a distance of 2,000 feet would be good. Removing the forest that extends beyond there and up the riverbed up to the east parking lot of JPL would be bad. Bad for our neighborhood and bad for the environment.

Sincerely,  
D. Carl Ehlig

Comment 136-1

**Response to Comment Letter #136 (D. Carl Ehlig)**

**Response to Comment 136-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Alternative 3 has the deepest configurations achievable while still maintaining the lowest elevation of the reservoir at the lowest outlet of the dam and with adequate grading to assist the flows towards the dam's valves. Any excavation below the lowest valve would pond water that could not be released. Excavating below the lowest outlet could also undermine the dam and ultimately cause dam failure.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. A footprint any smaller would decrease the volume removed and the ultimate capacity of the reservoir, which would fail to meet Proposed Project objectives.

**From:** [Susette Horspool](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [Hannah Petrie](#); [7thPrincipleNbrhd@yahoo.com](mailto:7thPrincipleNbrhd@yahoo.com)  
**Subject:** Re: comment about sediment removal at Devil's Gate Dam  
**Date:** Tuesday, January 07, 2014 6:42:45 PM

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Comment 137-1 | To whom it may concern - I chair a 15 member Green Council in Pasadena with a 130 member list serve. We, also, are opposed to the county's current plans for moving sediment from behind Devil's Gate Dam. We understood that the EIR just published would likely result in a reasonable plan for removal. Instead, the plan seems to be much the same as the first unworkable plan that the county proposed before the EIR. This smacks of deliberate avoidance of public concern. My list serve and I will join any organized public protest that arises, if the county goes ahead with this proposal.

Sincerely,

*Susette*

Susette Horspool/Chair  
7th Principle Green Council  
[www.uuneighborhood.org/7thPrinciple.html](http://www.uuneighborhood.org/7thPrinciple.html)  
626-798-1087

On Jan 7, 2014, at 3:53 PM, Hannah Petrie wrote:

To whom it may concern,

Thank you for listening to the public comments, and extending the deadline to submit them.

I am the Associate Minister of Neighborhood UU Church, located on N. Orange Grove, next to the Gamble House. We have received numerous awards for instituting many green technologies on our campus. Over the years, we have participated in many environmental activism initiatives that affect the public.

I am personally connected with many pastors in the Pasadena area who would be happy to work with me in making sure your plans to dramatically change the landscape do not go forward. I respect the fact that you are trying to find the best long term solution for dealing with this sediment. But I also want to make sure you know that you would be facing a lot of organized public protest if you proceed with your current proposal.

I do not live far from the area in question. My husband works at JPL, and enjoys riding his bike there. I also have good connections with JPL employees who would join in the fight to oppose this project as it stands, as well as many Ultimate Frisbee players who

enjoy playing at Hahamonga Park on a weekly basis.

From what I understand, it is simply too destructive – there must be a gentler, more reasonable solution to removing sediment than the radical proposal you have set forth twice now.

Again, I appreciate all the work and time this entails to come up with a different solution. Please offer a plan that is something the public and the many inhabitants of this natural area can live with.

Thank you for taking my comments seriously,  
Rev. Hannah Petrie

**Response to Comment Letter #137 (Susette Horspool – 7<sup>th</sup> Principle Green Council)**

**Response to Comment 137-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter does not support the Proposed Project.

Comments and information received during the scoping process (see Appendix A of the Draft EIR) were taken into consideration for the analysis and formulation of alternatives and mitigation. The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders, including concerns for long-term habitat preservation. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns, while adequately reducing flood risk to downstream communities. The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

**From:** [Hannah Petrie](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [Susette Horspool \(shtiger@att.net\)](#); [rodys@earthlink.net](#); [nancy.busacc@gmail.com](#)  
**Subject:** comment about sediment removal at Devil's Gate Dam  
**Date:** Tuesday, January 07, 2014 3:49:50 PM

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To whom it may concern,

Comment 138-1 | Thank you for listening to the public comments, and extending the deadline to submit them.

Comment 138-2 | I am the Associate Minister of Neighborhood UU Church, located on N. Orange Grove, next to the Gamble House. We have received numerous awards for instituting many green technologies on our campus. Over the years, we have participated in many environmental activism initiatives that affect the public.

I am personally connected with many pastors in the Pasadena area who would be happy to work with me in making sure your plans to dramatically change the landscape do not go forward. I respect the fact that you are trying to find the best long term solution for dealing with this sediment. But I also want to make sure you know that you would be facing a lot of organized public protest if you proceed with your current proposal.

Comment 138-3 | I do not live far from the area in question. My husband works at JPL, and enjoys riding his bike there. I also have good connections with JPL employees who would join in the fight to oppose this project as it stands, as well as many Ultimate Frisbee players who enjoy playing at Hahamonga Park on a weekly basis.

Comment 138-4 | From what I understand, it is simply too destructive – there must be a gentler, more reasonable solution to removing sediment than the radical proposal you have set forth twice now.

Comment 138-5 | Again, I appreciate all the work and time this entails to come up with a different solution. Please offer a plan that is something the public and the many inhabitants of this natural area can live with.

Thank you for taking my comments seriously,  
Rev. Hannah Petrie

## **Response to Comment Letter #138 (Hannah Petrie – Neighborhood UU Church)**

### **Response to Comment 138-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

### **Response to Comment 138-2:**

Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

### **Response to Comment 138-3:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, LACFCD will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment. Furthermore, LACFCD has added an optional configuration for Alternative 3, the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes (see Section 4.6 of the Final EIR).

**Response to Comment 138-4:**

See Response to Comment 138-2.

The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders, including concerns for long-term habitat preservation. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns, while adequately reducing flood risk to downstream communities. The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

**Response to Comment 138-5:**

See Response to Comment 138-2. As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

**From:** [Chris Brophy](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 07, 2014 8:10:59 AM

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Hi,

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Oak Grove Disc Golf Course has international significance as the worlds 1st course. I know this is a complicated decision but please keep this in mind when making these important choices for our community.

Thank you,

Christopher Brophy  
chrisbrophy33@gmail.com  
213-392-3118

Comment 139-1

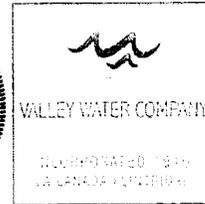
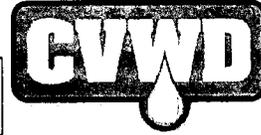
**Response to Comment Letter #139 (Christopher Brophy)**

**Response to Comment 139-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.



December 16, 2013

Supervisor Michael Antonovich  
500 West Temple Street, Room 869  
Los Angeles, CA 90012

Dear Supervisor Antonovich:

Support for Devil's Gate Reservoir Sediment Removal and Management Project

On behalf of the Foothill Family of Water Agencies, this letter is intended to express support for the Devil's Gate Reservoir Sediment Removal and Management Project which will protect areas downstream of the dam from flooding. The project will also increase water reliability by allowing runoff to be held behind the dam and recharging the groundwater basin thus increasing groundwater capacity.

The area the Foothill Family serves is approximately 22 square miles encompassing the unincorporated Los Angeles County areas of La Crescenta-Montrose and Altadena, plus the incorporated urban area of La Cañada Flintridge.

The Foothill Family of Water Agencies consists of Foothill Municipal Water District and eight retail agencies: Crescenta Valley Water District, La Cañada Irrigation District, Las Flores Water Company, Kinneloa Irrigation District, Mesa Crest Water Company, Lincoln Avenue Water Company, Rubio Cañon Land and Water Association, and Valley Water Company.

FMWD operates as a wholesale water utility that distributes imported water it receives from the Metropolitan Water District of Southern California (MWD) to the retail agencies which are located across three communities. FMWD takes delivery of imported water via a connection to MWD's Upper

Comment 140-1

Comment 140-2

Comment 140-2  
continued

Feeder in the vicinity of the Rose Bowl located in the City of Pasadena. FMWD maintains infrastructure in this lower region of the Arroyo Seco, including its Arroyo Pumping Station. Without this pump station, FMWD is unable to lift water into the service area thus impacting water supplies to 86,000 people within its service area.

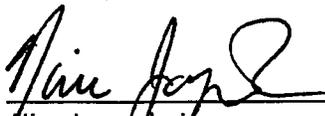
Comment 140-3

Sediment removal from Devil's Gate Reservoir and the implementation of a regular sediment management system will help to maintain the flood control capacity of the reservoir and protect the dam from any failures. A reservoir configuration that allows for routine maintenance activities will ultimately reduce downstream flood risk to adjacent communities and FMWD infrastructure.

Seven of the retail agencies have access to some local groundwater. One member agency is 100 percent dependent on imported water while another member agency takes no imported water. The remaining six agencies are dependent on varying degrees of imported water to augment locally produced groundwater. Some of the agencies also capture surface runoff from the local canyons which they are able to then provide to customers. By having a regular sediment removal maintenance program and managing the water conservation pool behind the dam, stormwater can be captured and held behind the dam, increasing groundwater capacity and individual agencies' ability to pump, maintaining water supply reliability in the area.

If you have any questions, please contact Nina Jazmadarian at (818) 790-4036 or at [njazmadarian@fmwd.com](mailto:njazmadarian@fmwd.com).

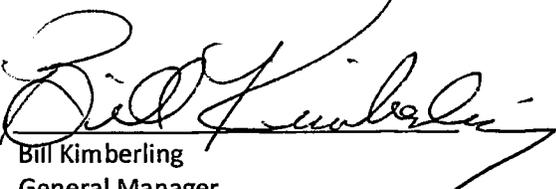
Sincerely,

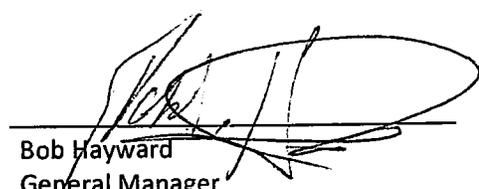
  
Nina Jazmadarian  
General Manager  
Foothill Municipal Water District

  
Dennis Erdman  
General Manager  
Crescenta Valley Water District

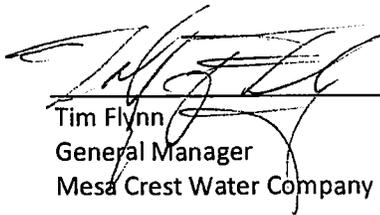
  
Mel Matthews  
General Manager  
Kinneloa Irrigation District

  
Doug Caister  
General Manager  
La Cañada Irrigation District

  
Bill Kimberling  
General Manager  
Las Flores Water Company

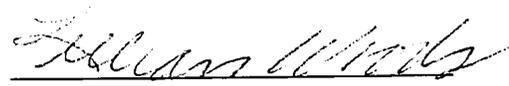
  
Bob Hayward  
General Manager  
Lincoln Avenue Water Company

*By keeping the valves operational & allow LAFCWD to draw the reservoir  
in an emergency. Although the probability of failure is very low we would not want to extend that risk due to the importance of keeping these facilities protected especially in an emergency.*



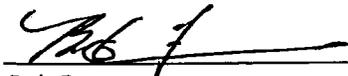
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Tim Flynn  
General Manager  
Mesa Crest Water Company



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Lillian Woods  
Operations Manager  
Rubio Cañon Land & Water Association



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Bob Fan  
General Manager  
Valley Water Company

cc: Board of Supervisors  
FMWD Board of Directors  
Gail Farber, Los Angeles County Department of Public Works  
Mayor Laura Olhasso, City of La Cañada Flintridge  
Mayor Bill Bogard, City of Pasadena  
FMWD Member Agencies  
Raymond Basin Watermaster  
Phyllis Currie, City of Pasadena

**Response to Comment Letter #140 (Foothill Family of Water Agencies)**

**Response to Comment 140-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's support for the Proposed Project. While holding water behind the dam permanently is not part of the Proposed Project objectives, the Proposed Project will have the ability to contain more of the local runoff, which in turn could result in more runoff percolating into the ground in the project area and subsequently recharging the groundwater basin. In addition, by removing sediment deposits, the Proposed Project will return the percolation characteristics of the reservoir to pre-Station Fire conditions, if not improve them.

**Response to Comment 140-2:**

LACFCD notes the information regarding the Foothill Family of Water Agencies.

**Response to Comment 140-3:**

LACFCD notes the commenter's support of a regular sediment maintenance program, such as the Proposed Project's. See Response to Comment 140-1, above.

December 30, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

I am an Assistant Director for Tom Sawyer Camps' Equestrian division and have spent the greater majority of my life growing up at Hahamonga Watershed Park. I was a camper for years, a junior counselor, an assistant counselor, a senior counselor, and now a director. I can speak, wearing all those different hats, on the importance of children attending a summer camp in an environment where they are playing with each other and positive adult role models, with nature as their canvas. The benefits of summer camp on children is a list longer than this letter, so I am writing to ask for your cooperation in allowing our camp to continue to function out of Hahamonga in a way that will give our campers access to explore the park as I did when I was a child.

While we support the sediment clean up in general, we are concerned about the impact as defined in the DEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding

Comment 141-1

Comment 141-2

Comment 141-3

Comment 141-3  
continued

the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 141-4

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 141-5

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely

Evan McDaniel  
1252 Norton Ave  
(626) 216-2937  
evanmcdaniel@hotmail.com

**Response to Comment Letter #141 (Evan McDaniel – Tom Sawyer Camps)**

**Response to Comment 141-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 141-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 141-3:**

See Response to Comment 141-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on

operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Berkshire Place intersection with Oak Grove Drive and thus will not approach the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 141-4:**

See Response to Comment 141-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 141-5:**

See Response to Comment 141-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Kaitlin Spak](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, December 17, 2013 2:10:34 PM

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Hello,

My name is Kaitlin Spak and I am a Pasadena resident; I keep my horse in Altadena and work at the Jet Propulsion Laboratory, where I can walk to the barn at lunchtime and ride around Hahamongna. You could truthfully say that my daily life literally revolves around the Hahamongna watershed park!

Hahamongna would not be the same if the natural habitat were destroyed and trucks were constantly driving in and out. I understand the necessity of sediment removal to maintain the dam, but please determine a more community and environmentally friendly method that will maintain the quality of the trails and paths through Hahamongna.

Thank you,  
Kaitlin Spak

Comment 142-1

## **Response to Comment Letter #142 (Kaitlin Spak)**

### **Response to Comment 142-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. Los Angeles County Flood Control District (LACFCD) will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. As discussed above, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Jeff Heapy](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 07, 2014 10:42:05 AM

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Hi,

My name is Jeffrey Heapy. I live at 4011 Scandia Way LA CA 90065.

Comment 143-1 | I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

I have been playing this course since I was a kid and would hate to see it modified. It is the first disc golf course ever and it is very important to the disc golf community. Please look into other options for this historical course. Preserve what natural beauty we have left!

Thank you,  
Jeffrey Heapy  
310-844-5467  
SoCal Health Insurance Agency

**Response to Comment Letter #143 (Jeffrey Heapy)**

**Response to Comment 143-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [luismistero\\_](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 5:18:32 PM

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Hi,

My name is Jose D La O . I live at 729 N Garfield ave Pasadena Ca 91104.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

My family and I have made counts of memories while golfin at this course please don't change it

Thank you,  
Jose De La O.

Comment 144-1

**Response to Comment Letter #144 (Jose De La O)**

**Response to Comment 144-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

Jan 3<sup>rd</sup>, 2014

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

**RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT**

Dear Department of Public Works, Water Resource Division,

Comment 145-1

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

Comment 145-2

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 145-3

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 145-4

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial

Comment 145-4  
continued

scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 145-5

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,



Karen Yehofsky  
628 W. Norman Ave.  
Arcadia, CA 91007

**Response to Comment Letter #145 (Karen Yenofsky)**

**Response to Comment 145-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 145-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 145-3:**

See Response to Comment 145-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Berkshire Place intersection with Oak Grove Drive and thus will not approach the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 145-4:**

See Response to Comment 145-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 145-5:**

See Response to Comment 145-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

December 30, 2013

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

I am currently an Assistant Program Director for Tom Sawyer Camps' summer camp program and have been fortunate to experience firsthand the genuine beauty, exploration, and exposure to natural wilderness that Hahamonga Watershed Park offers us of the surrounding communities. This last summer was my nephew's first summer attending camp and the growth I was able to witness of a child I know extremely well was remarkable. Aside from my nephew, I have watched countless children blossom because of Tom Sawyer Camp and this park. I have seen them play, *simply play*, outside, all day, everyday, for ten glorious weeks in the summer. I am writing so we can continue to witness this positive interaction of the outdoors and play.

While we support the sediment clean up in general, we are concerned about the impact as defined in the DEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding

Comment 146-1

Comment 146-2

Comment 146-3

Comment 146-3  
continued

the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 146-4

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 146-5

Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely

Kristin McDaniel  
1252 Norton Ave  
(818) 913-6626  
kvlockridge@hotmail.com

sent  
1/10/17  
10:11  
AM

**Response to Comment Letter #146 (Kristin McDaniel – Tom Sawyer Camps)**

**Response to Comment 146-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 146-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and provide additional areas for wildlife movement.

**Response to Comment 146-3:**

See Response to Comment 146-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Berkshire Place intersection with Oak Grove Drive and thus will not approach the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 146-4:**

See Response to Comment 146-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 146-5:**

See Response to Comment 146-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Mario Manzano](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 07, 2014 1:13:37 PM

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Hi,

My name is Mario Manzano. I live in Norwalk, but I play disc golf in Pasadena.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

this is the original disc golf course. This is where the sport was born and is growing. This course should be granted historical status and preserved for future generations.

Thank you,

Mario Manzano  
Disc Golf Player

Comment 147-1

**Response to Comment Letter #147 (Mario Manzano)**

**Response to Comment 147-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

Jan 2, 2014

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

**RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT**

Dear Department of Public Works, Water Resource Division,

Comment 148-1

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

Comment 148-2

While we support the sediment clean up in general, we are concerned about the impact as defined in the dEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Comment 148-3

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944). Approximately 1250 of our campers and 150 staff use this site each summer, which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 148-4

Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial

Comment 148-4  
continued

scrub areas for these experiences, along with other areas of the park.  
Hahamongna is home to generations of staff and campers whose lives have  
been directly and dramatically enriched by this natural refuge, including mine.

Comment 148-5

Tom Sawyer Camps is a very important program and my request could easily go  
unnoticed but I believe the impact that camp has on the children of tomorrow is  
significant. Summer in the watershed is a rare and unique opportunity for children  
to be away from noise and disruption and engage with nature and outdoor  
adventure in a safe, peaceful, and joyful manner. We hope you will see the value  
of camp and make every attempt to minimize the impact the sediment clean up  
will have during the summer months and for the generations of children to use  
the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs.  
Please feel free to contact me if you have any questions.

Sincerely,

Miriam Fine

Miriam Fine  
628 W. Norman Ave  
Arcadia, CA 91007  
mirfi48@gmail.com

**Response to Comment Letter #148 (Miriam Fine)**

**Response to Comment 148-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 148-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and provide additional areas for wildlife movement.

**Response to Comment 148-3:**

See Response to Comment 148-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant

impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Berkshire Place intersection with Oak Grove Drive and thus will not approach the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 148-4:**

See Response to Comment 148-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 148-5:**

See Response to Comment 148-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Philip Fitzpatrick](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 6:29:45 PM

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Hi,

My name is Phil Fitzpatrick. I live in Sherman Oaks, CA.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have a tragic impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Did you know this Disc Golf course is the first disc golf course in the world? It was installed in the 1970's is a historic site for a global community. Pleas reconsider your plans.

Thank you,

Philip D. Fitzpatrick

(818)267-4722

[philipdouglas@mac.com](mailto:philipdouglas@mac.com)

Comment 149-1

**Response to Comment Letter #149 (Philip Fitzpatrick)**

**Response to Comment 149-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Garibay, Raul](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Dam project  
**Date:** Tuesday, January 07, 2014 11:17:41 AM

---

I am in support of the clean out project for a number of reasons:

1. The dam was retrofitted to current earthquake standards and needs to be fully utilized
2. Full utilization of the dams potential storage lessens the probability of flooding down stream
3. Retention of more water allows more surface water to percolate into the local groundwater basin; local water purveyors use this basin to extract water via wells

However, the rate at which the material is removed should be coordinated with the local residents. I do not believe that the County was negligent in removing the material sooner but probably was not able to act until sufficient funding was secured. Some may say that our current weather pattern does not necessitate this action but I would tend to disagree. It is a resource that needs to be maintained.

**Response to Comment Letter #150 (Raul Garibay)**

**Response to Comment 150-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. LACFCD notes the commenter's support for the Proposed Project and fully utilizing the dam and reservoir.

**Response to Comment 150-2:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Project site.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of the LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [thimreed@yahoo.com](mailto:thimreed@yahoo.com)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 5:55:45 PM

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Hi,

My name is Thim Reed. I live on 1629 Folsom Lane. I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course. Please honor and value the place in history this course has the worlds first Dic Golf Course. It would be the equivalent of tampering with the original home of golf in St. Andrews Scotland. I'm asking you please to do the right thing.

Thank You!  
Thim Reed

Comment 151-1

**Response to Comment Letter #151 (Thim Reed)**

**Response to Comment 151-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [tommy](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 06, 2014 6:46:36 PM

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My name is Tom La Torre. I live at 1748 16th street.

Comment 152-1 | I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

| This is such an amazing disc golf course for the community, please help save it.

Thank you,  
Tom La Torre

**Response to Comment Letter #152 (Tom La Torre)**

**Response to Comment 152-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Trevor](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 07, 2014 1:11:38 PM

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Hi,

My name is Trevor Mutch. I live at 1031 Calle Contento, Glendale, CA 91208.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course. Alternative 3 is the best plan, but the western branch will remove 2 of our playable positions. Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

Oak Grove Disc Course, as the world's first permanent disc golf course, has been a rich tradition for the City of Pasadena. Please continue to maintain and protect its historical significance and beauty! The course is widely enjoyed by families, visitors, and local enthusiasts!

Thank you,  
Trevor

Comment 153-1

**Response to Comment Letter #153 (Trevor Mutch)**

**Response to Comment 153-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Bette Cooper](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamonga Project  
**Date:** Friday, January 10, 2014 2:37:46 PM

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To Whom It May Concern:

I truly hope that when the People speak/email/twitter/blog about a project such as this, you sit up and take notice. We are aware of the pros and cons, and it is a fact of life these days that people like us, the public, must take the time to bring a different perspective that might help us all to "see the forest from the trees".

We all get caught up in our own thoughts, businesses, ideas, etc., and sometimes we cannot get a clear picture of the very serious pros and cons of a situation in order to make a decision that is beneficial to all.

Hahamonga appears to be one of those situations. It's obvious there is too much silt and sediment that has collected over many years. Many years in fact, and why it must be removed in such a concentrated timeframe to the detriment of many interests that use that area and have done so for many years is puzzling.

It would be beneficial to the environment, to those who use that area for recreational purposes, for all the wild animals, for the trees that help keep our air clean, for you to come up with a modified and smarter plan. Speaking of our clean air, the existing plans would create an extraordinary amount of dust, dirt, and exhaust to name a few of the negative repercussions.

Also, is there no place where this silt/sediment can be used in a beneficial way, which would make your project a positive one in the long run.

Please take a step back and reevaluate these plans before you begin something that we might all regret later. This is a beautiful piece of nature, which would be very sad to ruin or abuse.

Thank you for your attention.

Regards,

Bette Cooper  
Past President of Pasadena Beautiful Foundation

## **Response to Comment Letter #154 (Bette Cooper – Pasadena Beautiful Foundation)**

### **Response to Comment 154-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average water year storm seasons. Additionally, Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, ; , due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of the LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur.

### **Response to Comment 154-2:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 , Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres . Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat

impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 154-3:**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.

**Response to Comment 154-4:**

Comment noted.

# A Common Sense Systems Approach to the Devil's Gate Dam and the Hahamongna Watershed Park

How to Remove the Sediment, Improve the Environment, Increase  
Water Capture and Reduce Future Maintenance Costs  
Using Systems Engineering

By  
Camron Stone

## What to do with the Hahamongna Watershed Park (HWP)?

This is the question that I have been asking myself and everyone connected to the basin that is called the Hahamongna Watershed Park. I still haven't received an answer other than from the LA county Department of Public Works (DPW) who wants to scrape out a 50-acre bowl of sediment (1/3 of a mile in diameter) out of the young Black Willow woodland area that has taken hold adjacent to the face of the Devil's Gate Dam. This project would remove about 1.6 million Cubic Yards (CU) of sediment and create a 50-acre wasteland.

Comment 155-2

To me, this is just plain silly – it is engineers solving a immediate problem with an immediate solution and they plan on spending \$35 million of the tax payer's money to do it. They are completely ignoring the fact that that five years down the road, the ¾ mile of built up sediment to the North of their scrape area within the basin will end up sluicing into their newly scraped bowl. Maybe then there will be another "emergency" (clogged valves) that will allow the DPW to grab another \$30 million of taxpayer money to do the same thing over again hoping for a different result.

## The Importance of Systems Engineering

**Systems engineering** is the design, implementation and/or study of any kind of system whether it be natural or man-made. There are two types of systems: **Open Loop** and **Closed Loop**. Open loop systems require intervention from outside the system to make the system operate properly. An example of an open loop system is the standard manual air conditioning system in a car. In this case the driver must constantly readjust the fan speed and air temperature controls to stay comfortable.

Comment 155-3

Conversely, a closed loop system operates autonomously and automatically.

√ This is because all closed loop systems have what is called a "feedback loop".

↑ The output and operation of such a system is monitored by sensors which feed back this information to the system so that the system can adjust its operating parameters to obtain the desired result. Automatic “Climate Control” systems on today’s modern cars are examples of a closed loop system. Information from temperature sensors in the car’s cabin is fed back to the system, which automatically adjusts the fan speed, and air temperature to gracefully reach the desired cabin temperature set by the driver. A poorly designed closed loop system will fluctuate wildly around the desired result so, in the case of the climate control system, an inefficient design would turn on maximum fans and coldest air until it shoots right past the desired temperature causing the heater to turn on full blast and again soar past the proper temperature and so on.

All natural systems or “ecosystems” are closed loop with the desired result being natural diversity. The term “Natural Balance” really refers to an efficiently operating closed loop system. In the simplest of examples, if a given natural ecosystem has too many predators, prey animals will gradually become more scarce and this in turn will cause a gradual reduction in the predator’s birthrate and force some to move on to other territories with a shortage of predators. Natural balance is attained seamlessly without wild fluctuations through this feedback mechanism.

Geologic systems such as the natural process of mountain erosion into sediment and its resulting flow out to the ocean and beaches are also closed loop systems, albeit extremely slow in their operation. The natural sediment management system in LA County had always operated flawlessly with the relatively even flow of sediment to the ocean regulated by the natural burning process that used to take place in our nearby mountains. Naturally occurring periods of drought and floods would keep the level of sediment in our streams and rivers at fairly constant levels while pushing it along on its journey at exactly the right pace to keep up with the amount of sediment being added to the system.

↓ With the advent of humans to the LA area and the creation of the LA County Flood Control District with its network of dams and debris basins, the feedback loop was broken and sediment management is now a poorly operating and inefficient open loop system. What’s more, the desired output of that system was changed by humans from the control and transportation of sediment to replenish the beaches, to the control of water. That change converted sediment from a valuable resource to a waste product of the new system.

By designating sediment as a waste product, the LA County Department of public Works (DPW) had to create a whole new open loop system to dispose of it. This new system not only has wildly changing inputs of sediment (due to huge fires caused by forest management) but it also has two additional inputs with extreme fluctuations: Money and Politics. And, unlike the open loop manual air conditioning system in a car that has many control settings for fan speed and air temperature, the DPW’s latest version of its sediment management system has

Comment 155-3  
continued

Comment 155-4

only two settings: “Off” and “Full Blast”. What’s worse, the control input “Full Blast” can only be used in one small part of the system at a time because of scarce resources. Imagine a car that has only three control options: “OFF”, “Max Heat” or “Max Cool” with the fan on “high” the whole time. Nobody would buy it.

The reason that the current sediment management system has only two extreme control inputs is that the other inputs to the system, “money” and “politics” have forced the DPW into a situation where they either do nothing or, promote grandiose super projects. The politics input to the system includes the internal drive of DPW management to keep the status quo until retirement and pass the accumulated problems on to the next generation. Politics also result in the reluctance of the DPW’s politically elected overseers to fund (the “money” input) the infrastructure and manage the DPW in a way that is required for an efficient system with refined levels of control that mimics the closed loop natural sediment management system that used to work so well. As a result of this, the DPW has morphed into a political organization focused on using “emergencies” or “public safety” to provide the motivation for politicians to open the public treasury and allow the DPW to reach in and grab tens of millions of taxpayer dollars (the “money” input) so that they can “prevent the destruction of property and lives”. The result of all this is a “Full Blast” project focused on a small area of the system that creates havoc on the local environment.

I know, most of you are saying: “What’s the big deal about looking at sediment management as a system – What I care about is the environment or flood prevention or public safety or oak trees or natural habitat.” Well, the beauty of designing an efficiently operating system is that no one ever thinks about it – it just works. Back to another climate control example: If you have ever gone to a meeting or worked in a high rise building, you know (but you didn’t think about the fact) that when you walk into the lobby of the building, the temperature is perfect. When you board the elevator and climb to the umpteenth floor, the temperature there is the same. On that floor, you can walk over to the sunny side of the building with the sun blazing into the windows – still the same temp. Then you walk over to the shaded side of the building – nothing changes. When you depart the building, you never once thought about the temperature or your associated comfort. The fact that you didn’t notice the building’s air conditioning system is endemic to an efficiently operating closed loop system. The only time that anyone notices or marvels in an efficient system is when there is an obvious extreme input being applied to the system. In the case of the high rise, if the temperature outside is over 100 degrees, one always approaches the building thinking, “I hope the AC is working in there.” Once inside, we are delighted to find out that the system is working properly.

The other case in which a system is noticed is when it is poorly designed, poorly maintained or broken. When this happens, everyone who is affected by such a system begins to complain. If the problem continues, the complaints become demands and the demands become calls for those responsible for the system to

Comment 155-4  
continued

Comment 155-5

Comment 155-5 continued  
↑ be fired or removed from office. If the people on the sunny side of a building are sweating and the people on the shady side of that building are freezing and that situation continues for a long period of time, those responsible for AC system maintenance will eventually get canned.

## **A Systems Engineering Approach to Managing HWP**

The Hahamongna Watershed Park is massively affected by three man-made systems: Flood Control, Water Resource Management and Sediment Management.

### **HWP Flood Control System**

The flood control system in operation at the HWP was first built in the 1920's as an open loop system and consists of the Devil's Gate Dam and its associated outlet valves and tunnels designed to control the amount of water that flows out of the reservoir. At first, it was up to the Dam Keeper to control the amount of water flowing out of the reservoir by weather observations and essentially using a dip stick to determine the amount of water in the reservoir and how fast it was rising or falling.

Comment 155-6  
This system has been expanded over the years to allow greater water flow flexibility and provide real time feedback to allow for the system to operate more efficiently and more closely resemble a closed loop system. The Arroyo Seco downstream of the dam was channelized to allow greater flow rates without flooding. In addition, several decision-making parameters (feedback) were added such as weather forecasting, instantaneous rainfall sensors, upstream water flow rates and upstream soil water content reporting. All of this feedback data has allowed more efficient operation of the flood control system at HWP, and it works. Nobody thinks about it except when an extreme input to the system occurs: a series of massive rainstorms. Helicopters fly and the people watch in amazement as the system controls the flow of water sent to the sea and prevents homes and businesses from being flooded.

A failsafe spillway design was incorporated into the dam in the 1990's that will allow the maximum amount of water to pass through the dam (that can be handled by the downstream channel without flooding) in the event of a failure of the dam's valves and tunnels or a 100 year rain event.

The downside of the flood control system design is that it creates a great amount of waste product: Sediment. More on that later.

## HWP Water Resource Management System

The Water Resource Management System at the HWP was designed in the mid-20<sup>th</sup> century to provide a scarce finite resource to the city of Pasadena. This starkly open loop system includes the diversion of incoming Arroyo Seco stream water to the network of 15 settling ponds that line the eastern side of the HWP basin (not including Johnson Field). The water that is sent to the settling ponds percolates down into the aquifer and is later pumped out at wells operated by the Pasadena DWP. The growth of Pasadena has resulted in the ever-increasing importation of water from the Metropolitan Water District (MWD) to the point where today, MWD water now provides about 60% of the water used by the City of Pasadena.

The current Water Resource Management System design in the HWP only diverts water from the Arroyo Seco stream whenever it is in a period of low flow after the winter storms have subsided. The result of this being that the majority of the fresh water that passes through the HWP ends up being sent downstream to the ocean. How could this be, you ask? The answer lies in the fact that when the Arroyo Seco is running hard (high flow rate), there is a great amount of fine sediment suspended in the water. Fine sediment and settling ponds don't mix. If water containing fine sediment were to be piped into the HWP's network of settling ponds, the process of percolation into the aquifer would be stopped cold. Fine sediment acts like a drain stopper in these ponds, completely blocking the percolation process. Therefore, high flow rate water is rejected by the current system and treated like a waste product.

Today, the cost of MWD water is skyrocketing and is now costing the City of Pasadena about four times the cost of water derived from the city's HWP Water Resource Management System. This situation has rightly caused the City to look into means of increasing the amount of HWP water that can be captured from the Arroyo Seco and percolated into the local aquifer. It looks to me like the City has chosen to expand the same old method of water capture by promoting an expansion of the number of settling ponds in the basin. In this regard, the City's current plan is to demolish the existing JPL parking lot on the east side of the basin and convert the area to settling ponds. The City believes that the value of additional water to be gained by this conversion would more than offset the lost revenue generated by leasing the property to JPL for parking.

This way of thinking and its reliance on the tried and true methods developed 70-80 years ago is now archaic. It still relies on treating fast moving water as waste. Most of the people in Pasadena are now thinking

Comment 155-7  
continued

about this broken system due to their ever-increasing water bills and new laws regulating their use of water.

There **is** a better way that maximizes the capture of water that moves through the basin – stay tuned.

### **HWP Sediment Management**

The HWP Sediment Management “System” is now unquestionably the elephant in the room. The reason for this is that the DPW (and the Flood Control District) has not developed, nor built any infrastructure, for an efficient Sediment Management System in the almost 100 years of its existence. From the beginning, sediment was defined as a waste product of the Flood Control System and until now, this waste product was easily hidden from public view (at what are called “Sediment Placement Sites”) close to its source and it doesn’t stink.

It is worth mentioning here that a highly efficient and effective closed loop system was built to manage another waste product of our society and that system has been operating in the LA basin for decades. This system operates with very few problems and hence, people rarely ever think about it. What is the waste product that has been so effectively managed? Sewage. Because sewage is not easily hidden, our society made the decision early on to invest in the infrastructure necessary to create a system to transport and treat our sewage such that the end product of the system became a resource: fertilizer. This waste product management system is so well designed that even extreme inputs to the system such as a Super Bowl commercial are handled without a hiccup.

The consequences of defining sediment as a waste product instead of a resource and the fact that the existing hiding places (SPS) are almost full has finally created a situation in which more and more people are taking notice of a Sediment Management “System” that has always been poorly designed and is now broken. The DPW’s current sediment removal plan for Hahamongna perpetuates and exacerbates the problems associated with this broken “system.”

The current “Sediment Management solution” (I can’t even call it a system) entails cleaning out the sediment in the 38 debris basins in the Flood Control System on an almost annual basis and hiding the sediment nearby. Without regular sediment removal, the network of small debris basins would fill up quickly, causing flooding of local residences which in turn, generates major customer complaints of a broken flood control system and that would threaten the retirement plans of DPW officials.

Comment 155-8

The eight dams within the system including Devil's Gate (which generate the most sediment waste product) are normally not cleaned out until a "public safety crisis" can be declared by the DPW providing access to the public treasury. In the case of Hahamongna, the last sediment clean out of the HWP basin occurred in 1993 and now it is full again. One local newspaper is already parroting the DPW's crisis playbook with stories and editorials that predict imminent flooding of the Rose Bowl and call our elected officials foolish for wanting to fully study the sediment situation at HWP as well as the DPW's current scorched earth plan to remove the sediment. This study, in the form of an Environmental Impact Report (EIR) will require input from the local community regarding the project's impact on the environment and local residents. This report should be considered a part of that community input.

The whole issue of creating and investing in the infrastructure required for a viable and efficient Sediment Management System that redefines sediment as a valuable resource will be the subject of a future report. Suffice it to say that Nature got a lot of things right by relying on gravity and water to move the sediment to where it was needed. Such a system will take many years to develop and implement, therefore, the following proposed sediment removal plan for the HWP is designed to integrate with a future Sediment Management infrastructure.

## **Proposed Plan for Sediment Removal at the HWP**

If you are still with me and have read this far, then you must be very interested in what happens at the Hahamongna Watershed Park (HWP) in Pasadena. Please note that what follows is a result my personal analysis (and multiple hikes within the basin) of the current condition of the HWP and my first hand experience with the Arcadia Woodlands tragedy. I am not speaking for the many HWP/Arroyo Seco organizations nor any environmental group. My hope is for this document to form the basis of a community consensus and response to the current DPW plan for sediment removal that will leave their characteristic massive scar upon a natural landscape. The DPW's plan is not sustainable and will result in another sediment "crisis" within just a few years forcing everyone involved to go through this process all over again.

I fully expect that everyone reading this proposed plan will have a problem with some part of it and that is a good thing. I want to hear about every objection especially those that that expose that my data or assumptions are incorrect. In this way we can all contribute to a community based response to DPW's plans during the EIR process.

It is my firm belief that with the amount of money that the DPW is currently spending on an unsustainable and broken Sediment Management "System", we

Comment 155-8  
continued

Comment 155-9

can begin to build the infrastructure and public policies needed to create an efficient Sediment Management System that redefines sediment as a valuable resource. We will know that we have succeeded with this goal when all of the DPW's sediment projects actually enhance the environment instead of destroying it. I also believe that Systems Engineering is the key to making this possible.

## The Sediment in HWP

The DPW reports that 1.67 million cubic yards of sediment needs to be removed from the basin to maintain flood control for the areas downstream of the Devil's Gate Dam. Very few people would argue with this necessity including myself. The purpose of this proposal is to promote a project design that will create a sustainable sediment removal process within the basin such that it will prevent a project of this magnitude from ever happening again in the HWP allowing a truly natural environment to establish and increase the recharge of the aquifer. This proposal focuses on the issues of how, where and the transport methods used in the removal of this sediment. In addition, special emphasis will be placed on preserving the HWP basin as a natural habitat (promoting natural systems) that can be enjoyed by future generations of humans and wildlife alike.

Everyone knows where the sediment that has built up behind the Devil's Gate Dam came from. Most people also know that the vast majority of that sediment first enters the basin when it passes under the JPL bridge at the mouth of the Arroyo Seco Canyon. From that point, the sediment is washed gradually down towards the Devil's Gate Dam, 1.3 miles from the JPL Bridge. At this time, after the Station Fire, the entire length of the basin behind the dam is now full of sediment ranging from about 15 feet in depth at the northern end to about 24 feet at the face of the dam (Source: DPW board Motion Report, Page 3).

The DPW has used the same methodology for sediment removal at Devil's Gate ever since the dam was built almost 90 years ago. Sediment is allowed to accumulate behind the dam for a period of 15 – 20 years. During this period, a wetland/riparian environment slowly establishes itself within a roughly circular area immediately upstream of the dam with a diameter of about .3 miles. Black Willow woodlands grow relatively quickly within this area and an annual, man made succession of flooding, stream formation and dry out occurs. Migrating waterfowl use the area during the wet periods and other wildlife moves in during the dry periods. When this semi-natural environment is fully established, the DPW is compelled for "safety" reasons to scrape out this environment forming yet another lunar crater over five football fields in diameter. Three hundred dump trucks every day for months on end and the local residents become

Comment 155-9  
continued

Comment 155-10

stressed out and agitated. Then the memory fades, history repeats itself and so it goes...

As stated earlier, the one-mile of accumulated sediment above this excavated crater is left untouched. Because the elevation of this remaining sediment is much higher than the bottom of the crater, it quickly flows into the crater filling it up almost to its previous level. Then, the gradual flow of sediment begins anew to slowly raise the sediment level of the entire HWP basin, from the dam to the JPL Bridge.

### **“Lake Hahamongna”**

The first element of this proposed solution is to create a lake and waterfowl refuge in the lower HWP. The creation of this lake would entail the removal of 1.0 million cubic yards of sediment from the basin adjacent to the dam. This circular excavation would leave an untouched island of approximately five acres in diameter in the center of the lower basin creating a roughly circular lake with an island in the center of it. Additional black willows and other native wetland trees would be planted on the island and its shores to prevent the sediment forming the island from flowing down into the lake bottom.

The benefits of such a permanent lake here would be tremendous:

- HWP would become a permanent stop on the routes of migrating waterfowl and other birds.
- The island would be a safe place for non-migrating waterfowl and other birds to nest safe from predators such as coyotes.
- The lake would become a permanent forty-acre settling pond to recharge the aquifer.
- Recreational opportunities within the basin would be increased by allowing fishing, more varied bird watching and possibly un-powered boating.
- Create habitat for endangered wetland species including frogs, newts, salamanders, toads and birds.
- Enhance the views, vistas and habitat zones experienced by hikers within the park.

Yes, the wetland habitat would be completely flooded with fast moving water during large winter storms, but recovery to normal levels would be relatively quick through intelligent use of the dam’s valves. This process would mimic the natural process found in other wetlands.

The creation of a lake within the basin formed by a dam is not a new idea and you don’t have to go far to see a successful implementation of this concept. Decades ago, the Army Corps of Engineers created a

Comment 155-10  
continued

Comment 155-11

Comment 155-11  
continued



permanent lake within the Santa Fe Dam basin in Irwindale. Granted, the area immediately around the lake is far more developed than most people would prefer in HWP, but the fact remains that this concept is viable.

At this point, I know you are thinking that engineering a lake here is ridiculous due to the fact that sediment coming into the basin would fill in the lake very quickly. The next element of this plan is designed to prevent that from happening.

### **“The Plunge Pool”**

Most people are aware that when they see a raging torrent of fast moving water in a river or stream, a great deal of sediment is suspended in the water and that sediment is traveling downstream at roughly the same speed as the water itself. Conversely, those same rivers and streams in their normal (non-flood stage) condition, with much lower flow rates and speeds, are usually crystal clear with no sediment suspended in the water. The bottom line is that sediment needs fast moving water to stay in the water column and move forward. When the water slows down or stops, the sediment precipitates out of the solution and drops to the bottom of the water column.

The only way that the water in a fast moving river can be stopped or slowed down is when it enters a large stationary body of water such as a lake or ocean. When fast moving water enters a stationary body of water and slows down, the sediment suspended within that water is immediately dropped to the bottom of the stationary body of water. That is the reasoning behind the design of a “*plunge pool*”. Man made plunge pools are commonly used to precipitate sediment out of a fast moving river or stream before the water in that stream moves downstream.

In a real world example of the usefulness of a “plunge pool”, the DPW’s current plan to remove the sediment within the Morris Dam Reservoir on the San Gabriel River in Azusa Canyon is to sluice it down canyon to the Santa Fe Dam. The problem with this plan is that the Army Corps of Engineers, who operate the Santa Fe Dam in Irwindale and the recreational park and lake within the reservoir, do not want the sediment from the Morris Dam to flow into their park and lake. Therefore, the Army Corps has required the Department of Public works to excavate a plunge pool near the 210 Freeway such that the sediment will be captured there by the plunge pool prior to flowing into the park. When this plunge pool has filled with sediment, the river will be diverted, the water in the pool will perk down into the aquifer and the DPW will excavate the new sediment and transport it to a nearby quarry pit. A beautiful solution to a complex problem forced on the DPW by the Army Corps.

Comment 155-12



**OK, now back to Hahamongna.** This proposal requests that the DPW create a *plunge pool* just south of the JPL bridge by excavating 670 thousand cubic yards of sediment from the bridge south - a distance of about one-half mile. This area currently resembles a sand beach so the excavation of this area would do minimal harm to habitat.

The sediment that has been deposited in this area is made up primarily of sand and gravel and not the fine sediment that has been deposited closer to the dam. The reason for this is that the entire HWP reservoir area acted like a plunge pool during the extreme floods of the 2009 and 2010 Winters. During these flood periods, the reservoir was full of water. As the fast moving water entered the basin, it began to slow down. Because the upper part of the basin is thinner than the lower part, the water slowed down gradually. Therefore, the heavier grains of sediment including gravel and sand precipitated out of the water column first and are deposited in the upper third of the basin. Finer sediments are deposited closer to the dam. The point of all this being that the sediment excavated to create a plunge pool in the northern third of the basin is far more valuable to materials corporations such as Vulcan than the fine sediment closer to the dam. The DPW may be able to convince these companies to take this sand and gravel off their hands or use it in one of their own road building or resurfacing projects.

Creating a plunge pool would be essentially like building a debris basin within the Devil's Gate Reservoir. The southern edge of the plunge pool would have to have a boulder and earth dam erected that would be not much higher than the current sediment level is today. The creation of this *plunge pool* would be the first step on the road to the construction of the infrastructure necessary for a sustainable sediment management system on the Arroyo Seco Watershed.

I can already hear "the powers that be" complaining about the cost of building a *Plunge Pool* dam as a part of the HWP sediment removal project. However, I believe that the plunge pool dam can be built for little, if any, extra cost over the \$35 million cost of the overall project. The greatest cost of the construction of this dam will be the acquisition and transportation of the large boulders needed for the dam. However, the DPW currently owns more than enough boulders to build this structure. They can all be found on top of the Upper SPS at the DPW's Santa Anita Facility. Here's how the cost is minimized: A small portion of the tucks carrying sediment from HWP to the Manning Pit in Irwindale would instead be diverted to the Santa Anita SPS (reducing travel distance by about 1/3). These trucks would dump their sediment loads on the Upper SPS at Santa Anita and would then be loaded with boulders for the return trip to the HWP. The net effect on the amount of material at the upper SPS at

Santa Anita would be nil because the trucks would be carrying away the same amount of material as they deposit at the site.

Additionally, because this structure would be built within an existing reservoir held back by an upgraded, earthquake safe dam, the approval process should be far less expensive than a similar structure built to stand on its own.

Now the question is: "Why build the *Plunge Pool*?" Here are several reasons:

- A *Plunge Pool* located in the upper third of the HWP basin will trap most of the sediment flowing into the reservoir from the mountains. Up to 600,000 cubic yards of sediment could be captured in the plunge pool every year.
- Large quantities of sediment would no longer enter the lower 2/3's of the HWP Reservoir. This would mean that the Hahamongna Lake proposed above would be free to establish itself as a functioning ecosystem for decades without interruption from DPW sediment removal operations.
- The safety of the Devil's Gate Dam and its flood control operations would be greatly enhanced because all of its valves and tunnels would not become clogged with sediment for many decades.
- The City of Pasadena would gain a massive new settling pond that will recharge the underground aquifers. This *plunge pool* will not only double the amount of settling pond acreage within the basin. but it will use only fast moving water (rejected by the current network of ponds) to do its job of recharging the aquifer. This will mean that Pasadena will gain a major new low-cost water source.
- The net effect of gaining so much additional settling pond area may allow the City of Pasadena to continue leasing the east side parking lot to JPL instead of converting this lot into ponds. The parking revenue from JPL would be maintained and JPL would not have to construct an unsightly parking garage on the edge of the HWP.
- The *plunge pool*, once constructed, would be maintained like any other debris basin within the DWP's Network and fall into the DWP's operating maintenance budget. Every summer, any sediment that flows into the *plunge pool* would be removed. This regular sediment removal process will also remove fine sediment and break up the bottom of the plunge pool such that its ability to percolate water down into the aquifer will be maintained for the next year.
- For at least half of every year, the *plunge pool* will be a second large lake (within the basin) that can be enjoyed by HWP visitors – humans, animals and birds.

Comment 155-13  
continued

Comment 155-14

## **Response to Comment Letter #155 (Camron Stone)**

### **Response to Comment 155-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter does not support the Environmental Impact Report Development Process or the Proposed Project.

Comments within the white paper have been responded to below.

### **Response to Comment 155-2:**

The purpose of the Proposed Project is to remove sediment in order to restore the design capacity of the reservoir. Additionally, the Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

### **Response to Comment 155-3:**

Comment noted.

### **Response to Comment 155-4:**

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

As noted in the Draft Environmental Impact Report (EIR), Section 2.2.1, LACFCD History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity. Historically, large amounts of sediment have been

deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 , Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres . Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

**Response to Comment 155-5:**

Comment noted.

**Response to Comment 155-6:**

Comment noted.

**Response to Comment 155-7:**

Comment noted.

**Response to Comment 155-8:**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing disposal sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

See Response to Comment 155-4. LACFCD has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were

removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average water year storm seasons. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

After the Proposed Project's main sediment removal has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. A maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

Devil's Gate Dam was the first dam built by LACFCD in 1920. The dam allowed for the channelization of and development along the Arroyo Seco. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway, also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam. Given the current, limited capacity of the reservoir, a 50-year storm event that results in a design debris event (DDE) would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. During a single design event sized storm, the Rose Bowl is not expected to be impacted by flows from the dam; however, if sediment from each storm event is not removed from the downstream floodplain, each subsequent storm would increase the flood risk. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website.

Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and the California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

LACFCD actively encouraged stakeholder involvement at the scoping meetings, during the scoping period, during the Draft EIR public review period, and at the community meetings. Responses to all comments received on the Draft EIR will be incorporated into the Final EIR.

**Response to Comment 155-9:**

See Response to Comments 155-2, 155-4, and 155-8.

**Response to Comment 155-10:**

See Response to Comments 155-2, 155-4, and 155-8.

**Response to Comment 155-11:**

Holding water behind the dam permanently, as a lake, is not a part of the Proposed Project objectives and is outside the scope of this project, and would therefore not be a viable alternative.

**Response to Comment 155-12:**

Comment noted.

**Response to Comment 155-13:**

See Response to Comments 155-8 and 155-11 above.

As discussed in the Draft EIR, Section 4.5, Alternative 2, Configuration C, an alternative to the Proposed Project which involved two excavation areas, similar to what the commenter is proposing, was analyzed. The lower excavation area would be excavated to a 985-foot elevation at the face of the dam, sloping up to a 1,045-foot elevation at approximately 2,901 feet north of the dam. The upper excavation area would be excavated to a 1,050-foot elevation at approximately 3,580 feet north of the dam, sloping up to a 1,065-foot elevation at approximately 4,727 feet north of the dam. The upper excavation area would be used for sediment capture. Alternative 2 would involve the removal of approximately 4 million cy of sediment, while the Proposed Project and Alternative 3 would involve the removal of approximately 2.9 million cy and 2.4 million cy of sediment, respectively. Alternative 2, Configuration C is considered environmentally inferior to the Proposed Project and Alternative 3 due to increased air quality, noise, and transportation impacts. These impacts are associated with the larger volume of sediment removal and with the need to maintain the upper of two maintenance areas through mechanical excavation and offsite trucking activities. FASTing operations, which is expected to be an effective means of keeping sediment levels low in the reservoir for the Proposed Project and Alternative 3, can only be used on the lower of the two maintenance areas.

**Response to Comment 155-14:**

See Response to Comment 155-11 above.

**From:** [ginnyh](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment RemovalPlan comment  
**Date:** Saturday, January 11, 2014 1:34:55 PM

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Comment 156-1

This reservoir has not been cleaned out for about 25 years. At that time a commercial gravel company helped keep the sediment level down by removing and selling the gravel. Could a gravel company be invited in again to make use of some of this sediment, thereby lessening the impact of the clean-out?

Comment 156-2

The clean-out of the remaining sediment could be accomplished using the "go slow" approach suggested by Tim Brick of the Arroyo Seco Foundation.

Ginny Heringer

## **Response to Comment Letter #156 (Ginny Heringer)**

### **Response to Comment 156-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As noted in the Draft Environmental Impact Report (EIR), Section 2.2.1, LACFCD History, Los Angeles County Flood Control District (LACFCD) has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cubic yards (cy) of sediment flowed into Devil's Gate Reservoir after just two average water year storm seasons. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft Environmental Impact Report (EIR). In addition, removal of the sediment by a gravel company would not reduce the impacts associated with sediment removal and would not eliminate the use of trucking to transport the sediment offsite.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfdc/sediment/stplan.aspx>.

### **Response to Comment 156-2:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** [John Favre](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Emergency water collection  
**Date:** Saturday, January 11, 2014 1:55:25 PM

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Comment 157-1

The risk of floods, could, be removed by raising the sides of the flood control channel at danger points, possibly only at times of risk, and building new water collection sites, above JPL and at the La Loma St. Bridge. By removing the risk of a flood, silt removal could be slowed to a pace to accommodate reshaping of the Hahamonga Basin. These possibilities should be considered as mitigation measures to the impacts of silt removal by trucks.

John Favre  
530 S. Arroyo Blvd.  
Pasadena, CA, 91105

Sent from my iPad

**Response to Comment Letter #157 (John Favre)**

**Response to Comment 157-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The purpose of the Proposed Project is to remove sediment in order to restore the design capacity of the reservoir, and establish a reservoir management system to maintain the flood control capacity of the reservoir. If additional flood control facility were placed in the Arroyo Seco, sediment would accumulate there and would need to be excavated eventually. In this case, project impacts would not be avoided; they would simply be moved up or downstream. New flood control structures and water collection sites are outside the scope of this project.

**From:** [John Garsow](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devils Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, January 12, 2014 5:45:08 PM

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To Whom it may concern,

My name is John Garsow. I live in Murrieta Calif. I have been playing Frisby Golf behind he Devils Gate Dam since the early 70's. While I was there recently, I noticed many posters regarding the planned removal of sediment from behind Devils Gate Dam. The General slant of the posters implied that portions of the course were going to be removed.

Having grown up in the Eagle Rock area in the 50's and 60's I understand that this is a necessary project to maintain the viability of what this dam was originally built for, to protect the people and infrastructure down stream. However, I would hope that the powers that be would take into consideration the long history of the park and adjoining flood control area related to recreation and the Frisby Disc Golf Course.

Many people not associated with the sport do not realize that approximately 50 years ago, Oak Park was the birth place of Disk Golf. Every Year thousands of people come from around the world to play this course. It is every bit as important to the Disk Golf world as the Rose Bowl is to the the College football world.

All I would ask in your planning is that you consider this as more of a land mark worthy of preservation and improvement rather than as a bunch of dirt needing to be removed.

Thank you for you time.

Respectfully yours,

John Garsow  
Owner John E Garsow  
Gems & Minerals

Comment 158-1

**Response to Comment Letter #158 (John Garsow)**

**Response to Comment 158-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Laurel Beck](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamonga Plan  
**Date:** Sunday, January 12, 2014 2:52:50 PM

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Comment 159-1

Please do not proceed with the scraping of Hahamonga. This is a deeply flawed project. Instead, we need a new alternative that includes greatly reduced sediment removal, an extended timetable, the creation of a wildlife lake and a much greater emphasis on sluicing.

Laurel Beck  
Pasadena, California

## Response to Comment Letter #159 (Laurel Beck)

### Response to Comment 159-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

While holding water behind the dam permanently, as a lake, is outside the scope of this Proposed Project, the Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders, including concerns for long-term habitat preservation. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns, while adequately reducing flood risk to downstream communities. The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

The Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Lawren Markle](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project - Comment  
**Date:** Sunday, January 12, 2014 1:52:16 PM

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Hi LA County DPW,

I am writing to oppose the current plan for sediment removal at the Pasadena Devil's Gate Dam site. The work would destroy very significant and valuable wildlife habitat in Hahamonga Watershed Park, and create a tremendous amount of air pollution and disruption for the area.

Please reconsider the approach you are taking here. The present plan seems like a moose in a china shop, and reminds me of the thinking 75 years ago when Army Corps channelized all the rivers. We have learned a lot since then but this plan doesn't adequately address environmental common sense.

A good alternative might be to remove sediment in a very, very narrow ribbon (from South to North) so that 85% of the trees and vegetation behind the dam are undisturbed. Do that for 5 years at a slow pace. Then allow that section to become natural again (trees slowly regrow) and move the work to a different South-North ribbon on the other side of the wash for 5 years, again leaving 85% of the trees undisturbed.

With this approach, the amount of traffic and noise will be minimized. Cost will be reasonable annually. There will be adequate habitat. And the sediment removal goals will be met at a conservative pace. Over 20 years, perhaps 70% of the basin will be nice and deep, and maybe some areas won't be touched at all, again for reasons of habitat preservation.

Please consult with biological experts about timing. Perhaps there would be no work from every December to May, to allow nesting and birthing of wildlife.

I would also request you utilize electric trucks or CNG trucks to reduce pollution.

A conveyer belt system might move the dirt up onto a loading area on Woodbury Avenue (just east of the dam) to reduce the need to drive trucks through habitat areas.

Thanks!

Lawren Markle  
Altadena Resident  
300 W. Loma Alta Dr  
Altadena, CA 91001

## **Response to Comment Letter #160 (Lawren Markle)**

### **Response to Comment 160-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

### **Response to Comment 160-2:**

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. A footprint any smaller would decrease the volume removed and the ultimate capacity of the reservoir, which would fail to meet Proposed Project objectives.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would

prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 160-3:**

Wildlife and botany experts composed the Biological Reports (Appendix D), as well as the mitigation measures contained in the Draft EIR. It should be noted that construction activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will serve to protect and avoid impacts to wildlife and include special provisions or requirements during nesting or breeding season.

**Response to Comment 160-4:**

See Response to Comment 160-1.

**Response to Comment 160-5:**

A conveyor belt system was considered in the Alternatives Analysis; see Section 4.10.1 of the Draft EIR. This alternative was rejected as it would not avoid or substantially reduce any significant environmental effects.

**From:** [rjmarti](#)  
**To:** [reservoircleanouts](#)  
**Subject:** "Devil's Gate Reservoir Sediment Removal and Management Project"  
**Date:** Friday, January 10, 2014 9:38:18 AM

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I have great concern over the county plan to remove millions of tons of sediment from Devil's Gate Dam reservoir in the Hahamongna Watershed Park.

Comment 161-1

I urge Los Angeles County officials to study the needs of the Devil's Gate Sediment Removal and Management Plan in greater detail, adopt a plan that mirrors the Hahamongna Watershed Park Master Plan and involve the city on a staff level in the project's design and engineering aspects. We must seek the least harmful sediment mitigation plan. Large concerns exist over increases to air and noise pollution, traffic and permanent loss of critical habitat.

The proposed project would remove anywhere from 2.95 to 4 million cubic yards of sediment, over an area of 120.42 acres for a period of up to five years, according to the project's Draft Environmental Impact Report.

Comment 161-2

Pasadena's Environmental Advisory Commission found the county's DEIR to be replete with flaws and that it offers "no scientific rationale" to the necessity to remove the sediment or why exactly it needs to be done in the five-year timeframe.

Comment 161-3

I don't want Hahamongna to go the way of other lost environmental treasures in Southern California.

R. Marti  
Altadena

**Response to Comment Letter #161 (R. Marti)**

**Response to Comment 161-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's concern over the Proposed Project.

The Draft Environmental Impact Report (EIR) analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders, including concerns for long-term habitat preservation. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns, while adequately reducing flood risk to downstream communities. The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with

local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 161-2:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 161-3:**

LACFCD notes that the commenter does not support the Proposed Project.

**From:** [Teina TUAIVA](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, January 12, 2014 12:15:46 AM

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Hi,

My name is Teina TUAIVA. I live at MOOREA PaoPao, French Polynesia.

I have looked at all the plans for the sediment removal project sponsored by the county, and all the plans will have an impact on our Disc Golf Course.

Alternative 3 is the best plan, but the Western Branch will remove 2 of our playable positions.

Please re-visit the sediment removal plans and make an alternative plan that will not impact the disc golf course.

thank you,  
Teina TUAIVA

Comment 162-1

**Response to Comment Letter #162 (Teina Tuaiva)**

**Response to Comment 162-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, Los Angeles County Flood Control District (LACFCD) recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, Los Angeles County Flood Control District (LACFCD) will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**From:** [Thomas Owens](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamonga  
**Date:** Sunday, January 12, 2014 10:59:48 AM

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Comment 163-1

I am a senior citizen. I visit the Hahamonga regularly. I like it because the flat terrain makes it a place in which senior citizens can take a walk. The mountains are too steep Also, it is a place one can walk year around, it is a very unusual a pretty place.

Thomas J. Owens  
2439 Highland Ave.  
Altadena, CA. 91001

**Response to Comment Letter #163 (Thomas Owens)**

**Response to Comment 163-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that walking is one of the many recreational activities that residents and visitors make use of in the reservoir.

3555 CHANNEY TRAIL  
ALHAMBRA, CA 91803  
JUN. 6, 2014  
(626) 794-3383

Co. of Los Angeles  
Public Works  
Water Resource  
Reservoir Cleanout  
P.O. Box 1460  
Alhambra, Calif. 91802  
Re: Hahamonga

Comment Letter #164

Dear Sirs:

There are three things that can be done with  
a dam such as Devil's Gate Dam in Pasadena  
(Hahamonga area):

Comment  
164-1

Comment  
164-2

Comment  
164-3

Comment  
164-4

- # 1 - Keep the dam maintained for the purpose for which it was constructed, namely, flood control
- # 2 - Return the area back to its natural state by dismantling the dam.
- # 3 - Nothing. This is actually an option. In fact it is an option that the City of Pasadena chose to do well over a decade ago when they decided to form the Hahamonga Park area behind the dam. And now, the City of Pasadena is saying,

"We have to do something about all the debris that is accumulating behind the Dam". "We" in this case means "We" the people of Los Angeles County and not "We" the City and Citizens of the City of Pasadena. According to the Star News, Mr. Gordo of the City Council indicated that the County of Los Angeles had not been doing their job all these years. Mr. Gordo does not realize that the decision of the City of Pasadena to allow Hukamarya to return to its natural state (and to exist the Three Soil, rock operators that were removing debris, and just as importantly, turning that debris into useful products) kept the County of L.A. from doing any debris removal in the first place.

All three options above mentioned have environmental consequences. Keeping the Dam maintained as a flood control facility requires debris removal. Not only the removal itself causes environmental concerns, but what to do with all that "Stuff" poses a problem as well. Years ago it was planned to turn a local Altadena canyon for a dump site for this debris, another environmental concern.

Dismantling the Dam and returning the Arroyo Seco back to its pre-Dam natural beauty certainly

Comment  
164-4  
continued

Comment  
164-5

Comment  
164-6

Comment  
164-6  
continued

will put all the folks (including the City of  
Pocahontas & Riverside Park) downstream at flood  
risk.

Comment  
164-7

Doing Nothing, the option chosen by the City of  
Pocahontas years ago, also has its environmental concerns.  
Once the Dam is filled to capacity, which it is well  
on its way, the area behind the dam will mature into  
into a flat plain ~~covered~~ with <sup>in place</sup> ~~growing~~ plant life  
and wildlife habitat, but its flood control capacity  
will be greatly diminished. The only flood protection  
will be that the flood water velocity will be ~~reduced~~  
reduced as the waters move slower across a flat  
area than on a downslope, but it will no longer  
hold back any more additional debris.

Comment  
164-8

Considering the three options above, the City of  
Pocahontas has to decide what they want to do with  
Hahamonga. Does the City want the Dam to fill up  
to capacity, and allow it to maintain itself through?  
It doesn't sound like they do. What about maintaining  
the current level of the debris by periodically removing  
any build up above the current level?

Comment  
164-9

In any event, maintaining the current level or increasing  
the current capacity will require debris removal  
by somebody. Frankly, I am not too thrilled

about that 'Somebody' being the taxpayers of Los Angeles County, especially since it was the City of Pasadena's decision to do nothing that allowed the debris to back up in the first place.

Comment  
164-9  
continued

I strongly recommend that if debris removal is pursued, that private rock, soil operations be allowed back in to at least remove some, if not all, of the debris.

Comment  
164-10

Sincerely  
Tom Nuccio  
Tom Nuccio

Copies to:

City Council of Pasadena

Supervisor Anita Antonovitch

**Response to Comment Letter #164 (Tom Muccio)**

**Response to Comment 164-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 164-2:**

Comment Noted.

**Response to Comment 164-3:**

As discussed in Section 4.10.3 of the Draft Environmental Impact Report (EIR), removal of the Devil's Gate Dam was considered but rejected due to its inconsistency with Proposed Project objectives, as well as the potential safety concerns. This alternative would fail to meet the Proposed Project objectives and would result in greater additional impacts than the Proposed Project (geology, hazards, hydrology, and public services). Devil's Gate Dam, built in 1920, was the first dam built by Los Angeles County Flood Control District (LACFCD). The dam was built in response to the severe flooding of Los Angeles in the early 1900s, and allowed for the channelization of and development along the Arroyo Seco. The Arroyo Seco normally carries low flows, but it is periodically inundated from severe floods flowing off of its large, steep watershed that includes mountainous terrain. Prior to the construction of the dam, cities such as Pasadena, South Pasadena, and Los Angeles would experience flooding from the Arroyo Seco during storms. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam.

The scope of the project is to restore capacity for Devil's Gate Reservoir. Removing the dam would remove the only flood attenuation mechanism that is in place along the Arroyo Seco. Areas downstream of the dam would be at high risk of flooding during storm events. Also, sediment would move downstream and accumulate within and adjacent to the channel due to the removal of the dam. Sediment accumulation in the channel would reduce the capacity of the channel in those areas and would further increase the likelihood of flooding.

**Response to Comment 164-4:**

The No Project Alternative was analyzed in Section 4.0, Alternatives Analysis. The analysis determined that Alternative 6, No Project Alternative will not meet any of the Proposed Project's objectives of satisfactorily reducing flooding risk, creating a configuration suitable for routine operations and maintenance, reducing the possibility of plugging at the dam face, removing sediment from Johnson Field, removing sediment in a timely manner, and delivering sediment to facilities already prepared to accept sediment. In addition, although no habitat will be directly impacted, habitat in the reservoir will likely degrade under Alternative 6, No Project due to continuous sediment deposition. Reduction in sensitive habitat would potentially impact sensitive or special status species, resulting in a potentially significant impact.

As noted in Section 2.2.1, LACFCD History, sediment removal efforts have previously taken place at the reservoir.

**Response to Comment 164-5:**

Comment noted.

**Response to Comment 164-6**

See Response to Comment 164-3. LACFCD agrees that removing the dam would increase the risk of flooding downstream.

**Response to Comment 164-7**

See Response to Comment 164-4. LACFCD agrees that the No Project Alternative has environmental impacts as well, as noted in Section 4.9 No Project Alternative in the Draft EIR.

**Response to Comment 164-8**

See Response to Comments 164-4 and 164-5. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. In order for the removal project to be efficient, and therefore reduce impacts and costs, the amount of sediment removed every year needs to exceed the amount of sediment deposited. Historically, approximately 130,000 cy a year was deposited in Devil's Gate Reservoir annually since 1920. If the reservoir is left in its current state, the flood risk to downstream communities would be left at an unacceptable level.

**Response to Comment 164-9**

See Response to Comments 164-4 and 164-8.

**Response to Comment 164-10**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the reservoir will be transported to the sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

LACFCD notes commenter's preference for sediment and debris removal.



Date: 7 January 2014

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

Re: Devil's Gate Reservoir Sediment Removal & Management Project

ADVOCACY AND PRESERVATION

Altadena Heritage is a volunteer-based organization active since 1980 and registered as a 501(c)3 corporation in 1987. We are dedicated to protecting, preserving, and raising awareness of the architectural, environmental, and cultural heritage of our community. We have 450 members interested in preservation and advocating for a more beautiful Altadena. At our annual members meeting on December 15, 2013, members voted to respond to the Draft Environmental Impact Report for Devil's Gate Dam Sediment Removal Project. A major portion of Altadena's western boundary runs along Hahamongna Watershed Park and the Devils Gate Dam area, and any of five alternatives proposed in this DEIR would impact our community immensely. We recognize the need to remove sediment, maintain the dam, and protect downstream public safety, but we have serious questions regarding the project's magnitude and timeline, and are concerned that best management practices for integrated watershed management are not incorporated in any of the proposed alternatives.

We look forward to reviewing your responses to our comments and questions as follows:

1) Why has the project grown from its original proposed goal of 1.67 million cubic yards of sediment removal to 2.4 – 4 million cubic yards? What hydrological studies or other science justify this major increase in scope? Please refer us to specific reports.

2) The sediment basin is Pasadena's, Altadena's and La Cañada's Hahamongna Watershed Park, an important regional resource used for recreation by thousands of local residents. Activities include hiking, horseback riding, bicycling, and bird-watching. Have alternatives that allow debris removal while retaining multiple benefits for multiple users been considered? If yes, why have these alternatives not been presented? If not, why not?

3) Proposed construction plans block the two main east-west trails. The top of the dam is the trail connector to north-south trails, and blocking this will prevent passage to Pasadena and trails to the south. East-west blockages will prevent passage west to La Canada Flintridge trails. Is there a way to retain trail connections during debris removal? Is there a plan for trails following debris removal?

4) The debris basin provides important wildlife habitat for numerous species of vertebrate and invertebrate animals, and serves as an important wildlife corridor bridging the front range of the San Gabriels with areas to the south. What protections of wildlife habitat and migration routes are being proposed for the project?

Altadena Heritage 730 East Altadena Dr. Altadena, CA 91001 (626) 797-0054 altadenaheritage.com

- |                                             |                |                |                  |                     |               |
|---------------------------------------------|----------------|----------------|------------------|---------------------|---------------|
| Mark Goldschmidt, <i>Chair (ex officio)</i> | Hugo Arteaga   | Gail Casburn   | Peggy Sue Davis  | Adele Shakal        | Alan Zorthian |
| John Zoraster, <i>Vice Chair, Budgets</i>   | Richard Benson | Kooshian Clary | Vivien Fortunaso | Matt-dell Tufenkian |               |
| Mabel Duncan, <i>Recording Secretary</i>    | Karin Bugge    | Richard Davies | Nancy Romero     | Michele Zack        |               |
| David Mosher, <i>Executive Secretary</i>    |                |                |                  |                     |               |
| Debbi Swanson Patrick, <i>Treasurer</i>     |                |                |                  |                     |               |

Comment 165-1

Comment 165-2

Comment 165-3

Comment 165-4

Comment 165-5

Comment 165-6



Comment 165-7

5) Is trucking the only solution for debris removal? The plan for 450 truck trips per day, 6 days per week, up to 12 hours per day, 9-10 months a year for 4-7 years will negatively affect quality of life for Altadena's 43,000 residents — and is both energy intensive and expensive. Altadena will bear major health impacts of increased traffic and pollution for years under all trucking alternatives proposed in this DEIR. Has the cost of these health impacts been assessed in the DEIR?

# ADVOCACY AND PRESERVATION

Comment 165-8

6) The Eaton Canyon/Devil's Gate Water Diversion Project's cumulative impacts, when combined with the Sediment Removal Project, have not been addressed sufficiently, but merely alluded to in this DEIR. We refer to the planned 4,500 acre-foot-per-year (as stated in the Proposition 1E application and other documents) water diversion via a 4.8 mile long 30 to 36-inch pressurized pipeline which is slated to run for virtually its entire length through Altadena from Devil's Gate dam to Eaton Canyon spreading grounds. Estimated cost for the diversion is \$10 to \$15 million. This project will require a large storage pond and a pumping station within the Devil's Gate Dam area, yet the Diversion Project and Sediment Removal project are not considered together. Why not?

The Diversion Project will result in torn up streets near several schools and in quiet neighborhoods, trucking, traffic delays, and pollution for the one and a half to two year estimated construction period. This will impact Altadena greatly. Why is it necessary to transfer this water 5 miles across Altadena instead of allowing it to settle within the Devils Gate area? The percolation rate in Devil's Gate is similar to that in Eaton Wash, and the water would replenish the Raymond Basin Aquifer if allowed to percolate closer to where it naturally flows. This would benefit Altadenans and Pasadenans without the cost and disruption of a pump and pipeline project. What is the rationale for installing the pipeline rather than allowing natural percolation at Devil's Gate? The estimated cost of \$10 to \$15 million seems low for this project, is it realistic?

Comment 165-9

7) On the other hand, the size and price tag of sediment removal, \$65-100 million, is high. Have less expensive approaches that accomplish identified goals been considered?

Comment 165-10

8) The DEIR consistently treats sediment as trash instead of a resource. Clearly, much of it has value, especially if allowed to work its way down to help build up eroding beaches at the other end of the system. Sediment could be exported by sluicing, or by conveyor belt to existing channels of the Arroyo Seco and on to the LA River. Some sand, rock, and gravel could be separated in Hahamongna for local use. Exporting even a portion of the sediment by means other than trucking via freeways to Irwindale would seem to be more sustainable and could result in substantial savings. Have these alternatives been fully explored and potential cost savings assessed?

Altadena Heritage 730 East Altadena Dr. Altadena, CA 91001 (626) 797-0054 altadenaheritage.com

Mark Goldschmidt, <i>Chair (ex officio)</i>	Hugo Arteaga	Gail Casburn	Peggy Sue Davis	Adele Shakal	Alan Zorthian
John Zoraster, <i>Vice Chair, Budgets</i>	Richard Benson	Kooshian Clary	Vivien Fortunaso	Matt-de!! Tufenkian	
Mabel Duncan, <i>Recording Secretary</i>	Karin Bugge	Richard Davies	Nancy Romero	Michele Zack	
David Mosher, <i>Executive Secretary</i>					
Debbi Swanson Patrick, <i>Treasurer</i>					



Comment 165-11

ADVOCACY AND PRESERVATION

9) We seriously question the advisability of removing sediment in a single large-scale engineering operation. Debris accumulation is continuous over time, so a debris basin can never be permanently emptied. A maintenance approach limiting work to a few months a year in defined areas of the basin would allow for continuous on-going maintenance, and reduce the size of yearly export with associated dust, noise, hydrocarbon pollution, and freeway congestion. Construction areas could be cordoned off to allow for recreation and wildlife habitat in other areas. An important plus would be guaranteed jobs for workers and local trucking firms into the foreseeable future, and the opportunity to sort valuable building materials on site for sale to local contractors and homeowners. Has such an ongoing maintenance program of debris removal been assessed? If not, why not?

Altadena Heritage understands and supports the need for flood control and dam maintenance but questions the size and detrimental impacts of alternatives described in the DEIR. This DEIR does not appear to make use of current well-accepted multiple beneficial uses and best practices, but instead harkens back to single-goal civil engineering practices of the past. Please consider the quality and health of all in this area, and develop more viable and creative alternatives. In fact, such alternatives may lead to cost savings.

Respectfully yours,

Mark Goldschmidt, Chairman  
Altadena Heritage

Altadena Heritage 730 East Altadena Dr. Altadena, CA 91001 (626) 797-0054 altadenaheritage.com

Mark Goldschmidt, <i>Chair (ex officio)</i>	Hugo Arteaga	Gail Casburn	Peggy Sue Davis	Adele Shakal	Alan Zorthian
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Mabel Duncan, <i>Recording Secretary</i>	Karin Bugge	Richard Davies	Nancy Romero	Michele Zack	
David Mosher, <i>Executive Secretary</i>					
Debbi Swanson Patrick, <i>Treasurer</i>					

## **Response to Comment Letter #165 (Altadena Heritage)**

### **Response to Comment 165-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the organization's concerns with the Proposed Project and Alternatives. As discussed in the Draft Environmental Impact Report (EIR), mitigation measures and best management practices are proposed to minimize the project impacts.

### **Response to Comment 165-2:**

The comments within this letter have been responded to below.

### **Response to Comment 165-3:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cubic yards (cy) was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

**Response to Comment 165-4:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Alternatives to the Proposed Project were analyzed in the Draft EIR, Section 4.0, Alternatives Analysis. Alternative 3 was found to be the Environmentally Superior Alternative. Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 165-5:**

See Response to Comment 165-4.

**Response to Comment 165-6**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed. In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.

### **Response to Comment 165-7**

Various amounts of sediment and methods of removal were analyzed under the Alternatives Analysis of the Draft EIR (see Section 4 of the Draft EIR). While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant. Also as discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related impacts.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

### **Response to Comment 165-8**

The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

### **Response to Comment 165-9**

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs. The remaining cost will be covered by LACFCD funds.

The estimated cost for the Proposed Project and for Alternatives 1, 2, 3, and 5 would range from \$80 million for the Proposed Project to \$65 million for Alternative 3. Due to the variety of factors,

including the indeterminate locations of the sediment fallout and requirements for removing sediment from these locations, the cost for Alternative 4 cannot be calculated.

### **Response to Comment 165-10**

See Response to Comment 165-9.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. A maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

A conveyor belt system was considered in the Alternatives Analysis; see Section 4.10.1 of the Draft EIR. This alternative was rejected as it would not avoid or substantially reduce any significant environmental effects.

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft EIR. Separating sand, rock, and gravel for local use would not eliminate impacts associated with sediment removal and would not eliminate the use of vehicles to transport the sediment off site.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

### **Response to Comment 165-11**

See Response to Comments 165-4, 165-6, 165-7, 165-8, and 165-10.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over

1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

FASTing, a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing cost, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

ANNA BURTON  
INTERIM GENERAL MANAGER

**CITY OF LOS ANGELES**  
CALIFORNIA



ERIC GARCETTI  
MAYOR

**EMERGENCY MANAGEMENT  
DEPARTMENT**

200 N. SPRING STREET, ROOM 1533  
LOS ANGELES, CA 90012  
TEL (213) 978-2222  
TEL (213) 484-4800  
FAX (213) 978-0517  
www.emergency.lacity.org

December 30, 2013

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

**RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT**

Dear Los Angeles County Flood Control District (LACFCD) Representative:

This letter is being sent in support the Devil's Gate Reservoir Sediment and Removal Management Project. The City of Los Angeles Emergency Management Department (EMD) is very concerned about the threat of flooding as a result sediment buildup behind the Devil's Gate Reservoir.

Nearly 500 homes in the City of Los Angeles have been identified by LACFCD as a flood risk from water overtopping the Arroyo Seco Channel because of the sediment buildup behind the Reservoir. Although the sediment removal project may inconvenience local residents near the reservoir, not moving forward with this project may result in major consequences to many residents in the City of Los Angeles.

Nearly a year ago, EMD was informed by the LACFCD of this flood threat. As a potential threat to both life and property, EMD has been working in partnership with the LACFCD by identifying homes in the flood inundation areas, mailing resident's preparedness and mitigation information, developing mass notification and evacuation plans, and identifying shelters in and around the area should this threat become a reality.

EMD supports this project and all five (5) alternatives identified in the DEIR (Draft Environmental Impact Report). Although the environmental impacts from the project are deemed significant in the DEIR, the threat to both life and property is just as significant. The nearly 500 residents in the City of Los Angeles, and others in surrounding jurisdictions, are at risk of losing their homes and having their lives endangered from major flooding as a result of this sediment buildup.

Please consider this letter of support from the City of Los Angeles Emergency Management Department for the Devil's Gate Reservoir Sediment Removal and Management Project when making your decision. If you have any questions or concerns regarding this memo or the City's efforts to preparing its residents from the potential effects from this flood threat, please contact Larry Meyerhofer at (213) 484-4814.

Sincerely,

ANNA BURTON  
Interim General Manager

Vince Jones, Bureau of Engineering

Comment  
166-1

Comment  
166-2

Comment  
166-3

**Response to Comment Letter #166 (City of Los Angeles Emergency Management Department)**

**Response to Comment 166-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's support for the Proposed Project.

**Response to Comment 166-2:**

LACFCD recognizes the flood risk for areas downstream of the Devil's Gate Reservoir. The purpose of the Project is to removal sediment from the reservoir to restore the design capacity and establish a reservoir management system to maintain the flood control capacity of the reservoir, thereby managing flood risk to downstream residents.

**Response to Comment 166-3:**

LACFCD notes the support from the City of Los Angeles Emergency Management Department for the Proposed Project and all five alternatives, as the project is necessary to reduce downstream risk.

**From:** [alton Cullen](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamonga project  
**Date:** Tuesday, January 14, 2014 2:41:38 PM

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Comment 167-1 | The EIR contains so many errors and omissions and does not address the issues using science and common sense and lacks good solid reasoning for the removal of so much sediment in such a short time. The entire report needs to be scrapped and one addressing the issues realistically is the only solution.

Comment 167-2 | None of the alternate solutions to the perceived problem are practical nor do they take into consideration the very negative impacts on the people of the area nor the total destruction of the Hahamonga basin.

Comment 167-3 | The only possible method of removal of the sediment is using sluicing over a long period of time (15-25) years to allow the material flow of the sediment from the mountains to the ocean. If sluicing is not used it will be one more step taken to diminish the beaches sand replenishment.

Comment 167-4 | It's time to take strong action and approach this issue with science, common sense and what is best for all including the environment.

Al Cullen  
385 So. Greenwood Ave.  
Pasadena, CA 91107-5018  
(626) 796-9844

**Response to Comment Letter #167 (Al Cullen)**

**Response to Comment 167-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Draft Environmental Impact Report (EIR) adequately analyzed all issue areas required by the California Environmental Quality Act (CEQA).

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

**Response to Comment 167-2:**

The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders including concerns for long-term habitat preservation and recreational usage. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities. The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

The Proposed Project would not result in the total destruction of the Hahamongna basin. In addition, the Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by

allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

**Response to Comment 167-3:**

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations, potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis. In addition, the Proposed Project will not decrease the current amount of sediment that flows downstream and, therefore, would not contribute to the erosion of beaches. Also as noted in the Sediment Management Strategic Plan (SMSP), "Without human intervention, most Southern California beaches would naturally be narrow and rocky. The wide beaches in Southern California were created and have been maintained by various agencies through artificial beach nourishment projects (also referred to as beach fill projects) and the construction of protective coastal structures since the 1930s." In addition, the SMSP states, "Since the Los Angeles River changed course in 1825, the largest waterway reaching this region of the coast is Ballona Creek, which has an estimated annual sediment yield of less than 50,000 cubic yards and delivers generally fine-grained sediment that is not appropriate for beach nourishment." For general information on beach nourishment, please see Section 6.5.1 of LACFCD's Sediment Management Strategic Plan Sediment Management Strategic Plan, which can be viewed here: <http://dpw.lacounty.gov/lacfcd/sediment/files/FullDoc.pdf>

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing cost, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 167-4:**

Comment noted.

**From:** [VSKimball@aol.com](mailto:VSKimball@aol.com)  
**To:** [reservoircleanouts](#)  
**Subject:** Comment re. Devil's Gate Reservoir Sediment Removal & Mgmt Project DEIR  
**Date:** Wednesday, January 15, 2014 4:23:02 PM

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Comments on the Draft Environmental Impact Statement for the Devil's Gate Reservoir Sediment Removal and Management Project from Virginia Kimball, 1685 La Vista Place, Pasadena, CA 91103, [vskimball@aol.com](mailto:vskimball@aol.com)

Comment 168-1 | I oppose this enormous plan, because it is too big and too destructive. There is a danger created by the buildup of sediment behind the dam, but the risk is not so great that 2,950,000 cubic yards of sediment need to be removed, using up to 425 truck round-trips per day April through December, six days per week for up to five years, and clearing a total removal area of 120.42 acres in the area behind Devil's Gate Dam. The proposed plan would create a nightmare for residents and visitors and this hardship is not fully disclosed in the DEIR, although it does determine that there would be significant and unavoidable effects on the aesthetics, air quality, transportation and traffic. These are of sufficient detriment that the Proposed Plan should be abandoned.

Comment 168-2 | 1. Justification for the project: The worst case scenarios are based on 50-year maximum rainfall events on burned hillsides, such as after the 2009 Station Fire. We had that event recently, and while it might happen again, the likelihood of another big fire in the same area followed by severe rains within the next ten years is unlikely. Certainly there is a risk of heavy rains, as that's how our rains seem to fall lately, but a gradual approach to reducing the risk is logical at the current time. The county's interim measures have worked well and will continue to work while a gradual sediment removal plan that involves some vegetation removal along with Flow Assisted Sediment Transport and sluicing is put into place.

Comment 168-3 | 2. Impact on biological resources: The DEIR determines the impact to be less than significant with mitigation. The proposed removal of all vegetation in the designated area, regardless of the selected alternative, is drastic. They propose removing the majority of vegetation in the Hahamongna basin, and indicate that wildlife will find another place to go. The basin is a broad wildlife corridor that will be altered drastically for five years or so. Wildlife may find routes around and through the area, including through inhabited areas, but the report does not address the ramifications of that disruption.

Comment 168-4 | The proposed project anticipates a period of years to remove the sediment and yet calls for total removal of all vegetation at the beginning of the project. It will probably have to be done again and again through the years of construction as regrowth occurs. Do we have to look at a huge sandpit while work proceeds at the edges? A gradual process, utilizing FAST and sluicing, would rely on a few roads into the area and vegetation removal along likely streambeds through the area along with clearing away the front of the dam. Vegetation removal would be required, but not at the proposed level. Wildlife will be able to accommodate a gradual process much better.

3. Impact on the natural erosion process: The proposed project ignores the natural process that Devil's Gate Dam was built to address. We live in an area adjacent to steep mountainsides that slough off debris through naturally caused erosion. The particles that come off the mountains are transported through streams and rivers to the beach, renewing the sandy beaches. Picking up the sediment, loading it into trucks and transporting it across town doesn't make any sense. Sluicing and FASTing (Flow Assisted Sediment Transport) would be more logical, cost effective and natural. I suggest a test period using FAST or sluicing to determine its effectiveness. This should be done carefully, allowing time for debris to make its way to the Los Angeles River and the ocean, so sediment will need to be sluiced downstream before rainstorms stop, permitting the stream of water to flush the system out.

Comment 168-5

The DEIR concludes that sluicing is environmentally inferior to the proposed project with respect to the likely need for sediment trucking from locations further downstream. I could read nothing in the DEIR to support such a conclusion. Properly done, there should be no need to truck sediment from locations further downstream. I think the DEIR is biased in this conclusion. The DEIR also uses its questionable hypothesis to address air quality concerns. "Therefore, sluicing *could* result in a potentially significant impact. This impact *will* be increased in comparison to the proposed project due to the *potentially* longer distance of trucking during vegetation removal activities." I added italics to this quote from page 478 to emphasize the faulty logic utilized in the DEIR.

4. Impact on Aesthetics: The Proposed Project would scrape everything off a beautiful area, leaving what would look like a gravel pit behind. The process would create clouds of dust with long days of destruction activity. Hiking, bird watching, horseback riding, picnics and outdoor relaxation/recreation would be severely impacted. People with respiratory challenges would be forced to remain indoors.

Comment 168-6

Homes within at least a radius of a few miles will have their property values drop. When we neighbors try to sell our homes, we must honestly disclose all problems. This would certainly include disclosing a nearby project that fills a truck every few minutes, creating a dust cloud over the Hahamongna basin, significant traffic jams, noise and a generally unpleasant atmosphere. We probably wouldn't even have to mention it to prospective buyers; they'd notice it themselves.

Comment 168-7

5. Impact on Transportation and Traffic: Just imagine all those trucks on the 210 freeway, especially at rush hours. From my home in Pasadena, I usually drive north on Linda Vista, turning on Oak Grove Drive/Woodbury Ave., and I would probably encounter slowing and delays. What will happen when there is a football game or other event in the Rose Bowl? Yes, these impacts are significant and unavoidable – except if you decide to take a gradual approach relying more on sluicing and FAST, perhaps using a ten year plan, instead of five.

Comment 168-8

6. Conclusion: I oppose all the alternatives in the Draft Environmental Impact Statement. The least bad alternative would be a combination of Sediment Removal Alternative #3 combined with Alternative #4, Sluicing, both adapted for an incremental sediment and vegetation removal plan.

Comment 168-9

Our home is a mile or so south of the dam. We hike in the lower Arroyo Seco Park weekly and hike through Hahamongna frequently as well. Our family celebrates Thanksgiving with a picnic in Oak Grove Park. Hahamongna and the Arroyo Seco

Comment 168-10

Comment 168-10  
continued

↑  
are natural treasures that should remain natural – scoured by the natural forces of flooding at times, but protected from this massive deconstruction project.

Virginia Kimball, 1685 La Vista Place, Pasadena, CA 91103

## **Response to Comment Letter #168 (Virginia Kimball)**

### **Response to Comment 168-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

The Draft EIR identifies impacts that the Proposed Project will have on the residents and visitors. Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

As noted in the Draft EIR, Section 3.4, Aesthetics, the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish.

All other potential California Environmental Quality Act (CEQA) impact categories were found to be fully mitigated or not require further evaluation in the Draft EIR.

While traffic and aesthetic impacts will remain significant during sediment removal; Section 15021(d) of the California Environmental Quality Act (CEQA) Guidelines states: "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment." Prior to implementation of the Proposed Project, the County of Los Angeles Board of Supervisors must consider the EIR, must certify the EIR, adopt the Findings of Fact, Mitigation Monitoring Program, and a Statement of Overriding Considerations.

**Response to Comment 168-2:**

See Response to Comment 168-1. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment , and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

Flow Assisted Sediment Transport (FASTing), a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing cost,

minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 168-3:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed. In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.

**Response to Comment 168-4:**

See Response to Comments 168-2 and 168-3. As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities. Also, as discussed in Draft EIR, Section 4.7.1, under Alternative 4, the Sluicing Alternative, this sediment removal method would require removal of all vegetation over an extended time frame.

**Response to Comment 168-5:**

See Response to Comments 168-2 and 168-3. As discussed in the Draft EIR, Section 4.7, Alternative 4, Sluicing, LACFCD conducted a Sediment Transport Capacity Analysis (Appendix K of the Draft EIR) that did study the effectiveness of sluicing sediment from the reservoir. Sluicing is a sediment removal method that uses construction equipment, such as bulldozers, to push sediment into moving water so that it will flow through the dam's lowest gate. This study determined most of the sediment that would be removed from the reservoir by sluicing would remain in the Arroyo Seco, with deposits primarily occurring in and around the natural reaches due to the lack of water received in the Arroyo Seco. This additional sediment would reduce the Arroyo Seco Channel's flood control capacity and introduce new downstream flooding risks. It is likely that this sediment would need to be mechanically removed and trucked out of the Arroyo Seco Channel. As discussed in the Draft EIR, Alternative 4, Sluicing is considered environmentally inferior to the Proposed Project with respect to impacts to air quality standards due to the likely need for sediment trucking from locations further downstream.

**Response to Comment 168-6**

See Response to Comment 168-1.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related acute short-term and long-term impacts.

#### **Response to Comment 168-7**

See Response to Comment 168-1 and 168-8. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant.

Comment regarding economic impacts to surrounding homeowners has been noted.

#### **Response to Comment 168-8**

See Response to Comments 168-1 and 168-2. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments along any of the Haul Routes. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site. This will include coordination of sediment transport activities with Rose Bowl special events.

**Response to Comment 168-9**

LACFCD notes the commenter's preference for the combination of Alternative 3 and Alternative 4.

**Response to Comment 168-10**

See Response to Comment 168-6.

**From:** [Joanne Watchie](#)  
**To:** [reservoircleanouts](#)  
**Cc:** ["Tony Bell"](#); ["Pasadena Mayor Bill Bogaard"](#); ["Councilman Steve Madison"](#)  
**Subject:** Save Hahamongna!  
**Date:** Wednesday, January 15, 2014 2:59:43 PM

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Hahamongna is the rare spot in the Arroyo Seco at the foot of the San Gabriel Mountains where the mountainous watershed meets the urban plain.

Hahamongna contains five unique habitat zones that only exist in alluvial canyons near the mountains. Most sites like this in Southern California have been destroyed.

Your plan to permanently remove 42-120 acres of habitat from the dam up to JPL would permanently destroy this unique habitat where many birds next, including the Least Bell's Vireo in 2012.

The earth is a precious place that we must safeguard for future generations! There is no recovering from poor decisions that jeopardize the earth's ecological balance – save Hahamongna!

Joanne Watche  
330 Cordova St, #376  
Pasadena, CA 91101  
[jwatchie@sbcglobal.net](mailto:jwatchie@sbcglobal.net)

Comment 169-1

## Response to Comment Letter #169 (Joanne Watche)

### Response to Comment 169-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Bird species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Hector Gonzalez](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [Daniel Bobadilla](#)  
**Subject:** City of Azusa Comments - Devil's Gate Draft EIR  
**Date:** Wednesday, January 15, 2014 2:32:14 PM

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Hello,

Comment 170-1 | Below are comments from the City of Azusa pertaining to the Devil's Gate Sediment Removal and Management Project Draft EIR.

- Comment 170-2 | 1. A pavement condition study pre and post project construction should be performed on roads impacted by proposed truck routes.
- Comment 170-3 | 2. A cash deposit or improvements will be required to repair roads along haul routes in the City of Azusa.
- Comment 170-4 | 3. Flagmen and/or automatic traffic lights may be required.
- Comment 170-5 | 4. A street sweeper and/or water truck will be required along the haul routes in the City of Azusa to mitigate effects of dirt, mud, or debris in the roadway.
- Comment 170-6 | 5. Truck shall queue on-site and not on city streets.
- Comment 170-7 | 6. Although the proposed Haul Route 2B is within the City designated truck routes, the City requests that the proposed truck route refrain from traveling on Azusa Avenue and instead follow Haul Route 2A.

Have a good Day,

**Hector Gonzalez Jr., P.E.**  
Engineering Assistant  
City of Azusa, Engineering Division  
213 East Foothill Boulevard  
Azusa, CA 91702  
(626) 812-5200 Ext. 5464  
[hgonzalez@ci.azusa.ca.us](mailto:hgonzalez@ci.azusa.ca.us)

**Response to Comment Letter #170 (City of Azusa)**

**Response to Comment 170-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The comments within the letter have been responded to below.

**Response to Comment 170-2:**

Trucks hauling sediment from the project site to any of the sediment placement sites will follow the respective cities' Designated Truck Routes. Hauling permits will be obtained as necessary from the appropriate localities, and all conditions of said permits will be followed accordingly.

**Response to Comment 170-3:**

See Response to Comment 170-2.

**Response to Comment 170-4:**

See Response to Comment 170-2. No intersections in the City of Azusa will be significantly impacted under the Proposed Haul Route segment to and from Interstate 210 (I-210) to Manning Pit (Traffic Study Haul Route 2A); therefore, no mitigation measures would be required for this segment of the haul route.

**Response to Comment 170-5:**

See Response to Comment 170-2. With the Proposed Project's full compliance with the South Coast Air Quality Management District's (SCAQMD's) Rule 403, sediment removal trucks are not expected to deposit dirt, mud, or debris along the haul route.

**Response to Comment 170-6:**

See Response to Comment 170-2. The Proposed Project will not involve queuing on city streets.

**Response to Comment 170-7:**

Los Angeles County Flood Control District (LACFCD) notes that the City of Azusa would prefer the project to follow Haul Route 2A.



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



Comment Letter #171

January 14, 2014

Mr. Christopher Stone, Assistant Deputy Director  
County of Los Angeles  
Department of Public Works, Water Resources Division  
Attn: Reservoir Cleanouts Program  
P.O. Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

**Subject: Draft Environmental Impact Report for Devil's Gate Reservoir Sediment Removal and Management Project, Los Angeles County, California (SCH#2011091084).**

Dear Mr. Stone:

The Department of Fish and Wildlife (Department) has reviewed the Draft Environmental Impact Report (DEIR) dated October 23, 2013 for the above-referenced Devil's Gate Reservoir Sediment Removal and Management Project, hereinafter referenced as Project. The document was prepared by Los Angeles County Flood Control District (LACFCD) acting as the Lead Agency (CEQA Guidelines § 15051). The Project approval would allow LACFCD to restore and maintain flood capacity within the Devil's Gate Dam and Reservoir to meet its intended level of flood protection for the communities downstream.

The Devil's Gate Dam and Reservoir are located in the City of Pasadena, in Los Angeles County; west of La Cañada Flintridge, east of the unincorporated community of Altadena, and south of the Los Angeles National Forest. Other land uses directly adjacent to the project site include the California Institute of Technology (Caltech)/National Aeronautics and Space Administration–Jet Propulsion Laboratory located directly to the northwest and east of the reservoir; La Cañada High School and Hillside School and Learning Center to the west; single-family residential uses to the north, east, and south; and Interstate 210 Foothill Freeway (I-210) to the south. The Project site is located within Hahamongna Watershed Park (Park). The Park is owned and operated by the City of Pasadena and includes the Oak Grove area. Southern California Edison, Southern California Gas Company, Pasadena Water and Power, and the LACFCD hold easements within Park.

The Project involves a comprehensive sediment removal plan that would restore flood capacity and establish a reservoir management system to maintain the flood control capacity of the reservoir. At the time the Notice of Preparation was released, an area of 178 acres was considered for the proposed project; the Project has been refined in the DEIR to an area of approximately 120 acres (consisting of 51.4 acres riparian woodland, 22.8 acres ruderal, 26.5 acres ephemeral stream (scoured), 9.3 acres mule fat scrub, 3.1 acres coastal sage scrub, 1.9 acres disturbed (trails/barren), 1.8 acres riparian herbaceous, 1.1 acres Riversidean alluvial fan sage scrub (RAFSS) and 0.4 acres ornamental landscaping).

Until this DEIR is adopted and certified, LACFCD has implemented the Interim Measures Project (IMP) which is currently underway at Devil's Gate Dam and Reservoir to reduce

downstream flood risk. The IMP includes minor dam modifications to help keep debris from plugging the outlet works and allows for removal of up to 25,000 cubic yards of sediment per year.

The Project has two distinct phases, the Sediment Removal Phase and the Reservoir Management Phase. The Sediment Removal Phase would remove approximately 2.9 million cubic yards of the existing excess sediment in the reservoir. Specific excavation limits and reservoir configuration for the Project are shown in DEIR Figure 2.5-1 (DEIR page 17). As shown in Figure 2.5-1, the basin will be excavated to a 985-foot elevation at the face of the dam, sloping up to a 1,070-foot elevation at approximately 4,977 feet north of the dam. In addition, any additional sediment that accumulates from storm flows would be managed and removed during the Reservoir Management Phase. The Project would not include excavation within the Oak Grove area of the Park or the City of Pasadena's spreading grounds on the east side of the reservoir.

Construction for the Project is expected to occur over the course of approximately 5 years beginning the summer of 2015. Excavation and associated activities within the reservoir area are expected to take place during drier months, from April to December, Monday through Saturday (except on holidays), as weather permits. During dry years, work could potentially start earlier and/or continue later. The Reservoir Management Phase is expected to start after the completion of the main Sediment Removal Phase and continue as needed for flood control purposes. The purpose of the proposed annual management activities, described below, is to reduce buildup of sediment in the reservoir management area and eliminate or substantially reduce the occurrence of another large-scale sediment removal project in the future.

Excavated sediment would be trucked offsite to existing disposal site locations which are currently available to accept the sediment. Trucks would travel and place sediment at one of the primary disposal site locations, the Waste Management Facility in Azusa, the Vulcan Materials Reliance Facility in Irwindale, or the Manning Pit Sediment Placement Site in Irwindale. Secondary disposal sites are facilities in Sun Valley (Sheldon Pit, Sun Valley Fill Site, Bradley Landfill, and Boulevard Pit).

The DEIR identifies the following vegetation communities within the project work area; mule fat scrub, riparian herbaceous, riparian woodland, coastal sage scrub, Riversidean alluvial fan sage scrub, and other habitats (ruderal, ornamental, disturbed, and scoured). Special status animal species observed onsite include least Bell's vireo (*Vireo bellii pusillus*). Two California Species of Special Concern (SSC), the yellow warbler (*Dendroica petechial brewsteri*) and two-striped garter snake (*Thamnophis hammondi*) were also observed on the project site. No special status plant species were observed during survey work.

The Project, through sediment removal, would impact approximately 118 acres of natural vegetation communities, specifically 51.4 acres riparian woodland, 26.5 acres ephemeral stream (scoured), 22.8 acres ruderal, 9.3 acres mule fat scrub, 3.1 acres coastal sage scrub, 1.9 acres disturbed (trails/barren), 1.8 acres riparian herbaceous, 1.1 acres of RAFSS, 0.4 acres ornamental landscaping.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the Project (California Environmental Quality Act [CEQA] Guidelines §15386) and pursuant to our authority

Comment 171-1  
continued

Comment 171-2

as a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code §2050 et seq.) and Fish and Game Code Section 1600 et seq.

1. **Coordination.** The Department has met and continues to collaborate with the LACFCD regarding Project excavation footprint and maintenance activities within Devil's Gate Dam and Reservoir. The Department has worked with the LACFCD on the implementation of the IMP and has had several conversations regarding the proposed Project. The Department and LACFCD met on November 20, 2013 to discuss the specifics of the long term sediment removal included in the DEIR and we continue to coordinate with LACFCD to assist LACFCD in its goal to avoid, minimize, and mitigate project-related impacts to biological resources.

A. The Department recommends LACFCD continue coordination with the Department to refine the project description for the Final Environmental Impact Report (FEIR) to minimize impacts to sensitive resources and meet the objectives of the Project (see comment 2).

B. The Department recommends LACFCD meet with the Department to discuss the need for a California Endangered Species Act (CESA) Incidental Take Permit (ITP) for impacts to CESA-listed species (see comment 3).

C. The Department recommends LACFCD meet with the Department to discuss the Lake or Streambed Alteration Agreement (LSA)(Fish and Game code §1600 et seq) necessary for the completion of this project. The Department has some concerns regarding the details of the jurisdictional delineation. Generally speaking, the Department would take lake or streambed jurisdiction over the entire reservoir area (see comment 9). The Department recommends LACFCD review the Department's current guidance on delineating episodic steams in the December 2010, *A Review of Stream Processes and Forms in Dryland Watersheds* (Dryland Streams Guidance document) available on the Department website at (<http://www.dfg.ca.gov/habcon/1600/1600resources.html>).

2. **Project Alternatives.** The DEIR analyses five separate alternatives to the proposed Project, which further reduce the biological impacts and still meet the objectives of the Project. Alternative 1, Configuration B was designed to maintain the original capacity in the reservoir but reduce vegetation impacts (54.56 acres) by excavating to 1,040 feet and isolating the impacts to the downstream portion of the reservoir. The DEIR Alternative 3, Configuration D was designated the Environmentally Superior Alternative to the Project, which would impact most of the existing habitat in the reservoir. While Alternative 3, Configuration D does not have the least impacts across all issue areas, the DEIR submits that it substantially reduced impacts to biological resources by reducing the acreage of vegetation removal by up to 44 acres (i.e., 36 percent to be left undisturbed) in comparison to the proposed Project.

A. **Riparian Impacts.** The Department supports the LACFCD initiative to modify the proposed Project in a manner that reduced impacts to biological resources. The Department's primary concern is to minimize the impacts to RAFSS onsite (see comment 3 below). The secondary goal is to minimize impacts to riparian habitats

Comment 171-8  
continued

Comment 171-9

Comment 171-10

Comment 171-11

Comment 171-12

Comment 171-13

Comment 171-14

Comment 171-15

suitable to support sensitive species known to occur onsite. While Alternative 3, Configuration D is the Environmentally Superior Alternative, the configuration could result in the conversion of sensitive RAFSS and active stream channel in an effort to establish willow riparian habitat within the upstream portion of the reservoir/existing wash.

**B. *Suitability of Mitigation Sites.*** The Department is concerned the proposed mitigation sites do not have the hydrology to support the proposal to revegetate the undisturbed areas in Alternative 3 (swaths of habitat along the west and east sides of the Project and in the center of the site between the two proposed excavated branches) with riparian habitats under Reservoir Management operations given the information provided in the DEIR.

**C. *Engineering/Maintenance Requirements.*** An additional concern of the Department is the amount of engineering that may be necessary to stabilize the proposed Alternatives. An episodic stream system, like the Arroyo Seco Creek (refer to Department's Dryland Steams guidance document, see comment 1 (C) above) requires more active maintenance to stabilize the channel. Episodic stream channels tend to move across the entire alluvial streambed versus a perennial stream utilizing one stable primary channel.

**D. *Additional Recommendations.*** Based on these concerns the Department recommends LACFCD consider the following modifications, measures or studies be included in the FEIR to further minimize, and avoid significant impacts of the Project to biological resources;

- i. The FEIR should include a measure to require an analysis of the hydrology and hydraulics (including sediment transport) in Arroyo Seco Creek upstream of the dam to determine the indirect effects to the stream and the habitat upstream of the final selected area for Reservoir Management.
- ii. Continue to work with the Department to modify the final design of the Project that minimizes the impacts to sensitive habitats. A Department hydrologist is available to assist LACFCD and Department staff with input on study and stream design. In addition the Department recommends further analysis of the existing and historical extent of Alluvial Sage Scrub Alliance onsite (see comment 4 below). This analysis will allow LACFCD and the Department to make more appropriate vegetation plans for the upstream portion of the reservoir.
- iii. The Department recommends the LACFCD include a measure within the FEIR to use the hydrologic information to evaluate and confirm the suitability of riparian vegetation to be established within mitigation sites identified within the reservoir prior to implementation of the a mitigation plan.

**3. Impacts to Least Bell's Vireo.** The DEIR on page 108 indicates that least Bell's vireo has not been observed successfully nesting onsite, but is known to be present (based on protocol surveys conducted in 2013). The DEIR indicates sediment removal activities would result in the removal of least Bell's vireo habitat within the riparian woodland and mule fat scrub communities, resulting in direct harm or take of these species, but this

impact could be mitigated to less than significant with implementation of mitigation measures MM BIO 1 through 5. The Department recommends LACFCD consult with the Department regarding anticipated Project-related "take" of least Bell's vireo to determine the need for an Incidental Take Permit (ITP) under CESA. If any project activity will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Applicant seek appropriate take authorization under CESA prior to implementing the Project activities. Appropriate authorization from the Department may include an ITP or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b), (c)). Conditions within an ITP will assure impacts to state listed species will be minimized to the maximum extent feasible and fully mitigated. Early consultation with Department regarding potential permitting obligations under CESA is encouraged since modification of the proposed project may be required to avoid or reduce impacts to State listed species.

Comment 171-15  
continued

4. **Vegetation Classification.** The DEIR uses Holland Code (Holland 1986) to classify vegetation communities. We recommend the FEIR vegetation classification mapping follow the Second Edition of the Manual of California Vegetation (MCV). This standardized vegetation classification has been accepted by State and federal agencies. The principal unit in the MCV is called an "Alliance" (or series). Alliances are a floristically defined vegetation type identified by its dominant and/or characteristic species in the upper layer of vegetation (such as in the Scalebroom or *Lepidospartum squamatum* Shrubland Alliance). For example, the DEIR (Figure 3.6-2) classifies 26.5 acres of "scoured" as a vegetation community. In episodic streams scoured soils would be included as part of an Alliance when assessing the stand of vegetation for structural integrity (structure of stand will have a similar history or environmental setting). A stand (as used in MCV) is the basic physical unit of vegetation in a landscape. It has no size limits. Some stands are very small such as wetland seeps, and some maybe several square kilometers in size such as desert stand types. The website ([http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/NaturalCommunitiesList\\_Oct07.pdf](http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/NaturalCommunitiesList_Oct07.pdf)) and the MCV provide a key that will allow LACFCD to cross reference the Holland Code into the standardized statewide (compliant with the National Vegetation Classification Systems) nomenclature supported by the Department. Additionally, the document, Alluvial Scrub Vegetation of Southern California, A Focus on the Santa Ana River Watershed In Orange, Riverside, and San Bernardino Counties, is available at California [http://cnps.org/cnps/vegetation/pdf/alluvial\\_scrub-diaz\\_evans2011.pdf](http://cnps.org/cnps/vegetation/pdf/alluvial_scrub-diaz_evans2011.pdf) is an additional tool to help the LACFCD cross-reference the Holland Codes to the Vegetation Classification system.

Comment 171-16

5. **Riversidean Alluvial Sage Scrub.** The DEIR adopted mitigation measure MM-BIO-6 to restore and/or enhance RAFSS habitat at a 1:1 ratio by acreage, and to map areas using aerial photographs. The Department recommends LACFCD use archival aerial photos that represent the extent of the vegetation community in conditions before the 2009 Station fire in the FEIR in order to accurately identify the extent of this community. This extent of RAFSS should be used as the baseline existing conditions for RAFSS. RAFSS has different successional stages (e.g., post scouring event, deposition event, and post fire events). The Department recommends using the maximum extent of RAFSS seen in pre-Station fire photos to determine the Project's potential impact.

Comment 171-17

6. **Sensitive Reptiles and Amphibians.** The project site supports habitat for the federally endangered arroyo toad (*Anaxyrus californicus*). The Department recommends US Fish and Wildlife Service (USFWS) protocol level surveys be performed for this species prior to implementation of ground disturbances associated with both the Sediment Removal and the Reservoir Management Phases because the project site supports appropriate habitat and there are historic records of Arroyo toad. Further survey efforts for SSCs including coast horned lizard (*Phrynosoma blainvillii*) and western spadefoot (*Spea hammondi*) are also recommended to be performed within appropriate habitat on the project site prior to implementation of ground disturbances associated with both the Sediment Removal and the Reservoir Management Phases.

7. **Burrowing owl.** Burrowing owl (*Athene cunicularia*), a SSC, may use open areas of the project site, especially during the winter. Proposed maintenance areas may create suitable burrowing owl habitat by maintaining these areas open and clear of vegetation. The Department recommends the FEIR include Burrowing owl surveys using Department recommended 2012 "Staff Report on Burrowing Owl Mitigation" prior to Project Sediment Removal Phase and Reservoir Management Phase within appropriate habitats. See website: [www.dfg.ca.gov/wildlife/nongame/docs/BUOWStaffReport.pdf](http://www.dfg.ca.gov/wildlife/nongame/docs/BUOWStaffReport.pdf).

8. **Other Sensitive Species.** The FEIR should include further discussion of regionally unique or rare species pursuant to CEQA Section 15125(c). For example, the DEIR lists western gray squirrel (*Sciurus griseus*) as occurring on the project site. The range of the western gray squirrel in Southern California is declining. This decline is thought to be the result of habitat loss and fragmentation, and competition with eastern fox squirrel (*Sciurus niger*). Impacts to western gray squirrel should be considered a significant direct and cumulative impact because western grey squirrel still persist in the Verdugo Mountains to the east of the project site. Any genetic exchange for this species should be encouraged. The project should be evaluated for impacts to western gray squirrel habitat and movement opportunities between the project site and the Verdugo Mountains through the Devil's Gate Dam via Flint Wash, pedestrian tunnels and at grade crossings.

9. **Department Jurisdictional Wetlands.** The Project includes the excavating of a lake and stream within the regulatory authority of the Department. The Department has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a LSA with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a responsible agency. The Department as a responsible agency under CEQA may consider the Lead Agency's EIR for the Project. To minimize additional requirements by the Department pursuant to Section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

Comment 171-21 continued

The Department may take jurisdiction on episodic streams, including alluvial fan streams even where flow occurs as sheetflooding. The paper recently published by the Department, *A Review of Steam Processes and Forms in Dryland Watersheds*, discusses the alluvial process and the significance to water resources. The Department recommends the Lead Agency require a jurisdictional delineation be completed by a hydrogeomorphologist familiar with assessments in dryland watersheds to complete a delineation of the stream or lake to be included in the FEIR. The delineation should be conducted pursuant to the USFWS wetland definition adopted by the Department. Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

Comment 171-22

10. **Oak Tree Impacts.** The proposed haul routes may remove oak trees to accommodate route creation or improvements. The Department recommends the FEIR elaborate on how many oak trees are proposed for removal and relate this to, California Public Resources Code Section 21083.4 (2004 Senate Bill 1334). If removal of these oaks are considered significant (either individual impacts or cumulative), then they should be mitigated as directed by the law. Acceptable mitigation measures include, but are not limited to, conservation of other oak woodlands through the use of conservation easements and planting replacement trees, which should be maintained for ten years.

Comment 171-23

11. **Sensitive Plant Species.** The DEIR Biological Technical Report Appendix D (page 50) states "the California Department of Fish and Game (CDFG) [*sic*] California Natural Diversity Database (CNDDDB 2012) and the *California Native Plant Society's Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California (CNPSEI 2012)* were reviewed for the quadrangles containing and surrounding the project site..." The Department recommends performing a nine (9) quadrangle search to develop an inclusive list of potentially occurring plant and animal species. The 9 quadrangle search more accurately reflects what species may have the potential to occur on the project site.

Frequently, plant and animals are observed in areas where they were not detected historically, and by using an inclusive list it allows the project proponent to evaluate these outlier species and manage for them should they occur on the project site. As a recent example, Santa Barbara morning glory (*Calystegia sepium* ssp. *Binghamiae*) was recently discovered in Chino, San Bernardino County (Brummitt, et al., 2012).

Comment 171-24

12. **Plant Surveys.** The FEIR should clarify when the last floristic surveys were conducted. The DEIR Appendix D page 11 indicates botanical surveys were conducted in 2010, however subsequent pages were not observed to update focused surveys information (DEIR Appendix D page 50 indicates surveys were conducted October 31, 2012, November 1, 2012, and November 2, 2012, outside normal floristic survey windows). The Department recommends the LACFCD include in the FEIR the last occurrence when floristic surveys were conducted. In addition, the Department recommends floristic surveys adhere to the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities. (See Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities at: <http://www.dfg.ca.gov/habcon/plant/>). The Department recommends the FEIR require plant surveys to be updated if focused surveys are older two years.

13. **Reference Sites.** Appendix D page 11 indicates surveys were conducted June 25, 2010 through June 30, 2010 and August 24, 2010. The Appendix D which includes the Biological Technical Report does not indicate if reference sites were visited to ensure the plants that could potentially occur onsite were observed to be blooming at known locations. For example, California macrophylla (*Erodium macrophylla*), a rare plant that has the potential to occur on-site, blooms between March and May ([http://www.calflora.org/cgi-bin/species\\_query.cgi?where-calrecnum=10468](http://www.calflora.org/cgi-bin/species_query.cgi?where-calrecnum=10468)) and could have been missed if surveys were conducted outside this period. California Macrophylla has been found in Los Angeles County in previously unknown areas and should be considered potentially present, among the other listed rare plants.

Comment 171-25

14. **Potential Plant Species.** Table 1 below includes a partial list of species that have the potential to occur on the project site. The Department recommends surveys for these species occur throughout the flowering season (consult the Jepson Manual, Second Edition (*Baldwin et al. 2012*) for a range of blooming times for each species).

Comment 171-26

**Table 1 – Plant Species**

Scientific Name	Common Name
<i>Arctostaphylos glandulosa</i> ssp. <i>gabrielensis</i>	San Gabriel manzanita
<i>Arenaria paludicola</i>	marsh sandwort
<i>Astragalus brauntonii</i>	Braunton's milk-vetch
<i>Astragalus tener</i> var. <i>titi</i>	coastal dunes milk-vetch
<i>Atriplex parishii</i>	Parish's brittlescale
<i>Atriplex serenana</i> var. <i>dauidsonii</i>	Davidson's saltscale
<i>Berberis nevinii</i>	Nevin's barberry
<i>California macrophylla</i>	round-leaved filaree
California Walnut Woodland	California Walnut Woodland
<i>Calochortus clavatus</i> var. <i>gracilis</i>	slender mariposa-lily
<i>Calochortus palmeri</i> var. <i>palmeri</i>	Palmer's mariposa-lily
<i>Calochortus plummerae</i>	Plummer's mariposa-lily
<i>Calochortus weedii</i> var. <i>intermedius</i>	intermediate mariposa-lily
<i>Calystegia sepium</i> ssp. <i>binghamiae</i>	Santa Barbara morning-glory
<i>Carolella busckana</i>	Busck's gallmoth
<i>Castilleja gleasoni</i>	Mt. Gleason paintbrush
<i>Centromadia parryi</i> ssp. <i>australis</i>	southern tarplant
<i>Chorizanthe parryi</i> var. <i>fernandina</i>	San Fernando Valley spineflower
<i>Chorizanthe parryi</i> var. <i>parryi</i>	Parry's spineflower
<i>Cladium californicum</i>	California saw-grass

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 continued

Cuscuta obtusiflora var. glandulosa	Peruvian dodder
Dodecahema leptoceras	slender-horned spineflower
Dudleya multicaulis	many-stemmed dudleya
Galium grande	San Gabriel bedstraw
Helianthus nuttallii ssp. parishii	Los Angeles sunflower
Horkelia cuneata var. puberula	mesa horkelia
Lasthenia glabrata ssp. coulteri	Coulter's goldfields
Lepidium virginicum var. robinsonii	Robinson's pepper-grass
Linanthus concinnus	San Gabriel linanthus
Malacothamnus davidsonii	Davidson's bush-mallow
Muhlenbergia californica	California muhly
Nasturtium gambelii	Gambel's water cress
Navarretia prostrata	prostrate vernal pool navarretia
Open Engelmann Oak Woodland	Open Engelmann Oak Woodland
Opuntia basilaris var. brachyclada	short-joint beavertail
Orobanche valida ssp. valida	Rock Creek broomrape
Phacelia stellaris	Brand's star phacelia
Pseudognaphalium leucocephalum	white rabbit-tobacco
Ribes divaricatum var. parishii	Parish's gooseberry
Riversidean Alluvial Fan Sage Scrub	Riversidean Alluvial Fan Sage Scrub
Scutellaria bolanderi ssp. austromontana	southern mountains skullcap



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Southern Coast Live Oak Riparian Forest	Southern Coast Live Oak Riparian Forest
Southern Cottonwood Willow Riparian Forest	Southern Cottonwood Willow Riparian Forest
Southern Mixed Riparian Forest	Southern Mixed Riparian Forest
Southern Sycamore Alder Riparian Woodland	Southern Sycamore Alder Riparian Woodland
<i>Symphotrichum defoliatum</i>	San Bernardino aster
<i>Symphotrichum greatae</i>	Greata's aster
<i>Thelypteris puberula</i> var. <i>sonorensis</i>	Sonoran maiden fern

The DEIR Appendix D page 51, indicates that all species occurrences older than 1960 were not considered to be potentially present because these records do not reflect current conditions within and adjacent to the Arroyo Seco Creek and the Los Angeles River. The Department recommends that Department survey guidelines, as stated above, be used when conducting plant surveys. The modification of the Arroyo Seco Creek does not mean these plants do not persist in the vicinity of the project area.

15. **Plant Taxonomy.** The scientific names used for botanical specimens should reflect the recent revision to the taxonomy of many of the plant families present onsite. The Department recommends the FEIR use the taxonomy used in the second edition to the Jepson Manual (*Baldwin et al. 2012*).

16. **Mitigation Measure MM-BIO-8.** DEIR mitigation measure MM-BIO-8 indicates a combination of on-site and off-site compensatory mitigation would be used to replace sensitive habitat and jurisdictional waters removed by the Project at no less than a 1:1 ratio. The Department recommends that any mitigation for unavoidable impacts to biological resources take place in this order of preference; onsite, offsite within the Arroyo Seco Creek, and offsite within the greater Los Angeles River watershed. Compensatory mitigation should be conducted at locations that lend themselves to riparian creation, restoration, and/or enhancement opportunities and wildlife movement preservation and which can be protected and managed in perpetuity by local land conservancies.

A. An example of riparian mitigation opportunities for consideration includes riparian restoration along portions of the concrete lined section of the Arroyo Seco Creek that flows through the Brookside Golf Course. The golf course site may offers abundant space for opportunities to replace some of the riparian resources removed from the reservoir. LACFCD should evaluate the potential for restoration

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at the golf course in coordination with the Stakeholder Taskforce as they develop land use priorities within the community.

- B. The Department recommends LACFCD consider discussing potential mitigation opportunities within the Arroyo Seco Creek with entities including but not limited to: Santa Monica Mountains Conservancy (<http://www.smmc.ca.gov/contact.html>), Arroyo and Foothill Conservancy (<http://www.arroyosfoothills.org>), the Arroyo Seco Foundation (<http://www.arroyoseco.org/index.htm>), North East Trees (<http://www.northeasttrees.org/index.html>), and the U.S. Army Corps of Engineers: (<http://www.spl.usace.army.mil/Media/FactSheets/tabid/1321/Article/13010/arroyo-seco-watershed-ca.aspx>). These entities may offer assistance or ideas in meeting various habitat mitigation needs.

17. **Mitigation Measure MM-BIO-1.** MM BIO-1 in the DEIR describes that a biological monitor will be onsite during the Project's initial ground or vegetation disturbances to implement protective measures. The Department recommends the FEIR clarify what protective measures will be implemented by the biological monitor.

- A. The Department recommends a biological monitor be onsite during vegetation and ground disturbance activities during the life of the Project including maintenance activities to capture and relocate out of harm's way any species of low mobility that may be killed or injured. Any captured species should be relocated to adjacent appropriate habitat not impacted by project-related disturbance activities.
- B. All vegetation removal should take place in a manner that allows wildlife to escape to contiguous, adjacent habitat. This will avoid situations where wildlife seek cover in an islands or isolated of habitat, only to be killed or injured during later removal of this cover.

18. **Mitigation Measure MM-BIO-3.** MM BIO-3 of the DEIR states: "Within 90 days prior to ground-disturbing activities, a preconstruction survey shall be conducted by a qualified biologist for the presence of any sensitive species in harm's way ..." The Department recommends the FEIR require any special status species observed on the project site be recorded on a California Natural Diversity Data Base (CNDDDB) field data sheet and submitted to the Department for inclusion into the CNDDDB.

19. **Mitigation Measure MM-BIO-5.** MM BIO-5 of the DIER discusses bat survey and protective measures for bats. It was not clear from our reading of the DEIR if this measure was proposed in order to make conclusions regarding significant impacts from the Project on special status bat species. To avoid the direct loss of bats that could result from removal of trees and/or structures that may provide maternity roost habitat (e.g., in cavities or under loose bark), the Department recommends that the following measures be included in the FEIR:

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Comment 171-29

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- A. The Department recommends the FEIR include the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species;
- B. To the extent feasible, tree removal or relocation would be scheduled between October 1 and February 28, outside of the maternity roosting season;
- C. If trees and/or structures must be removed during the maternity season (March 1 to September 30), a qualified bat specialist should conduct a pre-construction survey to identify those trees and/or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats;
- D. Each tree and/or structure identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no greater than 7 days prior to tree disturbance to more precisely determine the presence or absence of roosting bats;
- E. If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, it is preferable to push any tree down using heavy machinery rather than felling it with a chainsaw. In order to ensure the optimum warning for any roosting bats that may still be present, the tree should be pushed lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and should remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts should not be sawed up or mulched immediately. A period of at least 24 hours, and preferably 48 hours, should elapse prior to such operations to allow bats to escape. Bats should be allowed to escape prior to demolition of buildings. This may be accomplished by placing one way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building;
- F. Maternity season lasts from March 1 to September 30. Trees and/or structures determined to be maternity roosts should be left in place until the end of the maternity season; and,
- G. The bat specialist should document all demolition monitoring activities, and prepare a summary report to the City upon completion of tree disturbance and/or building demolition activities.

20. **Wildlife Movement.** The Department recommends the FEIR analyze the Project's effects on wildlife movement at a regional level. A complete and accurate description of the existing wildlife movement onsite and in the vicinity is necessary for a complete analysis of project-related wildlife movement impacts. The DEIR (Page 130) in discussing sediment removal and reservoir management states "...Sediment removal and reservoir management activities would interfere temporarily with the movement of native resident or migratory wildlife species, resulting in a significant impact". The Department concurs with these assumptions. In addition, the FEIR should consider the

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Projects potential for long-term significant impacts to wildlife movement between the San Gabriel Mountains, location of the Project, and Verdugo Mountains.

- A. Several wildlife accessible conveyances are present in Flint Wash, along with pedestrian tunnels and an at grade road crossings in the Project area. These conveyances and open space provide important wildlife movement opportunities past the dam. Wildlife use of these conveyances and open space are not well understood at this present time, but they are reasonably able to provide some of the remaining wildlife crossing opportunities in the region between the San Gabriel and Verdugo Mountains. These remaining crossings are important for maintaining genetic flow between isolated populations, and associated biological diversity between these larger areas of core habitat. The Department recommends the FEIR analyze offsite wildlife movement from and to the Project through any of the conveyances and permeable open spaces that could provide wildlife movement.
- B. The LACFCD should consider mitigation measures in the FEIR that include tracking stations, camera stations, and any on-going telemetry data currently being conducted in the area. The studies should be conducted for at least a full year to fully document use of conveyances and open space by wildlife. This evaluation would further assist in determining Project impacts to wildlife movement and in implementing avoidance and mitigation measures.
- C. The Department recommends LACFCD adopt mitigation measures to avoid using temporary or permanent fencing that could adversely restrict wildlife movement through the Project and to off-site locations. If fencing is determined to be necessary for public safety and/or to direct wildlife to safe passageways through the Project, beneath Oak Grove Drive, and/or the 210 freeway, then the fencing should be constructed with materials that are not harmful to wildlife. Materials to avoid include, but are not limited to spikes, razor, and barbed wire. All hollow fence posts or fence posts with open top holes, and abandoned pipes should be capped, plugged, or crushed and abandoned properly to prevent the entrapment of avian species and other wildlife.

We appreciate the opportunity to comment on the DEIR for the Project and to assist the LACFCD in further minimizing and mitigating Project impacts to biological resources. If you have questions regarding this letter, please contact Mr. Matt Chirdon by telephone at (760) 757-1004 or email at [Matthew.Chirdon@wildlife.ca.gov](mailto:Matthew.Chirdon@wildlife.ca.gov).

Sincerely,



Edmund Pert  
Regional Manager  
South Coast Region

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continued

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REFERENCES:

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ec: Betty Courtney, CDFW, Santa Clarita  
Erinn Wilson, CDFW, Los Alamitos  
Matt Chirdon, CDFW, San Diego  
Kelly Schmoker, CDFW, Mission Viejo  
Scott Harris, CDFW, Pasadena  
Sarah Rains, CDFW, Newbury Park  
State Clearinghouse, Sacramento

**Response to Comment Letter #171 (California Department of Fish and Wildlife)**

**Response to Comment 171-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The comment includes Proposed Project Description information from the Draft Environmental Impact Report (EIR).

**Response to Comment 171-2:**

Los Angeles County Flood Control District (LACFCD) notes that the California Department of Fish and Wildlife (CDFW) is a Responsible Agency for the Proposed Project under CEQA.

**Response to Comment 171-3:**

As noted in the comment, LACFCD has been conducting ongoing coordination with CDFW. This coordination will continue as the Proposed Project progresses.

**Response to Comment 171-4:**

As noted in Response to Comment 171-3, above, LACFCD's coordination with CDFW will continue.

**Response to Comment 171-5:**

LACFCD has been and will continue to work closely with the California Department of Fish and Wildlife (CDFW). Prior to commencement of the Proposed Project, LACFCD will have worked with CDFW to obtain all necessary permits for the Proposed Project.

As discussed in Section 3.6.6 of the Draft EIR, the Proposed Project is not expected to have a substantial adverse effect on any plant species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by CDFW or United States Fish and Wildlife Service (USFWS). To ensure no harm or take to any special status wildlife species, Mitigation Measures MM BIO-1, MM BIO-2, and MM BIO-3 have been provided. With implementation of these mitigation measures, direct impacts to special status species would be less than significant.

**Response to Comment 171-6:**

LACFCD has been and will continue to work closely with CDFW. CDFW jurisdiction applies to the top of the banks, or in the case of this reservoir, the high water mark (HWM) of the Proposed Project. For the Streambed Alteration Agreement, this includes drainage features, wetlands, and the riparian vegetation outside the wetlands within the entire HWM of the Proposed Project. CDFW jurisdictional acreage impacts for the Proposed Project, Configuration A are detailed in the Jurisdictional Delineation, contained in Appendix D – Biological Resources Reports in the Draft EIR.

**Response to Comment 171-7:**

The comment includes information regarding the Alternatives that was provided in the Draft EIR. Comment noted.

**Response to Comment 171-8:**

As discussed in the Draft EIR, Section 3.6.2, in 2010, Riversidean Alluvial Fan Sage Scrub was present on the northeast portion of the Proposed Project site. Much smaller patches of this community remain in 2013. The reduction in habitat is due to post-fire sediment accumulation occurring as a result of the 2009 Station Fire, which has greatly reduced the size of this community and has inhibited its ability for succession. Even with the reduction in the community, the Draft EIR determined that impacts to Riversidean Alluvial Fan Sage Scrub (RAFSS) would result in a significant impact requiring mitigation. To minimize impacts due to loss of RAFSS, Mitigation Measure MM BIO-6 has been provided. Removing the accumulated sediment and designing a system that will provide transport of sediment downstream will allow a more natural expansion of sediment that will benefit the alluvial fan sage scrub establishment. With implementation of this mitigation measure, impacts to RAFSS would be reduced to a level below significance.

As analyzed in the Draft EIR, Section 4.0, impacts to RAFSS during the sediment removal phase of Alternatives 1, 2, and 3 would be reduced in comparison to the Proposed Project. With all the Alternatives, impacts to RAFSS would be mitigated through restored and/or enhanced at a ratio of at least 1:1 ratio by acreage. The mitigation details will be finalized during the negotiations with the resource agencies, including CDFW, during the regulatory permitting process.

**Response to Comment 171-9:**

After the Station Fire in 2009, the following two storm seasons brought 1.3 million cubic yards of sediment into the reservoir, raising the ground elevations within the reservoir and burying most of the established vegetation. Since then, vegetation has reestablished within the reservoir, including in the areas that will remain in place and/or possibly used as mitigation sites under Alternative 3. The sediment removal efforts aim to restore the historic elevations within the reservoir to the conditions existing prior to the impacts caused by the Station Fire. After the sediment removal project, ground elevations within the reservoir will be in either present or historic levels and will have exposure to flowing stormwater. The habitat restoration plan will include and address monitoring and success criteria.

LACFCD will continue to work with CDFW to ensure all revegetation and mitigation plans are viable.

**Response to Comment 171-10:**

In Alternative 3, the proposed cut at the northern end of the reservoir is approximately 25:1, a very shallow slope, which mimics the historic slopes in that area of the reservoir. With this slope, LACFCD does not expect this project configuration to cause any major cutting or erosion upstream, outside the project boundary or the LACFCD easement. Any loose sediment recently deposited after the Station Fire is expected to continue to move downstream during significant storm events. LACFCD will provide to CDFW the necessary information to assess the historic slopes and hydrology of the reservoir, including historic contours and reservoir inflow data.

Due to the nature of a dam and reservoir system, as the Arroyo Seco enters the reservoir, the slope naturally flattens and stabilizes within the reservoir. As a part of the sediment removal project, the cut plan mimics these historic slopes by incorporating 3:1 side slopes and varying but gradual bottom slopes, all of which are shallow and stable.

The reservoir configuration will provide for natural movement of sediment and water through the reservoir and also to the maintenance area near the face of the dam, efficiently rather than unnecessarily impounding large quantities of sediment in the upper end of the reservoir. During the maintenance activities, the configuration will be maintained in order to help sustain flows and delivery of sediment through the reservoir.

As a part of the maintenance plan, a majority of the incoming sediment will remain suspended in the flows through the reservoir and move through the dam with Flow Assisted Sediment Transport, or FASTing, operations as it has in the past. These FASTing operations will keep sediment suspended in the flowing water, which will further reduce the potential for cutting.

**Response to Comment 171-11:**

The additional recommendations have been noted and have been responded to below.

**Response to Comment 171-12:**

See Response to Comment 171-10. It should be noted that unconsolidated and recently deposited post-fire sediment upstream is expected to continue to wash downstream during significant storm events and that this will occur regardless of the Proposed Project. In addition, the area outside the existing easement is beyond the jurisdiction of LACFCD and the scope of this project.

**Response to Comment 171-13:**

LACFCD is dedicated to minimizing the impacts to biological resources, especially sensitive habitats, as much as feasible and will continue to collaborate with CDFW to ensure reasonable minimization efforts and mitigation are achieved. The purpose of the cut configuration alternatives is to reestablish the reservoir behind Devil's Gate Dam in order to provide capacity for flood control needs.

LACFCD recognizes that any Alluvial Fan Sage Scrub habitat near the upper end of the reservoir is a sensitive habitat and will work with CDFW to minimize any impacts to the habitat while maintaining the flood control function of the reservoir and dam. It should be noted that the majority of the Alluvial Fan Sage Scrub habitat in this area was buried up to approximately 10 feet deep by sediment deposited in the 2010-2012 storm seasons after the Station Fire. The proposed slope in this area near the upper end of the reservoir is very shallow, and only a small fraction of the total sediment removed will be from that area; however, the reservoir requires the proper slope to maintain flow through the reservoir towards the dam. LACFCD will provide available records of the existing and historical extent of Alluvial Fan Sage Scrub Alliance onsite in order to facilitate collaboration with CDFW on revegetation plans for the upper portion of the reservoir after the sediment removal project has occurred; however, it should be noted that the baseline biological conditions for the project per the California Environmental Quality Act (CEQA) are set by the biological surveys, as noted in the Draft EIR.

**Response to Comment 171-14:**

See Response to Comment 171-9.

LACFCD will continue to work with CDFW to ensure all revegetation and mitigation plans are viable. LACFCD will provide to CDFW the necessary information to assess the hydrology of the reservoir, including historic contours and reservoir inflow data.

**Response to Comment 171-15:**

LACFCD has been and will continue to work closely with CDFW. Prior to commencement of the Proposed Project, LACFCD will have worked with CDFW to obtain all necessary permits for the Proposed Project, including an Incidental Take Permit, if needed.

**Response to Comment 171-16:**

Species names used in the Draft EIR were consistent with the Master Watershed Plan for the Hahamongna Watershed, by request of the City of Pasadena, to maintain consistency with the Master Plan. Species names have been updated (see Section 3.6 of the Final EIR).

**Response to Comment 171-17:**

The use of archival aerial photos could indicate the extent of the RAFSS in conditions before the 2009 Station Fire; however, the method of using only historical aerial photos to map the vegetation communities may be inaccurate, particularly for the level of detail necessary to follow the Manual of California Vegetation (MCV). In addition, as noted in Section 3.6.1 of the Draft EIR, conditions in 2011 were severely impacted by sediment deposition, reducing the amount and quality of vegetation communities. In order to achieve a more conservative analysis of the potential impacts to biological resources from the Proposed Project, 2013 conditions were also taken into account.

**Response to Comment 171-18:**

The arroyo toad (*Anaxyrus californicus*) is not expected to occur on the Proposed Project site. No historic occurrences exist within 5 miles of the Proposed Project; and none were known to occur from local organizations, including the Pasadena Audubon Society and the Arroyo Seco Foundation, who were contacted about the Proposed Project prior to the Draft EIR being prepared. Currently, no habitat for arroyo toads occurs downstream of the dam. Although sandy substrates exist on site, flowing water does not occur during the breeding season. As a result, no breeding habitat exists within the Proposed Project or immediately upstream. Therefore, protocol-level surveys for this species are not warranted.

As discussed in the Draft EIR, Section 3.6.2, Special Status Animal Species, and the Biological Technical Report (BTR), Section 3.1.3, due to the lack of known historical occurrences within 5 miles of the Survey Area, the coast horned lizard (*Phrynosoma blainvillii*) has low potential for occurrence on the Proposed Project site. In addition, the western spadefoot (*Spea hammondi*) is not expected to occur on the Proposed Project site because this species requires clay soils to conserve moisture during aestivation. In addition, as discussed in the Draft EIR, Section 3.6.6, Sensitive Wildlife, to avoid harm or take of any special status wildlife species, mitigation measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will be implemented. These include preconstruction surveys, having a biological monitor on site during construction, and measures to avoid impacts to sensitive species. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant. LACFCD will continue to work with CDFW to ensure all revegetation and mitigation plans are viable.

**Response to Comment 171-19:**

As discussed in the Draft EIR, Section 3.6.2, Special Status Animal Species, and the BTR, Section 3.1.3, due to the lack of known historical occurrences within 5 miles of the Survey Area (burrowing owls exhibit high site fidelity), the quality of breeding habitat, and level of disturbances within the Proposed

Project, the burrowing owl (*Athene cunicularia*) has low potential for occurrence on the Proposed Project site. Surveys of the Proposed Project site indicate no burrowing owls occur within the Proposed Project. In addition, as discussed in the Draft EIR, Section 3.6.6, Sensitive Wildlife, to avoid harm or take of any special status wildlife species, Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will be implemented during both sediment removal and maintenance activities. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant. LACFCD will continue to work with CDFW to ensure all revegetation and mitigation plans are viable.

**Response to Comment 171-20:**

Although the western gray squirrel (*Sciurus griseus*) is not considered to be a sensitive or special status wildlife species, avoidance and minimization measures have been developed to protect wildlife. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant. LACFCD will continue to work with CDFW to ensure all revegetation and mitigation plans are viable.

**Response to Comment 171-21:**

LACFCD has been and will continue to work closely with CDFW. LACFCD will apply for a Streambed Alteration Agreement for the Proposed Project authorization. For the Streambed Alteration Agreement, this includes all stream and drainage features, wetlands, and the riparian vegetation outside the wetlands within the entire HWM of the Proposed Project. A jurisdictional delineation has been conducted and performed under CDFW and United States Army Corps of Engineers (USACE) guidance for arid regions. The Proposed Project was investigated for hydrological and morphological characteristics of stream environments in dryland regions.

As discussed in the Draft EIR, Section 3.6.6, Sediment Removal/Reservoir Management, Mitigation Measure MM BIO-8 will be implemented for habitat restoration and monitoring over a five-year period. With implementation of conditions within the CDFW Streambed Alteration Agreement and the mitigation measures in the Draft EIR, direct impacts to biological resources would be less than significant. LACFCD will continue to work with CDFW to ensure all revegetation and mitigation plans are viable.

**Response to Comment 171-22:**

The Draft EIR did analyze whether the Proposed Project would have a significant effect on oak woodlands and determined what mitigation would be necessary, as per Public Resources Code Section 21083.4. As discussed in the Draft EIR, Section 3.6.2, Existing Environmental Setting, Vegetation, Riparian Communities, Riparian Woodland/Black Willow Series, in 2010, Coast Live Oak was present in the Riparian Woodland mostly at the southern end of the Proposed Project site (Chambers Group 2010a). In 2013, only four small patches were identified in the project site, including one located east of the dam face (Chambers Group 2013b). As discussed in the Draft EIR, Section 3.6.6, BIOLOGY-5, the Proposed Project would remove trees from the Proposed Project site. Implementation of Mitigation Measure MM BIO-7 will identify trees that will be removed or potentially affected, the appropriate level of tree replacement, and protection of the root zone of oak trees. Implementation of this mitigation measure will reduce impacts to trees (which includes native oak trees) to a level below significance. Based on Mitigation Measure MM BIO-7, within 90 days prior to ground-disturbing activities, a qualified biologist will conduct a tree survey within the project footprint to identify trees that will be removed or

potentially affected by the Proposed Project and trees that can be avoided. LACFCD will replace trees that cannot be avoided. The replacement is expected to be up to 1:1 by acreage. The biological monitor will implement measures to protect the root zone of oak trees that may be impacted immediately adjacent to the project site and along access roads. LACFCD will continue to work with CDFW to ensure all revegetation and mitigation plans are viable.

**Response to Comment 171-23:**

A nine-quadrangle search in Los Angeles County would create a list that would include species that occur in habitats found at a great distance from the Proposed Project site, such as deserts and beaches. Chambers Group's review of the California Natural Diversity Database (CNDDDB) and California Native Plant Society Electronic Inventory (CNPSEI) databases for the surrounding United States Geological Survey (USGS) 7.5-minute quadrangles took into account the presence or absence of suitable habitat, suitable elevation range, and the presence of potential barriers to the migration of species into the project area. Therefore, an adequate search of the databases was conducted for the Proposed Project.

**Response to Comment 171-24:**

The dates for floristic surveys will be clarified in the Final EIR (see Section 3.6 of the Final EIR). As discussed in the BTR (Appendix D of the Draft EIR), Chambers Group conducted the reconnaissance-level survey in the Survey Area on May 27, 2010. Focused surveys for special status plants that were floristic in nature (i.e., identified all plants observed to the appropriate taxonomic level to determine rarity and/or special status) took place in June and August 2010, within the appropriate survey windows to observe the target annual species during their blooming periods. Because the sensitive plant species with potential to occur have two different flowering periods, two separate focused plant surveys were conducted. The first focused survey was conducted on June 28 through June 30, 2010. The second focused survey was conducted on August 24, 2010.

The biological resource surveys that occurred in October and November 2012 were general biological surveys that did not focus on special status plants; but if special status plants were observed, they were documented.

As addressed in Comment 171-23, Chambers Group has assessed the preliminary literature review conducted by CDFW which resulted in 41 sensitive species and 7 sensitive habitats that have records of occurrence within 9 USGS 7.5-minute quadrangles where the Proposed Project area is located and the adjacent quadrangles. The plants and communities with potential to occur within the project site were presented in Tables 3.6-2 and 3.6-3 of the Draft EIR.

Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records of occurrence were used as additional data; but since the CNDDDB is a positive-sighting database, this data was used only in support of the analysis from the previously identified factors. Based on the results of the BTR, additional protocol-level focused surveys were conducted for plants and wildlife.

After reviewing the previous mapped habitats of the existing conditions within the Proposed Project area, the following species have been considered absent from the Proposed Project area due to lack of suitable habitat and/or the species fell outside the elevation range of the Proposed Project area.

- San Gabriel manzanita (*Arctostaphylos gabrielensis*)

- marsh sandwort (*Arenaria paludicola*)
- coastal dunes milk-vetch (*Astragalus tener* var. *titi*)
- Parish's brittle-scale (*Atriplex parishii*)
- round-leaved filaree (*California macrophylla*)
- Palmer's mariposa lily (*Calochortus palmeri* var. *palmeri*)
- Mt. Gleason paintbrush (*Castilleja gleasoni*)
- southern tarplant (*Centromadia parryi* ssp. *australis*)
- California saw-grass (*Cladium californicum*)
- San Gabriel bedstraw (*Galium grande*)
- Los Angeles sunflower (*Helianthus nutallii* ssp. *parishii*)
- Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*)
- San Gabriel linanthus (*Linanthus concinnus*)
- Gambel's water cress (*Nasturtium gambellii*)
- prostrate vernal pool navarretia (*Navarretia prostrata*)
- short-joint beavertail (*Opuntia basilaris* var. *brachyclada*)
- Rock Creek broomrape (*Orobanche valida* ssp. *valida*)
- southern mountains skullcap (*Scutellaria bolanderi* ssp. *austromontana*)
- Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*)
- Busck's gallmoth (*Carolella busckana*) (not a plant)

Updates to focused surveys will be conducted for special status plants and significant natural communities (sensitive habitats) with a potential to occur within the Proposed Project area, in accordance with CDFW guidelines, as part of the habitat restoration mitigation measure MM BIO-8.

**Response to Comment 171-25:**

See Response to Comments 171-23 and 171-24. As 2010 was considered an El Niño year with adequate rainfall for plant surveys, no official reference sites were visited in 2010. Plants with the potential to occur on the site were evaluated and surveyed during the appropriate blooming period.

It was determined that round-leaf filaree (*California macrophylla*) was absent due to lack of suitable habitat found within the reservoir. This species occurs in clay soils in cismontane woodlands and foothill and valley grasslands. The closest vegetation community on site would be a patch of White Alder Woodland; however, soils are very sandy in this location due to constant scouring. Clay soils are important for this species and were lacking on site; therefore, round-leaf filaree is considered absent due to lack of suitable habitat.

**Response to Comment 171-26:**

See Response to Comments 171-23 and 171-24.

**Response to Comment 171-27:**

See Response to Comment 171-16.

**Response to Comment 171-28:**

LACFCD has been working and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. Mitigation locations will comply with CDFW recommendations as follows: first, onsite; second, offsite within the Arroyo Seco Watershed; and third, offsite within the greater Los Angeles River watershed.

**Response to Comment 171-29:**

Mitigation Measure MM BIO-1 has been revised in the Final EIR, Section 3.6, as follows. Added text is shown in bold and italics.

**MM BIO – 1:** A qualified biological monitor shall be present during initial ground- or vegetation-disturbing project-related activities *to provide protection measures and monitor for wildlife in harm's way. This includes initial ground-disturbing project-related activities at the annual start of each year of sediment removal or maintenance activities.* Following initial project-related activities, a qualified monitoring biologist shall be present as necessary to maintain the implemented protection measures and monitor for additional species in harm's way. *These protection measures shall include, as appropriate: redirecting the wildlife, identifying areas that may require exclusionary devices (e.g., fencing), or capturing and relocating wildlife outside the work area. Any captured species shall be relocated to adjacent appropriate habitat that is contiguous to adjacent habitat and not impacted by project-related disturbance activities.*

**Response to Comment 171-30:**

Mitigation Measure MM BIO-3 has been revised in the Final EIR, Section 3.6. Added text is shown in bold and italics, and deleted text is shown in strikeout.

**MM BIO – 3:** Within 90 days prior to ground-disturbing activities, a preconstruction survey shall be conducted by a qualified biologist for the presence of any sensitive species in harm's way, including coast range newt, the southwestern pond turtle, and the two-striped garter snake. If sensitive species are observed in harm's way, the qualified biologist will develop and implement appropriate protection measures for that species. These protection measures shall include, as appropriate, redirecting the species, ~~constructing~~ construction of exclusionary devices (e.g., fencing), or ~~capturing~~ capture **and relocating** relocation ~~wildlife~~ wildlife outside the work area. Preconstruction surveys shall be repeated annually for the duration of the sediment removal. *Observations of special status species made during these surveys shall be recorded onto a CNDDB field data sheet and submitted to CDFW for inclusion into the CNDDB.*

**Response to Comment 171-31:**

See Response to Comment 171-30.

**Response to Comment 171-32:**

Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would

not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.

The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 171-33:**

The contact person noted in the letter, Mr. Matt Chirdon, will be contacted if any questions regarding the letter arise.

**From:** [Susanna Dadd](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamongna Watershed park/debris basin  
**Date:** Sunday, October 27, 2013 12:06:24 PM

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Dear Sirs:

Comment 172-1

I do understand that it is necessary to periodically clean out the debris basins of built up silt. However, I oppose the annual grubbing out of all vegetation in Hahamongna after the basin is cleared.

Comment 172-2

We strongly suggest that debris removal is begun at the north end of the basin and the area is allowed to regrow as the work is completed. We have so little habitat remaining since the Station fire, and riparian areas are rare in southern California. We ask that you allow the vegetation and trees to recolonize the area after work is completed. The vegetation will itself suck up a lot of water and will also slow down the speed of flood waters. It will take decades before the basin is filled up again. Let's not create another desert in our midst.

Thank you,

--

Susanna Dadd and James Griffith  
626 398 9939  
1601 E. Loma Alta Drive  
Altadena, CA 91001

**Response to Comment Letter #172 (Susanna Dadd)**

**Response to Comment 172-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter does not approve of the proposed annual grubbing of vegetation during the maintenance phase of the Proposed Project.

A maintenance regime put in place after the main sediment removal project is completed greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. The maintenance area for Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), will be smaller than the original sediment removal footprint, allowing for habitat to reestablish (see Section 4.6 of the Final EIR).

**Response to Comment 172-2:**

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby avoiding more existing vegetation and providing a greater habitat buffer on the west side of the reservoir.

**From:** [robsayhello@](mailto:robsayhello@reservoircleanouts)  
**To:** [reservoircleanouts](mailto:reservoircleanouts)  
**Subject:** reservoir cleanout  
**Date:** Wednesday, November 06, 2013 7:26:56 PM

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Comment 173-1 | Is it possible to have those trucks run on natural gas to reduce smog?

**Response to Comment Letter #173 (Rob)**

**Response to Comment 173-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Air quality impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

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

fax (626) 979-5436, [reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov)

January 15, 2014

Subject: Devil’s Gate Reservoir Sediment Removal and Management Project - Keith Lilley

Dear Mr. Lilley,

This communication is intended as a Public Comment on the Draft Environmental Impact Report for the project.

I have been a property owner and taxpayer in the City of Pasadena, California for eight years. Listed on my Secured Property Tax For Fiscal Year July 1, 2013 to June 30, 2014 are the following Direct Assessments that I pay yearly to Los Angeles County: Flood Control, County Park District, County Sanitation District.

With this investment I place my trust in you and other managers in government agencies to make the best choices in how this money is spent. In reading through the description of this project and its many pages of appendixes on a very limited time schedule due to its requirement to be fully digested during a time of year when the Holiday schedule coincides, it appears to be quite alarming in its sloppiness and redundancy. However, I do appreciate the amount of difficulty you are faced with trying to coordinate all the different elements involved. Likewise, my comments are not as complete and detailed as I would like them to be.

CUMULATIVE AFFECT ANALYSIS INCOMPLETE

Why isn’t there an assessment of the cumulative affect this project will have on the local ecosphere? Why is there no mention of the proposed Metro/ Caltrans extension and tunnel construction of the 710 freeway? Is it lack of information each has of the other or simply expedient for both agencies; Metro/Caltrans and LACFC to coincide EIR studies to leave each other out? What is the logical explanation for this important omission when Gail Farber, your experienced director, spent nineteen years working for Caltrans?

CULTURAL RESOURCE ANALYSIS UNDULY MINIMIZED

Did you know that the sand and soils in what you call the Devil’s Gate Dam Reservoir are of great value? In addition to being a taxpayer and having a financial investment in Hahamongna Watershed Park well-being, which you have regrettably avoided using its proper identifying name throughout the report, I am an oil painter trained in the technique of the historic High Renaissance period. The sand and soil in Hahamongna Watershed Park is collected to grind and mix with oil mediums to create an unique color palette and chemical alchemy that is distinctive to upper arroyo and mountains.

Did you know that the consultants you’ve hired who claim to have expertise on this subject appear to have failed you? They claim that since no ancient

bones have been left in the area you call the reservoir after decades of the site being pillaged and degraded, there could be no possible sacredness or historical significance in this part of the Arroyo Seco. How can you agree with their analysis? Your consultant and agent addressed this concern at a community meeting by rephrasing the question: "Are there any ghosts in the Devil's Gate Dam Reservoir?"

Comment 174-4  
continued

Why were the many artists, painters, spiritualists and naturalists, historians and kin to the native tribes that once camped along the shores of this river not considered? Did you know that this is what makes a place sacred and its rarity culturally important? Why did you not take advantage of the world class curators and experts on arroyo culture and art right here in the San Gabriel Valley?

INCOMPLETE DATA ON COMMERCIAL ENTERPRISE OPERATIONS AND LIABILITIES

Is Vulcan Materials, a private business, the likely award for this multi-million dollar trucking contract as well as the excavation job? Are you considering other private companies to avoid the appearance of making an extremely large gift to Vulcan Materials? What is the sales percentage paid out of your budget to the company or companies that receive the contracts?

Comment 174-5

Did you know that Vulcan Materials is the same company that has chosen, out of its short-term self-interest, to intentionally remove and severely alter the San Gabriel mountain skyline? Why would you pick a company that has demonstrated a lack of respect and care for aesthetics, and historic resources for the very part of this job that requires sensitivity?

Why does your report reveal a dismissal of the need to have low emission vehicles perform this massive undertaking? Is your 100 million dollar budget too restrictive? Do you need more money? Do you have enough budgeted for the massive claims and damages that will not be covered by the operators insurance policies?

Comment 174-6

As you can see in other public comments, the health and economic affects on residents will be quite severe and you have been formally noticed prior to taking any action. How will private commercial entities share in intentional liability? Who will be protected from or assume all of it?

Comment 174-7

Do you know of any protection the law provides when a "defendant" (that would be you and your agents/contractors) intentionally activates or causes intensification of a poison? Recently, in People v. Atlantic Richfield Company, et al., Superior Court of California, County of Santa Clara, Case No. 1-00-CV-788657, Proposed Statement of Decision the judge wrote about lead paint poisons being unleashed upon an uninformed public:

"Each Defendant certainly knew or should reasonably have known that exposure to lead at high levels, including exposure to lead paint, was fatal or at least detrimental to children's health.

Comment 174-8

That knowledge alone should have caused each Defendant to cease its promotion and sale of lead pigment and/or lead paint for home use.

Instead, after becoming aware of the hazards associated with lead paint, they continued to sell it."

Comment 174-9

How is what manufactures of poisons did in that case different from what you

Comment 174-9  
continued

suggest doing in all of the alternative projects you have presented? Isn't the lack of a long term plan that does not put at risk the health and safety of living beings (not buildings) the same as selling lead paint year after year because nobody is watching? Is it a "So what? We'll just pay the fines and the claims."? As a taxpayer, you and I are partners, we can't operate like malignant psychopathic narcissists.

Comment 174-10

Did you know in July 2013 a report from the California Water Quality Monitoring Council said chromium VI was present in Pasadena water? The source of chromium VI in Pasadena drinking water is "naturally occurring" in contrast to the contamination caused by industry as in the Glendale water system. Whether the source is natural or industrial, chromium VI is especially toxic when made airborne by digging. <sup>1</sup>

Comment 174-11

Do you really think the use of a water spray truck will reduce the risk of contamination and its distribution? What about the dirt from tires and undercarriages? What about inadequate covering on the trucks? What about the surrounding living beings where the sediment will be dumped and poison made airborne again?

Is it a melodramatic scenario where 4,000,000 CY of sediment must be removed on a short, intensive schedule or flood damage will occur downstream? Isn't flood damage defined by property damage? How is property damage ever more important than the health of children and the elderly? Where is the legitimate scientific analysis that supports the extreme reaction? I see only analysis that supports a much more subtle approach presenting much less risk of harm to all living things—not buildings. Why have you interpreted your reports this way?

#### BEST MANAGEMENT PRACTICES HANDBOOK NOT FOLLOWED

Comment 174-12

In a document still in use by your agency entitled the Stormwater BMP Handbook, January 2003, Construction: Preservation of Vegetation EC-2, published by the California Stormwater Quality Association, it states clearly on the first page as best management practices this: " Carefully planned preservation of existing vegetation minimizes the potential of removing or injuring trees, vines, shrubs, and grasses that protect soil from erosion." Under the next heading, Suitable Applications: "Preservation of existing vegetation is suitable for use on most projects. Large project sites often provide the greatest opportunity for use of the BMP. Suitable applications include the following: Areas within the site where no construction activity occurs, or occurs at a later date. This BMP is especially suitable to multi year projects where grading can be phased.; Areas where natural vegetation exists and is designated for preservation. Such areas often include steep slopes, watercourse, and building sites in wooded areas.; Areas where local, state, and federal government require preservation, such as vernal pools, wetlands, marshes, certain oak trees, etc. These areas are usually designated on the plans, or in the specifications, permits, or environmental documents.; Where vegetation designated for ultimate removal can be temporarily preserved and be utilized for erosion control and sediment control.

On page 2, EC-2 Preservation of Existing Vegetation, Implementation: "The best way to prevent erosion is to not disturb the land."

Page 3, EC-2 Preservation of Existing Vegetation, Costs: There is little cost associated with preserving existing vegetation if properly planned during the project design, and these costs may be offset by aesthetic benefits that

enhance property values. During construction, the cost for preserving existing vegetation will likely be less than the cost of applying erosion and sediment controls to the disturbed area. Replacing vegetation inadvertently destroyed during construction can be extremely expensive, sometimes in excess of \$10,000 per tree." (Note: Update that cost to 2014 \$\$\$ and add ,000, per tree).

Comment 174-12  
continued

This best management practices manual contains guidelines on the use of soft bottom channel clearing. In these guidelines it describes the many requirements of the vehicles used at the site. It covers fueling, cleaning of equipment, potential chemical and oil spills and side casting. Did you know that side casting is defined as the piling of debris and soil to the side of the soft bottom channel is not permissible? The guidelines suggest: "The soil and sediments from previous storms could be groomed or leveled in a way to allow flow of water and minimize storm water pollution."

Why does this project violate so many provisions in the BMP Manual?

LONG TERM PLAN IS NOT INCLUDED

Comment 174-13

In my written scoping comment on this project, I suggested a **serpentine** type of ravine across the width of Hahamongna incorporating the natural willows and existing habitat as a filtration system and allowing for stream to flow carrying sediment with it. Why was this not studied as an alternative?

Comment 174-14

With respect to our forefathers design and engineering of Devil's Gate Dam and the other dams and debris basins along the foothills, isn't it an error in placement, design and engineering to call it or allow it to become a reservoir when it exists at the base of extremely high and steep, erosive mountains? Is that not a recipe for disaster in and of itself?

Comment 174-15

How do you get the sediment out of there safely? This is the permanent question as long as the dams and debris basins exist in the configuration that they do now. In the future, Devil's Gate Dam should and will be removed. The best possible use of resources is to prepare for that eventuality. The Los Angeles River is being restored. The lower Arroyo Seco at and around the confluence is in need of reconfiguration to protect property from the sometimes flood, help conserve water and filter pollutants. This is a transitional time for Southern California. It is a public works emergency that rises above the polemics. With the increase in climate instability the safest position is returning to a more natural state. It is a time for going with the flow instead of fighting it.

Thank you for the opportunity to comment.

Sincerely,

Dianne Patrizzi

564 N. Oakland Ave.

Pasadena, CA 91101

(626) 390-0750

Email: thaddius.d.patrizzi@gmail.com

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<sup>1</sup> (Genesis of hexavalent chromium from natural sources in soil and groundwater By Christopher Oze, Proceedings of the National Academy of Sciences of the United States of America, vol. 104 no. 16, April 17, 2007, Boston, Mass. <http://www.pnas.org/content/104/16/6544.full>)

**Response to Comment Letter #174 (Dianne Patrizzi)**

**Response to Comment 174-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Los Angeles County Flood Control District (LACFCD) strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, utilizing all low-emissions trucks, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

LACFCD recognized the length of the Draft Environmental Impact Report (EIR) and considered this when providing an extended public review time for the Draft EIR. The California Environmental Quality Act (CEQA) requires that the public comment period for a Draft EIR be 45 days in length. LACFCD extended this review period initially to 75 days and then further extended the review period to 90 days to allow for additional commenting time.

**Response to Comment 174-2:**

The Draft EIR does contain a cumulative analysis. The cumulative analysis contains projects as determined by LACFCD, California Department of Transportation (Caltrans), and the surrounding cities and communities to have a potential cumulative effect due to overlapping time frames of the projects. Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130. The Interstate 710 (I-710) project was not included in the Draft EIR as a cumulative project, as it was determined to be outside the area of influence. A cumulative growth factor was used in the Traffic Study that accounted for future traffic growth and its cumulative effects. The Devil's Gate Reservoir Sediment Removal and Management Project sediment removal phase is scheduled to be completed by 2020, prior to the initiation of the I-710 tunnel project. At this time the I-710 Extension/Tunnel project is in the preliminary phases, and a project schedule has not been established (Caltrans 2010). The growth factor considered in the analysis provided a conservative project condition volume that accounts for expansion and regional growth.

**Response to Comment 174-3:**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of the 2012 LACFCD's Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

As noted in Section 2.1, Project Location, of the Draft EIR, Devil's Gate Dam and Reservoir is within the City of Pasadena's Hahamongna Watershed Park.

**Response to Comment 174-4:**

The Draft EIR, Section 3.7 Cultural Resources recognizes the history and ethnography of the site, including the potential to discover unidentified archaeological sites.

As noted in the Draft EIR, the Native American Heritage Commission (NAHC) maintains the Sacred Lands Inventory identifying lands sacred to Native Americans in California and other states. Chambers Group contacted the NAHC in June 2011 and requested a search of the Sacred Lands Inventory for any information regarding Sacred Lands or other cultural resources in the vicinity of Devil's Gate Reservoir (Appendix E). The results of the search were negative. The NAHC provided Chambers Group with a list of tribes affiliated with the Devil's Gate Reservoir area and recommended they be consulted regarding the Proposed Project.

As discussed in the Draft EIR, Chambers Group notified those tribes in August 2011 and invited comments regarding cultural resources in the area (Appendix E – Cultural Resources Report). A response was received from the Gabrieleño Band of Mission Indians stating that the site is considered culturally sensitive by their Elder Committee and Tribal historians.

As discussed in the Draft EIR, most of the soil in the Proposed Project area consists of recently accumulated sediment and archeological sites are not anticipated to exist; however, it is always possible that unidentified archaeological sites exist in native soils below the accumulated sediment. If sediment removal or reservoir management activities exceed the depth of the historic flood deposits and encounter native soils, implementation of Mitigation Measures MM CUL-1 through MM CUL-3 will reduce potential impacts to less than significant.

**Response to Comment 174-5:**

The bidding process to select a contractor will begin after the County of Los Angeles Board of Supervisors certifies the Final EIR and LACFCD acquires all regulatory permits and finalizes design documents. LACFCD uses a formally advertised sealed bid process for public works construction contracting. The goal of the process is to award a contract to the lowest cost "responsive" and "responsible" bidder. California Public Contract Code mandates the use of an advertised bid process for construction contracting. Contractors and service providers must meet certain qualification requirements to be considered by the County for selection and contract award.

More detailed information on the County's construction bidding process can be found in the *County of Los Angeles Countywide Construction Policy Guidelines*, available online at the following location: [http://dpw.lacounty.gov/aed/construction\\_manual.pdf](http://dpw.lacounty.gov/aed/construction_manual.pdf)

**Response to Comment 174-6:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**Response to Comment 174-7:**

See Response to Comment 174-6. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related impacts.

Under CEQA, the lead agency is not required to analyze an economic impact associated with a project in the EIR; as Section 15131(a) of the CEQA Guidelines states: "Economic or social effects of a project shall not be treated as significant effects on the environment." Moreover, CEQA allows economic analysis in the administrative record only if the basis for infeasibility, and thus rejection of a mitigation or alternative, is economic, as described in CEQA Guidelines Sections 15091(a)(3) and 15364.

**Response to Comment 174-8:**

See Response to Comment 174-7. The Proposed Project does not involve significant health risk impacts.

**Response to Comment 174-9:**

See Response to Comment 174-7.

**Response to Comment 174-10:**

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities including excavation, grading, material loading, and hauling would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 174-11:**

See Response to Comments 174-7 and 174-10.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

**Response to Comment 174-12:**

As noted in Section 2.7 of the Draft EIR, the Proposed Project would be conducted in accordance with applicable standards and best management practices (BMPs). In order to remove the necessary amount of sediment from the reservoir, some vegetation must be removed, as the vegetation sits atop many layers of accumulated sediment. Alternative 3, Configuration D is considered the Environmentally Superior Alternative, as it leaves the greatest amount of vegetation and habitat undisturbed. This alternative will still remove some vegetation; however, it will also remove the amount of sediment necessary to provide downstream protection from flooding. After sediment removal activities are completed, habitat restoration will occur.

**Response to Comment 174-13:**

Alternative 3, Configuration D, Option 1 is the alternative most closely resembling the alternative that the commenter suggests. In Alternative 3, Configuration D, Option 1 the western edge of the reservoir as well as an island in the middle of the reservoir will remain untouched (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, providing a greater distance between the western side and the excavation area.

**Response to Comment 174-14:**

Devil's Gate Dam, built in 1920, was the first dam built by LACFCD. The dam was built in response to the severe flooding of Los Angeles in the early 1900s and allowed for the channelization of and development along the Arroyo Seco. The Arroyo Seco normally carries low flows, but it is periodically inundated from severe floods flowing off its large, steep watershed that includes mountainous terrain. Prior to the construction of the dam, cities such as Pasadena, South Pasadena, and Los Angeles would experience flooding from the Arroyo Seco during storms. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway, also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam.

**Response to Comment 174-15:**

See Response to Comment 174-14. The scope of the Proposed Project is to restore capacity for Devil's Gate Reservoir. Removing the dam would remove the only flood attenuation mechanism that is in place along the Arroyo Seco. Areas downstream of the dam would be at high risk of flooding during storm events. Also, sediment would move downstream and accumulate within and adjacent to the channel as a result of removal of the dam. Sediment accumulation in the channel would reduce the capacity of the channel in those areas and would further increase the likelihood of flooding. Dam removal with new flood control downstream is outside the scope of this project and is inconsistent with the Proposed Project objectives. The main objectives of this project are to satisfactorily reduce flood risk, create a configuration suitable for routine operations and maintenance, and reduce the possibility of plugging at the face of the dam. By removing the dam, these objectives would not be met.

The Proposed Project is designed to be a long-term plan. After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. A maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

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

January 17, 2014

## **DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT: COMMENTS ON THE DEIR**

Barbara Ellis,  
636 West California Boulevard  
Pasadena  
CA 91105  
(Babs.ellis@gmail.com)

### **1. The draft DEIR has not been publicized correctly according to CEQA rules**

The official notices about the DEIR are supposed to be advertised in prominent positions at the Hahamongna entrances. Instead, they have been placed under scratched and dirty Perspex, and are illegible. Despite drawing attention to this early on in the commenting process, nothing has been done to replace the Perspex. A new notice of the extension of the comment period to January 21 was placed under the same dirty covers just a few weeks ago (see photo below). I am a regular user of Hahamongna and have watched all other users walk right by these pedestals without noticing that there was important information to read. Most users of Hahamongna Watershed Park have no idea about the proposals and are shocked when I tell them what is planned. This, and the unfortunate timing of the commenting period between Thanksgiving and the New Year, will have greatly reduced the number of people that have submitted comments.



## **2. Why has the amount of sediment to be removed increased substantially?**

In November 2010 the Hahamongna Advisory Committee (HAC) was informed that the sediment removal project would remove 1.67 million cubic yards and scour 50 acres with only 15 of those to remain permanently bare. Now the DEIR project and alternatives will scour up to 120 acres and remove from 2.4 to 4 million cubic yards of sediment. What hydrological studies or other science justify this major increase in scope?

When I attended the HAC meeting in November 2010, we were told that the plan was to increase the capacity of the reservoir to cope with one DDE. This was considered sufficient to ensure the safety of areas downstream in the event of water overflowing the dam's spillway. Why has this since been increased to two DDEs?

Much of the sediment resulting from the Station Fire in 2009 has already come down the watershed. And in the intervening 4 years, a significant amount of the remaining sediment has been anchored by new plant growth, especially the dense regrowth of alders, many now 20 feet or more high, along the Arroyo Seco and Millard canyon river banks upstream from Hahamongna. The entire watershed will not burn again significantly for at least 30 years, so it is highly unlikely that even one DDE will occur during that time. Planning for a worst-case scenario of 2 DDEs is unnecessary, expensive, and will permanently destroy most of Hahamongna Watershed Park, which is an invaluable recreational and wildlife area in Pasadena.

## **3. The DEIR fails to consider the implications of the simultaneous the Eaton Canyon/Devil's Gate Water Diversion Project**

This project will require a large storage pond, and a pumping station, within the Devil's Gate Dam area. On the website for the "Devil's Gate and Eaton Stormwater Flood Management Project," it is stated that "Implementation of this Project will reduce flood risks for the downstream communities from high, debris latent flows from Devil's Gate Dam. The pipeline project is a plan to capture most of the 6.900 acre/feet of water that would be sent into the ocean and use it to recharge the aquifer instead."

Surely, by removing excess water via this pipeline, the chances of the spillway overflowing will be decreased? Will this not obviate the need to remove the 2.4 to 4 million cubic yards of sediment that are planned for in the DEIR?

This project is due to begin in 2016. It will cause even more disruption to the Hahamongna Watershed Park, with closures for recreation and yet more noise, traffic and air pollution than mentioned in the DEIR.

## **4. The DEIR does not contain an assessment of the risk of flooding of downstream areas**

The DEIR does not identify or document the flood threat. When the spillway overflowed in 2005, massive amounts of water entered the Arroyo Seco channel, yet there was no flooding. The concrete channel was deep enough to contain the water, and will doubtless be deep enough to hold the water in future severe rainstorms. We need a scientific risk analysis by a team of experts, rather than unsubstantiated statements about the risks to the

Comment 175-2

Comment 175-3

Comment 175-4

Comment 175-4  
continued

Rose Bowl, the golf courses, the Arroyo Seco Parkway, and downstream communities and cities.

Comment 175-5

**5. The DEIR does not provide details of mitigation for habitat loss**

It does not even guarantee that the mitigation will be in Hahamongna, rather than in another part of the region, such as Tujunga canyon. Moreover, there are no details of the aftercare of new plantings. Opportunistic non-native weeds will need to be controlled, and the new plantings will need irrigation during the dry months. Has this been taken into account? What guarantee is there that efforts will be made to bring back the rich habitat destroyed by the sediment removal?

Comment 175-6

**6. The biological studies in the DEIR are unrepresentative of the plant and animal diversity of Hahamongna**

The environmental study was conducted during an unusually dry period. The lack of rain has led to a sharp decrease in insects, frogs, other amphibians, and reptiles. This in turn has affected the animals such as rats, mice, bats, snakes, coyotes, herons, egrets and ducks, as well birds of prey such as hawks, kites, merlins and falcons. In my experience as a regular user of Hahamongna over 12 years, during times of normal or above average rainfall, there are lakes full of frogs and tadpoles, wetlands rich in insects, worms, snails, frogs, snakes and lizards, and numerous animal and bird species, plus deer, coyotes, raccoons, skunks, bobcats and mountain. The biological findings in the report are therefore not representative of the usual rich wildlife and plant life present in non-drought years and underestimate the extent to which the proposed work will damage the ecosystem.

**COMMENTS ON SPECIFIC STATEMENTS IN THE DEIR**

Comment 175-7

“THE ANALYSIS UNDERTAKEN FOR THIS DRAFT EIR HAS DETERMINED THAT IMPACTS TO BIOLOGICAL RESOURCES, CULTURAL RESOURCES, LAND USE AND PLANNING, AND NOISE COULD BE MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT.”

**I disagree strongly that the impact on biological resources can be mitigated to a level that is less than significant.**

It will not be possible to mitigate the permanent destruction of more than 100 acres of riparian and riversidean mulefat and willow habitat. During the five to ten years of plant and sediment removal, most of the wildlife in this area will die, or move elsewhere. Animals and birds, including the endangered least Bell’s vireo, will attempt to find new habitats, though these are becoming increasingly rare in the region. If they can find food and room to reproduce elsewhere, they will not return. The proposed annual maintenance cleaning of the reservoir will remove plants and trees that have taken root, which will permanently prevent the recovery of this ecosystem.

Comment 175-7  
continued

↑ The County proposes replacing habitat on a 1:1 basis, but most mitigation programs require significantly higher ratios, on the order of 3:1 to 5:1. While the County promises to perform as much of the mitigation on-site in Hahamongna, there is no way that they can do that since their program will destroy more than 100 acres of riparian and prime habitat and permanently leave a large maintenance area as bare earth. There is also no guarantee that the mitigation planting will be in Hahamongna, rather than in another part of the region.

Comment 175-8

**I disagree strongly that the impact on land use and planning can be mitigated to a level that is less than significant.**

The diverse range of users of this area includes hikers, dog walkers, runners, picnickers, commuters between Pasadena, JPL and La Canada, soccer and baseball players, disc golfers, mountain bikers, horse riders, riding for disabled children, and Tom Sawyer camp. There are 10 schools in the vicinity that use the area. The Park also connects an extensive trail system, joining trails from Pasadena, Altadena, the San Gabriels and La Canada. None of this will be possible during the greater part of 5 years. The area will not be useable due to disruption, truck traffic, noise, and air pollution. Trails will be disrupted and closed, some permanently. The beauty of the area, especially the willow tree wood in the basin near the dam, attracts people. It's what makes this my favorite place for walking. But if the trees are ripped out, and the area is left permanently bare, I will no longer want to spend time there, and I'm sure many others will feel the same way.

Comment 175-9

**I disagree strongly that the impact of noise can be mitigated to a level that is less than significant.**

There is no way the noise can be mitigated unless all the dump trucks and earthmoving equipment are electric, and gravel isn't crushed. The beeps from reversing machinery alone are extremely irritating and stressful. Houses in Pasadena to the west of North Windsor Avenue will suffer 5 years of this noise, traffic and air pollution, and will lose their property values. These houses may even be unsellable during the work period. The noise will also severely affect pupils at La Canada High School on the western edge of the area.

Comment 175-10

“UNMITIGABLE SIGNIFICANT IMPACTS INCLUDE SIGNIFICANT IMPACTS TO AESTHETICS, AIR QUALITY, AND TRAFFIC/TRANSPORTATION.”

These are very serious impacts that cannot be dismissed readily.

Comment 175-11

**Aesthetics**

↓ The sediment removal will do tremendous and permanent damage to the attractiveness of Hahamongna Watershed Park, Pasadena's largest open space and recreational area. It's presently a rare area of beauty, one that is flat and relatively easy to walk in. It's especially suitable for those not fit enough or confident enough to hike in the San Gabriels, and it is also a very accessible and safe area for children.

Comment 175-11  
continued

Removal of all the trees and plants from near the dam wall to two-thirds of the way to JPL and the foothills will definitely destroy the aesthetics. The changing colors of the willow wood in the basin are an annual delight, yet there are no plans to allow these trees to return. And the extensive permanent maintenance areas proposed will destroy the pleasure of walking in this area. The proposed plan will leave a large part of Hahamongna looking like the barren surface of Mars.

### **Air quality**

Comment 175-12

The County will remove 7,650 cubic yards per day over a three to five year period; 425 truck trips in and out per day working on Monday to Friday from 7 am to 7 pm and Saturday from 8 am to 5 pm. These are double trucks, each of which holds 20 cubic yards. Massive earth-moving equipment will fill these trucks. The trucks will descend into the basin just north of the dam and line up to await filling. The DEIR projects that one truck will be filled every two minutes, but this is impossible to achieve. Instead, there will be a long line of idling trucks waiting to be filled. There is no guarantee from the County that these trucks will not cause high levels of air pollution; 425 trucks a day will definitely create unhealthy diesel fumes. There are simply not enough low-emission trucks available for this massive project.

Comment 175-13

Much of the sediment, when dry, becomes a fine dust that blows everywhere. This “fugitive” dust thrown up by the heavy sediment-removal equipment and the trucks will pose a health risk for park users, for the residents nearby, for the children at the 10 schools close to the edges of the reservoir and for the 4,000 or so employees of the Jet Propulsion Laboratory. There will be traces of metals, such as arsenic, and other toxic pollutants in the wet mud by the dam wall and in the watercourses, and in the dry dust in the rest of the basin. Ash from the Station Fire that is now part of the mud and dust in Hahamongna is also unhealthy. Has the sediment been analyzed for toxicity?

### **Traffic**

The proposal cannot go ahead without a detailed traffic study to determine the extra impact of the huge fleet of sediment removal trucks.

Comment 175-14

The large number of trucks leaving the 210 freeway at the Windsor off-ramp and rejoining it at either the Windsor or Berkshire on-ramps will considerably add to the congestion at these junctions, especially when mixed with school and JPL traffic at peak hours. Further, the 210 freeway is already considerably congested to the point of being stationary at key times of the day, and will not be able to cope with so many large trucks constantly coming and going to Azusa or Sunland. In the morning, there’s already a huge traffic jam heading west all the way from the junction with the 57 freeway. In the evening, the 210 east is bumper to bumper from the junction with the 134 freeway to the 605. Of particular concern is the 210 east tunnel in Pasadena, which is very narrow. Eastbound traffic on the 210 is already often stationary from Lincoln or Windsor. Frustrated car drivers will find surface routes through Linda Vista and North Pasadena to get around the congestion, and this will negatively impact the residents there.

## SUGGESTIONS

- Comment 175-15 | 1. Cut back the amount of sediment to be removed to that needed in the event of 1 DDE, as in the original proposal.
- Comment 175-16 | 2. Do this slowly over 20 years, disturbing only small areas each year, flushing as much sediment as possible out through the dam, as suggested by the Arroyo Seco Foundation. This would cause much less disturbance to the habitat. Sediment has accumulated ever since the dam was built and has, in past years, been at an even higher level, yet there has never been any incidence of flooding downstream. Why are we being panicked into thinking there is an imminent catastrophe, and why does it have to be done so quickly and at such a great cost?
- Comment 175-17 | 3. None of the alternatives presented are acceptable because of the scale and pace of the sediment clearance proposed. However, of all these proposals, Alternative 3, configuration D would destroy marginally less habitat. But this option should be amended to allow regrowth and new planting on the side slopes above 1020 feet rather than above 1040 feet.
- Comment 175-18 | 4. Consider digging deeper over a narrower area to increase the water capacity of the reservoir and leave more untouched, vegetated land around the edges. These edges provide crucial habitat.
- Comment 175-19 | 5. Also, reduce the proposed area to be stripped out around the edges of the reservoir to preserve as much riparian and riversidean habitat as possible. The willows are very valuable for birds, while the dense mulefat areas provide a sheltered habitat for coyotes, rabbits, snakes, lizards, and the birds that prey on them. These areas should be protected as much as possible.
- Comment 175-20 | 6. Give priority to enhancing the habitat after sediment removal by creating wetland areas for water birds, herons, birds of prey, amphibians, and reptiles. Consider cutting some deeper pits that can fill with water to provide seasonal lakes. This has happened in the past when pits were accidentally dug deeper than intended during previous sediment removal operations. Over the years, I have observed many different kinds of birds using these lakes for breeding. Creating habitat like this is an easy and inexpensive way to enhance the ecology of the area.
- Comment 175-21 | 7. Work with the City of Pasadena to increase the wildlife value of their land in order to create new areas for the displaced animals to go.

Barbara Ellis

(Babs.ellis@gmail.com)

**Response to Comment Letter #175 (Barbara Ellis)**

**Response to Comment 175-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Per the California Environmental Quality Act (CEQA) Guidelines Section 21902 (b)(3), notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:

- publication in a newspaper of general circulation in the area affected by the Proposed Project
- posting of notice by the lead agency on and off site in the area where the Proposed Project is to be located
- direct mailing to the over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll

The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the LACDPW website

Therefore, notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

CEQA requires that the public comment period for a Draft Environmental Impact Report (EIR) be 45 days in length. The public review period for the Draft EIR for the Proposed Project was extended to 90 days, running from October 23<sup>rd</sup> to January 21<sup>st</sup>, in order to provide additional opportunity to comment.

**Response to Comment 175-2:**

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

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[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cubic yards (cy) was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average storm seasons. Additionally, over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

**Response to Comment 175-3:**

See Response to Comment 175-2. The Devil's Gate Water Conservation Project is a separate project from the Devil's Gate Reservoir Sediment Removal and Management Project. The Devil's Gate Water Conservation Project is proposed to conserve stormwater and will not provide any flood protection. The project is still in a conceptual design phase and is not currently scheduled for construction; however, this project was included in the cumulative analysis, as noted in the Draft EIR in Table 2.9-1: Cumulative Projects.

**Response to Comment 175-4:**

See Response to Comment 175-2.

Devil's Gate Dam, built in 1920, was the first dam built by the LACFCD. The dam allowed for the channelization of and development along the Arroyo Seco. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway, also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam. Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. During a single design event sized storm, the Rose Bowl is not expected to be impacted by flows from the dam; however, if sediment from each storm event is not removed from the downstream floodplain, each subsequent storm would increase the flood risk. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website.

Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and the California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

**Response to Comment 175-5:**

Mitigation locations will comply with the California Department of Fish and Wildlife (CDFW) recommendations as follows: first, onsite; second, offsite within the Arroyo Seco Watershed; and third, offsite within the greater Los Angeles River watershed. If offsite mitigation sites are needed, several offsite areas within the Arroyo Seco/Los Angeles River watershed are being considered for restoration.

A detailed restoration plan will be prepared and provided to the CDFW and USACE for review and approval prior to project implementation and to satisfy permitting requirements. The plan will include and address noxious weed management, monitoring, and success criteria.

**Response to Comment 175-6:**

The Draft EIR, Biological Technical Report (BTR), and focused surveys provide thorough and accurate existing conditions for biological resources (Draft EIR, Section 3.6; Appendix D, Biological Reports). Species with the potential to occur within the Proposed Project and species that were identified during surveys are presented in the biological survey reports in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the

reconnaissance survey. The locations of prior database records and species lists of occurrence were used as additional data; but since these are positive-sighting databases, this data was used only in support of the analysis from the previously identified factors. Based on the results of the BTR, additional protocol-level focused surveys were conducted for Proposed Project. The field surveys were conducted in 2010 and 2013, including general biological surveys, focused sensitive plant surveys, focused least Bell's vireo, coastal California gnatcatcher, and southwestern willow flycatcher surveys, and federal and state jurisdictional waters surveys.

**Response to Comment 175-7:**

See Response to Comment 175-5. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

As with any project that involves CDFW, United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

**Response to Comment 175-8:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

None of the trails will be closed permanently, as suggested in the comment. In addition, the reservoir will not be permanently left bare, as a habitat restoration plan will be implemented after sediment removal activities are completed.

**Response to Comment 175-9:**

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule.

As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant.

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a 1-decibel (dB) increase on Berkshire Place east of the Interstate 210 (I-210) northbound ramps. A 1-dB increase is well below the 3-dB increase threshold of perception and would therefore not be anticipated to disturb the learning environment. The roadway noise impact analysis provided in the Draft EIR found that the Proposed Project would result in less than significant impacts for all analyzed alternatives.

Due to fine gradation or particle size of the majority of sediment that entered the reservoir since the Station Fire, crushers are not expected to be used with frequency during the project. The Proposed Project was designed to limit the backing up of trucks, as the trucks will enter at one access road and exit at a separate access road to encourage circular flow. The backup beeps on the trucks and equipment are an Occupational Safety and Health Administration (OSHA) requirement, with the priority being to protect the safety of both the workers onsite and the general public. In addition, contractors will be required to comply with local noise ordinances as stated in the Draft EIR, Section 3.14 Noise and Vibration.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

Comment regarding economic impacts to surrounding homeowners has been noted.

**Response to Comment 175-10:**

As stated in Response to Comment 175-9, the Draft EIR discussed significant and unmitigable impacts.

**Response to Comment 175-11:**

See Response to Comments 175-7, 175-8, and 175-9.

**Response to Comment 175-12:**

See Response to Comment 175-9. During the sediment removal phase, excavators will be loading sediment into trucks for offsite disposal. All of the trucks will be loaded within the reservoir; and if a queue of trucks develops, the trucks will stage within the reservoir itself to lessen impacts on the adjacent streets. Long queuing and idling times will not occur during the Proposed Project. It is estimated that trucks will briefly idle during loading, but the average loading time per truck is estimated to be one minute. In addition, LACFCD typically requires equipment to shut down if idling time is expected to be more than five minutes. Estimated project idling times were included in the air quality analysis and health risk assessment for the Draft EIR, Section 3.5, and Appendices B and C.

The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours

per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need.

**Response to Comment 175-13:**

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities including excavation, grading, material loading, and hauling would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations. As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related acute short-term and long-term impacts.

**Response to Comment 175-14:**

As part of the Draft EIR, a Traffic Impact Analysis (Appendix J of the Draft EIR) was conducted that detailed the impacts of the Proposed Project along the haul routes and surrounding intersections and discussed in Section 3.16 of the Draft EIR. The volumes on Interstate 210 (I-210), the on- and off-ramps, and the local roadways within the study area included those potentially impacted by the project. The analysis provided a conservative project condition volume that accounts for expansion and regional growth within the study area.

No significant impacts were found to occur on the freeway segments studied. Potential impacts due to the added truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 175-15:**

See Response to Comment 175-2.

**Response to Comment 175-16:**

See Response to Comments 175-2 and 175-4.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR determined Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to

71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**Response to Comment 175-17:**

LACFCD notes that the commenter would prefer an option that allows regrowth and new planting on the side slopes above 1,020 feet rather than above 1,040 feet.

**Response to Comment 175-18:**

See Response to Comment 175-7 for a proposed alternative configuration. A footprint any smaller would decrease the volume removed and the ultimate capacity of the reservoir, which would fail to meet Proposed Project objectives.

**Response to Comment 175-19:**

See Response to Comments 175-7 and 175-18.

**Response to Comment 175-20:**

See Response to Comment 175-7.

**Response to Comment 175-21:**

LACFCD has been coordinating and will continue to coordinate with the City of Pasadena. Impacts to habitat and wildlife will be mitigated with Mitigation Measures MM BIO-1 through MM BIO-8.

COMMENTS IN RESPONSE TO  
**THE DEVIL’S GATE SEDIMENT REMOVAL AND MANAGEMENT  
 PROJECT**  
 1/17/2014

**Overview:**

The County of Los Angeles Department of Public Works, Flood Control Division is to be commended for moving forward with an Environment Impact Report (EIR) as opposed to trying to obtain a Statement of Overriding Consideration which would not have allowed for this important opportunity for community input.

As someone who is in touch with the multiple agencies and numerous individuals who have been involved with the Devil’s Gate and Hahamongna Watershed Park for almost three decades, I know that detailed comments will be forthcoming that touch on many aspects of the project – biology, traffic, air pollution, water conservation, noise, etc. Therefore, these comments deal not so much with specifics as with the goals of sediment management and how best to accomplish them. They emphasize the overriding need for a long-term comprehensive sediment management, water conservation and stream management plan – something long overdue and still, to my knowledge, not contemplated by the Department of Public Works (DPW).

Before commenting, I want to make clear that I recognize the tremendous responsibility of DPW, Flood Control Division for protecting the public safety downstream and helping to maintain the structural integrity of Devil’s Gate dam. For this reason, it is clear to almost all who have studied the issues that some sediment must be removed. The real question is how much and how best to accomplish it.

**Sediment has value:**

When the County Sanitation District had a problem with “sludge,” once regarded as a waste product, it developed a treatment plant for processing it into fertilizer. That fertilizer now nurtures vegetable fields in Central California. Santa Anita Race Track had a similar problem with horse manure until it struck a deal with nearby mushroom farms. What’s to stop DPW from finding creative, cost effective ways of processing or refining sediment for use at beaches, in gardens or on roads or driveways?

In this day and age, it’s no longer viable to mow down old-growth forests in order to create “sediment placement sites.” New methods of reuse must be found. Although transferring some sediment to gravel pits in nearby cities may help, it is not the long-term solution that is needed. ***Sediment must be treated as something of value due to its potential for reuse. To make this happen, the talented engineers at DPW should be released and encouraged to analyze and present new opportunities and methods for sediment use.***

Comment  
176-1

Comment  
176-2

## Scope of the Devil's Gate Sediment Removal:

In its documents to the County Board of Supervisors and the State of California requesting funding, the DPW Flood Control Division stipulated a project of "up to 2 million cubic yards" of sediment to be removed from behind Devil's Gate Dam. As the project developed and, without further communication with those agencies, (at least not any made available to the public), the project was arbitrarily expanded to approximately 4 million cubic yards. This has raised many questions about how DPW arrived at the increase.

Although members of the public have repeatedly asked for answers to the questions listed further on in this document so that they could intelligently comment on some of the technical assumptions and goals of the project, their requests have gone unanswered by DPW. In a community that is home to both JPL and Caltech and where the public consists of numerous highly skilled engineers and scientists, some of whom were seeking this information, such an omission is tragic. DPW lost valuable input that might have enhanced the project and expanded its own understanding.

***Given that DPW told both the State of California and the Board of Supervisors that the public safety could be protected with the removal of "up to 2 million cubic yards" of sediment, there is a strong movement within the surrounding communities of Altadena, Pasadena and La Canada to restrict the project to those dimensions while DPW examines other methods for gradual long-term sediment removal.***

## The Pasadena Connection:

Behind Devil's Gate Dam is Hahamongna Watershed Park which is partly owned by the City of Pasadena and leased to the County. It is an important multi-use area with streams, meadows, hiking and equestrian trails and settling ponds. Uses for the area are governed by the Hahamongna Watershed Park Master Plan as well as the City's Green City Plan. There is every indication that the Devil's Gate DEIR for the removal of 4 million cubic yards as currently proposed by the County would violate important parts of these agreements and could make the City liable. **Therefore, County DPW should honor its agreement with its Board of Supervisors, the State of California (for its grant) and the City of Pasadena by proposing and executing a project of under 2 million cubic yards of sediment.**

## Need for Blue Ribbon Committee:

Just as no person has all the answers to any given problem, no agency, even a “stand alone agency,” has all the knowledge, experience and creativity to address every problem or issue. Today more than ever before, the Department of Public Works, Flood Control Division is addressing many pressing problems simultaneously. Managing debris, controlling flooding and finding new locations for sediment are among them. So is finding ways to retain more water. Because of the lingering drought, water is California’s new gold. The pressure is on DPW to conserve or transfer more of it to nearby settling ponds as well as to reduce the amount of storm water run-off now sent over dam spillways.

Many who have been studying the situation at Devil’s Gate for decades feel it is time for new thinking at DPW. They are strongly recommending the creation of a Blue Ribbon committee of outside specialists to work with DPW engineers in analyzing past sediment management practices and devising appropriate new approaches. In order to stop the cycle of massive excavation of sediment at long intervals, it may be time for an innovative long-range approach to sediment management and water conservation. No city in the nation has more qualified resources and experts to partner with in seeking solutions than Los Angeles DPW. All that is needed is leadership and the willingness of DPW management and staff to work together with their colleagues in the academic, engineering or business world to bring about change. Many in the community ***strongly encourage such a partnership in the form of a Blue Ribbon committee to develop a long-range comprehensive plan for both sediment management and water conservation for the future of Los Angeles.***

## Important unanswered questions:

### 1. How much sediment needs to be removed?

In its own documents, the County told the State of California in its grant application for funding that it would remove “up to 2 million cubic yards” of sediment and not 4 which is the current proposal. The request before the Board of Supervisors was also for the smaller amount. Was the Board of Supervisors informed of the change and did they approve it? As a “stand alone agency,” DPW may feel that it is immune to supervision by our elected officials. The public sees it differently. And this kind of conflicting information creates distrust among those who believe that what is promised is what will happen. So ***how did the project expand in size and who authorized an increase from roughly 2 to 4 million cubic yards?***

**2. What is the technical basis for providing the capacity for two as opposed to one Debris Design Event (DDE)?**

Because of the recent Station Fire, it is fairly impossible for the vegetation in the foothills behind Devil's Gate to grow to the extent that they would supply sufficient fuel for another disaster of a similar nature. Because of the lack of fuel, is it reasonable to assume that there is not likely to be another major fire for up to 20 years and this will reduce the risk of even one "worst case disaster" during that period. ***So why 2 DDEs and has the goal of the Sediment Removal Project been adjusted to account for post-fire flood and erosion events?***

Comment  
176-7

**3. What is the record of the frequency of Floods?**

One of the prime purposes of an EIR is to provide information to the public which they may use in preparing their comments. A key question in the Devil's Gate project is how frequently have floods occurred in the past and, in this era of drought, what does it portend for the future. ***So did the engineers at DPW study historical records to determine the maximum discharge for the 50-year design flood used for this DEIR?***

Comment  
176-8

**4. Is there a comparison of the costs associated with levels of flood risk based on the removal of different quantities of sediment?**

It is appropriate to know what level of flood risk might be anticipated during a 50-year design storm. Because flood prevention in the form of sediment removal or channel repairs requires considerable public expense, a cost/benefit analysis at different levels of risk should have been included in the DEIR. ***Therefore, did DPW analyze the level of cost associated with the risk for the removal of 2, 3 and 4 million cubic yards? If so, why was not a cost and risk benefit analysis made available in the DEIR?***

Comment  
176-9

**5. What amount of sluicing is too much?**

I understand that an independent review of sluicing was done for DPW and it was determined that increased sluicing would not work because of the accumulation of sediment in the storm channels. ***Was any analysis done to compare the costs and effectiveness of reinforcing flood channels at key choke points (Highland Park) where sediment builds up and doing regular maintenance of the channels to prevent build up? Could such a maintenance program reduce the costs and need for the massive excavation at Devil's Gate?***

Comment  
176-10

Thank you for your consideration of these comments in response to the Devil's Gate DEIR on Sediment Removal and Management Project.

Christle Balvin

## **Response to Comment Letter #176 (Christle Balvin)**

### **Response to Comment 176-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

### **Response to Comment 176-2:**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft Environmental Impact Report (EIR).

For further information regarding beneficial uses for sediment at the Los Angeles County Flood Control District (LACFCD) sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

### **Response to Comment 176-3:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cy was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of

protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

The lowest cost Proposed Project Alternative is expected to cost approximately \$65 million. LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs. Only a portion of the Proposed Project will be funded through the grant; therefore, only a portion of the Proposed Project was included in the project description in the grant application. As identified in the grant application, the preferred alternative would be identified through the EIR.

Outside experts, especially those on the Stakeholder Task Force, were consulted during the formation of the LACFCD's Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts, cities, and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

**Response to Comment 176-4:**

See Response to Comment 176-3.

LACFCD does not lease Devil's Gate Dam and Reservoir area. As described in Section 2.1.4 of the Draft EIR, through easements granted in May 1919 and March 1965, the City of Pasadena granted the LACFCD, under a perpetual easement, the right to construct, reconstruct, inspect, maintain, repair, and operate Devil's Gate Dam, its spillway, bypasses, tunnels, and other support facilities as may be necessary for the construction and maintenance of a reservoir capable of impounding the waters of the Arroyo Seco for purposes of storage and control, and to control such waters as may be necessary in the prevention of damage by flood (City of Pasadena 1919/1965). Analysis of consistency with the Hahamongna Watershed Park Master Plan (HWPMP) was included in the Draft EIR, Section 3.12 Land Use and Planning.

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 2 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the

maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 176-5:**

See Response to Comment 176-3. The Draft EIR analyzes long-range maintenance of the reservoir under the Reservoir Maintenance phase of the Proposed Project and Alternatives.

Please also refer to the Sediment Management Strategic Plan, which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.

**Response to Comment 176-6:**

See Response to Comment 176-3.

**Response to Comment 176-7:**

See Response to Comments 176-3.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. It should be noted that design debris amounts can be produced from a freshly burned watershed with rainfall amounts considerably below capital

flood levels (a 5- to 10-year frequency storm). Similarly, higher intensity rainfall could produce more debris. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

**Response to Comment 176-8:**

See Response to Comments 176-3 and 176-7.

All facilities, including open channels, dams, bridges, and debris basins under LACFCD jurisdiction are required to meet Capital Flood protection levels. The Capital Flood is characterized by the Hydrology Manual as "the runoff produced by a 50-year frequency design storm falling on a saturated watershed (soil moisture at field capacity)" (Public Works, Hydrology Manual, 2006). A 50-year frequency design storm is defined as the magnitude of a storm that is likely to occur once every 50 years. Therefore, the chance of a 50-year storm occurring in any given year is 1 out of 50, or a 2 percent chance of occurring. "Capital Flood protection also requires adding the effects of fires and erosion under certain conditions" (Public Works, Hydrology Manual, 2006).

The Capital Flood is derived using the Hydrology Manual and is unique for each watershed. Some of the factors that affect the hydrology of a watershed are topography, geology, vegetative cover, land use, and climate. The Intensity-Duration-Frequency equation establishes a relationship between rainfall intensity, duration, and frequency. This equation as well as the Design Storm determination process is explained further on page 37 of the Hydrology Manual.

**Response to Comment 176-9:**

See Response to Comments 176-6 and 176-7.

Under CEQA, the lead agency is not required to analyze an economic impact associated with a project in the EIR; as Section 15131(a) of the CEQA Guidelines states: "Economic or social effects of a project shall not be treated as significant effects on the environment." Moreover, CEQA allows economic analysis in the administrative record only if the basis for infeasibility, and thus rejection of a mitigation or alternative, is economic, as described in CEQA Guidelines Sections 15091(a)(3) and 15364.

**Response to Comment 176-10:**

The Sediment Transport Capacity Analysis found that the storm flows received in the reservoir would not move the necessary amount of sediment out of the reservoir, and the sediment moved downstream would fall out and remain in the Arroyo Seco or Los Angeles River. Reinforcing channels downstream and doing regular maintenance of these channels is outside the purview of LACFCD.

The scope of the project is to restore capacity to Devil's Gate Reservoir, a critical flood control facility in the Los Angeles River Watershed. Providing new flood control downstream is outside the scope of this project and is inconsistent with the Proposed Project objectives. LACFCD takes a system-wide approach to flood control management. For that reason, the main objectives of the project are to satisfactorily reduce flood risk, create a configuration suitable for routine operations and maintenance, and reduce the possibility of clogging the outlet works of the dam.



OFFICE OF THE MAYOR

January 16, 2014

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

**Re: City of Pasadena Comments on Draft Environmental Impact Report for Devil's Gate Reservoir Sediment Removal and Management Project**

Dear County of Los Angeles:

On behalf of the City of Pasadena, I convey our thanks to the County of Los Angeles for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Devil's Gate Sediment Removal and Management Project (Project). The City's comments on the DEIR are set forth in this letter and in the attached statement of comments. We ask that both this letter and the statement of comments be reflected in the record of comments received as the DEIR comments of the City of Pasadena.

As specifically reflected in the statement of comments, Pasadena City staff have extensively reviewed the DEIR as the basis for the comments provided. Moreover, the City Council reviewed the Project on December 9 and December 16 of last year. The Council's evaluation was preceded by review by the Council's Municipal Services Committee on November 12, as well as by the City's Hahamongna Watershed Park Advisory Committee (HWPAC) on November 13 and the Environmental Advisory Committee (EAC) on November 19.

**The City's Next Steps**

The City is taking steps to identify a responsible Project design and sediment management program that reflects the configuration, aesthetics, habitat restoration, and vegetation management described in the Hahamongna Watershed Park Master Plan (HWPMP) adopted by the Pasadena City Council in 2003. The City's Project review seeks to answer key questions including the following:

- Is the scope of the Proposed Project and Project Alternatives too large?
- Does the County have to play catch up for its failure to maintain the Reservoir over the years at the expense of the City and other impacted communities and will the County specify and adhere to a specific maintenance program?

Comment  
177-1

Comment  
177-2

- Can a more gradual project approach be effective?
- What is the true downstream flood risk?
- How frequently have storms associated with a design debris event (DDE) occurred? What is the likelihood of two concurrent DDE occurring?

The City's efforts include an independent review of the Sediment Removal and Management Project and solicitation of input from key community members with relevant expertise. The City will update the County on its progress at the annual City Council meeting with Supervisor Antonovich on March 19, 2014.

We look forward to continuing the cooperation and consultation that have occurred so far in this extremely important project. In that regard, it will perhaps be helpful for us to provide certain background information about matters the City considers critical to a sediment removal and ongoing management project that will be consistent with the best interests of our community.

### **Hahamongna Watershed Park (HWP)**

Hahamongna Watershed Park (HWP) is a unique environmental resource, unparalleled in Southern California for its biological and water resources. For decades, the Pasadena community has diligently protected and enhanced the natural character of this alluvial canyon and its rich riparian and stream zone habitat through major community-based planning efforts and City has adopted numerous policy documents relevant to HWP, such as the Hahamongna Watershed Park Master Plan (2003), Arroyo Seco Master Plans and Design Guidelines (2003), United Nations Urban Accords (2006), Green City Action Plan (2006), Hahamongna Watershed Park Master Plan Addendum for the Hahamongna Annex (2010), and Open Space & Conservation Element of the General Plan (2012.)

These efforts commit the City of Pasadena to protect native habitats, conserve and protect the water resources of the Arroyo Seco, reduce greenhouse gases, and provide diverse recreation opportunities for the Pasadena community among other goals. Over the last ten years, between 2003 and 2013, the City has invested \$2.7 million in HWP projects. Millions of dollars' worth of projects have been also completed downstream in the Central and Lower Arroyo Seco in furtherance of the City's commitment to preservation of the Arroyo Seco.

The adoption in 2003 of the Hahamongna Watershed Park Master Plan (HWPMP) was the culmination of a five-year community planning process with extensive County participation. The HWPMP is the central guiding document for how the City moves forward in planning for this area. There are several goals which would be greatly impacted by the Project as proposed and they are outlined below.

#### ***Hahamongna Watershed Park Master Plan (HWPMP) – Goal 1 – Preserve, restore & enhance the native habitats***

Due to the size of the basin areas and corresponding maintenance plans, the Proposed Project and Project Alternatives are inconsistent with this HWPMP goal. The City expects the County to prepare a final Project design more closely resembling the configuration, aesthetics, habitat restoration and vegetation management described in the HWPMP. The HWPMP establishes a minimum flood control capacity of 2.3 million CY and includes a conceptual grading plan that would create a flood management/conservation pool of 3 million CY. At the time of HWPMP preparation

(2003), the sediment removal required was approximately 800,000 CY. When completed, the basin would have a 69-acre surface area. The Proposed Project would remove 2.95 million CY over a 120-acre area to create a flood control capacity of 4.15 million CY. The Project Alternatives would remove between 2.4 and 4.0 million CY with an affected area of 76 to 120 acres.

The larger footprints of the Proposed Project and Project Alternatives would have a greater initial and ongoing impact to native vegetation and habitat than envisioned in the HWPMP. The HWPMP describes a habitat restoration plan and distinct vegetation types that would occur at various elevations within the basin. Corresponding with the water level of the conservation pool, vegetation below elevation 1030 feet would be periodically removed as a part of regular maintenance, over an approximately 54-acre area. For elevations above 1030 feet, including the side slopes of the basin, the HWPMP describes a habitat restoration plan including periodic replanting due to future sediment removal efforts. The Proposed Project would periodically remove vegetation from the entire basin as a part of regular maintenance, resulting in significantly less habitat than described in the HWPMP. The Project Alternatives describe similar maintenance over areas ranging from 47 to 120 acres.

The Proposed Project and Project Alternatives would destroy regionally significant willow and mule fat riparian forest. The forest provides critical habitat for a variety of animals and birds, including nesting Yellow Warbler, which is a species of Special Concern in California. In 2012, 'Least' Bell's Vireo, which is a federally endangered species, nested here for the first time. Other animals found here include mountain lion, bobcat, mule deer, gray fox, gopher snake, pacific tree frog, and other reptiles and mammals. Other types of habitat, including freshwater marsh, alluvial scrub, and chaparral would be destroyed.

Further, the Project offers no habitat mitigation plan. Because the lost habitat is riparian, it should be replaced at the highest ratio possible and as much of the mitigation as possible should occur within the Hahamongna basin. I request the County collaborate with the City of Pasadena to determine the most suitable restoration areas.

***Hahamongna Watershed Park Master Plan (HWPMP) – Goal 2 – The Devil's Gate Flood Control basin will be managed to provide protection to the developed and natural downstream area***

The Proposed Project and Project Alternatives may be consistent with the flood control objectives of this HWPMP goal, but the objectives related to a lower-impact and comprehensive approach to sediment removal and management are either not met or not included in the Proposed Project or Project Alternatives. Accordingly, these reaches of the Arroyo Seco stream could be impacted under the Proposed Project or any of the Project Alternatives and should be included within the Project area. The City requests that the inclusion of the Central and Lower Arroyo Seco downstream areas in a further modeling and sediment transport analysis be conducted since sediment removed from the reservoir by the Flow-Assisted Sediment Transport (FAST) method will move through this area.

Possible impacts of sediment drops in the soft-bottom areas under the 134 Freeway and Colorado Street Bridge include adverse impacts to adjacent lands and downstream City improvements. The County should recognize responsibility for ongoing maintenance of these areas to ensure protection of the soft-bottom sections of the Arroyo Seco and downstream improvements in Pasadena.

Comment  
177-6  
continued

Comment  
177-7

***Hahamongna Watershed Park Master Plan (HWPMP) – Goal 4 – Provide diverse recreation opportunities for Pasadena community***

Comment  
177-8

Due to the proposed sizes and Project impacts, the Proposed Project and Project Alternatives could adversely affect the City of Pasadena's ability to meet this goal. Passive recreation within the vegetated areas would be harmed and the presence of a large, industrial operation in the Hahamongna basin, causing significant dust and noise impacts, will harm present and potential park users, notably hikers, equestrians, and bird watchers.

**Other DEIR Concerns**

***Aesthetics***

Comment  
177-9

The DEIR determined that there will be significant impacts to the appearance of the Reservoir, but identified no feasible mitigation measures. It states that the preservation of existing visual conditions is not required for Reservoir management. The City of Pasadena respectfully disagrees and requests the County prepare a final Project design more closely resembling the configuration, aesthetics, habitat restoration and vegetation management described in the HWPMP, which only allows impacts necessary for Reservoir management.

***Air Quality***

The DEIR determined that there are significant and unavoidable impacts to air quality even after mitigation requiring equipment to meet EPA 2007 standards. This is due to the nature of the debris removal by heavy construction equipment that generates excessive daily NOx emissions.

Comment  
177-10

The Proposed Project anticipates the hauling of 7,650 CY of sediment per day using double dump trucks which have an estimated capacity of 16 to 20 CY. Removal of the sediment, vegetation, trees, and organic debris is expected to require an average of 50- truck round trips per hour, with an estimated maximum of 425 truck round trips per day during excavation activities. The trucks will drive through local neighborhoods and the 134 and 210 Freeways. The diesel trucks will operate for an estimated nine months per year, six days per week.

Short and long term health effects due to silica dust, fugitive dust clouds, diesel fumes, carbon monoxide, NOx emissions and other pollutants should be fully evaluated to determine the health risk assessment to the adjacent neighborhoods and sensitive receptors. Greater use of alternative fuel vehicles for hauling is critical and must be required as a mitigation measure.

***Downstream Impacts***

Comment  
177-11

While the DEIR mentions potential Arroyo Seco Channel overtopping areas (flooding) including locations in Pasadena, Los Angeles, South Pasadena, and the 110 Freeway, impacts are not discussed in depth. Notably, flooding/damage risks to critical Pasadena infrastructure and natural resources, including the historic Rose Bowl, Hahamongna Watershed Park (HWP), Arroyo Seco Golf Course, and the Central and Lower Arroyo Seco are not clear. Without knowing the magnitude of the flood risk, the City of Pasadena will take any and all steps necessary to identify the least

Comment  
177-11  
continued

↑ impactful Project, one that balances the City's priorities of protecting its public investments, infrastructure and the natural resources of HWP.

### **Noise**

Comment  
177-12

Loud construction noise may be mitigated by restriction on operation of off-road construction equipment with a 200+ horsepower engine within 180 feet of residences. Other equipment should be limited to using access roads only.

Further analysis should be made of haul vehicle noise generated on haul routes. There also should be limitations on the use of warning alarms on construction vehicles over certain decibels when used in the reservoir.

### **Project Scope**

Comment  
177-13

The DEIR does not present scientific rationale for the need to remove between 2.43 to 4.0 million CY of sediment from the Reservoir within 5 years. When Los Angeles County initiated project planning for a large-scale project to remove sediment from the Reservoir in 2010, the project scope approved by the County Board of Supervisors in March 2011 envisioned a 1.67 million CY sediment removal project. As the City of Pasadena bears a significant burden from the Sediment Removal and Management Project, it is imperative that the Project scope be appropriately scaled to provide adequate flood protection in the most environmentally responsible and respectful manner possible resulting in as little impact to HWP as possible.

### **Sediment Management Phase**

Comment  
177-14

Regular maintenance of the Hahamongna basin by the County is essential to lessening the need for future large-scale sediment removal projects. The DEIR fails to specify the County's commitment to an ongoing sediment management program. The document describes an estimated 13,000 CY of annual removal with a periodic removal of approximately 170,000 CY should a heavy rainfall year occur. The City objects to this broad latitude, as it would allow the County to not perform removals some years and initiate larger, periodic removal projects when desired. The City requests that the County commit to a specified maintenance program that defines a minimum and maximum amount of work that the County will perform annually. The annual minimum and maximum should conform to the limitations and responsibilities of the Easement and be only as impactful as necessary to preserve and maintain the Reservoir for water conservation and flood control purposes.

### **Traffic**

Comment  
177-15

The DEIR has determined there will be significant and unavoidable traffic impacts caused by the project. To the fullest extent, the County of Los Angeles must independently mitigate these impacts without relying on local agencies.

↓ The proposed schedule of eleven to twelve-hour work days during the week and nine hour work days on Saturdays, involving a maximum of 425 truck round trips per day during excavation activities will increase traffic on haul routes and generate burdens to residential and other streets throughout Pasadena and neighboring communities that are not mentioned in the DEIR. Such local

Comment  
177-15  
continued

burdens, as well as impacts to the 134 and 210 Freeways and area schools must be identified and mitigated before a final project is approved.

### **Rose Bowl and Brookside Golf Course**

Our statement of background information the City considers critical to a reasonable and responsible sediment removal and management project would not be complete without reference to the Rose Bowl and Brookside Golf Course.

Comment  
177-16

The historic Rose Bowl and Brookside Golf Course are major attractions that provide significant economic benefits to Pasadena. In 2011, the City of Pasadena embarked on the \$182 million renovation of the Rose Bowl, prominently located downstream of the Reservoir in the Central Arroyo Seco. The primary project objectives are to improve public safety, enhance fan experience, maintain the Bowl's National Historic Landmark status, develop revenue sources to fund long-term improvements at the stadium, and enhance facility operations. The renovations, which will preserve the Rose Bowl as a Pasadena icon and enable the facility to stay competitive within the industry, will be completed in FY 2015. The City recognizes the needs to protect both the Rose Bowl and golf course from any potential future flood damages, but this needs to be balanced with a Project that is respectful of the Central Arroyo Master Plan and the expectations of the community. It is imperative that the County coordinate sediment removal and transport activities with Rose Bowl special events, which involve substantial traffic on the 134 and 210 Freeways.

### **Concluding Comments**

Comment  
177-17

The City of Pasadena has identified the foregoing Pasadena-specific concerns with the Sediment Removal and Management Project, beginning with impacts to Hahamongna Watershed Park (HWP), followed by concerns with topics studied in the DEIR. Any one of these items is sufficient to warrant review by the County of the impact of this Project on Pasadena. Collectively, the items offer a compelling argument that the Project as proposed is not reasonable or responsible for Pasadena.

While the City acknowledges the need for a responsible sediment removal project and ongoing sediment management program at the Devil's Gate Reservoir, it is strongly committed to protect the vast public assets in the vicinity of the Devil's Gate Reservoir and to preserve the quality of life in adjacent neighborhoods.

Comment  
177-18

The Sediment Removal and Management Project as proposed in the DEIR differs from the Los Angeles County Board of Supervisors March 2011 action which authorized the Los Angeles County Department of Public Works to remove 1.67 million CY of sediment from the Reservoir. The DEIR fails to explain this critical difference.

Comment  
177-19

We expect the County to carry out this project within the confines of the Easement which the City granted to the County. The City intends to assure the Easement is not overburdened by an aggressive Project that unnecessarily destroys habitat and denudes vegetation. We request the County to collaborate with Pasadena to design and implement a Project that conforms to the limitations and responsibilities of the Easement and is only as impactful as necessary to preserve and maintain the Reservoir for water conservation and flood control purposes.

Comment  
177-20

The DEIR does not identify the City as a potential responsible agency pursuant to the California Environmental Quality Act (CEQA.) The City may have discretionary authority over approvals required to implement the Project. As discussed above, the Project must conform to the limitations and responsibilities of the Easement; otherwise the County will have to seek City authority to go beyond those limits. Further, the City may have discretionary permitting authority required to implement the Project or any alternative thereto. The City's analysis of its responsible agency status is ongoing and will require close cooperation between the City and County to ensure that all City permitting requirements are met and that the EIR is adequate for the City's use as a responsible agency.

Comment  
177-21

The City requests that the County of Los Angeles include the City's Department of Public Works staff in the ongoing precise design and engineering tasks related to the Project.

### Conclusion

Comment  
177-22

The City of Pasadena looks forward to continued cooperation and consultation with the County of Los Angeles on this critical initiative. We wish to express sincere appreciation to County staff members, especially Keith Lilley, for their willingness to present the Project in various settings and their responsiveness during the public comment period. The City is also appreciative of the County's affirmative response to our community members' request for an extension of the public comment period.

If you have any questions regarding this letter, please do not hesitate to contact Julie A. Gutierrez, Assistant City Manager, at (626) 744-7371 or [jgutierrez@cityofpasadena.net](mailto:jgutierrez@cityofpasadena.net), or me at (626) 744-4311 or [bbogaard@cityofpasadena.net](mailto:bbogaard@cityofpasadena.net).

Respectfully submitted,



BILL BOGAARD  
Mayor

### Attachments:

1. Hahamongna Watershed Park Master Plan (HWPMP) Goals & Objectives
2. City of Pasadena Comments on Draft Environmental Impact Report (DEIR) for Devil's Gate Reservoir Sediment Removal and Management Project

Copy: Michael D. Antonovich, Los Angeles County Board of Supervisors, District 5  
Keith A. Lilley, Senior Civil Engineer, Los Angeles County Department of Public Works  
Michael J. Beck, City Manager, City of Pasadena  
Julie A. Gutierrez, Assistant City Manager, City of Pasadena  
Siobhan Foster, Director of Public Works, City of Pasadena  
Brad Fuller, Assistant City Attorney, City of Pasadena

**Attachment 1:**

Hahamongna Watershed Park Master Plan (HWPMP) Goals & Objectives

## **1.6 GOALS & OBJECTIVES OF THE HAHAMONGNA WATERSHED PARK MASTER PLAN**

**The following are the goals and objectives specific to Hahamongna Watershed Park:**

**Goal 1: Preserve, restore, and enhance the native habitats.**

*Objectives:*

- Develop a habitat restoration plan for Hahamongna Watershed Park.
- Protect and enhance the Hahamongna Watershed Park wildlife corridor linkages to the upper watershed and the downstream reaches of the Arroyo Seco.
- Restore, enhance, and reestablish the historical native plant communities of the Arroyo Seco.
- Create wetland and aquatic habitats in HWP to increase the biodiversity.
- Locate new facilities in developed or disturbed areas so as to minimize impact to established habitats.
- Enhance the edges of the spreading basins with native trees and other appropriate plantings to blend these facilities with the riparian setting.
- Limit exterior lighting for security, safety, and operational purposes to lessen the impact on nocturnal wildlife.
- Relocate existing overhead power and communications lines to restore the natural environment and provide adequate, safe maintenance access.
- Develop dam maintenance and flood control procedures that promote preservation of native habitats.
- Repair the harmful impacts of the mining operations by regrading the highly disturbed, unnatural topography within the flood plain to allow for the successful planting of native plant communities to establish quality habitat.
- Establish a monitoring program to study runoff and sediment delivery in the flood basin to determine impacts on plant communities in HWP.
- Restore areas where erosion has occurred.

**Goal 2: The Devil's Gate flood control basin will be managed to provide protection to the developed and natural downstream areas.**

*Objectives:*

- Facilitate the dam and reservoir maintenance operations in a manner that is compatible with the proposed features of the Master Plan and will result in minimal impacts to the surrounding area.
- Maintain or improve the flood capacity behind Devil's Gate Dam.
- Develop a sediment removal plan that minimizes the impact to the basin and to the surrounding neighborhoods.
- Develop a grading plan that allows habitat restoration and recreational activities to co-exist with flood management and water conservation.
- Develop a multi-agency task force to review maintenance, sediment removal, dam operation, permit, and liability issues on a continual basis after this plan is adopted.
- Develop dam maintenance and flood control procedures that promote water conservation.
- Establish a monitoring program to study runoff and sediment delivery in the flood basin to determine impacts on flood management/water conservation capabilities.

**Goal 3: Conserve and protect the water resources of the Arroyo Seco.**

*Objectives:*

- Maximize groundwater recharge to minimize the amount of water purchased from outside sources.
- Develop a grading plan that allows habitat restoration and recreational activities to coexist with flood management and water conservation.
- Monitor water entering the basin from Flint Wash and various storm drains to ensure safe water quality.
- Develop a program to minimize and provide the means to control the inflow of trash from Flint Wash and various storm drains.
- Develop an alternative to the JPL eastside surface parking area for expanded spreading basins for groundwater recharge.

**Goal 4: Provide diverse recreation opportunities for the Pasadena community.**

*Objectives:*

- Balance the recreation needs for active, passive, and educational activities in HWP.
- Develop a grading plan that allows habitat restoration and recreational activities to co-exist with flood management and water conservation.
- Design children's play areas to emphasize learning and connections to the natural environment.
- Distribute recreation facilities to allow equal access from the surrounding neighborhoods.
- Maintain the historic recreational uses within HWP.

**Goal 5: Enrich and promote the unique history and culture of Hahamongna Watershed Park.**

*Objectives:*

- Develop HWP as a "living laboratory" for local schools and environmental education programs.
- Preserve and encourage Native American use of HWP as a cultural resource.
- Explore the possibilities of a joint partnership with the U.S. Forest Service and Native Americans in developing an interpretive center and native-plant nursery at HWP.
- Develop design guidelines to ensure aesthetic compatibility and quality construction for any improvements made in HWP.
- Develop passive viewing areas with unique vantage points.
- Create programs that inform and educate the public about the natural processes, the history and the culture of the site.
- Underground or relocate the existing above-ground electrical transmission lines.

**Goal 6: Provide a safe and secure park.**

*Objectives:*

- Provide adequate water and sewage infrastructure where needed throughout HWP.
- Develop guidelines and delegate agency responsibilities for recreation, flood management, and water conservation liabilities.

- Retain and enhance, as needed, the recently reestablished Park Ranger Program to ensure compliance with municipal laws, codes, and regulations. Secure entrances and perimeter of HWP.
- Develop an all-weather perimeter trail/road for emergency and maintenance access as well as for passive recreation.

**Goal 7: Provide adequate circulation, access and parking.**

*Objectives:*

- Provide public transportation and nonmotorized access to HWP.
- Provide adequate parking throughout the park for all proposed recreation activities and facilities.
- Maintain and restore the trail links to the Central Arroyo, the surrounding neighborhoods, and the Angeles National Forest.
- Develop separate trail systems for bicycles, hikers, and equestrians wherever possible.
- Comply with ADA (Americans with Disabilities Act) standards for a “natural park.”
- Develop a signage system that provides clear directional information and informs park visitors without being intrusive.
- Improve the east entrance for better access, circulation, and traffic safety.
- Protect residential neighborhoods from the nuisances related to maintenance equipment, traffic, and noise.
- Improve and enhance regional trail connections.
- Continue to assist JPL in meeting its parking needs.

The *Arroyo Seco Master Plans* were developed by the combined efforts of the Planning and Development Department and the Department of Public Works. The implementing department for the completed *Arroyo Seco Master Plans* will be the Department of Public Works. The projects identified in the *Arroyo Seco Master Plans* are described and listed to easily translate to the City’s capital improvement program.

**Attachment 2:**

**City of Pasadena Comments on Draft Environmental Impact Report (DEIR) for  
Devil's Gate Reservoir Sediment Removal and Management Plan**

Comment  
177-23

The City of Pasadena offers the following comments on Los Angeles County Flood Control District's Draft Environmental Impact Report (October 2013, State Clearinghouse No. 2011091084) for the Devil's Gate Reservoir Sediment Removal and Management Project. As reflected below, the comments are provided by the following City departments: Fire, Human Services, Water and Power, Planning, Police, Public Health, Public Works, and Transportation.

Unless otherwise specified, these comments are applicable to the project as well as the alternatives.

Section	Paragraph	Comment
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**The Pasadena Fire Department provides the following comments:**

Comment  
177-24

2 - Project  
Description

2.3

The Fire Dept. understands the need for the project and requires adequate notification, should any obstacles/obstructions occur during the implementation of the project.

**The Pasadena Human Services and Recreation Department provides the following comments:**

Comment  
177-25

3.15 – Recreation  
/ Public Services

3.15.2

Use of the park is under-reported and has increased since data was provided. Statistics provided address only those users visiting the park as part of a permit or reservation-based activity, or as part of club or organization activity. Data provided for non-permit or reservation-based activities is insufficient. Passive recreational use such as walking/jogging, bird watching, etc. is not addressed or quantified and represents a significant percentage of overall recreational use within HWP.

Comment  
177-26

3.15 – Recreation  
/ Public Services

3.15.6

The Department of Human Services and Recreation (HS&R), as the Recreation Manager, must have the opportunity to review all final information and plans, so as to be able to redirect recreation use from Hahamongna, if possible and necessary, during any time during the scope of the project.

LACFD must coordinate with HS&R when the need to relocate any use from Hahamongna to another City facility is necessary, to ensure an alternate location is a good match for the use needing relocation. HS&R must be provided with a project schedule 6 months in advance and notified of the likelihood of HWP facility closure or impact with ample time (no less than 30

Section	Paragraph	Comment
3.15 – Recreation / Public Services	3.15.6	<p>days), since alternate sites have their own user groups and regularly permitted activities; considerable effort will be necessary to relocate any of the regular HWP permittees.</p> <p>HS&amp;R foresees temporary impacts to regularly permitted recreational activities on the west side of HWP, during the life of the project. Regular and timely coordination between LACDPW and the City of Pasadena HS&amp;R Dept. is necessary.</p>

Comment 177-26 continued

**The Pasadena Water and Power Department provides the following comments:**

2 - Project Description	2.4	<p>LACFCD is currently using Johnson Field with storing sediment and green waste. The agency acknowledges in the DEIR they will remove the material as part of the project. However, there is no reference if LACFCD will be restoring it to a specified agreed condition per the City prior to placement of the material. Condition #9 of the City permit PW-49-13 (September 3, 2013) states, "County agrees that upon commencement of large-scale sediment removal activity, removal of sediment from Johnson Field and its rehabilitation as a basin will be prioritized."</p>
2 - Project Description	2.9	<p>Table 2.9.1 lists projects that may have cumulative impacts with the Proposed Project. Pasadena Water and Power's (PWP) Recycled Water project should be included in the list for potential impacts since this project may undergo construction at the same time as LACFCD's Proposed Project. The proposed Monk Hill Treatment System optimization projects (new well and re-purposing of the Behner Water Treatment Plant) should also be added to the list of other projects evaluated as part of Cumulative Impacts.</p>
3 - Environmental Analysis	3.10.2	<p>Recommend not using "rocket fuel" when referring to perchlorate. Perchlorate is a component of solid rocket propellants. There are multiple types of rocket fuel, including various liquid propellants, solid propellants, and hybrid propellants.</p>
3.17 - Utilities	3.17.2	<p>This section does not reference or recognize that PWP owns a subterranean infiltration tunnel system, called the Devil's Gate Tunnel that is located below the Devil's Gate Dam and runs both northerly along the project area and southerly to Manholes 1 and 2. The tunnel that runs north of the dam consists of sections that are connected by manholes. A number of these manholes may</p>

Comment 177-27

Comment 177-28

Comment 177-29

Comment 177-30

Section	Paragraph	Comment
3.17 – Utilities	3.17.2	not be visible at ground surface. Under PWP's Recycled Water project, the Devil's Gate Tunnel will provide a source of non-potable water. LACFCD will need to locate and protect the tunnel and manholes from damages during the Proposed Project and Reservoir Management.
4 – Alternatives Analysis	4.3.0	<p data-bbox="568 493 1477 934">1. The Proposed Project (Configuration A) with annual Reservoir Management by the Los Angeles County Flood Control District (LACFCD), including alternative Configurations B, C, and D provide a benefit to the Water Department in the long-term by removing current and future sediment deposits in the reservoir thereby increasing percolation rates and recharge of surface runoff in the Monk Hill Sub-basin. The added water to the aquifer is a benefit by maintaining or increasing local groundwater levels. It will also benefit the aquifer and pumpers in the Monk Hill Sub-basin by providing a hedge against the risk for a reduction in future pumping rights similar to actions applied to pumpers of the Pasadena Sub-basin.</p> <p data-bbox="568 976 1477 1648">Fresh water is becoming much scarcer in southern California and every effort must be taken to maximize local run-off. Ironically, the Reservoir Management will promote releases of water during the Flow Assisted Sediment Transport (FAST) process, however, it is PWP's belief that the volume of water released or discharged during this process will be outweighed by the benefit gained from increases in recharge when percolation rates rise as less sediment is present behind the dam. There is also likely gain in percolation rates in the upper reservoir under the Proposed Project and annual Reservoir Management when the overall topography is reconfigured. The elevation of the proposed finish grade of the reservoir is higher further north of the dam face which promotes increased flow velocity. At the face of the dam the grade elevation is significantly shallower thus providing storage and results in a drop off in both flow velocity and fines. It is by design that the sediment fines are carried as close to the dam face as possible to maximize removal during the FAST process.</p>

Comment 177-30 continued

Comment 177-31

Section	Paragraph	Comment
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**The Pasadena Planning Department provides the following comments:**

2 - Project Description

2.1.6

The EIR doesn't properly characterize Hahamongna Watershed Park (HWP) or the nature of the surrounding land. The discussion of recreational facilities in the Hahamongna Watershed Park focuses on the Oak Grove area on the west side of the Hahamongna Basin and implies this area is separate from HWP. The Oak Grove area is contained within HWP. In addition to the facilities described in the DEIR, Hahamongna Watershed Park includes recreational improvements on the east side of the Basin, including trails and picnic areas. In addition, Pasadena Water & Power (PWP) maintains multiple water infrastructure improvements in this area including a series of spreading basins.

Comment 177-32

2 - Project Description

2.5.1

Sediment Removal Phase: This section does not specify the maximum or average size of the site that would be subject to grading activities at any given time or the maximum amount of grading/operations to occur per day. As a result, the EIR does not allow proper consideration of impacts related to biological resources, aesthetics, air quality, greenhouse gas emissions, noise, and traffic.

Comment 177-33

Sediment Disposal: The EIR does not provide enough detail to discern the maximum hourly or average daily impacts, nor can the reasonableness of the stated level of operations be considered. This section states, "The trucks are anticipated to haul an estimated 7,650 cy per day. Removal of the sediment, vegetation, trees, and organic debris is expected to require an average of 50 truck round trips per hour, with an estimated maximum of 425 truck round trips per day during excavation activities." Is the estimated 7,650 cy per day the maximum or average amount to be hauled? The maximum hourly and the average daily operations are not identified and therefore not adequately studied. Construction equipment is described as "including but not limited to approximately four front loaders with 4-cubic-yard buckets, two bulldozers, one excavator, one grader, one water truck, and two tender trucks..." The quantity of equipment listed seems inadequate to acquire the sediment, place 16-20 yards into a truck every 72 seconds, and maintain suitable access for the trucks throughout each day. The EIR

Comment 177-34

Section	Paragraph	Comment
2 - Project Description Comment 177-34 continued	2.5.1	seems to agree by acknowledging there may be more equipment. A more realistic equipment estimate is required to adequately study their impacts.
2 - Project Description Comment 177-35	2.5.2	Reservoir Management Phase, Vegetation Removal: This section states that vegetation will be removed annually by mowing or grubbing, but does not specify how that determination will be made and the amount of area subject to each method. The EIR does not specify the maximum or average size of the site that would be subject to maintenance activities at any given time. This level of detail must be provided to allow proper consideration of impacts related to biological resources, aesthetics, and air quality. This comment applies to all alternatives as well.
2 - Project Description Comment 177-36	2.5.2	Reservoir Management Phase, Vegetation Removal: Similar to the Sediment Removal Phase, this section does not identify a revegetation plan for the land disturbance area. How will the disturbed land be revegetated? The EIR must describe: What measures will be taken to prevent the propagation of non-native and/or invasive species? What measures will be taken to ensure that the revegetated areas function ecologically with the existing natural communities in the Hahamongna area? As previously noted, the City of Pasadena requests that 1) a revegetation plan be developed by a qualified restoration ecologist; 2) that only native species be planted; and 3) that revegetation occur concurrently with sediment removal, such that the minimum amount of denuded land necessary to conduct sediment removal activities exist at any given time.
2 - Project Description Comment 177-37	2.5.2	Reservoir Management Phase, Option 1, Sediment Excavation/Trucking Offsite: This section states, "It is estimated, based on past storm events, that sediment excavation/trucking offsite will be required to remove an average of 13,000 cy of sediment annually. Based on an estimated removal of 4,800 cy per day, it is expected this will occur over an estimated two-week period, Monday through Friday." These estimates must be clarified, as 4,800 cy per day for 10-working days would result in 48,000 cy of sediment removal rather than 13,000 cy. Also, the equipment fleet that would be utilized for this annual operation must be identified, so that the impacts can properly be analyzed.

Section	Paragraph	Comment
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2 - Project Description	2.5.2	Reservoir Management Phase, Sediment Excavation/Trucking Offsite: This section further states, "A moderately large sediment removal event, anticipated to involve around 170,000 cy, could take place over an estimated 12-week period during the late summer/early fall following the vegetation maintenance." The EIR must provide details for this level of operation, including average and maximum daily operations, maximum hourly truck trips, the equipment fleet that would be utilized for this annual operation, etc. Such information is necessary to allow proper consideration of impacts related to air quality, greenhouse gas emissions, noise, and traffic. Regarding Option 2, Vegetation Removal: Similar to the Sediment Removal Phase and Option 1, this section does not specify the maximum or average size of the site that would be subject to grading activities at any given time. This level of detail must be provided to allow proper consideration of impacts related to biological resources, aesthetics, and air quality.
	2.5.2	Reservoir Management Phase, Option 2, Vegetation Removal: Similar to the Sediment Removal Phase, this section does not identify a re-vegetation plan for the land disturbance area. In fact, this section states, "All vegetation and sediment outside the reservoir management footprint will be allowed to naturally re-establish and/or remain in place." Should this statement be interpreted to mean that the County does not plan to manage the re-vegetation of the scarred areas? What measures will be taken to prevent the propagation of non-native and/or invasive species? What measures will be taken to ensure that the re-vegetated areas function ecologically with the existing natural communities in the Hahamongna area? As previously noted, the EIR must include 1) a re-vegetation plan be developed by a qualified restoration ecologist; 2) that only native species be planted; and 3) that re-vegetation occurs concurrently with sediment removal, such that the minimum amount of denuded land necessary to conduct sediment removal activities exist at any given time.
	2.9	It is not clear what the criteria are for related projects. The Lincoln Avenue Specific Plan should be considered as a related project as it is relatively close to the project site and envisions additional development on Lincoln Avenue. The EIR can be found at this link:  <a href="http://cityofpasadena.net/Lincoln Avenue Specific Plan.aspx">http://cityofpasadena.net/Lincoln Avenue Specific Plan.aspx</a>

Comment  
177-38

Comment  
177-39

Comment  
177-40

Section	Paragraph	Comment
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3.4 - Aesthetics	3.4.2	<p>Scenic Vistas: The City does not agree that scenic vistas are not identified in the Hahamongna Watershed Park Master Plan. This EIR section states, "Hahamongna Watershed Park Master Plan area, including the Proposed Project site, does not contain any designated scenic vistas (City of Pasadena 2002)." This citation appears to reference a statement in the Arroyo Seco Master Plan Master EIR, which in turn referenced the City's former (1994) General Plan. A more relevant reference is the Hahamongna Watershed Park Master Plan. This Master Plan recognizes in various narratives the quality of views of the Hahamongna basin from surrounding public vantage points and establishes uses to take advantage of such views including trails and overlooks (e.g., Dam Observation Trail, Sunrise Overlook, and Sunset Overlook).</p>
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Comment  
177-41

3.4 - Aesthetics	3.4.3	<p>City of Pasadena General Plan: The reference to Objective 9 and Policy 9.5 are in the Land Use Element of the General Plan, not the generic General Plan.</p>
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City of Pasadena General Plan: This section should also cite objectives and policies in the Green Space, Parks & Recreation Element and Master Plan adopted November 2007. This element can be found at this link:

[http://cityofpasadena.net/Planning/CommunityPlanning/Green\\_Space\\_Element\\_and\\_Master\\_Plan/](http://cityofpasadena.net/Planning/CommunityPlanning/Green_Space_Element_and_Master_Plan/)

At a minimum, these citations must include:

*Policy 1.2 – Protect Open Spaces: Protect natural open areas, watersheds, and environmentally sensitive areas such as Hahamongna, Eaton Canyon, riparian areas, and other open spaces.*

**OBJECTIVE 2 – PRESERVATION AND PROTECTION OF THE ARROYO SECO AND ADJACENT OPEN SPACE AREAS:**  
*Recognize the importance to Pasadena of the history, cultural resources, and unique character of the Arroyo Seco, and conserve and enhance these assets.*

Comment  
177-42

Section	Paragraph	Comment
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3.4 - Aesthetics	3.4.3	<p><i>Policy 2.1 – Arroyo Seco Planning: Fully implement all master plans and design guidelines for the Arroyo. This includes the Lower Arroyo Master Plan, the Hahamongna Watershed Park Master Plan, and the Central Arroyo Master Plan. (LUE Policy 9.2)</i></p> <p><i>Policy 2.3 – Balance Recreation with Environmental Protection: Implement the Arroyo Seco Master Plans by balancing recreational opportunities with protection and restoration of the ecosystem, while recognizing the important existing water resources and flood management functions of the area.</i></p> <p><i>Policy 2.4 – Promote multi-faceted use of the Arroyo: Through implementation of the Arroyo Seco Master Plans, continue to maintain and enhance the area as a prime resource for quality of life of Pasadena residents.</i></p>
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Comment 177-42 continued

3.4 - Aesthetics	3.4.6	<p>Impacts and Mitigation, Impacts AESTHETICS-1 and AESTHETICS-3: The project's impact on views and visual character/quality are rightfully identified as significant impacts. However, no mitigation measures are offered to reduce such impacts. Suggestions for mitigation include limiting the acreage of the land scar that is visible at any one time and a managed revegetation plan that occurs simultaneously with sediment removal.</p>
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Comment 177-43

		<p>Furthermore, PM10 emissions identified in Table 3.5-6 are unrealistically low. Given that the project's primary purpose is to move soil, daily excavating, grading, scraping, loading, and hauling activities would be of the most intense variety; and thus would presumably generate dust emissions well in excess of the SCAQMD thresholds of significance (150 lbs/day), not just a mere fraction thereof. As previously noted the DEIR fails to provide adequate detail about the peak daily grading activities (e.g., maximum daily acreage of ground disturbance, maximum daily hauling activities, etc.) and thus fails to provide the reader with the information necessary to adequately consider the air pollution impacts of the project.</p>
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Comment 177-44

3.5 - Air Quality	3.5.6	<p>Table 3.5-6 Unmitigated Sediment Removal Emissions: This table identifies maximum daily PM10 emissions to be 13.70. However, PM10 emissions from fugitive dust alone are estimated to be 27.30. This must be explained and the study revised as necessary.</p>
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Comment 177-45

Section	Paragraph	Comment
3.6 - Biological Resources Comment 177-46	3.6.3	Applicable Regulations, Local: The City's Tree Protection Ordinance was amended on January 25, 2010. The list of trees was revised and the Finding # 6 was changed to <i>"The project includes a landscape design plan that emphasizes a tree canopy that is sustainable over the long term by adhering to the adopted replacement matrix."</i> The study must be revised to correctly cite the 2010 Tree Protection Ordinance and its revised findings.
3.6 - Biological Resources Comment 177-47	3.6.6	Impacts and Mitigation, BIOLOGY-1: The conclusion that the project would not significantly impact any special-status plants is based on surveys conducted in 2010. It is unclear how the use of these studies supports the conclusion that vegetation removal to be conducted in 2015-2020 and beyond, would not impact special-status plants. Given the long-term nature of the project and the dynamic nature of the site's ecological system, annual pre-grading plant surveys are warranted.
3.6 - Biological Resources Comment 177-48	3.6.6	Impacts and Mitigation, BIOLOGY-1: The City does not agree with the EIR findings. The project would substantially reduce habitat for Least Bell's Vireo, a State and fed listed endangered species and four Species of Special Concern. The City views this loss of habitat as a significant impact in contradiction to the County's conclusion.
3.6 - Biological Resources Comment 177-49	3.6.6	<p>BIOLOGY-2: The City disagrees with the EIR. The project would impact sensitive habitat as detailed below. mitigation is proposed at a 1-1 ratio and impacts are then considered less than significant:</p> <ul style="list-style-type: none"> <li>• 1.1 acres of Riversidean Alluvial Fan Sage Scrub</li> <li>• 51.4 acres of Riparian Woodland</li> <li>• 9.3 acres of Mule Fat Scrub</li> </ul> <p>The loss of sensitive habitat and 1:1 replacement ratio is not sufficient to deem the impact less than significant.</p>
3.7 - Cultural Resources Comment 177-50	3.7.3	Applicable Regulations, City of Pasadena Comprehensive General Plan: Last sentence – the policies that follow are from the Land Use Element, not the Land Use and Mobility Element.

Section	Paragraph	Comment
3.7 - Cultural Resources	3.7.6	Mitigation Measures: MM CUL-1 states, "If sediment removal or reservoir management activities exceed the depth of the historic flood deposits and encounter native sediments, these activities will be monitored by a qualified archaeologist." How will the County determine if activities will exceed the depth of flood deposits? Will analysis occur prior to grading? The EIR must provide the estimated depth/contours at which "native sediments" would be encountered and consideration of whether excavation below such depths/contours is necessary.
Comment 177-51		
3.8 - Geology and Soils	3.9.2	Local GHG Inventory: This DEIR section needs to be completely revised. The 2009 Greenhouse Gas Inventory was a draft that was never adopted and was discredited by the Environmental Advisory Commission and Planning Commission. In 2013, a Greenhouse Gas Inventory was prepared and adopted by the City Council on November 18, 2013, therefore, the DEIR does not provide adequate analysis. The staff report and Inventory can be found at this link:
Comment 177-52		
		<a href="http://ww2.cityofpasadena.net/councilagendas/2013%20agendas/Nov_18_13/agendarecap.asp">http://ww2.cityofpasadena.net/councilagendas/2013%20agendas/Nov_18_13/agendarecap.asp</a>
		Also correct the reference #44 on page 631.
3.13 - Mineral Resources	3.12.3	Applicable Regulations, City of Pasadena General Plan: Clarify which elements of the Pasadena General Plan were reviewed.
Comment 177-53		
3.14 - Noise and Vibration	3.14.3	Local Regulations, City of Pasadena General Plan Noise and Vibration Policies: Need to clarify that these policies (7b, 7c, and 7d) come from the Noise Element of the General Plan. There are additional policies and objectives in this element that might be relevant.
Comment 177-54		
		<a href="http://cityofpasadena.net/Planning/CommunityPlanning/GeneralPlanNoiseElement/">http://cityofpasadena.net/Planning/CommunityPlanning/GeneralPlanNoiseElement/</a>
		References on page 631 should also include the Noise Element of the General Plan.

Section	Paragraph	Comment
3.14 - Noise and Vibration	3.14.3	Regulatory Framework, City of Pasadena Municipal Code: The EIR considers this project to be "construction" and thus applies only the Construction Noise portion of the City's Noise Ordinance (PMC 9.36.070 and 9.39.080). However, the proposed project is both long-term construction and ongoing annual maintenance and operation. Thus, the project should be evaluated against the entire City Noise Ordinance, including 9.36.050 General noise sources.
3.15 – Recreation / Public Services	3.15.3	City of Pasadena General Plan: The reference to Objective 9 and related policies are in the Land Use Element of the General Plan, not the generic General Plan.

Comment  
177-55

Comment  
177-56

**The Pasadena Police Department provides the following comments:**

2 - Project Description	2.5.1	<p>In review of the Environmental Impact Report and the Traffic Impact Analysis, the research data did not adequately provide a clear analysis regarding a coordinated traffic plan along the 210 freeway corridor ramps. It is the assessment of the Pasadena Police Department (PD) that the impact will likely occur at the Berkshire Avenue and Arroyo Blvd on/off ramps in the City of La Canada and may cause moderate slowdowns for local Pasadena residents using the freeway system for exits such as Windsor Avenue and Arroyo Blvd. Moreover, the Berkshire Avenue ramp is a primary exit for those who attend La Canada High School, creating significant traffic impacts in the mornings and afternoons. It is recommended that the report reflect an inclusive analysis of the impact at specific on/off ramps such as the Berkshire Avenue exit in coordination with the City of Pasadena and the Pasadena Police Department.</p> <p>The Traffic Impact Analysis did not sufficiently provide calculation data of the potential impact to traffic flows during major events at the Rose Bowl. In 2014, Pasadena will host the UCLA football season between September and December as well as concerts and other special at the Rose Bowl and other Pasadena venues. In review of the report, the PD is concerned with traffic impacts during major events for the duration of the sediment removal</p>
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Comment  
177-57

Section	Paragraph	Comment
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2 - Project Description	2.5.1	phase which is planned to occur on Saturdays between 8am-5pm. Therefore, it is recommended that the EI report reflect a specific traffic plan regarding the sediment removal with consideration for Rose Bowl and other significant events. This recommendation should assist in the design of a traffic strategy to mitigate potential problems prior to the project start date.

Comment 177-57 continued

**The Pasadena Public Health Department provides the following comments:**

3.14 - Noise and Vibration	3.14.6	Possible health impacts of dust: Due to the potential risk of soil-endemic pathogens particularly Coccidioidomycosis, LAC or AQMD, or the like, should reduce the risk of exposure by wetting the soil before excavation. This will also help prevent exacerbation of respiratory symptoms of high-risk residents who may be exposed.
		Noise considerations: Require that any construction equipment comply with the noise ordinance restrictions outlined in the City of Pasadena Municipal Code and all workers must comply with OSHA guidelines for employee safety. In addition, residents, schools and businesses in the impacted area must be notified that the noise levels may be affected beginning 2014 and ending 2019. Require noise monitoring be included as part of the requirement and be funded to ensure that there are no long-term effects.
		Recommend that an Environmental Impact Assessment be completed to look at all other environmental impacts.

Comment 177-58

Comment 177-59

Comment 177-60

**The Pasadena Public Works Department provides the following comments:**

2 - Project Description	2.1.1	The EIR provides a brief mention of the project's location within the Arroyo Seco watershed but does not include a graphic representation. Provide a map that shows the Arroyo Seco watershed including the project location, the Arroyo Seco stream and the L.A. River. It would contribute to a greater understanding of the Devil's Gate Reservoir's relationship to the Arroyo Seco watershed.
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Comment 177-61

	<b>Section</b>	<b>Paragraph</b>	<b>Comment</b>
Comment 177-62	2 - Project Description	2.1.6	Rose Bowl Riders also sublets to Move A Child Higher (MACH1), an organization that provides equine assisted activities to riders with disabilities.
Comment 177-63	2 - Project Description	2.5.1	The City's Berkshire Creek Restoration project will likely require fill material as a part of the implementation. It is anticipated that this work will take place while the County's sediment removal efforts are underway. Coordination between LACFCD and the City of Pasadena to utilize sediment for this fill material, should the material be deemed suitable for this use, that would otherwise be removed from the site will contribute to reductions to traffic and air quality impacts.
Comment 177-64	2 - Project Description	2.5.1	Fig. 2.5-1 shows portions of the access roads to be outside the project boundary but improvements to the road are described in the project description. This discrepancy is confusing and affects a reviewer's ability to fully understand the proposed access road implementation. These access roads must be described in greater detail. The DEIR does not describe or study potential impacts of modifications to the existing paved trail on the west side to protect trail users during sediment removal or maintenance operations or whether the trail surface in this area be strengthened to accommodate truck and equipment traffic. For the east access drive, how will the existing trail be accommodated as a part of this design? Figure 2.5-6 appears to include the approach to the east side trail undercrossing within the proposed access road, but this is not a suitable vehicular route. If there is a specific reason why this area is shown as part of the access road, it must be described in detail in the EIR.
Comment 177-65	2 - Project Description	2.5.1	The City will require street repair for City streets including, but not limited to, Oak Grove Drive, Arroyo Blvd., and Windsor Avenue as deemed necessary to repair damage caused by sediment hauling.
Comment 177-66	2 - Project Description	2.5.2	The EIR does not correctly describe the project footprint related to the reservoir management phase. Section 2.5.2 describes the effects of the Flow-Assisted Sediment Transport (FAST) method as finer grained sediment being transported down the Arroyo Seco Channel. The effects of this process are not studied in the EIR though. The EIR states "the majority of these FAST operations will be similar to historic FAST operations and that finer sediment discharged during FAST operations will be

Section	Paragraph	Comment
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2 - Project Description

2.5.2

transported to the Pacific Ocean via Arroyo Seco Channel..." The City's observed results of FAST indicate substantial sediment drops in the soft-bottom areas under the CA-134 and Colorado Street bridges. Over time, sediment build-up can create an adverse effect to adjacent lands and downstream City improvements. The EIR must include a detailed analysis of these downstream effects of FAST including projected sediment accumulation and potential flooding. Additionally, LACFCD must include active sediment removal from these downstream areas as part of the sediment management phase and not rely solely on discharge to move deposited sediment further downstream.

Comment 177-66 continued

2 - Project Description

2.5.2

The County must provide 72 hours minimum notification to the City Public Works (PW) Department in advance of beginning a FAST Operation for all FAST operations described for the project and alternatives.

Comment 177-67

2 - Project Description

2.5.2

Due to sediment accumulation in the Arroyo Seco Channel as a result of FAST operations, a separate sediment management MOU between the City and LACDPW will need to be developed to insure protection to the soft-bottom sections of the Arroyo Seco and downstream improvements in Pasadena.

Comment 177-68

3.4 - Aesthetics

3.4.2

The viewpoint #5 image is misleading and should reflect a more panoramic view, typical of what a viewer's eyes provide. Additionally, a more important viewpoint is found just north at the City's recently implemented Sunset Overlook project. An interpretive sign panel containing a panoramic image of this vista (below) was placed at this location because of the inclusive view of the Park.

Comment 177-69



Section	Paragraph	Comment
3.4 - Aesthetics	3.4.6	Impacts and Mitigation, Visual Change: The EIR uses "view blockage" as one factor in determining the overall visual change of an area. It is improper and misleading to include this as a measure of project impact. The nature of the project is not to construct something that will block a view; rather it removes something that as a result, affects a view. Including view blockage as a measure and ranking it as "none" for each view results in skewing the overall visual change rankings downward.
3.5 - Air Quality	3.5	The City strongly encourages LACDPW to aggressively pursue the reduction of air quality impacts through the requirement of the lowest-emission and alternative-fuel vehicles available for this project. Within the anticipated timeframe of this project, the County will be required to have completed the conversion of heavy trucks to alternative fuel or clean diesel. The County could study the feasibility of imposing such requirements onto the contractor who will perform this work and/or commit to using some or all of their own fleet for hauling.
3.5 - Air Quality	3.5.2	The MACH1 organization is a certified Premier Accredited Center (PAC) as determined by the Professional Association of Therapeutic Horsemanship International (PATH). This certification is required for MACH1's professional good-standing and by the City to establish MACH1 as the most qualified provider of their services. Condition F34 of PATH's accreditation standards require MACH1 to have system in place to minimize exposure to dust for both humans and animals. MACH1 does have this system in place, but fugitive dust created by sediment removal and sediment management activities may overwhelm MACH1's efforts and potentially jeopardize their PAC status. The County must: ensure that all best management practices related to fugitive dust control are utilized to their fullest, notify the City and MACH1 in advance of upcoming activities in the vicinity of the MACH1 facility, and coordinate work activities with the City and MACH1 to schedule activities in the vicinity of MACH1 during MACH1's non-operational times.
3 - Environmental Analysis	3.6.6	The City has identified areas where habitat mitigation efforts can be prioritized. Refer to 'Habitat Establishment and Restoration Projects' identified on pg.3-18 of the HWP Master Plan as well as the Berkshire Creek Restoration project, as appropriate.

Comment  
177-70

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177-71

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177-73

Section	Paragraph	Comment
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3 - Environmental Analysis	3.6.6	
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Comment 177-74

The City has established a thorough habitat restoration plan as part of the Hahamongna Watershed Park master plan. The City will review the final Habitat Restoration Plan for the project prior to its finalization. The City also requests being a part of any consultations between regulatory agencies dealing with habitat establishment/restoration and the County for this project, to be able to clearly explain the City's habitat restoration projects for the park and to ensure the agencies are aware of the City's overall plans for the park.

3.12 - Land Use and Planning	3.12.6	
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Comment 177-75

Mitigation Measures, MM LAN-1: The mitigation measure oversimplifies the recreational uses in HWP. It is not sufficient to simply purpose redirecting recreational use to another facility as HWP is a unique setting and similar facilities are not within a close distance. The mitigation measure must be revised to include provisions that the City must review and approve suggested public information and redirection plans related to recreation.

3.13 - Mineral Resources	3.13.2	
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Comment 177-76

The EIR states that sediment removal is not expected to involve arroyo stone, however, the City's observations indicate the amount of sediment transported into the basin since the Station Fire has completely buried an area where the City was stockpiling a large collection of large boulders for various projects in HWP. For Arroyo stone that may be produced by the sediment removal effort, the City requests coordination with the County and its contractor on the preservation and relocation of these valuable mineral resources.

3.14 - Noise and Vibration	3.14.3	
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Comment 177-77

The EIR identifies HWP as the most impacted sensitive receptor for noise, but dismisses this due to County and City noise exemptions for public works projects. Park tenants and other recreational users must be made reasonably aware in advance when noise impacts are likely to be greater in areas of the park. The City requests the County provide anticipated work schedules and locations in advance and provide timely notification to the City and HWP tenants of expected work. In the event of HWP tenant events, the County should make every effort to direct work efforts away from these scheduled events.

Section	Paragraph	Comment
3.14 - Noise and Vibration Comment 177-78	3.14.3	Table 3.14-5 lists Hahamongna Watershed Park as a sensitive receptor for noise, but table 3.14-11 does not for vibration. HWP must be included as a sensitive receptor for vibration due to potential effects on horses and domestic animals boarded and visiting the park. Panic reactions by animals due to vibration could become a public safety issue and should be adequately studied in the EIR.
3.15 – Recreation / Public Services Comment 177-79	3.15.2	Existing Conditions: The City disagrees that recreational use of the basin or any other portion of Hahamongna Watershed Park is "unofficial". The park area within the project footprint is a specific recreational draw within the City that is not duplicated elsewhere.
3.15 – Recreation / Public Services Comment 177-80	3.15.2	Recreation Uses: As stated earlier, the MACH1 organization is not included in the list of recreational users.
3.15 – Recreation / Public Services Comment 177-81	3.15.2	Area Recreational Facilities. The discussion of Area Recreational Facilities is too broad. Many of the facilities described do not provide similar recreational features, are a considerable distance away, and in 3 cases, are private facilities. This list and discussion must be revised to suggest reasonable recreational alternatives to HWP. Figure 3.15.1 Exhibit is misleading in the way it shows HWP a sitting outside the project boundary. Revise this exhibit to show actual boundaries of HWP and other nearby parks.
3.15 – Recreation / Public Services Comment 177-82	3.15.6	City staff must coordinate with LACDPW staff and consultants during the precise design and engineering efforts to help establish limits of grading to protect existing and future recreational resources.
3.15 – Recreation / Public Services Comment 177-83	3.15.6	The EIR improperly states that sediment removal activities will not limit the use Oak Grove Disc Golf Course. The course footprint extends into the project basin area. Implementation of the project or alternatives will result in the permanent loss of a portion of the course or require a reconfiguration of the course to avoid this impact.
3.15 – Recreation / Public Services Comment 177-84	3.15.6	The City does not agree that the Altadena crest trail must be closed during the sediment removal phase. The County must provide a temporary re-route of the trail segment and way finding signs to maintain the availability of this trail for public use.

Section	Paragraph	Comment
3.15 – Recreation / Public Services <small>Comment 177-85</small>	3.15.16	There are potential significant, periodic impacts to Rose Bowl Riders, Tom Sawyer Camps and MACH1 operations. The County must coordinate with the City and these tenants to minimize operational impacts to these organizations and their associated City services.
3.16 - Transportation <small>Comment 177-86</small>	3.16.0	The Metro Gold Line extension is scheduled to open at end of 2015. The County could adjust their anticipated project start to allow commuters the opportunity to use Metro instead of driving.
3.16 - Transportation <small>Comment 177-87</small>	3.16.1	The City recommends no work on Sat/Sun/Holidays. This will reduce or eliminate Rose Bowl and other scheduled event conflicts, and preserve greatest amount of recreational enjoyment for park users.

**The Pasadena Transportation Department provides the following comments:**

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3.16 -  
Transportation

3.16.2

Proposed Project Site and Freeway Access:

- DEIR states: "Trucks will access the Proposed Project site from I-210 by exiting at Windsor Avenue/Arroyo Boulevard, turning north at Windsor Avenue, turning left onto northbound Oak Grove Drive, and then entering the eastern reservoir access road."
- With 50 inbound trucks per hour assumed, it is anticipated that a queue of trucks could occur through the intersection and along Oak Grove Drive as they wait to enter the eastern reservoir access road, especially during start and end times for La Canada High School or during Rose Bowl events. This may adversely impact emergency service vehicles entering or existing the Bowl. County needs to evaluate potential impacts and include appropriate mitigation.
- Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines:

(<http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821>)

The County must meet with the City to determine the street segments for analysis and appropriate mitigation included.

- What is the truck turning radius? The trucks turning into Oak Grove Drive may encroach onto the adjacent traffic lane before entering the site. Please provide a schematic drawing for further evaluation of potential impacts.
- Will there be a planned staging area for trucks to queue, and a program in place for communication between queued trucks to enter the site? Without such programming, the project could potentially cause congestion, especially during the school pick-up and drop-off periods or during Rose Bowl events. Please evaluate potential impacts and include appropriate mitigation.

Comment  
177-88

Comment  
177-89

**Section**

**Paragraph**

**Comment**

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3.16 -  
Transportation

3.16.6

Impacts and Mitigation: Devil's Gate Reservoir to/from I-210:

- Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines:  
<http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821>  
The County shall meet with the City to determine the street segments for analysis of potential impacts.
- DEIR states: "Proposed Project haul trucks would avoid using the Berkshire Place and I-210 eastbound ramps intersection during the AM peak period by instead using the Windsor/Arroyo and I-210 ramps. This would require the median on Oak Grove Drive to be restriped to a Two Way Left Turn Lane (TWLTL). Trucks exiting the Devil's Gate Reservoir driveway will cross the two lanes of oncoming westbound traffic on Oak Grove Drive and utilize the TWLTL if necessary to merge into the eastbound traffic. The changes to Oak Grove Drive would require the approval from the City of Pasadena."
- Provide a schematic showing the proposed striping plan and indicate how many cars may be accommodated inside the TWLTL.
- 50 outbound trucks per hour suggests that the proposed 2-way left turn lane along Oak Grove Drive may not provide enough queue length to accommodate trucks without encroaching onto through traffic lanes. The truck turning movements may cause congestion, especially during the school pick-up and drop-off periods where congestion at this segment is greatest and may potentially prevent such turning movement from occurring. Please evaluate potential impacts and include appropriate mitigation.

Comment  
177-90

Comment  
177-91

Comment  
177-92

Comment  
177-93

Section	Paragraph	Comment
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3.16 -  
Transportation

3.16.6

Impacts and Mitigation: Table 3.16 LOS for Devil's Gate Reservoir to/from I-210:

- Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines:

<http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821>

- The County shall meet with the City to determine the street segments for analysis and appropriate mitigation included.

Comment  
177-94

J - Traffic Report

Ch. 1

Project Description:

With 50 trucks per hour proposed, the proposed 2-way left turn lane along Oak Grove Drive may not provide enough queue length to accommodate the trucks without encroaching onto the thru traffic lanes. Is a staging area planned for trucks to queue, and a program in place for communication between queuing trucks to enter the site? Without such programming, the project could potentially cause congestion, especially during the school pick-up and drop-off periods. Please evaluate potential impacts and include appropriate mitigation.

Comment  
177-95

J - Traffic Report

Ch. 2

Level of Service Analysis Criteria For Local Jurisdictions:

As stated on p. 31: "It is important to note that each city/jurisdiction has different criteria and thresholds to identify the lowest acceptable service levels." However, the analysis does not reflect City of Pasadena thresholds as conveyed in an email dated August 1, 2011 and stated in the traffic impact study guidelines.

Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines:

<http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821>

The County must meet with the City to determine the street segments for analysis and appropriate mitigation included.

Comment  
177-96

Section	Paragraph	Comment
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J - Traffic Report	Ch. 3	
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Existing plus Project Traffic Analysis:

Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines:

<http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821>

The County must meet with the City to determine the street segments for analysis and appropriate mitigation included.

J - Traffic Report	Ch. 4	
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Project Trip Generation:

As stated in a July 6, 2012 email, justify your methodology (and include in the report) for arriving at a PCE of 2.5 for inbound trucks, and 3.0 for outbound trucks.

J - Traffic Report	Ch. 5	
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Route Summary and Mitigations/Potential Impact Reduction Measures:

The report indicates: "Berkshire Place (EW) and I-210 Freeway Eastbound Ramps (NS): The Intersection is anticipated to operate at an unacceptable LOS during the AM peak period. The optional measures of this intersection are beyond of the scope of the project. The Haul Route is, therefore, anticipated to continue to operate at an unacceptable LOS during the AM peak period." It is recommended that school operations not be disrupted during sediment removal operations. Programming to address this issue shall be included in the report. Furthermore, signage at the Devil's Gate Dam and Reservoir driveway as a traffic mitigation measure may not be sufficient to manage traffic during the peak hours. Use of traffic control personnel could provide more guidance and safety to motorists at these locations.

**Response to Comment Letter #177 (City of Pasadena)**

**Response to Comment 177-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) will include these in the Response to Comments within the Final Environmental Impact Report (EIR) and will respond to the comments contained in this letter.

**Response to Comment 177-2:**

Comment noted.

**Response to Comment 177-3:**

LACFCD appreciates the opportunity to continue to coordinate with the City of Pasadena regarding this Project.

**Response to Comment 177-4:**

LACFCD notes that the Hahamongna Watershed Park Master Plan (HWPMP) is an important policy document for the area, including the Proposed Project site. Analysis of consistency with the HWPMP was included in the Draft EIR, Section 3.12 Land Use and Planning.

**Response to Comment 177-5:**

See Response to Comment 177-4.

**Response to Comment 177-6:**

As noted in the comment, the HWPMP was prepared in 2003. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average storm seasons; which has correspondingly increased the amount of sediment requiring removal.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's HWPMP. Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. Overlays of the Proposed Project and Alternatives boundaries on the Hahamongna Watershed Park Master Plan are provided on LACFCD's website as a quick reference. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

Table ES-1 of the Draft EIR lists all Mitigation Measures proposed for the Proposed Project. These Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and

negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

Mitigation locations will comply with CDFW recommendations as follows: first, onsite; second, offsite within the Arroyo Seco Watershed; and third, offsite within the greater Los Angeles River watershed. If offsite mitigation sites are needed, several offsite areas within the Arroyo Seco/Los Angeles River watershed that will conform to the HWPMP are being considered for restoration. As mentioned above, Alternative 3 will allow for the largest area of site replanting and mitigation to take place within the reservoir footprint.

**Response to Comment 177-7:**

A Sediment Transport Capacity Analysis was conducted to determine how sediment would move through the Arroyo Seco and Los Angeles River under a sluicing alternative. Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. As discussed in Section 4.7 and in the Sediment Transport Capacity Analysis (Appendix K), most of these downstream locations would be in the Arroyo Seco, with deposits primarily occurring in and around the two soft bottom areas. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

FASTing operations have been routinely used at Devil's Gate Reservoir and result in relatively small amounts of finer grained sediment passing through the reservoir. After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. As with the ongoing use of FASTing, future FASTing operations would naturally remove sediment of finer particle size from the reservoir through the dam and on to the ocean.

**Response to Comment 177-8:**

See Response to Comment 177-6. Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper

east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 177-9:**

See Response to Comment 177-6.

As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish, similar to that described in the HWPMP.

The Draft EIR determined that visual impacts associated with reservoir management will be less than significant and, therefore, will not require mitigation. Reservoir management impacts to visual character under both of the Proposed Project's management options will result in a lower degree of contrast than seen during sediment removal. Due to the rapid growth of wetland herbaceous plants, it is expected that during the majority of the year the Proposed Project site will appear vegetated. In addition, as with existing conditions, vegetation conditions on the Proposed Project site, including height and density, would change on a regular basis due to seasonal conditions, water flow/views, water storage, and sediment conditions.

Alternative 3 would closely resemble the configuration, aesthetics, habitat restoration, and vegetation management as described in the HWPMP.

**Response to Comment 177-10:**

Air quality and noise impacts were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. The Draft EIR analyzed impacts to sensitive uses, including residents, recreational uses, and schools, adjacent to the Proposed Project site and along the proposed haul routes. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related impacts.

**Response to Comment 177-11:**

See Response to Comment 177-6.

All facilities, including open channels, dams, bridges, and debris basins under LACFCD jurisdiction, are required to meet Capital Flood protection levels. The Capital Flood is characterized by the Hydrology Manual as “the runoff produced by a 50-year frequency design storm falling on a saturated watershed (soil moisture at field capacity)” (Public Works, Hydrology Manual, 2006). A 50-year frequency design storm is defined as the magnitude of a storm that is likely to occur once every 50 years. Therefore, the chance of a 50-year storm occurring in any given year is 1 out of 50, or a 2 percent, chance of occurring. “Capital Flood protection also requires adding the effects of fires and erosion under certain conditions” (Public Works, Hydrology Manual, 2006).

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring the closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential for flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website.

Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders, including the Pasadena Police and Fire Departments, and the California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

**Response to Comment 177-12:**

The Draft EIR, Section 3.14, found that through adherence with all applicable noise regulations, the Proposed Project would result in a less than significant impact from onsite construction noise impacts and no noise mitigation was required. The stated mitigation of restricting 200+ horsepower engines from operating within 180 feet of residences was from mitigation developed to reduce vibration impacts to less than significant levels with implementation of Mitigation Measure MM N-1, as previously listed in the Draft EIR.

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a 1-decibel (dB) increase on Berkshire Place east of the Interstate 210 (I-210) northbound ramps. A 1-dB increase is well below the 3-dB increase threshold of perception. The roadway noise impact analysis provided in the Draft EIR found that the Proposed Project would result in less than significant impacts for all analyzed alternatives. No further analysis is required or warranted.

The Proposed Project was designed to limit the need for trucks to back up by having trucks enter at one entrance road and exit at a separate road to encourage circular flow. The backup beeps on the trucks and equipment are an Occupational Safety and Health Administration (OSHA) requirement, with the

priority being to protect the safety of both the workers on site and the general public. In addition, contractors will be required to comply with local noise ordinances as stated in the Draft EIR, Section 3.14 Noise and Vibration.

**Response to Comment 177-13:**

See Response to Comment 177-6. In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cubic yards (cy) was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. It should be noted that design debris amounts can be produced from a freshly burned watershed with rainfall amounts considerably below capital flood levels (a 5- to 10-year frequency storm). Similarly, higher intensity rainfall could produce more debris. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 177-14:**

Future maintenance activities are described in Section 2.5.2 of the Draft EIR. After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment

from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. Moderately large sediment deposits have the potential to occur during a storm season; but it is anticipated that, even with this type of event, the newly deposited sediment could be removed in one season. A moderately large sediment removal event, anticipated to involve around 170,000 cy, could take place over an estimated 12-week period during the late summer/early fall following the vegetation maintenance. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. The maintenance activities will take place within the LACFCD easement. Regardless of these estimates, Devil's Gate Reservoir is a dynamic system in which the amount of sediment deposited in the reservoir each year is heavily dependent on rainfall amounts received; and, thus, the amounts vary greatly. For this reason, defining strict sediment removal quantities is not possible due to unforeseeable results of weather conditions.

**Response to Comment 177-15:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Project Site will have a potentially significant impact. This intersection is located in the City of La Cañada Flintridge and is outside of the City of Pasadena. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. Alternative haul routes with the potential to reduce impacts and/or provide flexibility were analyzed in the Draft EIR, Section 4.8. In order to provide more flexibility, a haul route segment previously analyzed in the Traffic Impact Analysis was included in Alternative 5 as an optional haul route along Berkshire Place to and from the Proposed Project Site and I-210 (see Section 4.8 of the Final EIR).

The volumes on Interstate 210 (I-210), the on/off-ramps, and the local roadways within the study area included those potentially impacted by the Proposed Project. The analysis provided a conservative project condition volume that accounts for expansion and regional growth within the study area. The volumes also account for redistribution of traffic.

LACFCD will implement the mitigation measures described in the Draft EIR, Section 3.16.6. Also as discussed in the Draft EIR, Section 3.16.6, potential impact reduction measures could reduce impacts to less than significant. These measures cannot be legally imposed by LACFCD; however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will be made to coordinate with and receive approval from the jurisdictional agencies to implement the impact reduction measures, but LACFCD cannot guarantee that the measures will be implemented. LACFCD will continue to work with local organizations and the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the project site.

**Response to Comment 177-16:**

LACFCD understands the need to balance flood protection with the goals of the HWPMP and the Central Arroyo Master Plan (the Master Plan area south of the HWPMP), as well as potential impacts to the community. LACFCD will continue to work with local organizations and the Cities of Pasadena and La

Cañada Flintridge and the community of Altadena to minimize traffic impacts around the project site. This will include coordination of sediment transport activities with Rose Bowl special events.

**Response to Comment 177-17:**

LACFCD notes that the City does not find the Proposed Project reasonable or responsible for Pasadena.

**Response to Comment 177-18:**

See Response to Comments 177-6 and 177-13.

**Response to Comment 177-19:**

The Proposed Project and its Alternatives conform to the limits and responsibilities of the easement. LACFCD will continue to work with the City to minimize impacts associated with the Proposed Project.

**Response to Comment 177-20:**

An easement granted in 1919 and revised in 1965 by the City of Pasadena to LACFCD encompassing Devil's Gate Dam and Reservoir states the easement is for the purpose of flood control and water conservation. The easement states, "Grantor does hereby grant to Grantee a perpetual easement for reservoir, water conservation and flood control purposes, including the right to construct, reconstruct, inspect, maintain, repair and operate a dam, spillway, reservoirs, tunnels, by-passes, channels embankments, protection works, and appurtenant structures for the purposes of controlling, confining, storing and conserving water in, over and across real property hereinafter described." The goal for the Sediment Removal Project is to maintain the reservoir for the purpose of controlling, confining, and storing water within the easement boundaries; and, therefore, the Proposed Project activities fall under the latitude of the easement granted.

The CEQA definition of a responsible agency refers to any agency which has discretionary approval power over the project, discretionary approval being that in which an agency can use its judgment in deciding whether and how to carry out or approve a project as distinguished from ministerial situations where the public agency merely has to determine whether a project is in conformity with applicable statutes, ordinances, or regulations. Ministerial permits are based only upon fixed City standards, with no subjective decisions required for approval.

Due to the location of the Proposed Project within the limits of the City of Pasadena, ministerial permits, such as hauling permits, will be required from the City; however, the conditions outlined in the easement granted to LACFCD do not necessitate discretionary authority from the City for the Proposed Project. LACFCD will continue to coordinate with the City of Pasadena.

**Response to Comment 177-21:**

LACFCD will continue to coordinate with the City of Pasadena.

**Response to Comment 177-22:**

LACFCD notes the contact person provided, in case any questions arise.

**Response to Comment 177-23:**

Comment noted.

**Response to Comment 177-24:**

Comment noted. LACFCD will provide the Pasadena Fire Department adequate notice as necessary.

**Response to Comment 177-25:**

See Response to Comment 177-8. Impacts to recreation were analyzed in the Draft EIR, Section 3.15. As discussed previously, the Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. LACFCD recognizes that the area is an important area for recreation, including passive recreation, as discussed in Section 3.15, Recreation/Public Services.

Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Therefore, the maximum degree of the temporary less than significant impacts to the recreational users of Hahamongna Watershed Park would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

Section 3.15 adequately accounts for and describes the types of recreational uses occurring in the Hahamongna Watershed Park. The level of impact to these recreational uses was not predicated on the numbers of users but on limitations to recreational uses. Additional statistics as to the number of recreational users will not affect the impact findings discussed above, which was accounted for in the Draft EIR, and would not add any additional constraints to those mentioned in the analysis in the Draft EIR.

**Response to Comment 177-26:**

See Response to Comment 177-8. LACFCD will continue to coordinate with the City of Pasadena regarding this project.

**Response to Comment 177-27:**

LACFCD will follow the conditions of said permit obtained from the City of Pasadena.

**Response to Comment 177-28:**

LACFCD prepared and consulted with surrounding cities and communities, including the City of Pasadena, to provide a list of past, present, and probable future projects producing related or cumulative impacts to the Proposed Project as established at the time of publication of the Notice of Preparation (NOP). These cumulative projects were determined by LACFCD and the surrounding cities and communities to have a potential cumulative effect due to overlapping time frames of the projects.

Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130. The Pasadena Water and Power's (PWP) Recycled Water project and the Monk Hill Treatment System projects were not identified as a potentially cumulative project. The list of cumulative projects was presented in Table 2.9-1 of the Draft EIR.

**Response to Comment 177-29:**

Use of the term rocket fuel has been revised to perchlorate in the Final EIR.

**Response to Comment 177-30:**

Under the Proposed Project and all of the alternatives, excavation limits will not exceed historic elevations. A utilities search will be performed prior to commencement of ground-disturbing activities to ensure that all existing utilities are identified and the limits of excavation are consistent with the design plans.

**Response to Comment 177-31:**

Comment noted. As stated in the Draft EIR, the Proposed Project will remove accumulated sediment deposits within the reservoir. This means the percolation characteristics of the reservoir will return to pre-Station Fire conditions if not improve, and the reservoir will still permit penetration of rainfall and percolation of local runoff to replenish the groundwater basin. Sediment removal will restore Devil's Gate Reservoir's ability to contain two DDEs. Due to the additional storage capacity of the reservoir more of the local runoff can be held behind the dam, which could result in more runoff penetrating into the ground in the Proposed Project area and subsequently recharging the groundwater basin. In addition, by keeping the reservoir clear of future sediment deposits, the Proposed Project will reduce the potential for accumulated sediments to negatively impact the percolation of stormwater.

**Response to Comment 177-32:**

See Response to Comment 177-25. Section 3.15 of the Draft EIR adequately describes the recreational facilities throughout the Proposed Project area, including both local and regional recreational opportunities and the existing conditions at the site. The Draft EIR does not imply that the Oak Grove area is separate from the Hahamongna Watershed Park. As stated in Section 3.15.2, Hahamongna Watershed Park includes the Oak Grove area of Hahamongna Watershed Park. The Draft EIR consistently refers to it as the Oak Grove area of Hahamongna Watershed Park, indicating it is part of Hahamongna Watershed Park. This also reflects the way the area is referenced in the HWPMP. Existing trails on both sides of the Proposed Project site are shown in the Draft EIR Figure 3.15.-2. As described in Section 2.5.1, the Proposed Project will not involve the City of Pasadena's spreading grounds on the east side of the basin.

**Response to Comment 177-33:**

The maximum or average size of the site that will be subject to grading activities at any given time or on a daily basis will vary with the conditions at the site; therefore, estimated maximum daily amount of sediment to be removed and associated estimated maximum number of truck round trips provide the most accurate and worst-case parameters with which to analyze proposed project impacts. The

estimated maximum daily amount of sediment to be removed and associated estimated maximum number of truck round trips was described in the Draft EIR Section 2.5.1 as 7,650 cy of sediment per day and 425 truck round trips per day. Based on these assumptions, the Draft EIR does give proper consideration to impacts associated with the Proposed Project.

**Response to Comment 177-34:**

The estimated 7,650 cy of sediment per day is the estimated maximum amount to be removed per day as reflected in the stated associated estimated maximum numbers of truck round trips. The Final EIR will be revised to clarify this; however, the estimated maximum amount of 7,650 cy of sediment per day and an estimated maximum of 425 truck round trips per day were consistently used throughout the Draft EIR to estimate impacts associated with the Proposed Project. The construction equipment required for sediment removal is listed in the Draft EIR, Section 2.5.1, Proposed Project Description, Configuration A, Sediment Removal Phase, Removal Method. This list is accurate and realistic, as it is based on LACFCD experience with removing sediment from the Proposed Project area, including the ongoing Interim Measures Project (IMP).

**Response to Comment 177-35:**

As stated in the Draft EIR, vegetation within the management area will be mowed or removed and grubbed annually. Areas subject to either of these activities will vary every year depending on the amount of vegetation growth and the amount of sediment requiring removal. Devil's Gate Reservoir is a dynamic system in which the amount of sediment deposited in the reservoir each year is heavily dependent on rainfall amounts received; and, thus, the amounts vary greatly. For this reason, defining specific yearly areas for each method is not possible due to unforeseeable results of weather conditions outside LACFCD's control. Therefore impacts associated with the reservoir management phase are accurately analyzed based on parameters described in the Draft EIR including: total management area involved and the estimated average annual sediment removal, daily sediment removal, duration, and maximum of truck trips.

**Response to Comment 177-36:**

After the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

Clearing and grubbing of vegetation must be completed in order to remove the sediment from the reservoir. Vegetation and organic debris will be hauled to a separate facility, Scholl Canyon Landfill.

Habitat restoration/enhancement will include use of willow cuttings and exotic species removal. Ruderal habitats within the basin shall be utilized whenever possible as mitigation sites. LACFCD is continuing to work closely with CDFW and USACE to identify appropriate sites for restoration and enhancement that will offset impacts and allow for sensitive habitat to recover naturally within the Proposed Project site but also to conserve and protect mitigation areas. The plan will include and address invasive species management, monitoring, and success criteria.

**Response to Comment 177-37:**

Section 2.5.2 of the Draft EIR states that removing the estimated typical amount of 13,000 cy of sediment annually will occur over an estimated two-week period, not that it will necessarily require two weeks. The estimated typical total amount of 13,000 cy could be removed in less than two weeks at the rate of 4,800 cy per day; however, as noted above, defining specific yearly areas for each method is not possible due to unforeseeable results of weather conditions. It is expected that in most years, sediment removal will be accomplished during a two-week period. The estimated 4,800 cy of sediment per day is the estimated maximum amount to be removed per day during sediment management. Removal of the sediment, vegetation, trees, and organic debris is expected to require an average of 50 truck round trips per hour, with an estimated maximum of 300 truck round trips per day during reservoir management excavation activities. The Final EIR will be revised to clarify this.

Moderately large sediment deposits have the potential to occur during a storm season; but it is anticipated that, even with this type of event, the newly deposited sediment could be removed in one season. A moderately large sediment removal event, anticipated to involve around 170,000 cy, could take place over an estimated 12-week period during the late summer/early fall following the vegetation maintenance. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir.

As noted in the Draft EIR, Section 2.5.2, sediment excavation/trucking off site will use the same methods and trucking routes as the initial sediment removal activities. Please refer to Section 2.5.1 for the construction equipment required for sediment removal.

**Response to Comment 177-38:**

See Response to Comments 177-14, 177-34, 177-35, and 177-37.

**Response to Comment 177-39:**

See Response to Comments 177-7 and 177-36. LACFCD does not plan to conduct habitat restoration within the reservoir management area.

**Response to Comment 177-40:**

See Response to Comment 177-28.

**Response to Comment 177-41:**

Although projects within the Hahamongna Watershed Park Master Plan are designed to take advantage of the scenic characteristics at the site, no City or County documents list the project site as a designated scenic resource. As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

The Draft EIR determined that visual impacts associated with reservoir management will be less than significant and, therefore, will not require mitigation. Reservoir management impacts to visual character under both of the Proposed Project's management options will result in a lower degree of contrast than seen during sediment removal. Due to the rapid growth of wetland herbaceous plants, it is expected that during the majority of the year the Proposed Project site will appear vegetated. In addition, as with existing conditions, vegetation conditions on the Proposed Project site, including height and density, would change on a regular basis due to seasonal conditions, water flow/views, water storage, and sediment conditions.

**Response to Comment 177-42:**

These policies, which are similar to the policies listed in the Draft EIR, will be added to the Final EIR.

**Response to Comment 177-43:**

See Response to Comments 177- 36 and 177-41.

**Response to Comment 177-44:**

See Response to Comments 177-10, 177-33, and 177-34.

**Response to Comment 177-45:**

The correct amount for fugitive PM<sub>10</sub> is 5.46, as shown in Table 7 of the Air Quality Report, Appendix B. This will be corrected in the Final EIR; however, the total PM<sub>10</sub> amount of 13.70 as shown in the Draft EIR, Table 3.5.6, is correct.

**Response to Comment 177-46:**

Information regarding the amendment to the Pasadena Trees and Trees Protection Ordinance will be added to Section 3.6.3 of the Final EIR. This information does not change the findings in Section 3.6.6, IMPACT-5.

The Los Angeles County Flood Control District was created by State legislation to implement the State-designated objectives of flood control and water conservation within the boundaries of the District. When implementing these State-designated objectives, LACFCD is not subject to local ordinances like the City's Trees and Tree Protection Ordinance.

The purpose of the Proposed Project is to restore and maintain flood capacity at the Devil's Gate Reservoir, which would directly further LACFCD's regional flood control objective. Accordingly, the Proposed Project would not be subject to the provisions of the Pasadena's City Trees and Tree Protection Ordinance.

**Response to Comment 177-47:**

The Draft EIR, Biological Technical Report (BTR), and focused surveys provide thorough and accurate existing conditions for biological resources (Draft EIR, Section 3.6; Appendix D, Biological Reports). The field surveys were conducted in 2010 and 2013 and included general biological surveys, focused sensitive plant surveys, focused least Bell's vireo surveys, and federal and state jurisdictional waters

surveys, as described in Section 3.6 of the Draft EIR. Updates to focused surveys will be conducted for special status plants and significant natural communities (sensitive habitats) with a potential to occur within the Proposed Project area, in accordance with CDFW guidelines, as part of the habitat restoration mitigation measure MM BIO-8.

**Response to Comment 177-48:**

Impacts to wildlife habitat loss, including those for the least Bell's vireo and other sensitive species, were adequately addressed in the Draft EIR, Section 3.6, Biological Resources. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

**Response to Comment 177-49:**

Mitigation Measures MM BIO-1 through MM BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. These Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. As with any project that involves CDFW, USACE, and RWQCB jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

**Response to Comment 177-50:**

Section 3.7.3 of the Final EIR will be revised to show that these policies are from the Land Use Element.

**Response to Comment 177-51:**

Depths to the native sediments of the reservoir will be determined by using historic contours of the reservoir compared to the existing topography. Construction staking within the reservoir will take place prior to excavation, and periodic surveys will be completed to ensure the limits of excavation are consistent with the design plans.

**Response to Comment 177-52:**

As discussed in Section 3.9.1 of the Draft EIR, the environmental baseline condition for the analysis of potential climate change/greenhouse gas (GHG) is considered at the time of publication of the NOP,

consistent with CEQA Guidelines Section 15125 (a). The NOP was published on September 28, 2011. Therefore, the GHG analysis uses the appropriate baseline.

**Response to Comment 177-53:**

All elements of the City of Pasadena General Plan were reviewed for applicable mineral resources discussions or policies. As noted in the Draft EIR, Open Space and Conservation Element (2012) briefly discusses that the Conservation Element must contain goals and policies to protect and maintain natural resources such as minerals.

**Response to Comment 177-54:**

References to Noise and Vibration Policies will be clarified in the Final EIR.

**Response to Comment 177-55:**

The Draft EIR correctly evaluates the Proposed Project noise impacts. As stated in the Draft EIR, the City of Pasadena and County of Los Angeles exempt public agencies from the Municipal Code noise requirements.

**Response to Comment 177-56:**

References to Land Use Policies will be clarified in the Final EIR.

**Response to Comment 177-57:**

See Response to Comments 177-15 and 177-16. LACFCD will continue to coordinate with the City of Pasadena regarding the Proposed Project.

**Response to Comment 177-58:**

As discussed in the Draft EIR, Section 3.5.6, the Proposed Project's activities, including excavation, grading, material loading, and hauling, would be in full compliance with SCAQMD's fugitive dust regulations, including applying water or a stabilizing agent during clearing and grubbing, crushing, or earth-moving activities in sufficient quantity to prevent the generation of dust plumes.

**Response to Comment 177-59:**

See Response to Comment 177-55. As noted in the Draft EIR, the temporary noise level increase from onsite construction noise and offsite vehicular noise would be less than significant; thus, no mitigation measures, such as notification or monitoring, are required.

**Response to Comment 177-60:**

LACFCD completed a Draft EIR to analyze all environmental impacts covered under CEQA.

**Response to Comment 177-61:**

Section 2.1.1 of the Final EIR has been revised to state “The Arroyo Seco watershed extends approximately 16 miles in length along the centerline of the watershed and 24 miles along the Arroyo Seco from its origin in the Angeles National Forest to the Arroyo Seco’s confluence with the Los Angeles River.”

**Response to Comment 177-62:**

The information regarding the MACH 1 facility will be added to Final EIR, see Sections 2.1.6, 3.12.2, and 3.15.2.

**Response to Comment 177-63:**

LACFCD appreciates the opportunity to continue to coordinate with the City of Pasadena regarding the City utilizing excavated sediment for future City projects.

**Response to Comment 177-64:**

See Response to Comment 177-8. Any haul routes, access roads, and staging areas to be used for the Proposed Project are clearly stated in the Draft EIR, Section 2.5.1. All traffic and recreational impacts, including those associated with haul routes, access roads, and staging areas associated with the Proposed Project, have been analyzed in Section 3.15 and 3.16, respectively.

**Response to Comment 177-65:**

Hauling permits will be obtained as necessary from the appropriate localities, and all conditions of said permits will be followed accordingly.

**Response to Comment 177-66:**

See Response to Comment 177-7.

**Response to Comment 177-67:**

See Response to Comment 177-7. As discussed in the Draft EIR, implementation of FASTing operations will be similar to historic FASTing operations. FASTing is a passive method to reducing sediment buildup in which the lowest outlet on the dam is left open during rain events in order to allow finer sediment to flow through the dam. FASTing is and has always been a part of regular and routine operations at Devil’s Gate. LACFCD will continue to coordinate with the City of Pasadena regarding this project.

**Response to Comment 177-68:**

See Response to Comment 177-7.

**Response to Comment 177-69:**

Viewpoints 1 and 2 provide panoramic views of the Proposed Project site. Viewpoint 5 provides an accurate representation of a view from this location. Additional panoramas would not change the findings in Section 3.4.

**Response to Comment 177-70:**

Blockage of views is an important criteria in determining impacts to viewsheds. The fact that the Proposed Project will not result in view blockage does not diminish the importance of the criteria.

**Response to Comment 177-71:**

See Response to Comment 177-10.

**Response to Comment 177-72:**

See Response to Comments 177-8 and 177-10. LACFCD understands MACH-1's concerns regarding their PATH International certification. As stated above, no significant impact to air quality will occur from the Proposed Project. LACFCD will continue to coordinate with the City of Pasadena regarding this project.

**Response to Comment 177-73:**

Comment noted.

**Response to Comment 177-74:**

See Response to Comment 177-49. LACFCD will continue to coordinate with the City of Pasadena regarding this project.

**Response to Comment 177-75:**

See Response to Comment 177-8. As discussed above and in the Draft EIR, the Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park; and sediment removal activities would be temporary and will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. As such, recreational uses will still be available in the Hahamongna Watershed Park during sediment removal. Therefore, with implementation of Mitigation Measure LAN-1, impacts associated with recreational activities coexisting with flood management and water conservation would be reduced to less than significant.

Mitigation Measure MMLAN-1 is enforceable and accepted as effective in reducing impacts to recreation. For example, similar mitigation measures were used by the City of Pasadena in the Hahamongna Multi-Benefit / Multi-Use Project Initial Study, 2012.

**Response to Comment 177-76:**

LACFCD will continue to coordinate with the City of Pasadena regarding this project.

**Response to Comment 177-77:**

See Response to Comment 177-8. LACFCD will continue to coordinate with the City of Pasadena regarding this project. It should be noted that construction activities would be temporary and would not occur year-round.

**Response to Comment 177-78:**

Table 3.14-11 shows representative sensitive receptors around the project site and represents a range of sensitive receptors that are located in the project vicinity. The Draft EIR does not claim that the receptors listed in Table 3.14-11 are the only vibration sensitive receptors that are located in the project vicinity. The vibration analysis in the Draft EIR found that a potentially significant impact would occur from construction-related vibration impacts and provides Mitigation Measure 2, which restricts the use of large bulldozers and other large equipment from operating within 180 feet of any occupied offsite structure. LACFCD considers the boarding structures for horses as “occupied structures” and would apply the restriction of large bulldozers and other large equipment from operating within 180 feet of the horse boarding structures. With implementation of Mitigation Measure 2, the vibration impacts to the horses would be reduced to less than significant levels.

**Response to Comment 177-79:**

The Draft EIR, Section 3.15, describes official recreational uses found in the Hahamongna Watershed Park. This reflects the description in the City of Pasadena’s Hahamongna Watershed Park Master Plan (HWPMP), Exhibit 2-1, Hahamongna Watershed Park Existing Conditions, and Section 2.10 Existing Recreation, showing all official recreational uses are outside the Proposed Project area.

**Response to Comment 177-80:**

See Response to Comment 177-62.

**Response to Comment 177-81:**

See Response to Comments 177-8 and 177-75. The discussion of Area Recreational Facilities in the Draft EIR presents existing recreational facilities in the surrounding area for the existing environmental setting, not as alternatives to the Hahamongna Watershed Park. As discussed in the Draft EIR, some of these facilities may see increased use; however, the Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park, and sediment removal activities would be temporary and will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park.

As with all the recreational facilities shown in Figure 3.15.1, Hahamongna Watershed Park’s location is pinpointed to show the general location of the park in relation to the Proposed Project site and other facilities.

**Response to Comment 177-82:**

See Response to Comments 177-8 and 177-75. LACFCD will continue to coordinate with the City of Pasadena regarding this project.

**Response to Comment 177-83:**

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, LACFCD recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, LACFCD will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed

Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area. Alternative 3, Configuration D, Option 2 will also avoid all currently existing Oak Grove Disc Golf Club holes.

**Response to Comment 177-84:**

See Response to Comments 177-8 and 177-75. LACFCD will continue to coordinate with the City of Pasadena regarding this project.

**Response to Comment 177-85:**

As part of the outreach effort, LACFCD has contacted recreational users, including the Pasadena Audubon Society, Rose Bowl Riders, Tom Sawyer Camps, Oak Grove Disc Golf Club, and MACH-1.

**Response to Comment 177-86:**

See Response to Comment 177-15.

**Response to Comment 177-87:**

See Response to Comments 177-15 and 177-16.

**Response to Comment 177-88:**

See Response to Comments 177-15 and 177-16.

All of the trucks will be loaded within the reservoir; and if a queue of trucks develops, the trucks will stage within the reservoir itself to lessen impacts on the adjacent streets.

Potential impacts due to the Proposed Project's truck trips to local roadways were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. The methods used are derived from the 2010 Highway Capacity Manual and 2003 Intersection Capacity Utilization (ICU) methods for Synchro for consistency across jurisdictions, which is a generally accepted methodology and is compliant with CEQA requirements. Therefore, additional analysis using another methodology would not be required.

The proposed haul routes can accommodate the trucks proposed for the project as they do currently with the IMP.

LACFCD will continue to coordinate with the City of Pasadena regarding this project.

**Response to Comment 177-89:**

See Response to Comments 177-16 and 177-88. Recommendations involve use of flaggers to control truck movements and direct trucks accordingly to minimize queues and delay conditions along the surface arterials.

**Response to Comment 177-90:**

See Response to Comment 177-88.

**Response to Comment 177-91:**

Comment noted. LACFCD will continue to coordinate with the City of Pasadena regarding this project. Use of flaggers would not necessarily require modification to striping, although it is recommended to avoid driver confusion. These and other traffic control details would normally be provided in the permitting phase of the project.

**Response to Comment 177-92:**

See Response to Comments 177-15, 177-89, and 177-91. LACFCD will continue to coordinate with the City of Pasadena regarding this project, including coordination of the design and implementation the two-way left turn lane (TWLTL).

**Response to Comment 177-93:**

See Response to Comments 177-88, 177-89, and 177-91.

**Response to Comment 177-94:**

See Response to Comment 177-88. LACFCD will continue to coordinate with the City of Pasadena regarding this project.

**Response to Comment 177-95:**

See Response to Comments 177-88, 177-89, and 177-91.

**Response to Comment 177-96:**

See Response to Comment 177-88.

**Response to Comment 177-97:**

See Response to Comment 177-88.

**Response to Comment 177-98:**

Passenger car equivalent (PCE) calculations are explained in Appendix C and D of the Traffic Report, accordingly.

**Response to Comment 177-99:**

See Response to Comments 177-88, 177-89, and 177-91.

**From:** [Cliff Towne](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project - Comments  
**Date:** Monday, January 20, 2014 10:45:13 AM

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Dear County,

I would like to address the plans that are currently being proposed to remove sediment from behind Devil's Gate Reservoir.

The Draft Environmental Impact Report on the proposed project is inadequate in a number of respects.

The negative environmental impacts of this project could be VASTLY reduced if the removal was phased over a longer time period.

Have you properly explored developing a plan that removes less sediment per year over a much long time period?

You could remove 10% of the targeted soil each year for 10 years - while you develop a more sustainable sediment removal plan that includes the correct amount of sluicing to remove sediment.

The cost of this project and the very great environmental impacts of it dictate that the County do its due diligence in determining the best method of maintaining the viability of the dam, while preserving the park and the neighborhood from severe environmental damage.

This Draft EIR does not show adequate evaluation of the environmental damage of the project. It does not account properly for the negative effects that the plan holds for the community and insufficient attention has been paid to less damaging and less costly alternatives to the current plan.

This area is important bird and wildlife habitat that would be permanently damaged. Why does the Draft EIR fail to adequately account for that?

There has never been a full EIR of Devil's Gate Dam and its impacts. This should be done before any sediment removal project of this scope goes forward.

The Draft EIR fails to mitigate the impacts on young folks that use the park, nature lovers, equestrians, disc golfers and other members of the public that visit the area for recreation. It fails to adequately address (and the plan fails to mitigate) the air pollution, noise and dust from all of the diesel trucks that will haul all that dirt and it fails to adequately access the traffic impacts for surrounding neighborhoods.

The County needs to figure out how to mitigate the negative impacts of air pollution, traffic and the destruction of the beautiful habitat there before proceeding. If the plan going forward is to dodge their responsibility to mitigate the negative impacts by getting the Supervisors to pass a statement of overriding considerations - that is just not right!

Thanks, Cliff Towne  
P.O. Box 35525  
Los Angeles, CA 90035

**Response to Comment Letter #178 (Cliff Towne)**

**Response to Comment 178-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Draft Environmental Impact Report (EIR) adequately analyzed all issue areas required by the California Environmental Quality Act (CEQA).

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 178-2:**

See Response to Comment 178-1.

Various amounts of sediment and methods of removal were analyzed under the Alternatives Analysis of the Draft EIR (see Section 4 of the Draft EIR). While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

**Response to Comment 178-3:**

The Draft EIR adequately analyzed all CEQA-required issue areas, including considering the impacts to the community. The Draft EIR, Section 4.0 Alternatives Analysis considers six alternatives, including the No Project Alternative. LACFCD determined that Alternative 3, Configuration D was the environmentally superior alternative that reduced impacts while still meeting the Proposed Project objectives.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

**Response to Comment 178-4:**

Impacts to wildlife habitat loss was adequately addressed in the Draft EIR, Section 3.6, Biological Resources. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 178-5:**

The Devil's Gate Dam was built in 1920 prior to the enactment of CEQA in 1970. Per CEQA Guidelines 15301, operation of existing facilities is exempt from the provisions of CEQA.

**Response to Comment 178-6:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. As discussed in this section, the Proposed Project will not result in any significant impacts associated with recreation and will therefore, not require mitigation. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the EPA's 2007 standards for emissions. Therefore, in order to

further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities including excavation, grading, material loading, and hauling would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will implement the mitigation measures described in the Draft EIR, Section 3.16.6 to reduce impacts to traffic. Also as discussed in the Draft EIR, Section 3.16.6, potential impact reduction measures could reduce impacts to less than significant. These measures cannot be legally imposed by LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will be made to coordinate with and receive approval from the jurisdictional agencies to implement the impact reduction measures but LACFCD cannot guarantee that the measures will be implemented. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 178-7:**

See Response to Comments 178-4 and 178-6. The Proposed Project's Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans.

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

**From: Friends of Hahamongna - Elizabeth Bour, Mary Barrie, Nina Chomsky  
Contact: Mary Barrie, <meb787@aol.com>**

**RE: Comments: Draft Environmental Impact Report for Devil's Gate Reservoir Sediment  
Removal and Management Project**

**DATE: January 19, 2014**

**I. Introduction**

Comment 179-1 Friends of Hahamongna hereby submits its comments on the Los Angeles County Department of Public Works (LACDPW) Devil's Gate Reservoir Sediment Removal Project at Hahamongna Watershed Park. We have reviewed the Draft Environmental Impact Report (DEIR) and related official documents about this proposed project and related projects. One or more of us has attended all of the County presentations.

Comment 179-2 The proposed project will permanently alter the environment, eliminating the possibility of implementing projects that would meet the goals of the Hahamongna Watershed Park Master Plan (HWPMP) ( [www.ci.pasadena.ca.us/PublicWorks/HWPMP](http://www.ci.pasadena.ca.us/PublicWorks/HWPMP) )

We believe that this project would result in serious environmental impacts to the surrounding communities, especially Pasadena, La Canada Flintridge, and Altadena as well as the negative environmental impacts to the park. We would like to address these impacts as well as inaccuracies and inadequacies with the DEIR.

II. **Issues with the Project Description:**

Comment 179-3 | The project description is legally inadequate in that it is inaccurate, inconsistent and incomplete.

A. Inconsistent statements regarding the necessary project scope

There are inconsistent statements in several official LACDPW documents regarding the amount of sediment that will be removed and the remaining capacity for sediment placement behind the dam. It is apparent that the justification for the project, the quantity of sediment to be removed and the excavation acreage are in dispute. Some of the official statements made are:

1. Stated Dam Capacity and Removal Quantity:

- A LACDPW presentation to the Pasadena’s Hahamongna Watershed Park Advisory Committee (HWPAC) on 11/30/2010 described the original sediment quantity to be removed as 1.67 million cubic yards (mcy) (Exhibit 1). The remaining capacity for sediment placement was stated as 1.242mcy (17%) (Exhibit 2). Finally, in the same presentation, it was stated that this project would regain necessary flood protection (Exhibit 3). ([http://www.savehahamongna.org/pdf/HWPAC\\_Presentation.pdf](http://www.savehahamongna.org/pdf/HWPAC_Presentation.pdf))
- The LACDPW report to the Los Angeles County Board of Supervisors on March 1, 2011 stated that one Design Debris Event (DDE) for Devil's Gate Dam was 1.67 mcy, the amount of sediment which LACDPW was originally proposing to remove from behind the dam. (Los Angeles County Board of Supervisors Statement of Proceedings, March 1, 2011, Item 60-C, , Item 60-C, Motion 11-1056, (<http://bos.co.la.ca.us/Services/RecordsSearch.aspx>).
- According to LACDPW Sediment Management Strategic Plan 2012-2032 (<http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>), Table 2-1 Reservoirs in the Flood Control District (Exhibit 4), the remaining capacity is 3.7 mcy (47%), almost 2 Design Debris Events (DDEs). In addition, the Strategic Plan Figure 8-27, Graph of

Historical Sediment Storage at Devil's Gate Reservoir, illustrates that just over two DDEs of storage capacity remained in the basin as of 2010 (Exhibit 5). The DEIR, however, states that available flood control capacity is currently less than one DDE (p.ES-3). This is a critical discrepancy which must be resolved since the size of the project depends directly upon the capacity remaining in the basin.

- A grant application submitted by LACDPW to the CA Water Resources Board (March 2013) for the Devil's Gate and Eaton Stormwater Flood Management Project, ([http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted\\_Applications/P1E\\_Round2\\_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20\(201243210009\)/Attachment%203%20-%20Att3\\_SWF\\_WorkPlan\\_1of2.pdf](http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted_Applications/P1E_Round2_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20(201243210009)/Attachment%203%20-%20Att3_SWF_WorkPlan_1of2.pdf)) indicated that Phase V of the project would remove an estimated 2mcy of sediment from the reservoir. The discrepancy between the grant application and the DEIR is that, with the exception of the No Project Alternative, the proposed project and the alternatives all remove more than 2 mcy of sediment. The grant application states that “the Devil’s Gate Reservoir Sediment Removal and Management Program will remove an estimated 2,000,000 cubic yards of sediment from the reservoir. This will reduce the level of flood risk to the downstream communities along the Arroyo Seco.” When the grant application went before the Board of Supervisors for approval, the amount of sediment removed was described as “up to 2,000,000 cubic yards” and the Chief Engineer or her designee was authorized only “to make minor changes in project scope.” (Los Angeles County Board of Supervisors, Statement of Proceedings, March 19, 2013, Agenda Item 13).
- The DEIR Appendix D, Biological Technical Report dated November 2010 was done before the scope of the project was changed. The text states “the proposed project will remove 1,671,000 cy of sediment debris from Devil’s Gate Reservoir.” (p.1). Figure 3 of the Biological Resources map in the same Appendix shows an excavation footprint which appears to correspond with that of the project as originally proposed to the HWP Advisory Committee and the Los Angeles County Board of Supervisors. Thus, there is evidence within the DEIR itself that the removal of

Comment 179-4  
continued

1.67mcy of sediment was the scope of the project since that is the amount of sediment removal anticipated when the biological reports were done.

The final EIR must answer the following questions:

- ? What is the correct percentage of sediment storage capacity remaining in the reservoir?
- ? How many DDEs of storage capacity remain?
- ? What is the actual minimum amount of sediment removal necessary for downstream flood protection?
- ? Why was no project studied in the DEIR, with the exception of the No Project alternative, within the scope of work for which the grant was obtained from the State of California?
- ? Even Alternative 3, Configuration D, the smallest alternative, is 400,000 cy larger than the project described in the grant. Does the California Department of Water Resources consider this “a minor change in project scope?”
- ? Why was the State of California told that the removal of one DDE of sediment would provide safety to the downstream communities when the decision makers and the public are now being told otherwise?
- ? Why were the biological technical reports not redone more recently? The report attached to the DEIR is now over three years old.
- ? Why and when was the project scope of work changed to the removal of from 2.4 to 4mcy of sediment?

2. Excavation Acreage:

- The excavation acreage presented to HWPAC in 2010 by LACDPW was 50 acres (only 15 acres of willows to be permanently removed) and would only occur in the area immediately behind the dam. According to this presentation, removal of 1.67 mcy of sediment and excavation of 50 acres would result in “regaining necessary flood protection” (Exhibit 14).
- According to the DEIR, the excavation acreage in the proposed project is 120 acres.

Comment 179-4  
continued

Comment 179-5

Comment 179-6

The final EIR must answer the following questions:

- ? Why is there such a significant increase in the acreage for the excavation area between the 2010 project description and this project and the alternatives presented in the DEIR?
- ? Why is flood protection no longer achieved with the removal of one DDE and the excavation of a much smaller area? What has changed?

**B. Incomplete project description, justification and insufficient risk assessment**

The project description does not quantify the current actual risk of flooding and what event(s) would be necessary to create that risk. No case is made for the removal of up to 4 million cubic yards of sediment or the need to do so within 5 years. Language from the DEIR (ES-3) related to downstream risk and the likelihood of a Design Debris Event (DDE) event is :

*The DDE is the estimated amount of sediment that could 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 Devil's Gate Reservoir is approximately 2 million cubic yards (cy).*

The definition of a DDE of 2 million cubic yards (mcy) is an LACDPW internal standard that has, somehow, increased since 2011 from 1.67 mcy. The County Sedimentation Manual was last updated in 2006 so, presumably, the standard has not changed since 2006. In Section 4.2 of the DEIR, Project Objectives (page 275) the following statement is made:

*The LACFCD must remove sediment that has accumulated behind the dam 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”.*

Again, there is no specific statement of the actual risk to the downstream communities, what event scenario would put these communities at risk and how much this project would reduce that risk. The final EIR should express risk assessment in terms of a scenario-based probability statement such as “there a \_\_\_ % chance of \_\_\_\_\_ event happening and the downstream consequences / cost would be \_\_\_\_\_”. Multiple scenarios should be discussed.

There is a **Flood Hazard Warning and Contingency Plan for the Arroyo Seco Channel** and the map of potentially impacted parcels (Exhibit 6) that is included in the grant application but is not included in the DEIR. In addition, the **Arroyo Seco Channel 50-Year Frequency Rainfall Bulked Flows and Superelevation Map** (Exhibit 7) was included in a report to the Board of Supervisors on March 1, 2011 (Los Angeles County Board of Supervisors Statement of Proceedings, March 1, 2011, Item 60C) but is not included in the DEIR. Both these maps show no danger of the Rose Bowl being impacted by flooding. However, information being circulated to the press as recently as October 2013 included: “Officials say locations downstream from the dam along the Arroyo Seco that could be in danger of flooding include the Rose Bowl...” (“County presents options for Devil’s Gate Dam sediment removal,” Los Angeles Times, October 26, 2013). The final EIR must include these two maps, explain the difference between them, and explain the downstream flood risk in an understandable narrative format.

The final EIR must answer the following questions:

- ? What is the risk, in terms of a percentage, of downstream flooding and under what conditions?
- ? What is an acceptable amount of risk and what is the minimum amount of sediment that would need to be removed to reduce that risk to an acceptable level?
- ? What documentation exists that justifies the change in the amount of a DDE?
- ? How many DDEs are needed to achieve flood control storage capacity in order to assure public safety?

- Comment 179-9 continued
- ? Why is it necessary to remove enough sediment to return the reservoir to pre-1938 levels when this would cause severe environmental damage which cannot be mitigated to a level of less than significance? (Exhibit 8, Sediment Management Strategic Plan, Devil's Gate Reservoir Historical Sediment Accumulation and Removal, Table 8-12)
  - ? How has it been possible to keep the areas south of the dam safe for over 75 years while still retaining between 2.62 mcy and 4.40 mcy in storage behind the dam (Exhibit 8, Sediment Management Strategic Plan, Devil's Gate Reservoir Historical Sediment Accumulation and Removal, Table 8-12)?
  - ? If downstream communities were, in fact, safe during all those years, what is now driving the need to remove most of the sediment in storage behind the dam?
  - ? Why are two important inundation maps which address flood risk downstream not included in the DEIR? Why was the public, including City Officials, misled in presentations and publications relating to flood risk at the Rose Bowl?

Comment 179-10

C. Inadequate and incomplete description of this project's relationship to other regional projects that are not discussed in the DEIR or evaluated for cumulative impacts.

There are several related projects in and around Devil's Gate Dam that have been announced and are partially funded but are inadequately addressed or not mentioned at all in the DEIR and not properly considered for cumulative impacts.

- Comment 179-11
1. A Prop 1-E funds grant application was submitted by the LACDPW (March 2013) for a project titled Devil's Gate and Eaton Storm Water Flood Management Project ([http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted\\_Applications/P1E\\_Round2\\_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20\(201243210009\)/Attachment%203%20-%20Att3\\_SWF\\_WorkPlan\\_1of2.pdf](http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted_Applications/P1E_Round2_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20(201243210009)/Attachment%203%20-%20Att3_SWF_WorkPlan_1of2.pdf)). The Los Angeles County Flood Control District (LACFCD) received \$28 million from the California Department of Water Resources toward the total projected project cost of \$80 million. The five phases of this project are:
    - Eaton Wash spreading grounds improvements

- Eaton Wash dam rehabilitation project
- Eaton Wash spreading grounds intake improvement and basin enlargement
- Devil's Gate Water Conservation Project (Phase IV)
  - Installing a pump to the upstream face of Devil's Gate Dam
  - Installing 27,000 feet of 30-inch reinforced concrete pipe from Devil's Gate Dam to Eaton Wash
  - Installing an outlet structure at Eaton Wash
- Devil's Gate Reservoir Sediment Removal and Management Project(Phase V)
  - Removing 2 million cubic yards of sediment
  - Establishing a reservoir configuration more suitable for routine maintenance

The Devil's Gate Water Conservation component will have significant impacts both upon Hahamongna and the surrounding region. According to the DEIR, *"Impacts to biological resources associated with the Arroyo Seco Canyon Project and the Devil's Gate Water Conservation Project are also not known at this time"*. The Water Conservation project, although partially funded, is still in the conceptual design phase. The final EIR must include a detailed project description and environmental documents for the Water Conservation project in order to properly evaluate cumulative impacts of the whole of the project.

It is also unclear whether the massive increase in the size of the current sediment removal project is related to the plan to store water behind the dam to be pumped to Eaton Canyon. According to the Technical Justification section of the Prop 1-E grant application, *"The resulting new reservoir configuration will result in the ability to impound stormwater to be conveyed via the new pipeline to Eaton Wash Spreading Grounds for conservation"*. This clearly ties these two projects together and it is clear that the completion of the pipeline project depends upon the completion of the sediment removal



Comment 179-11  
continued

project. The project in the DEIR appears to be designed to facilitate and/or accommodate this pipeline to Eaton Wash but the pipeline project is not defined or evaluated for cumulative impacts in the DEIR. Since these two projects are described in the grant application as integrated elements of one project, both projects will have the same lead agency and/or responsible agencies, both projects are in the same area, and both are scheduled to be implemented during roughly the same time frame, the project description in the final EIR must include both phases in order to evaluate the impacts of the “whole of the project”. The final EIR must answer the following questions:

- ? Are there any of the alternatives studied in the DEIR that are not compatible with the Water Conservation Project?
- ? Were the proposed project and the alternatives included in the DEIR designed to support the water conservation project?
- ? Is this why the proposed project and the alternatives are all larger than the project originally proposed to the Los Angeles County Board of Supervisors and the CA Department of Water Resources?

2. In March 2013, the Foothill Municipal Water District (FMWD) submitted a grant as part of a Greater Los Angeles County application containing numerous projects for consideration in the California Department of Water Resources (DWR) Integrated Regional Water Management (IRWM) Proposition 84 grant program funds. [Los Angeles County Flood Control District, Prop 84 IRWM Grant Program Implementation Grant, Round 2, 2013] The grant was awarded and the FMWD component of this large grant request is titled Foothill Municipal Water District Recycled Water Project.

<http://www.ladpw.org/wmd/irwmp/docs/Prop84Round2ImplGrantApp/Attachment%20%20Eligibility%20Documents%20of%20.pdf>

The County was aware of this component project at the time it was completing this DEIR. As stated in the project description, “*The proposed locations for the MBR [Membrane Bioreactor Plant] facility integrate the FMWD Recycled Water Project into the Arroyo Seco Watershed as a key feature supporting a sustainable, local and reliable*

supply within the Raymond Groundwater Basin. As the MBR facility will be neighboring the La Cañada United Methodist Church, La Cañada High School, and Hahamongna Watershed Park ... FMWD is currently investigating three discharge methods for the recycled water produced from the MBR facility. All methods operate via indirect potable reuse and demonstrate potential methods of groundwater replenishment for the Raymond Groundwater Basin. These scenarios are outlined below:

- *La Cañada United Methodist Church MBR location:*
  - *Option 1: La Cañada High School Infiltration Galleries*
  - *Option 1a: Devil's Gate Dam Spreading*
  - *Option 1b: Flint Canyon Creek Live Stream*
- ? *La Cañada High School MBR location:*
  - *Option 1: La Cañada High School Infiltration Galleries*
  - *Option 1a: Devil's Gate Dam Spreading*
  - *Option 1b: Flint Canyon Creek Live Stream*

The Foothill Municipal Water District project is included in the suite of Greater Los Angeles Integrated Regional Water Management projects which were 100% funded in the amount of \$23,433,962 as of September 25, 2013. Foothill's portion of this amount was \$1,499,500 [Los Angeles County Board of Supervisors Statement of Proceedings, March 19, 2013, Item 35, Board Letter]

As of September 4, 2013, Foothill Municipal announced that the Recycled Water Demonstration Project had been suspended. However, since the project has been suspended rather than cancelled and since it now has grant funding available, it may be undertaken at a later date or by another agency. Thus, the cumulative effects of this project must be studied in the final EIR. The final EIR must answer the following questions:



Comment 179-13  
continued

- ? Since two of the three infiltration methods would impact the quality of the water held behind the dam, why is this project not evaluated in the DEIR?
- ? Since this FMWD project has components in Hahamongna/Devil's Gate Dam area, is an anticipated project and, although suspended, is partially funded through County managed IRWMP funds, why is there no mention of this project or consideration of cumulative impacts in this DEIR?
- ? Are there any of the alternatives studied in the DEIR that are not compatible with the Foothill Municipal Water District Recycled Water Project?

3. Another possible project conflict for the immediate area is the NFL Temporary Use of the Rose Bowl. The projected duration of this project is five years and it is possible, indeed likely, that the timeline for these two projects would be the same. The EIR for the NFL use of the Rose Bowl identified several CEQA categories with likely significant impacts, some unavoidable, including recreation, traffic, air quality and noise.  
[http://cityofpasadena.net/Rose\\_Bowl\\_EIR](http://cityofpasadena.net/Rose_Bowl_EIR)

Although the assertion is made in this DEIR that *“The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable.”*, the DEIR must analyze the possible cumulative impacts in detail so that the decision makers can fully assess the costs of the project relative to the benefits. For example, traffic impacts and the level of service at intersections in and around Pasadena, especially during weekday NFL events need to be discussed in detail.

The DEIR does not evaluate the impact to recreation as significant and unavoidable and suggests all activities can be relocated. In the proposed project for the NFL’s use of the Rose Bowl, one of the mitigations suggested for displaced recreation was to relocate that recreation to neighboring parks, including Hahamongna Watershed Park. However, recreational opportunities in Hahamongna Watershed Park will not be possible during this project and possibly well beyond. The recreational opportunities for

Comment 179-13  
continued

Comment 179-14

hikers and equestrians at both the Rose Bowl and Hahamongna Watershed Park will be displaced with limited or no relocation opportunities. The equestrian trails cannot be relocated. The final EIR must answer the following questions:

? Since the NFL project is anticipated, why is there no detailed analysis of the cumulative traffic impacts?

? How will the County address the proposed relocation of recreational activities into Hahamongna if the NFL project moves forward?

D. Inadequate project description in that there is apparent segmentation and pre-commitment to other projects

Per CEQA Guideline 15126 "All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation". To properly avoid segmentation, an EIR's project description must include foreseeable related projects, specifically for complete and adequate evaluation of cumulative impacts. The County has announced, defined, and requested grant money for the Devil's Gate Water Conservation project and is in partnership with FMWD for the Foothill Municipal Water District Recycled Water project. These projects must be included in this DEIR project description and evaluated for cumulative impacts. In the DEIR, the Devil's Gate Water Conservation Project is mentioned only once in Table 2.9-1 (p.29), and is described as a project which is still in the conceptual design phase. Even though these two projects are components of the same larger project, there are two separate environmental reviews planned. The Devil's Gate Sediment Removal EIR comment period closes January 21, 2014. The grant application states that the environmental work for the Water Conservation Project component will be done at the same time. However, representatives for the LACDPW have stated during recent public meetings that the Initial Study or Mitigated Negative Declaration for the Water Conservation component will not be available for public review until February or March 2014.

Further, environmental reviews of the Devil's Gate Water Conservation and FMWD Recycled Water projects are not scheduled until after the date by which public comments

Comment 179-14 continued

Comment 179-15

Comment 179-16

must be submitted for the sediment removal phase of this project. Consequently, the public and the decision makers are deprived of the opportunity to review and comment on the cumulative environmental impacts of these three very large and costly projects. Not only does this omission appear to be illegal segmentation, but it also raises the question whether there was a pre-commitment to the pipeline and recycled water projects that may have influenced the decision on the preferred/proposed sediment removal project, may have limited alternatives presented, or may have limited the level of environmental review performed on these alternatives. The final EIR must answer the following questions:

- ? Since the pipeline and recycled water projects are anticipated and even partially funded, why is there no project description for two of the projects or evaluation of the cumulative impacts of these three related projects?
- ? Why are the three projects that are in the same location and that are being constructed at the same time not being evaluated in one environmental process?
- ? Given that the amount of sediment proposed to be removed from the basin is much greater than was originally proposed in November of 2010, is this increase in sediment removal necessary to support the Water Conservation component or the Foothill Municipal Water District Recycled Water project?
- ? How much sediment removal is necessary to support the Water Conservation component and in what areas will the basin be cleared to support this project?

E. Inadequate and potentially inaccurate description of the County easement rights and responsible agencies

The LACDPW has clearly taken over full management of the proposed project, and is using the easement as a justification for control of this project and the entire park from the sediment removal phase through to the foreseeable future. There is a question as to LACDPW's legal right to do so and whether this project exceeds its rights under the easement between the City of Pasadena and the County. Because permits will be required from Pasadena, Pasadena is a Responsible Agency and the final EIR must directly identify Pasadena as a Responsible Agency. As the land owner and a Responsible Agency,

Pasadena must oversee all aspects of this project including all mitigation measures and the relationship between this project and projects planned as a result of the Hahamongna Watershed Park Master Plan.

In addition, another Responsible Agency, the California Regional Water Quality Board, rejected the County's earlier project proposal. In a March 2011 letter, the California Regional Water Quality Control Board denied the Los Angeles County Flood Control District (LACFCD) water quality certification for the original, much smaller, 1,600,000 cy project which would have cleared only 50 acres:

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/401\\_water\\_quality\\_certification/final\\_letters/Documents/2011/10-170DenialWQC.pdf](http://www.waterboards.ca.gov/losangeles/water_issues/programs/401_water_quality_certification/final_letters/Documents/2011/10-170DenialWQC.pdf).

The Board was informed that the removal of 1,600,000 cy of sediment would provide a "total cleanout" which would bring the reservoir "back to its original design contours which were developed when the reservoir was constructed." The objections raised by the Board are very similar to those which the public has raised throughout the environmental review process. According to the Board, LACFCD would be required to "demonstrate that appropriate alternatives, in terms of the amount of material to be removed and in terms of the timing or phasing of the removal of materials were considered." These alternatives were to include "cleanout alternatives sufficient to protect public safety other than 'return to design capacity.' LACDPW was directed to "identify the immediate, public safety, capacity need which allows proper function of the flood control system and the corresponding sediment removal need. With this basis, LACFCD shall then develop an alternative(s) for this amount of sediment removal." They were to "identify cleanout alternatives which would minimize the 50-acre impact and identify alternatives for phasing the project to minimize impacts over time." The Board stated that the "final analysis should include the rationale for the determination that the proposed project is the most appropriate design for this project which meets project needs and that there are not other, more appropriate, project designs which avoid or minimize impacts to waterways while also meeting project needs". It is clear from this language that the California Regional Water Board had concerns and

Comment 179-19  
continued

was not willing to certify a much smaller project. The final EIR must answer the following questions:

- ? Do the project boundaries exceed the easement boundaries? This will require a Survey.
- ? Does the extent of the proposed project exceed the legal rights granted in the easement or legal rights under applicable California law?
- ? Does the easement allow for the County to construct the infrastructure/ equipment necessary to pump water held behind the dam into the Eaton dam pipeline?
- ? What will the City of Pasadena's role be for implementation and management rights over all adopted EIR mitigations?
- ? What permits from the City will be required and how will Pasadena be engaged to enforce its permitting authority and application review? There must be strict enforcement over all County future operations in Hahamongna arising out of this project and/or related projects.
- ? Why doesn't the DEIR state that the Pasadena Tree Protection Ordinance protects native trees and all public trees, native and non-native, within the City including those in Hahamongna Watershed Park? Why doesn't the DEIR discuss the jurisdiction of Pasadena's Urban Forestry Advisory Committee over tree removal in Hahamongna? The DEIR only states that the Pasadena Tree Protection Ordinance applies to trees "in certain parts of the City" (p.121).
- ? Who will all the other Responsible Agencies be and what permits will be required from each?
- ? How can the necessary certification from the California Regional Water Board for this project be expected when the Board rejected a much smaller Devil's Gate sediment removal project in March 2011? Why was the Water Quality Board informed that one DDE would bring the reservoir back to its original design contours when the public was subsequently told that the removal of two DDEs would be necessary? Why did LACDPW ignore the Board's directive to develop an alternative which minimized the 50

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continued



acre impact and, instead, defined the project and all the alternatives as much larger projects?

F. Inadequate Alternatives

1. The DEIR is deficient in that it fails to propose and evaluate alternatives in a legally adequate manner. The extremely confusing alternatives section is dense and impenetrable. Each alternative is considered separately and its environmental impacts are divided into issue areas. The method of presentation is very difficult to follow as this example shows:

- Alternative 1, Configuration B is considered environmentally superior to the Proposed Project.
- Alternative 1, Configuration B will also be environmentally superior to Alternative 2, Configuration C; Alternative 4, Sluicing; and Alternative 5, Haul Route Alternative.
- Alternative 1, Configuration B will be environmentally inferior to Alternative 3, Configuration D
- Alternative 1, Configuration B will be environmentally superior to Alternative 6, No Project Alternative

2. Despite the 350 page length of the Alternatives section, there was no simple, straightforward narrative discussion which compares in plain English the pluses and minuses of the alternatives so that the public and the decision makers can make an informed decision as to which alternative would be best. The alternative described as the Environmentally Superior Alternative gets two short paragraphs and no discussion whatsoever as to why it was not chosen by the County as the Preferred Project. In the final EIR, all alternatives must be presented in a format which allows the reader to easily compare the environmental impacts of the alternatives.

3. The DEIR failed to consider possible less impactful alternatives. Los Angeles County's own documents and their historical removal of sediment in the basin prove that a slower, more environmentally sensitive approach can keep the downstream areas safe.

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Comment 179-23



LACDPW has never removed more than 750,000 cy of sediment at one time from behind Devil's Gate Dam and yet the downstream communities have been safe for 75 years. In 1977, the year that 750,000 cy of sediment was removed, the amount of sediment in storage was 3.9 mcy or about the same amount in storage now (Exhibit 8). Based on the historical record, a sediment removal alternative should have been developed and considered for the removal of a maximum of 750,000 cy of sediment. Removing this amount of sediment along with increased sluicing and extending the timeframe would meet the stated project goals while reducing the level of impacts and would conform to the goals and objectives stated in the HWPMP. This alternative should also provide for a slow, ongoing process of sediment removal which would avoid the kind of massive, environmentally destructive project now proposed.

The second possible, although less desirable, alternative would be for LACDPW to return to its initial proposal to remove 1,670,000 cy of sediment which would scour only 50 acres and keep permanently cleared only 15 acres (Exhibit 14). There is ample evidence in the record that Flood Control believed this plan to be sufficient to provide flood protection to the downstream communities despite the far more damaging alternatives now proposed in the DEIR.

The least objectionable of the alternatives proposed in the DEIR is, however, Alternative 3 (Configuration D), referred to in the DEIR as the environmentally superior alternative. In light of the considerable evidence in the record, however, it is clear that there are far more superior alternatives meeting the project objectives which should be considered in the final EIR.

The final EIR must answer the following questions:

- ? Why was a document as important as the Sediment Management Strategic Plan 2012-2032, which has so much critical information about sediment removal behind Devil's Gate Dam, not discussed in the DEIR?
- ? Does Alternative 2, Configuration 3 also allow for the restoration of previously existing recreational opportunities?

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continued

Comment 179-24

Comment 179-24  
continued



? Why will it still take only five years to complete Alternative 2 when it would remove over 1 mcy more sediment than the Proposed Project?

**III. Issues with the DEIR:**

**A. Aesthetics**

Comment 179-25

In both this section and in the Biological Resources section, there is a statement that “[m]ost of the vegetation and trees on the Proposed Project site were dead, washed out, or buried under sediment...” Most of the trees in the excavation area are willows which were not only alive but thriving after the influx of sediment. This assertion must be removed in the final EIR.

Comment 179-26

The San Gabriel Mountains are the dominant feature in the scenic vista throughout Hahamongna Watershed Park which is why the City of Pasadena’s Master Plan calls for both a Sunset Overlook and a Sunrise Overlook. The recently built pedestrian bridge also has a small park seating area which overlooks both the basin and the mountains.

Comment 179-27

The DEIR states that Management Option 1, the permanent clearing of vegetation from 120 acres of the basin, will “result in a less than significant impact to scenic vistas” and that for most of the year the Proposed Project site will appear vegetated. The Reservoir Management Visual Change Table, p. 58 shows that the overall visual change will be low even though the scoured basin is at the very center of most of these scenic vistas. In reality, except during the rainy season, 120 acres or most of the basin will not be green but rather dirt/sand with brown dry non-native vegetation. The final EIR must accurately state the appearance of the basin today (existing conditions) and the truth about the resulting appearance if the proposed project is implemented. The final EIR must answer the following questions:

Comment 179-28

- ? Why does the DEIR state that most of the trees in the proposed project site are dead when this assertion is not true?
- ? Why does the DEIR state that the project site is not a “designated scenic resource” when the Hahamongna Watershed Park Master Plan has numerous projects, several



already implemented, that were designed specifically to take advantage of the scenic vistas?

? What is the actual impact to aesthetics and to the already established scenic vistas?

B. Air Quality

Although air quality impacts have been determined to be significant and unavoidable, the impacts have been under-assessed and understated in that the only monitoring performed was at two Source Receptor Areas (SRAs), one in Pasadena, and one in Burbank for the years 2006 through 2011 (Table 3.5-2: Ambient Air Quality Monitoring Summary). There was no monitoring for ambient measurements performed on-site or along the transportation routes to sediment placement sites. Since much of the identified air quality impacts are due to exhaust from the trucks and particulate matter (PM) that may be released during transport, monitoring for ambient air quality during the project must be performed for all impacted areas. The DEIR air quality impacts and mitigations are also deficient in the following areas:

1. Degradation of air quality is a serious public health matter. It is essential that accurate and current baseline studies are conducted and that the EIR accurately state the additional project-related air quality degradation so that decision makers and the public will know the environmental cost. Baseline studies for ambient air quality were performed, for the most part, at an SRA in Pasadena five miles from the project site. For particulate matter (PM<sub>20</sub>) the location for the SRA was in Burbank, eight miles away from the project site and not along the sediment transport route. In order to appropriately assess the ambient air quality, there should have been baseline monitoring at the site location.

2. There is limited discussion on mitigating the particulate matter that can and will be released during excavation, loading, and as the sediment is being transported to sediment placement sites. Although tarps are mentioned as a part of the SCAQMD's Rule 403 standards, there must be a mandate that appropriate quality tarps are used to

cover the truckloads and that best practices for fugitive dust management are implemented. There is also only one water truck proposed for use (p. 87). Water trucks should be used in the areas of excavation and should be used to water down unpaved access routes. Given that the excavation area is very large, and that there will be up to 400 trucks per day driving on mostly unpaved surfaces, there must be significantly more than one water truck used to minimize fugitive dust. All actions proposed for the management of particulate matter and fugitive dust, including the use of tarps and an adequate number of water trucks must be stated as specific mitigation measures in the final EIR.

Comment 179-31  
continued

3. According to Table ES-1 of the DEIR, the proposed mitigations may not be possible. The statement under “*Level of significance after mitigation*” is “*Full implementation of these mitigations could be unachievable. Therefore, impact remains significant and unavoidable*”. If mitigation is not possible, it is not mitigation. The feasibility of the mitigations must be determined and documented in the final EIR so that decision makers have an understanding of the full impacts on regional air quality.

Comment 179-32

4. Neighborhood air quality events, such as wildfires that create smoke or large events at the Rose Bowl can further degrade air quality. There must be continuous monitoring of the air quality when such an events occur and there must be a plan to halt all project-related activities if and when the air becomes unhealthy.

Comment 179-33

### C. Biological Resources

The DEIR states that the removal of habitat will have a less than significant impact. Under the proposed project, the entire 120 acres will be completely and permanently cleared of all vegetation, habitat, and candidate, sensitive or special status species. This cannot be described as anything but significant and unavoidable.

Comment 179-34

The DEIR does not discuss the fact that Hahamongna Watershed Park is included within the Los Angeles River/Arroyo Seco Corridor, an area the resources of which have been determined “nationally significant through the Rim of the Valley Special Resource Study

(Exhibit 15). The Rim of the Valley Study, spearheaded by Congressman Adam Schiff, studied the significant natural and cultural resources of the mountains encircling the San Fernando, La Crescenta, Santa Clarita, Simi and Conejo Valleys in California. The study, which is ongoing, analyzed two options: the potential creation of a new unit of the national park system or the potential adjustment of the existing boundary of the Santa Monica Mountains National Recreation Area.

The DEIR also does not address the long-term impacts of removing up to 120 acres of habitat from the last remaining wildlife corridor connecting the San Gabriel Mountains and the San Rafael Hills. Recently, the Arroyo Foothills Conservancy (AFC) announced their on-going efforts to purchase Cottonwood Canyon for \$1.6 million, just south of Devil's Gate Dam, in order to preserve wildlife corridors throughout the San Rafael Hills, and the Arroyo Seco Canyon, including Hahamongna Watershed Park. According to the 2012 Los Angeles County Department of Regional Planning's SEA Program the project site is located within the Altadena Foothills and Arroyos Significant Ecological Area (SEA). The Significant Ecological Area (SEA) Program is a component of the [Los Angeles County General Plan Conservation/Open Space Element](#): "*SEAs are ecologically important land and water systems that support valuable habitat for plants and animals, often integral to the preservation of rare, threatened or endangered species and the conservation of biological diversity in the County. While SEAs are not preserves, they are areas where the County deems it important to facilitate a balance between development and resource conservation. Development activities in the SEAs are reviewed closely in order to conserve fragile resources such as streams, oak woodlands and threatened or endangered species and their habitat.*"

([http://planning.lacounty.gov/assets/upl/sea/2\\_Altadena\\_Foothills\\_\\_Arroyos\\_SEA\\_Spring\\_2012\\_GP.pdf](http://planning.lacounty.gov/assets/upl/sea/2_Altadena_Foothills__Arroyos_SEA_Spring_2012_GP.pdf)).

The Arroyos & Foothills Conservancy has identified wildlife corridors in the area and Hahamongna Watershed Park is a critical segment of the corridor that allows migration to and from the Angeles National Forest. (Exhibit 9). The proposed project would permanently remove these sections of the corridors that pass through Hahamongna Watershed Park.

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Comment 179-35

Since the proposed project will prevent the recovery of any natural vegetation, many species would not return to the area and the wildlife corridor would never recover. Pasadena has made significant investments toward the preservation of unique environmentally sensitive areas. The final EIR must answer the following questions:

- ? How can the determination for biological resources be less than significant when so much habitat will be destroyed and so many species will be permanently removed?
- ? How can the determination for biological resources be less than significant when a County designated SEA will be severely impacted, especially as it relates to wildlife corridors?
- ? Why doesn't the DEIR reference the fact that HWP is included in an ongoing federal study to protect "nationally significant" resources?
- ? How can the elimination of biological resources in Hahamongna be considered less than significant when these resources are in an area which has been determined to be "nationally significant" in a federal study?

D. Land Use and Planning

The development of the HWP Master Plan was a years-long collaboration between Pasadena and the community. The Executive Summary of the HWP Master Plan clearly states the goals and guiding principles established by the City that will control the future of Hahamongna. They are as follows:

- *To encourage and promote the stewardship and enjoyment of the Arroyo Seco in Pasadena.*
- *To balance and integrate the interrelated issues of water resources, recreation, natural resource preservation and restoration, and flood management in the Arroyo Seco.*
- *To provide a safe, secure and accessible Arroyo Seco for public enjoyment.*

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- *To recognize the importance to Pasadena of the history, cultural resources and unique character of the Arroyo Seco, and to conserve and enhance these assets.*
- *To preserve and acquire open space in or adjacent to the Arroyo Seco.*
- *To recognize that the Arroyo Seco in Pasadena is comprised of distinct geographical areas that are interconnected by a number of resources and features including, but not limited to, water, habitat, geology, recreation, and culture; and that it is part of a larger watershed.*

And the stated Goals include:

- *Preserve, restore, and enhance the native habitats*
- *The Devil's Gate flood control basin will be managed to provide protection to the developed and natural downstream areas.*
- *Conserve and protect the water resources of the Arroyo Seco*
- *Provide diverse recreation opportunities for the Pasadena community*
- *Enrich and promote the unique history and culture of Hahamongna Watershed Park*
- *Provide a safe and secure park*
- *Provide adequate circulation, access and parking*

This project conflicts with a number of the stated Guiding Principles and Goals. It appears that LACDPW is planning for only one of the principles to the detriment of all others. The proposed project, which permanently eliminates natural resources, habitat, wildlife, and much of the recreation, is clearly in conflict with the goals and guiding principles established in the HWP Master Plan.

In addition to LACDPW's failure to comply with the HWPMP, the DEIR does not acknowledge the Spirit of the Sage Council Settlement with the City of Pasadena which restricts any new trails in much of the basin. (Spirit of the Sage Council v. City of Pasadena LASC Case No. BS083201). The DEIR must answer:

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continued

? Why is the legally binding agreement between the City and the Spirit of the Sage Council not acknowledged or addressed in the DEIR?

The Hahamongna Watershed Master Plan and MEIR cost millions of dollars to complete. Capital Improvement funds, grant funds and in some cases, private funds have been set aside for project implementation. Some of the completed or proposed projects that, with the implementation of the proposed project, will either be destroyed, rendered useless or eliminated are:

1. Flint Wash Bridge restoration – This Master Plan project has been completed but, according to the LACDPW presentation, the bridge and the top of the dam will be closed for the duration of the project, possibly beyond, to accommodate the storage of trucks and equipment. This bridge and the top of the dam are integral parts of the Perimeter Trail.
2. Sunset Overlook – This Master Plan project has been completed but will have no value during and after this project. The aesthetic value of the park for which Sunset Overlook was developed will no longer exist.
3. Berkshire Creek Restoration – This Master Plan project is in the planning process. But, according to the proposed project map, the restoration of the natural stream is located in the excavation area. This project will not be possible if the proposed project moves forward. Some of the project alternatives may allow for the Berkshire Creek Restoration after sediment removal but the area will be significantly degraded as a result of truck traffic through the area during sediment removal.
4. Multi-Benefit, Multi-Use (MBMU) Project - Although the Multi-benefit/multi-use project is now being re-scoped by the City of Pasadena, the Perimeter Trail is still an anticipated project as acknowledged in DEIR Table 2.9-1, Cumulative Projects. The City of Pasadena has received considerable grant funding toward the project, including a \$789,440 Proposition 50 grant from the California River Parkways Program as well as funding from several other sources (Exhibit 10). Part of the MBMU project is the west-

side perimeter trail restoration but portions of this trail are in the project area and will be permanently eliminated.

In the Aesthetics section, p, 67, the DEIR states that Pasadena’s Multi-Benefit Multi-use Project (MBMU Project) will be screened from the sediment removal project by mature vegetation reducing the potential for cumulative impacts to less than significant. Since the Initial Study for the MBMU Project is being redone, the specifics are not available about the boundaries of the project, or the number of trees to be removed. The final EIR must answer the following questions:

- ? How can the MBMU project be properly included in cumulative impacts if the project description and boundaries are not yet known?
- ? Why is the environmental impact of eliminating portions of the Perimeter Trail not evaluated in the DEIR?
- ? Since the MBMU Project as it was proposed involves the removal of trees and vegetation, how can the DEIR state that the potential for cumulative impacts is less than significant?

5. Perimeter Trail – This trail encompasses several projects in the Master Plan, some are completed, and some are in the planning phase. The City has already received a \$789,440 in grant funding (Proposition 50) toward the completion of the Westside Perimeter Trail. For all the alternatives, sections of the Westside Perimeter Trail, especially in the south-west area of the basin, will be closed or severely impacted by noise and dust for the duration of the sediment removal project. It is clear in the DEIR that the Perimeter Trail and several other trails and access points will be closed during the project. In the case of the proposed project, portions of the Perimeter Trail are in the excavation area and, as a result, the trail will be permanently lost and all projects related to restoration must be cancelled.

In the Recreation Trails section (3.4) of the HWPMP, the Perimeter Trail is define as:

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Comment 179-41

*“an all-weather, permeable surface roadway will loop around the entire basin providing hikers and equestrians an internal recreational trail with links to connecting trails in the Angeles National Forest, the Central Arroyo, and the County-maintained trails to the east and west of the park. The Perimeter Trail will serve as a delineator, separating the stream and its associated restored habitats at the center of HWP from areas of concentrated recreation activity on the westside and water resources facilities on the east side. This delineation helps preserve the streambed and sloped banks as a wildlife corridor.” (P.3-42).*

And, on page 3-11 of the HWPMP the following statement is made about City “designated” trails in the HWPMP, showing that there are “designated” trails in the project area:

*There are no designated recreation trails inside this [Perimeter Trail] loop with the exception of one trail, just north of the flood management/water conservation pool that crosses the widened stream corridor at elevation 1027 to connect the east and west recreational areas.*

The westside perimeter trail restoration, although partially funded, cannot be completed during the proposed sediment removal project. The Dam Observation Trail will be closed during of sediment removal and on-going maintenance activity. There will be no designated trail in or around the basin that allows for crossing from the east side to the west side. In addition, trail closures will include designated trails that allow access from La Canada Verdugo Road, the tunnel that leads to trails in the Central Arroyo and the Flint Canyon trail that provides access to the southern half of the La Canada Flintridge trail system. For the duration of the sediment removal project and during maintenance activities, there will be no way to get from the Central Arroyo trails to either the Flint Wash Bridge, the Altadena Crest Trail, the remnants of the Perimeter Trail or the Angeles National Forest.

According to mitigation measure MM LAN-1, “Temporary impacts to designated recreational facilities and trails shall be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project”. First, this

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mitigation measure does not address permanent impacts to portions of the trail that are within the proposed project excavation/maintenance area and will be permanently lost. Second, some of the trail uses such as equestrian trail use cannot be “redirected” elsewhere and connections of several designated trail systems that are defined projects in the HWPMP will be closed during the project period and beyond.

Eliminating trails in Hahamongna has a wider impact than upon the park alone. The trails in the park are of vital importance, tying together an excellent regional trail network which includes the trails of La Canada Flintridge, Pasadena, Altadena, South Pasadena and the Angeles National Forest. Within the past decade, La Canada Flintridge has completed extensive trail repairs and new trail construction to make a great trail system even better. After 40 years, the La Canada Loop Trail has been completed. Los Angeles County and the Altadena Crest Trail Restoration Working Group have been working to reconnect the historic Altadena Crest Trail to the rest of the trail network. Pasadena is upgrading the trails in Hahamongna as well as those trails farther south in the Arroyo. The trails are an important and highly valued recreational resource in our region.

The project as proposed will cut off access for trail users coming to the park from Pasadena, from Altadena and from La Canada Flintridge for the nine month duration of the project each year for five years or more. Trail closures such as the Altadena Crest Trail are not necessary and should be temporarily rerouted. Every effort should be made to allow weekend access to all the trails during the project and to make sure the trails are accessible during the months when work is not taking place.

6. Establishment of riparian habitat – Implementation is not possible, especially if the proposed project moves forward.

7. Establishment of willow and sycamore habitat – Implementation is not possible, especially if the proposed project moves forward.

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continued

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8. Establishment of several woodlands - Implementation is not possible, especially if the proposed project moves forward.

9. Construction of the westside spreading basins - The boundaries of the proposed Project will prevent the City of Pasadena from building the westside water spreading basins which have been approved in the Hahamongna Master Plan. The final EIR must answer the following questions:

? Why does the DEIR not discuss the impacts to Pasadena's abilities to percolate water within the basin?

? How many acre feet of water per year will not be recovered within the basin because of the implementation of the sediment removal part of the project?

10. Organizations currently using the park - Tom Sawyer Camps (TSC), the Rose Bowl Riders (RBR) club and charitable services to the community like Move A Child Higher Therapeutic Riding (MACH I) have made significant improvements to the park to support their activities. MACH I is not mentioned in the DEIR except as "a *small special-needs population*" (p. 211) that is a part of the Rose Bowl Riders membership. LACDPW clearly does not understand that MACH I is a PATH-certified therapeutic riding program that is currently a sub-tenant of Rose Bowl Riders and not recreation. MACH I recently completed the construction of a new facility in Hahamongna Watershed Park which involved significant private investment and grant monies as well as hundreds of hours of volunteer work. Tom Sawyer Camps, Rose Bowl Riders and MACH I will experience significant disruption to their operations, at least during the projected 5 year project, and possibly permanently. Relocation for these equestrian organizations is not practical. According to the DEIR, there are two other stables within a 15-mile radius of Hahamongna (p. 211). While it is true that individual horses could be moved to these facilities, Rose Bowl Riders, Tom Sawyer Camp and MACH I, all community organizations, could not.

Not mentioned in the DEIR is the rich equestrian heritage and active equestrian community in neighboring Altadena, northwest Pasadena, and La Canada Flintridge

that rely on Hahamongna. The DEIR does not acknowledge that Rose Bowl Riders moved to the Park at the invitation of the City of Pasadena in the early 1950s and has been a unique recreational resource for the community ever since. The DEIR does not recognize that the facilities of the Club, currently used for boarding, lessons, and horseshows, are an active social gathering place for horse lovers from all over greater Los Angeles. The final EIR must properly recognize the unique organizations that MACH I, Tom Sawyer Camps, and Rose Bowl Riders are and must also properly evaluate the environmental impacts upon them.

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E. Noise

The DEIR states that Pasadena and Los Angeles County exempt public agencies from the Municipal Code noise requirements, p.201. La Canada Flintridge does not have an ordinance setting maximum noise levels during the proposed construction hours.

According to the DEIR, "the Proposed Project will comply with all local noise ordinances, and roadway noise impacts will be less than significant". Given the massive size of the project, LACDPW owes it to the community to provide a frank and forthright assessment of the environmental impacts of five years of construction and traffic noise. The final EIR

must answer the following questions:

- ? In addition to diesel engine noise, why doesn't the DEIR evaluate the backup warning beeps on construction equipment?
- ? Shouldn't the community, particularly those who live on the edge of the Arroyo, be informed that they will be subjected to this intrusive beeping noise six days a week, up to twelve hours a day, for five years or more?
- ? Why is the LACDPW citing ordinances rather than disclosing the facts?
- ? How can this been considered less than significant?

F. Recreation

The DEIR is deficient in its assessment of the environmental impacts of the project upon recreation, which is one of the primary goals of the HWPMP as adopted by the Pasadena

Comment 179-51

City Council in 2003. Numerous inaccurate and/or inadequate statements are made regarding the impacts to recreational activities in the park and the impacts resulting from this project. For example:

1. The DEIR states “*During project sediment removal, most of the Proposed Project site will be closed to public use from the dam face to the edge of the Proposed Project’s excavation limit boundaries.*” With the proposed project, this encompasses all of the areas used recreationally today within the basin except the trail that runs north along the JPL fence line. However, trail along the JPL fence line is currently closed and unavailable for use indefinitely due to construction for a new JPL parking structure.

2. The DEIR states “*The majority of the maintenance roads will be closed during sediment removal; however these roads are not officially designated for recreational uses and are often not available for unofficial recreation use due to reservoir water levels or maintenance activities*”. First, the statement that the maintenance roads are often not available is untrue. They are only unavailable for a short time after major rain falls. Second, the evaluation of recreational and/or land use impacts, including trails, should not be limited by whether the County believes they are designated. The trails are used extensively today, will not be useable at all during and possibly after the project and the current users will be displaced. The impact to trails and trail use is greatly minimized due to this arbitrary distinction between “designated” and “non-designated” trails. In the final EIR, the trails maps must be redrawn to include ALL proposed and existing trails, including the Perimeter Trail.

3. The DEIR states “*As detailed below, implementation of sediment removal will result in temporarily restricted access to portions of designated trails and indirect impacts to existing recreation uses associated with construction activities. These impacts may increase the use of other area parks and recreational facilities such as those listed in Table 3.15-1, Area Recreational Facilities.* There are recreational activities that will not be able to be relocated or make use of existing recreational facilities. First, there is no alternate location for the disc golf course half of which is in the proposed project boundaries. Second, Table 3.15-1 includes the Rose Bowl area as an alternate

recreational location. The EIR for the NFL's temporary use of the Rose Bowl Stadium states that recreation around the Rose Bowl will be displaced and lists Hahamongna Watershed Park as alternate location for much of that recreational activity (Temporary Use of the Rose Bowl Stadium by the NFL, July 1012, Section 3.6 Recreation). Both of these projects, if implemented, will occur at the same time, displacing all recreation from both project sites.

4. The DEIR states "*The Oak Grove area of Hahamongna Watershed Park and the associated facilities including Oak Grove Disk Golf Course will remain open during sediment removal and will continue to provide active recreational facilities to the area. Sediment removal activities will not limit the use of the Oak Grove area of Hahamongna Watershed Park by individuals or by organizations such as the Oak Grove Disc Golf Club, the Rose Bowl Riders, or Tom Sawyer Camp*". First, the historic Disc Golf Club will lose use of much of their playing area. Second, Tom Sawyer Camp conducts much of its activity, including horseback riding and exploring nature, within the project area. Third, the statement that the sediment removal activities will not limit use of the area is incorrect. Use of the area will, in fact, be eliminated for most recreational activities. Fourth, MACH I is not mentioned in this statement. MACH I currently subleases a portion of Rose Bowl Riders but is a separate non-profit organization with special needs clients. These statement errors must be correct in the final EIR.

The final EIR must answer the following questions regarding impacts to recreation:

- ? Who determined and where is the documentation for which trails are "designated" and why only "designated" trails need to be considered in the EIR?
- ? If these trails are listed as "designated" by the City of Pasadena, why do the alignments and trail names not all correspond with the Trail Plan as adopted in the HWP Master Plan (Exhibit 11)?
- ? Why aren't all existing trails, including those within the basin, shown on the existing trails map in the DEIR (Figure 3.15-3) since their elimination will have just as much of an impact upon recreation as will the elimination of the "designated trails"?

Comment 179-56 continued ↑  
? How will the final EIR address the fact that this project along with the NFL use of the Rose Bowl create a cumulative impact on recreation and each project site plans to redirect recreation to the other project site?

? Why is there no baseline study of the recreational use of the area?

G. Transportation/Traffic

Comment 179-57  
Although traffic has been determined to be a significant and unavoidable impact at the project site, and at Pasadena, La Canada and Altadena intersections, the impacts have been severely understated in the following areas:

Comment 179-58  
1. The Mobility Element of Pasadena's General Plan ([http://cityofpasadena.net/Planning/CommunityPlanning/General\\_Plan/](http://cityofpasadena.net/Planning/CommunityPlanning/General_Plan/)) includes the goal of protecting neighborhoods by discouraging traffic from intruding into community neighborhoods. Commuter vehicles attempting to avoid the truck traffic, especially in and around the 210 South to 210 east interchange tunnels will exit the freeway and drive through the neighborhoods.

Comment 179-59  
2. In its scoping letter, Caltrans stated that haul trips should be limited to off-peak commute hours. Mitigation measures TRA-1 and TRA-2 propose to prohibit delivery to Boulevard and Vulcan sediment placement sites during PM peak hours. Peak PM hours start at 2pm. Peak AM hours will be from 6am until 9am yet there are no mitigation measures proposed for inbound truck traffic from Irwindale. The PM mitigation proposed will likely extend the hours per day trucking will occur or extend the number of years that the project will take.

Comment 179-60  
3. The DEIR does not discuss the cumulative impacts to traffic resulting from this project in conjunction with the Devil's Gate Water Conservation (pipeline) project. The proposed location for the pipeline to Eaton Wash is under Woodbury Street and New York Drive. These streets are currently alternate routes for east-west traffic trying to avoid congestion on the 210 freeway. These two streets are also key access routes to all Altadena residential areas. The Water Conservation Project must be defined in the final EIR and the cumulative impacts must be considered in the final EIR

4. The DEIR is deficient in that traffic patterns within the park are not delineated. Access routes are shown only in the extreme southern area of the park. The public was advised that there would be no particular haul routes within the basin. The DEIR indicates otherwise, however, stating that vehicular activity will be limited to established unpaved roads and unpaved parking lots (p.86). The final EIR must clarify where the access/haul routes will be within the basin. In addition, the final EIR must state how wide the access routes within the park will be. At the project information meetings, County staff indicated the access roads will be 16 feet wide and used for one way traffic only. This needs to be confirmed in the final EIR. The environmental impact of the haul routes and parking lots within the park cannot be accurately assessed when the locations and dimensions have not been fully disclosed. The final EIR must provide a map showing the maintenance roads/trails, parking lots and any other facility that will be used as the haul routes and staging areas within the basin.

Comment 179-61

5. In an article in the Altadena Patch, Kerjon Lee, spokesman for County Public Works was quoted as stating the County might use a road the City of Pasadena was looking at building on the west side of the park (“Devil’s Gate Dam Project Could Be Larger than Expected,” Altadena Patch, September 26, 2011, [www.altadena.patch.com](http://www.altadena.patch.com)). Since there has been vehement, decades-long community opposition to any new roads in Hahamongna, this quote raised questions which were never adequately answered about how the proposed sediment removal project might be used as a pretext to build new roads in and around the basin. Any discussions between County Public Works and the City of Pasadena staff concerning construction of roads in the basin before, during and after this project must be disclosed now so that the cumulative environmental impacts can be evaluated by the public and the decision makers.

Comment 179-62

The final EIR must answer the following questions regarding impacts to transportation and traffic:

Comment 179-63

- ? Why is there no discussion of impacts to all neighborhoods along the 210 corridors, including East Pasadena, Arcadia, and Monrovia?

Comment 179-63  
continued

- ? How long would the proposed project take if haul trips are only during the off-peak commute hours as suggested in mitigation measures TRA-1 and TRA-2? Why is there no mitigation measures proposed for inbound trucks from Irwindale during AM peak hours?
- ? What will be the cumulative impact when this project is combined with the Water Conservation Project that will shut down a major east-west freeway traffic alternative?
- ? Where are the access routes within the basin and how do these impact the trails and other recreational uses?
- ? Have there been discussions between County Public Works and the City of Pasadena staff concerning road building and/or expansion in Hahamongna?

H. Incomplete Statements of Impacts and Inadequate Mitigations

Comment 179-64

1. The County was aware of and given the opportunity to comment on the Hahamongna Watershed Park Master Plan (HWPMP). According to the response matrix, the LACDPW submitted two comment letters. The concerns raised by the County were related to the liner to be used in the water conservation pool, the need to adhere to seismic ordinances and codes, concerns about the Superfund Site, the City's need to get County permits for construction, some project costs and sediment removal frequency and quantity. For the most part, the LACDPW was supportive of the projects planned in Hahamongna.

[http://www.ci.pasadena.ca.us/PublicWorks/AS\\_MEIR](http://www.ci.pasadena.ca.us/PublicWorks/AS_MEIR), Arroyo Seco Master EIR V3 Section 13 Responses to Comments

The City of Pasadena was put in a position of detrimental reliance when it moved forward with the cost of planning and implementing numerous projects in the HWPMP. The proposed project, as described in the DEIR, is in direct conflict with the stated guidelines, goals, numerous projects and land use in Hahamongna Watershed Park. Conflicts with the HWPMP are detailed below under "Land Use and Planning".

Comment 179-64  
continued

? Why hasn't LACDPW described in detail the impacts to ALL projects listed in the HWPMP?

2. The proposed project and most of the alternatives have environmental impacts which cannot be mitigated to a level of less than significant. Given the size and extent of this project and the environmental impacts, the list of 18 mitigation measures presented is an amazingly short list and, for the most part, ineffective. Essential to the legal adequacy of mitigation measures is that there is a real effort to identify feasible, performance-based mitigations that do not rely on future planning. And, per CEQA, maximum effort needs to be made to present alternatives that allow most if not all mitigation measures to be performed on-site. As discussed above, the actual amount of sediment proposed to be removed should be reduced to what is actually necessary to meet this project's objectives, not to accommodate other projects or to meet other unstated County goals. The amount of sediment to be removed should not exceed the amounts stated in other County documents such as the Devil's Gate and Eaton Storm Water Flood Management Project grant application. It is likely that a smaller amount of sediment and excavating only 50 acres or less immediately behind the dam would allow for much more on-site mitigation. It is clear that slowing the project down and down-scaling the project would reduce the need for mitigation and improve mitigation opportunities.

Comment 179-65

As described, the proposed project would excavate and keep permanently cleared 120 acres, including riparian habitat, a major wildlife corridor, 50+ acres of willows, hundreds of other trees, and endangered and protected species. There is no mitigation for the restoration of wildlife corridors, and several protected species might never return to the area. Since the proposed project will scour 120 acres, mitigation for trees and riparian habitat would certainly have to be primarily offsite. Further, the DEIR suggests for mitigation replacement at a ratio of 1:1. This is less than the standards generally used by the City of Pasadena which, for trees, often uses a ratio of 3:1 in order to insure that at least one tree survives for every 3 planted.

The County may not approve or carry out a project for which an EIR identifies one or more significant effects on the environment unless all of the adverse environmental effects have been mitigated to a level of insignificance *or* all feasible mitigations and alternatives have been adopted *and* that project benefits outweigh the significant effects on the environment. Project benefits cannot be mischaracterized and must be supported by substantial evidence. The County must mitigate properly if they want to pursue any statements of overriding consideration as required by CEQA.

Some inadequacies in the mitigation measures are:

- The DEIR does not discuss where the off-site mitigation measures will be.
- MM BIO-8: The DEIR states that mitigation for tree removal is going to be a combination of onsite and offsite habitat restoration at a replacement ration of 1:1 and that ruderal habitats within the park are to be used whenever possible. But, there will be few ruderal habitat opportunities since the 120 acres will be scoured.
- MM AQ-1: The mitigation measure states trucks that meet EPA's emission standards for model year 2007 as reasonably feasible. This is not an effective mitigation measure if it is not feasible.
- MM BIO-7: This mitigation measure references trees within the project area "that can be avoided". But, with the proposed project all vegetation will be removed and kept out of the project area. The DEIR does not address how they will obtain the necessary permits for tree removal from the City of Pasadena and what the oversight will be to assure all City regulations are complied with. The mitigation measure references additional measures that will be implemented to protect the root zone of oak trees but does not state what these additional measures will be.
- MM LAN-1: The mitigation measure addresses "temporary" impacts to recreational facilities and trails. The DEIR does not propose any mitigation

Comment 179-65  
continued

Comment 179-66

Comment 179-66  
continued



measures for “permanent” impacts to recreational facilities such as the disc golf course and the numerous trails that will be lost.

The final EIR must address these inadequacies and answer the following questions:

- ? Where will all off-site mitigation occur?
- ? What percentage of habitat mitigation will be on-site and what percentage off-site?
- ? How much of the off-site mitigation will be at locations within the City of Pasadena?
- ? How can LACDPW propose a project of this size and not guarantee the EPA emissions standard will be met? Who will determine what a feasible effort for meeting the standard is? Who will monitor this mitigation to assure that the standard has been met?
- ? How is it possible to use ruderal habitats within the park for mitigation if the 120 acres of the park are scoured as is stated in the proposed project? What is the acreage of ruderal habitat that would remain in the park to be used for mitigation under the proposed project and each of the alternatives?
- ? What mitigation measures are proposed for “permanent” impacts to recreational facilities such as the disc golf course and the numerous trails that will be lost?
- ? How will trees within the project area be “avoided” when all 120 acres will be scoured? At what point will LACDPW obtain the necessary permits for tree removal from Pasadena? Who will oversee that all City regulations are complied with? What “additional” measures will be implemented to protect the root zone of oak trees

Comment 179-67

#### IV. Errata and Necessary Clarifications

Comment 179-68

A. The LACDPW Sediment Management Strategic Plan (2012-2032) has specific information on the remaining capacity of the reservoir. However, a search of the DEIR for the word



“strategic” did not turn up a single reference to the County’s Strategic Plan. In addition to the specific information about Devil’s Gate Dam, the Strategic Plan is relevant to the decision makers and the public trying to gain an understanding of the County’s entire sediment management plan and how Devil’s Gate fits in. The final EIR must include all relevant information from the Strategic Plan concerning Devil’s Gate Dam and Reservoir.

Comment 179-68  
continued

B. The trails map in the DEIR, Figure 3.15-2 Devil’s Gate Area Designated Trails, is drawn incorrectly. It does not correspond with either the trail alignments shown in the trail plan adopted in the HWP Master Plan or the existing Hahamongna trails as shown on the City of Pasadena Arroyo Seco Guide to Public Trails and Recreation, revised 3/23/2010 (Exhibit 12).

Comment 179-69

C. The alignments of the West Rim Trail in the vicinity of the Oak Grove Sports Field do not correspond with those in the adopted HWP Master Plan Trail Plan. Since the West Rim Trail is not even depicted in the Arroyo Seco Guide to Public Trails and Recreation, the source of the alignments in the DEIR is in question. The final EIR must disclose source(s) used for the trail alignments and the alignment of the West Rim Trail must be changed to correspond with that in the adopted HWPMP.

Comment 179-70

D. The DEIR states that maintenance roads in the park are used as “unofficial trails when reservoir water levels and conditions permit,” p.211. This is inaccurate. The Perimeter Trail as proposed in the adopted Park Master Plan would utilize the park maintenance roads as part of the official trail network. The most recent version of the Perimeter Trail in Pasadena’s Multi-benefit multi-use Project includes a bridge which would raise the trail out of the inundation area. In the final EIR, the trails map must be redrawn to include all proposed and existing trails, including the Perimeter Trail. And, the analysis of impacts must be corrected to reflect the environmental impacts of this project upon all existing and proposed trails in the park as indicated in the park Master Plan adopted by the Pasadena City Council.

Comment 179-71

E. The DEIR states on p.35 that, after the Station Fire, most of the vegetation and trees on the Proposed Project site were dead, washed out, or buried under sediment...”. The 2003 picture of the project area was taken in May (Figure 3.4-1). The 2010 picture of the project

Comment 179-72

area ( Figure 3.4-2) and the 2011 picture of the project area (Figure 3.4-3) were taken during the month of February when the willow trees in Hahamongna are dormant. A photo taken on November 7, 2010 (Exhibit 13) shows that the willow trees behind the dam were very much alive. The final EIR must present project area photos that accurately reflect the current state so as to not give the misleading impression that the trees behind the dam are dead. Most of the trees behind the dam, primarily willows, not only survived the Station Fire but flourished.

F. The public's task in understanding the environmental impacts of the sediment removal project has been made much more difficult by conflicting information in County Public Works documents. As stated in section II-A, there are discrepancies related to project storage capacity between the original Devil's Gate sediment removal plan, the 2010 grant application to the CA Department of Water Resources for the Devil's Gate and Eaton Stormwater Flood Management Project, and the County of Los Angeles Sediment Management Strategic Plan 2012 – 2032. These discrepancies need to be resolved and corrected in the final EIR.

G. The DEIR states that Alternative 2, Configuration C will have an increased conflict with bike and pedestrian facilities. The final EIR must clarify this.

H. The DEIR states that Alternative 2, Configuration C, as with the Proposed Project, will occur over 5 years. It does not seem likely that Alternative 2 could be completed in 5 years when it proposes removing 1mcy more sediment than with the proposed project.

I. The list of schools in the immediate vicinity (p.74) is incomplete. It does not include La Canada Junior High School and the Child Education Center which is immediately adjacent to La Canada High School. The latter omission is significant since the school has programs for infant/toddler (as young as 2 months old), preschool, and school age children.

J. In the Air Quality-6 Cumulative Impacts section (p.93), the temporary use of the Rose Bowl by the NFL is not listed as one of the projects which could be going on at the same time as the sediment removal project p.93. This needs to be corrected in the final EIR.

Comment  
179-72  
continued

Comment  
179-73

Comment  
179-74

Comment  
179-75

Comment  
179-76

Comment  
179-77

Comment 179-78 | K. The Flint Canyon Trail, one of La Canada Flintridge's main trails, is incorrectly identified in the DEIR as the Flint Wash Trail, p.210

Comment 179-79 | L. In Appendix D, Biological Reports (p.1), the text states "The proposed project will remove 1,671,000 cy of sediment debris from Devil's Gate Reservoir." The Biological Report was apparently done before the Proposed Project was enlarged from its original scope. Figure 3 of the Biological Resources Map is also incorrect in Appendix D. It shows an excavation footprint which corresponds with that of the project as originally proposed rather than the much larger footprint of the DEIR Proposed Project.

Comment 179-80 | M. The Move a Child Higher (MACH I) therapeutic riding program must be accurately define as a stake-holder in and a designated use of Hahamongna Watershed Park. The reference that MACH I is nothing more than "*a small special-needs population*" of Rose Bowl Riders is inaccurate and must be corrected and the impacts to this group need to be analyzed.

**V. Conclusion:**

Comment 179-81 | After careful study, Friends of Hahamongna believe there are many problems with the proposed project and all the alternatives. We support a sediment removal alternative that would phase the removal of sediment over a much longer period of time, remove only the amount of sediment that is necessary, make more use of sluicing, destroy a much smaller area of Hahamongna and cost far less. We believe there is a far less impactful alternative that meets the project goals. The concepts advocated by the Arroyo Seco Foundation (ASF) should be used as a basis for the development of an environmentally superior alternative. LACDPW must develop a sediment removal plan which would promote the multiple goals of the Hahamongna Watershed Park Master Plan rather than addressing only flood control to the detriment of all other purposes served by the park such as habitat preservation and recreation.

Comment 179-82 | LACDPW should make use of the many community suggestions for an effective yet tolerable solution that does not create such a negative impact on the environment and surrounding communities. It is also important the LACDPW take into consideration and fully respect alternatives presented by Responsible Agencies such as the City of Pasadena.

**VI. Exhibits:**

# Postfire Sediment Removal Project

Emergency Response to the 2009 Station Fire and 2010 Severe Winter Storms

- Planning to remove **1,671,000 cy** (1 DDE) of sediment due to expected 5 year recovery
- Construction to begin September 2011
- Estimated 3 years to complete
- Sediment will be hauled to Manning Pit SPS and Azusa Land Reclamation

## Station Fire Effects on Devil's Gate

- 2009-2010 Storms brought in 936,000 cy of sediment after only 1st year
- Estimated Current Capacity: 1,242,000 cy (~17%)

## Project Benefits

- Relieves threat to Devil's Gate Dam outlet works
- Establishes a permanent maintenance area
- Increased capacity = regaining necessary Flood Protection
- Improved Water Conservation
- Opportunity for better Water Conservation in the future (pool)

Exhibit 4 – Sediment Management Strategic Plan – Table 2-1

Table 2-1 Reservoirs in the Flood Control District

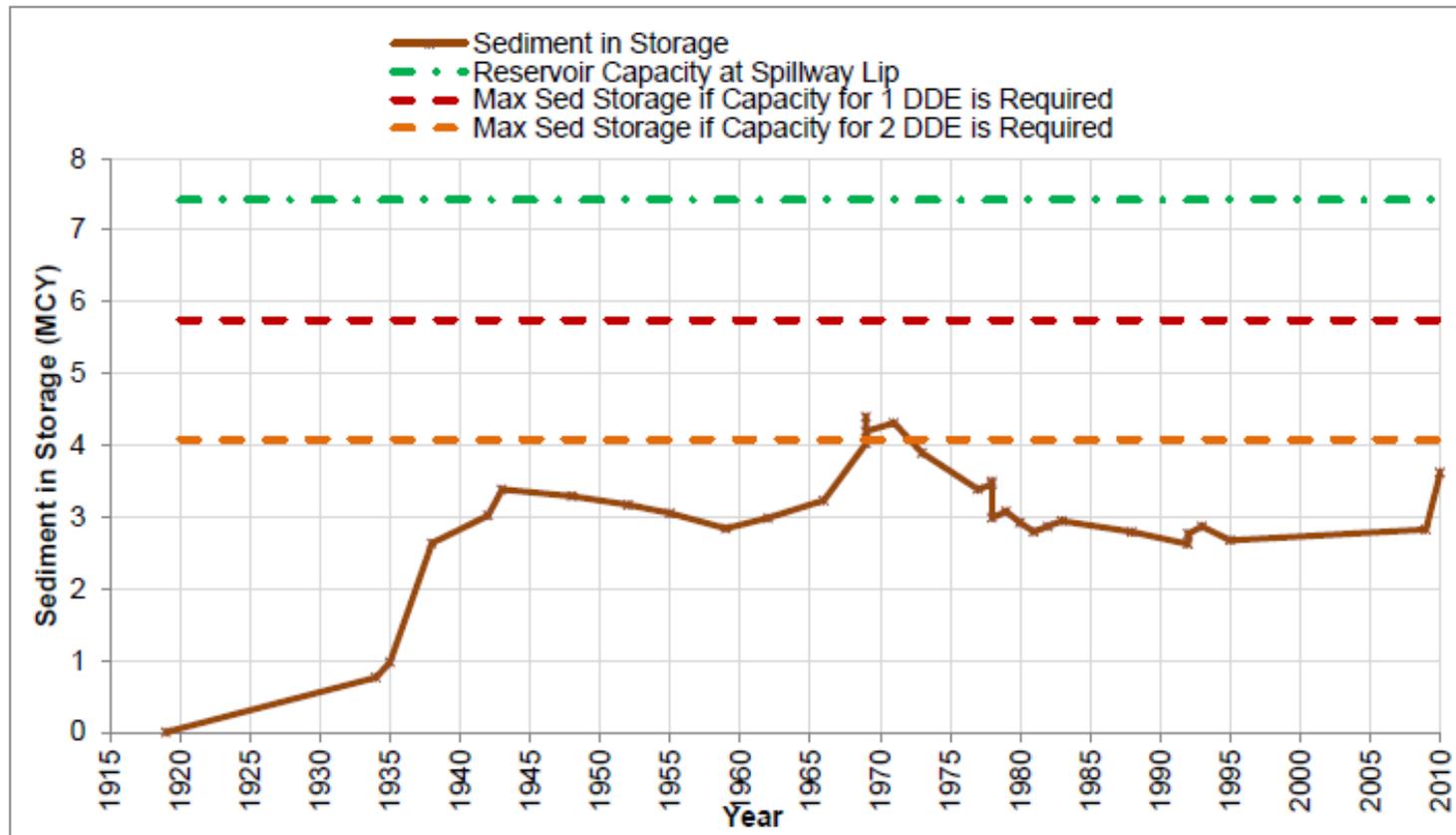
Reservoir	Original Capacity (MCY)	Historic Sediment Removal		Conditions as of the Last Survey				
		Sluiced (MCY)	Excavated (MCY)	Date of Last Survey	Sediment Quantity in the Reservoir (MCY)	Available Capacity <sup>(a)</sup> (MCY)	Percent of Capacity Taken Up by Sediment <sup>(b)</sup>	Percent of Capacity Available <sup>(c)</sup>
Big Dalton	1.7	0.0	1.6	Jul 2008	0.0	1.7	0%	100%
Big Tujunga	10.1	3.1	10.4	Aug 2011	2.0	8.1	20%	80%
Cogswell	19.8	1.3	4.4	Aug 2011	3.9	16.8	20%	80%
Devils Gate	7.4	2.2	5.9	Mar 2011	3.9	3.7	53%	47%
Eaton	1.5	0.0	3.3	May 2010	0.5	1.1	33%	67%
Live Oak	0.4	0.0	0.6	Nov 2008	0.008	0.4	2%	98%
Morris	52.1	2.6	0.0	Dec 2010	13.1	36.4	25%	75%
Pacoima	9.8	2.2	0.0	Sep 2010	5.1	4.7	52%	48%
Puddingstone	28.1	0.0	0.0	Sep 2004	1.7	26.4	6%	94%
Puddingstone Diversion	0.2	0.0	1.5	May 2005	0.0	0.4 <sup>(d)</sup>	0%	100%
San Dimas	2.4	0.2	4.4	Aug 2009	0.0	2.5 <sup>(d)</sup>	0%	100%
San Gabriel	86.1	11.8	24.3	Dec 2010	14.4	71.7	17%	83%
Santa Anita	2.2	1.9	0.8	Dec 2010	0.3	1.2	14%	86%
Thompson	1.0	0.0	0.4	Jun 2004	0.2	0.8	20%	80%

Notes

- a. Available Capacity = Original Capacity – Sediment Quantity in the Reservoir, or as determined based on the surveys.  
Example: San Gabriel Reservoir's Available Capacity = 86.1 MCY – 14.4 MCY = 71.7 MCY
- b. Percent of Capacity Taken up by Sediment = Sediment Quantity in the Reservoir / Original Capacity.  
Example: San Gabriel Reservoir's Capacity Taken Up by Sediment = 14.4 MCY / 86.1 MCY = 17%
- c. Percent of Capacity Available = 100% - Percent of Capacity Taken Up by Sediment  
Example: San Gabriel Reservoir's Percent of Capacity Available = 100% - 17% = 83%
- d. When a reservoir's available capacity is greater than the original capacity, it could be that the reservoir was overexcavated at some point. Alternatively, it could be a reflection of the inaccuracy of bathymetric surveys, which are used to determine sediment quantities in reservoirs.

Exhibit 5 – Sediment Management Strategic Plan – Figure 8-27

Figure 8-27 Graph of Historical Sediment Storage at Devil's Gate Reservoir



Sediment has been removed 32 times in the 92-year life of the reservoir as shown in Table 8-12. Table 8-12 shows that both excavation and sluicing have been used to remove sediment from Devils Gate Reservoir in the past. The majority of the sediment (73 percent) has been removed through excavation.

Exhibit 6 – Flood Hazard Warning and Contingency Plan for the Arroyo Seco Channel Map



Exhibit 7 – Arroyo Seco 50-Year Frequency Rainfall Bulked Flows and Superelevation Map (partial)

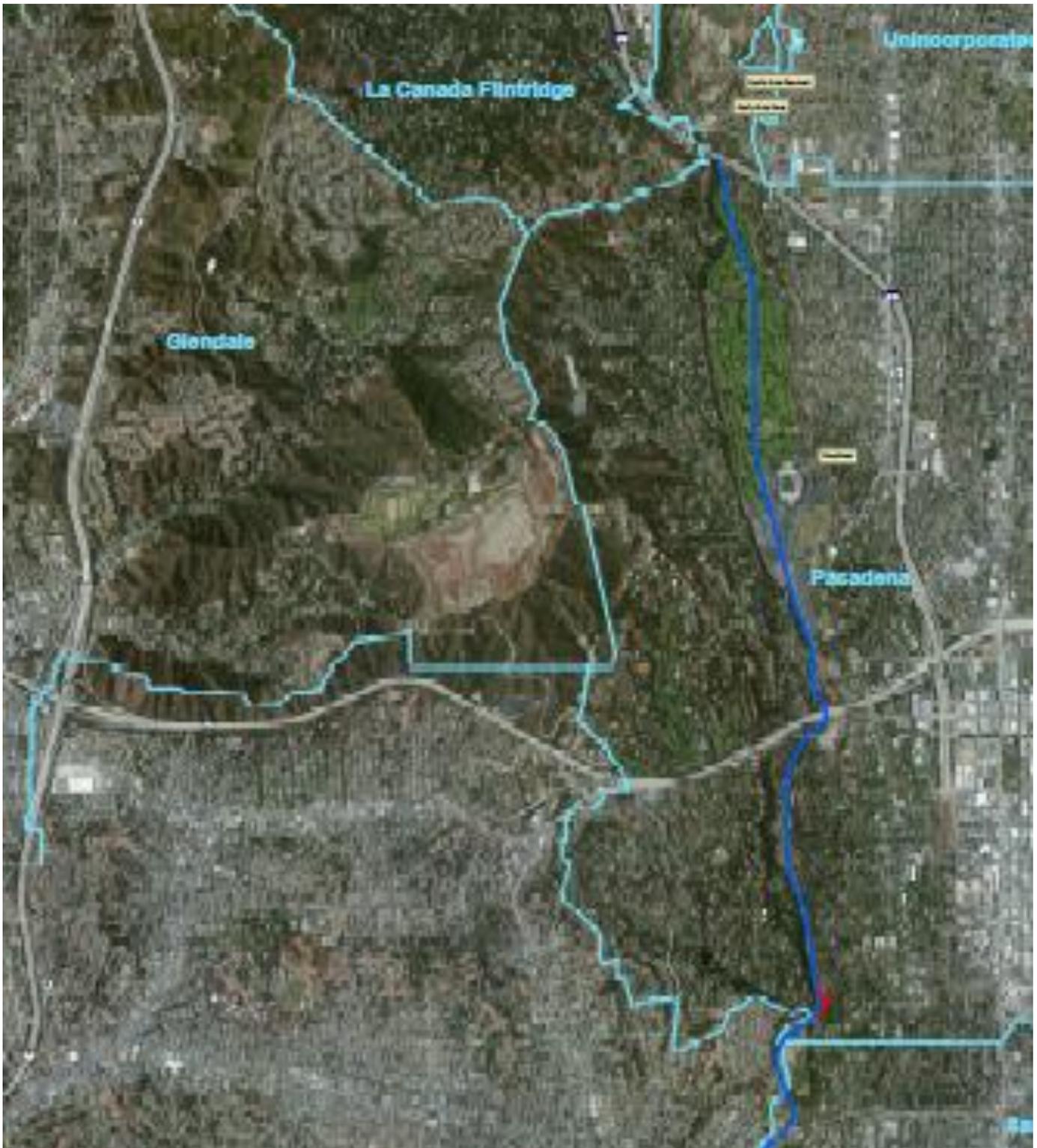


Exhibit 8 – Sediment Management Strategic Plan – Devil’s Gate Reservoir Historical Sediment

Table 8-12 Devils Gate Reservoir historical sediment accumulation and removal

Survey Date	Reservoir Capacity @ Elevation 1,054 ft (MCY)	Quantity Sluiced (MCY)	Quantity Excavated (MCY)	Sediment Accumulated Between Surveys (MCY)	Sediment in Storage (MCY)
October 1919	7.42	-	-	-	-
September 1934	6.66	-	0.08	0.84	0.76
June 1935	6.45	-	-	0.21	0.98
June 1938	4.79	-	-	1.66	2.64
January 1942	4.40	1.04	0.04	1.46	3.02
December 1943	4.04	0.10	0.03	0.50	3.38
Fall 1948	4.13	0.12	0.07	0.10	3.29
July 1952	4.25	0.41	0.14	0.43	3.17
September 1955	4.37	-	0.12	-	3.05
December 1959	4.58	-	0.28	0.07	2.84
May 1962	4.44	-	0.70	0.84	2.99
September 1966	4.19	0.08	0.60	0.92	3.23
February 1969	3.40	-	0.03	0.83	4.03
March 1969	3.02	-	-	0.37	4.40
November 1969	3.23	0.19	0.01	-	4.19
December 1971	3.11	-	0.23	0.35	4.31
October 1973	3.53	-	0.47	0.06	3.90
March 1977	4.04	-	0.75	0.24	3.39
March 1978	3.97	-	0.24	0.31	3.45
July 1978	3.93	-	-	0.04	3.50
December 1978	4.43	-	0.51	-	2.99
February 1979	4.34	0.25	0.12	0.47	3.08
March 1980	4.50	-	0.45	0.30	2.92
July 1981	4.63	-	0.32	0.19	2.79
September 1982	4.55	-	0.10	0.18	2.87
April 1983	4.48	-	0.05	0.13	2.95
June 1988	4.63	-	0.20	0.05	2.79
February 1992	4.80	-	0.17	-	2.62
July 1992	4.66	-	-	0.14	2.77
April 1993	4.68	-	-	0.10	2.87
November 1995	4.94	-	0.19	-	2.68
April 2009	4.79	-	0.02	0.18	2.83
April 2010	3.99	-	-	0.79	3.62
March 2011	3.72	-	-	0.27	3.89

Exhibit 9 - Wildlife Corridors – Cottonwood Canyon Through Hahamongna Watershed Park (AFC Website)

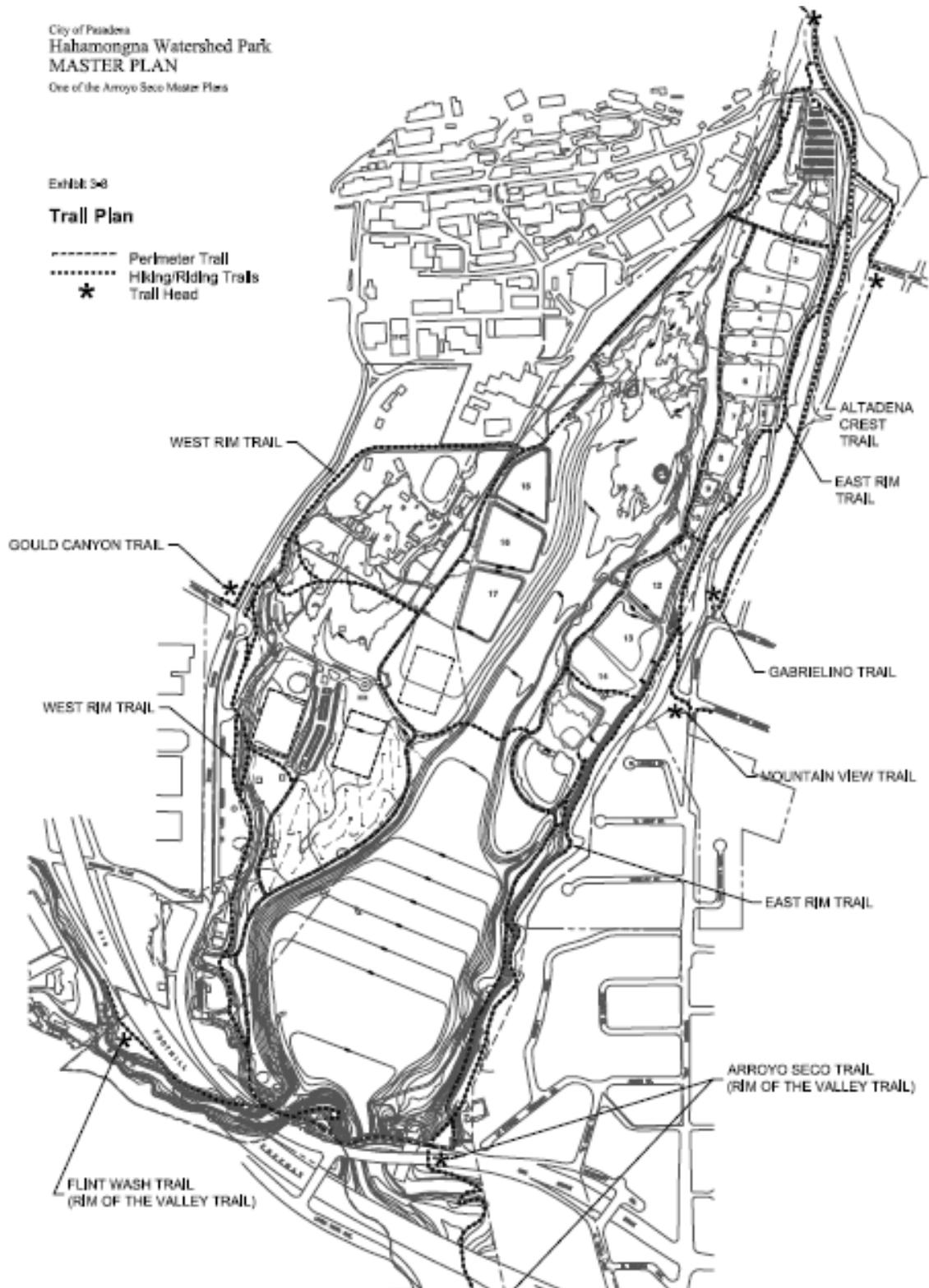


Friends of Hahamongna

**Exhibit 10 – HWP Perimeter Trail Project Grants (Information compiled from publicly available sources as of 8/8/2012)**

NAME and/OR LOCATION	GRANT SOURCE	ENVIRONMENTAL
Trail and Bikeway (Component 7) Upper Arroyo Seco Trail Hub Project	Requested from the CA River Parkways Program, CA Natural Resources Agency  (Prop. 84)	Grant denied
Westside Perimeter Trail Improvements – from the northern limits of Sycamore Grove field to the northern limit of Hahamongna Annex	State Environmental Enhancement Mitigation Grant 2010-11 for habitat restoration and trail improvements  (\$100,000)	Environmental compliance, coordination with LA County and regulatory agencies, and design to be completed in FY 2012
Funds obtained for Westside Perimeter Trail	Los Angeles River Parkway Program (established by the Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Act of 2002) Riparian and Riverine Habitat Program  \$400,000  RR-17-003 (Funds obtained in 2002)	Completion due date 3/31/2013?
Trail improvements to the Westside Perimeter Trail (CIP 77507)  Project includes the southernmost portion of the Westside Perimeter Trail and the Spur Trail to the expanded parking lot	FEMA                   \$8465  Prop 50               789,440 (Grant R81745-00)  Prop A '92           80,000	Environmental compliance and coordination with Los Angeles County and other regulatory agencies and final design to be completed in FY 2013  Hahamongna MBMU Project Initial Study
Berkshire Creek Restoration (including trail)	CA Dept of Water Resources Urban Streams Restoration Program Final Prop 84 Grant Awards – April 2012 Sponsor/cosponsor – Pasadena and the Arroyo Seco Foundation 638,410	

Exhibit 11 – Hahamongna Watershed Park Master Plan – Trail Plan Ex. 3-8





## Friends of Hahamongna

Exhibit 13 – Photo of Hahamongna Watershed Park – November 7, 2010 – Courtesy of Petrea Burchard

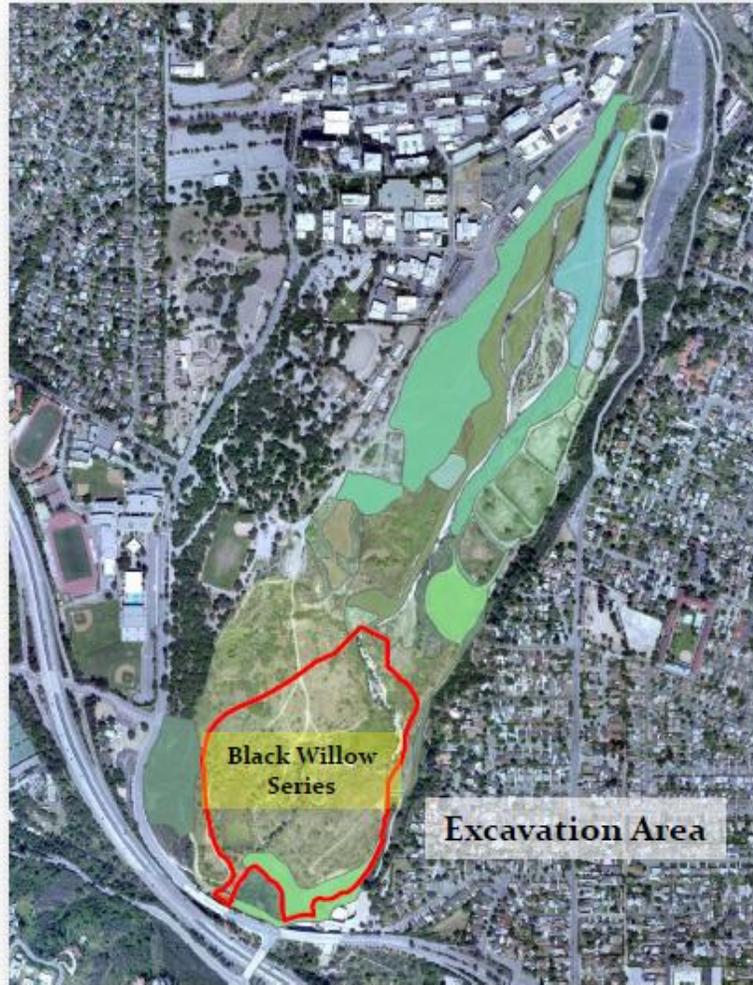


# Excavation Site

- Excavation Area: < 50 acres
- Willow Tree Removal (permanent) : ≤ 15 acres
- Avoidance of sensitive species

**VEGETATION COMMUNITY**

	Alder Woodland
	Alluvial Fan Sage Scrub
	Black Willow Series
	Coast Live Oak Woodland - Disturbed
	Coastal Sage Scrub
	Mule Fat Scrub - Disturbed
	Peppergrass Series
	Posion Hemlock Series/ Mule Fat Scrub - Disturbed
	Riparian Herbaceous
	Stream
	Ephemeral Pond
	Disturbed
	Ornamental



# Friends of Hahamongna

## Exhibit 15 – Geographic Areas within the Rim of the Valley Corridor

Map to the left: Two geographic areas within the Rim of the Valley Corridor study area have previously been found by the NPS to contain nationally significant resources: the Santa Monica Mountains National Recreation Area and the San Gabriel Mountains.

### Special Resource Study Criteria Preliminary Findings (New Park Unit)

**National Significance** - Does the study area contain nationally significant resources?

Two geographic areas within the Rim of the Valley Corridor study area have previously been found by the NPS to contain nationally significant resources: Santa Monica Mountains National Recreation Area (SMMNRA), and the San Gabriel Mountains.

The purpose and national significance of SMMNRA was established by Congress through its enabling legislation (Public Law 95-625). It recognizes the Santa Monica Mountains and adjacent coastline as an area of national significance because of its combination of natural, cultural, recreational, and aesthetic resources, and further states that, "... there is a national interest in protecting and preserving these

benefits." Through the San Gabriel Watershed and Mountains Special Resource Study process, the NPS has determined the San Gabriel Mountains to be of national significance for its geologic resources and high biodiversity. The Rim of the Valley Corridor study is not revisiting the significance of these two areas. However, the previously identified nationally significant resources are incorporated into the summary provided below.

The remaining portions of the Rim of the Valley Corridor study area are being evaluated through this study to determine the extent of nationally significant resources. The NPS preliminary findings indicate that the remainder of the study area contains nationally significant resources, including outstanding examples of geologic and paleontological resources, high biodiversity, as well as a culturally rich, long history of human use. The following summary describes how the study area resources, including the Santa Monica and San Gabriel Mountains, meet the national significance criteria.

Rim of the Valley Corridor Special Resource Study • Newsletter #3 • Fall 2012 • 5

**Response to Comment Letter #179 (Friends of Hahamongna)**

**Response to Comment 179-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 179-2:**

As discussed in Section 3.12.6 of the Draft Environmental Impact Report (EIR), the Proposed Project will not have any significant impacts or conflict with the applicable land use plans, policies, or regulations of adopted plan, including the Hahamongna Watershed Park Master Plan (HWPMP).

Impacts associated with the Proposed Project and mitigation measures to reduce those impacts were adequately and accurately analyzed per requirements of the California Environmental Quality Act (CEQA) in the Draft EIR for the Proposed Project.

**Response to Comment 179-3:**

The Draft EIR provided a legally adequate project description as per CEQA Guidelines 15124. As described in Section 2.0 of the Draft EIR, the Proposed Project description provides: the precise location and boundaries of the Proposed Project on a detailed map and on a regional map, a statement of objectives sought by the Proposed Project, a general description of the Proposed Project's characteristics, and the intended uses of the EIR. These were all provided in the Draft EIR, Section 2.0, Project Description.

**Response to Comment 179-4:**

Exhibits noted. In the Proposed Project scope as listed in the Initial Study (IS) dated September 28, 2011, the official commencement of the Proposed Project has always been listed as:

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.

The presentation and Board of Supervisors report, referenced in the commenter's letter, occurred before this date and referred to the emergency sediment removal project, which was never completed. In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cubic yards (cy) was proposed. This amount was considered justifiable as an emergency exemption to the CEQA. This emergency project was not completed because in March 2011 the County of Los Angeles Board of Supervisors motioned Los Angeles County Flood Control District (LACFCD) to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management

Project. Knowing that the EIR would take a considerable amount of time to complete, the County of Los Angeles Board of Supervisors also motioned for an Interim Measures Project to be implemented in order to help reduce the flood risk downstream of the dam until the ultimate sediment removal project commenced.

For Devil's Gate Dam, the design debris event (DDE) was previously calculated as 1.67 million cy. That previous calculation was based on the presence of debris-retaining structures including Browns Canyon Dam, located within the Angeles National Forest upstream of Devil's Gate Dam. These structures filled with sediment decades ago and no longer provide capacity to "control" any portion of the watershed. A subsequent analysis determined that the correct DDE, based on the absence of sediment control facilities in the Forest, is 2.0 million cy. Following the Station Fire, the Los Angeles County Department of Public Works (LACDPW) reviewed the DDE calculations and confirmed that 2.0 million cy is the current and appropriate volume for the DDE.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 LACDPW Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need. The Sediment Management Strategic Plan (Strategic Plan) is a 20-year plan that pursues new alternatives which can reduce the environmental and social impacts of sediment management. As described in the Strategic Plan, it is intended to be an advisory document. Development of specific cleanout plans for LACFCD's numerous facilities will be guided by the Strategic Plan, which provides opportunities for additional public input, including that from the local communities affected by each cleanout. The Proposed Project follows many of the objectives outlined in the Strategic Plan; however, the Strategic Plan is completely separate from the Proposed Project and is therefore not required to be a part of the environmental document.

The Strategic Plan included sediment history data to demonstrate the volume of sediment deposited into the dams and used that data along with statistical analysis to develop projected 20-year sediment volumes for County facilities. The sediment history provided for Devil's Gate Dam (pages 8-42 and 8-43 of the Sediment Management Strategic Plan) correctly shows the sediment volumes accumulated at the dam; however, the column titled "Reservoir Capacity at Elevation 1,054 ft." can be somewhat confusing with respect to the current capacity in the dam. That column provides the remaining capacity below elevation 1,054 feet, which is the original spillway elevation of the dam. The spillway was rehabilitated in order to pass the Probable Maximum Flood. The rehabilitation entailed lowering the spillway bottom elevation, thereby constructing the spillway ports. The reservoir capacity below the existing spillway ports (elevation of 1,040.5 feet) is the appropriate parameter for determining the currently available

capacity for meeting the sediment volume requirements for the dam. The current capacity in the reservoir below the spillway is 1.3 million cy. This is only 32.5 percent of the required storage capacity and only 65 percent of one DDE. Please note that additional sediment deposits have accumulated within the reservoir easement above the elevation of 1,054 feet. This accumulated sediment has the potential to be washed toward the dam during significant storm events and further reduce the available capacity below the spillway.

The lowest cost Proposed Project Alternative is expected to cost approximately \$65 million. LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. As only a portion of the Proposed Project will be funded through the grant, only a portion of the Proposed Project was included in the project description in the grant application. As identified in the grant application to the California Department of Water Resources, the preferred project alternative would be identified through the EIR.

The first survey in Appendix D was completed for the emergency project in 2010, but it correctly lists the biological resources found during that survey. The biological resources map created for that survey was the area that was surveyed at that time. The information in the biological report completed for the emergency project is still relevant, as it involves the Proposed Project area. Subsequent biological surveys were completed for the entire Proposed Project area and include maps for the Proposed Project.

The Draft EIR, Biological Technical Report (BTR), and focused surveys provide thorough and accurate existing conditions for biological resources (Draft EIR, Section 3.6; Appendix D, Biological Reports). The field surveys were conducted in 2010 and 2013 and included general biological surveys, focused sensitive plant surveys, focused least Bell's vireo surveys, and federal and state jurisdictional waters surveys, as described in Section 3.6 of the Draft EIR. Updates to focused surveys will be conducted for special status plants and significant natural communities (sensitive habitats) with a potential to occur within the Proposed Project area, in accordance with California Department of Fish and Wildlife (CDFW) guidelines, as part of the habitat restoration mitigation measure MM BIO-8.

The 2013 report was completed less than a year prior to the release of the Draft EIR for public review.

**Response to Comment 179-5:**

See Response to Comments 179-4.

Pursuant to Section 15126.6(a) of the CEQA Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, "[a]n EIR is not required to consider alternatives which are infeasible" (CEQA Guidelines Section 15126.6(a)) or "which could change the fundamental nature of the proposed project." (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.*(1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project's significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable.

14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency (1991)* 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council (1991)* 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

**Response to Comment 179-6:**

Exhibit noted. See Response to Comment 179-4.

Response to Comment 179-7:

See Response to Comment 179-4.

Response to Comment 179-8:

Exhibits noted. See Responses to Comments 179-3 and 179-4. As stated above, the Draft EIR provided a legally adequate project description as per CEQA Guidelines 15124; however, additional information concerning DDE calculation methods has been added for clarification to the Final EIR, Section 2.3, Project Need.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. In order for the removal project to be efficient, and therefore reduce impacts and costs, the amount of sediment removed every year needs to exceed the amount of sediment deposited. Historically, approximately 130,000 cy a year was deposited in Devil's Gate Reservoir annually since 1920.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and Caltrans to execute any necessary evacuations or freeway closures.

The Flood Hazard Warning and Contingency Plan (FWHCP) for Arroyo Seco Channel was prepared in an effort to coordinate with local and state agencies to minimize negative impacts in anticipated areas of flooding along the Arroyo Seco Channel, should those events occur. This effort is outside the scope of the Proposed Project and will not be included in the Final EIR. The potential flooding analyzed in the FWHCP is anticipated to occur during a Capital Flood Event (caused by a 50-year rainfall event) and under the current impacted reservoir condition of the Devils Gate Dam. The 50-Year Frequency Rainfall Bulked Flows and Super elevation Map in the FWHCP depicts the potential flooding risks along the Arroyo Seco downstream of Devil's Gate Dam.

During a single design-event-sized storm, the Rose Bowl is not expected to be impacted by flows from the dam; however, if sediment from each storm event is not removed from the downstream floodplain, each subsequent storm would increase the flood risk.

**Response to Comment 179-9:**

Exhibit noted. See Response to Comments 179-4 and 179-8.

The Devil's Gate Dam and Reservoir are part of a fluctuating system dictated by unpredictable forces of nature. As such, capacities in the reservoir fluctuate as well. To manage this and continue to provide adequate downstream flood protection, LACFCD has periodically executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average water year storm seasons.

**Response to Comment 179-10:**

The Draft EIR contains an adequate and complete cumulative impact analysis within each of the subsections of Section 3.0 Environmental Analysis. The cumulative analysis contains projects as determined by LACFCD and the surrounding cities and communities to have a potential cumulative effect due to overlapping timeframes of the projects. Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130.

**Response to Comment 179-11:**

See Response to Comment 179-4.

As noted in the Draft EIR, the Devil's Gate Water Conservation Project is still in the design phase, and no environmental report is available for public review at this time. It would be speculative to address impacts to biological resources before the concept of the Devil's Gate Water Conservation Project is finalized. Per CEQA, the project descriptions of cumulative projects are not required to be included in the Draft or Final EIR.

The Proposed Project does not require the implementation of the Devil's Gate Water Conservation Project in order to achieve the Proposed Project's objective to satisfactorily reduce flood risk, create a configuration suitable for routine operations and maintenance, and reduce the possibility of plugging at the face of the dam. The Devil's Gate Water Conservation Project does not require the implementation

of the Proposed Project to be carried out. Neither project is a foreseeable consequence of or a future expansion of the other project; therefore, these projects are separate projects per CEQA.

The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

The Devil's Gate Water Conservation Project would be compatible with all the alternatives; however, none of the alternatives were designed to enable that project. Implementation of the No Project Alternative would require that the Devil's Gate Water Conservation Project be designed to accommodate decreased Devil's Gate Reservoir capacity.

The Eaton Wash Spreading Grounds Improvement, Dam Rehabilitation, and Intake Improvement and Basin Enlargement projects have all been completed.

**Response to Comment 179-12:**

See Responses to Comments 179-4 and 179-11.

**Response to Comment 179-13:**

During the preparation of the Draft EIR, LACFCD prepared and consulted with surrounding cities and communities to provide a list of past, present, and probable future projects producing related or cumulative impacts to the Proposed Project. Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130. The Foothill Municipal Water District Project was not identified as a potentially cumulative project. The list of cumulative projects was presented in Table 2.9-1 of the Draft EIR. As noted in the comment, the Recycled Water Demonstration Project has been suspended and is still in the concept phase. As the timing and the project description are unknown, it would be speculative and not reasonably foreseeable to include this project in the cumulative project list.

**Response to Comment 179-14:**

The temporary use of the Rose Bowl by a National Football League (NFL) team was analyzed as a cumulative project in the Draft EIR, as noted in Section 2.9, Cumulative Scenario, and in the Traffic Study, as noted in Section 4, Project Conditions-Year 2014, Project Trip Growth.

Traffic impacts associated with the Proposed Project were discussed in detail in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations and the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the project site. This will include coordination of sediment transport activities with Rose Bowl special events.

As discussed in the Draft EIR, the NFL Temporary Use of the Rose Bowl could result in an increase in visitor population to onsite and proximate parks and recreational facilities or disrupt availability of these

facilities; however, this impact would be limited to 25 days per year and will not affect recreation for an extended time period. Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 179-15:**

See Response to Comment 179-14.

As discussed in the Draft EIR, recreational users may choose to visit other area parks, recreational facilities, or trails due to the temporary access restrictions or the indirect effects of construction-related activities during reservoir management activities. It is anticipated that these visitors will be dispersed throughout the area and that no single park or facility will experience a substantial increase in use. Therefore, cumulative impacts to recreation uses are expected to be less than significant.

**Response to Comment 179-16:**

The Devil's Gate Water Conservation Project, the Foothill Municipal Water District Project, and the Proposed Project are three completely separate projects, not phases of the same project. See Response to Comments 179-4, 179-11, and 179-13. The Devil's Gate Water Conservation Project was analyzed as a cumulative project in the Draft EIR, as noted in Section 2.9, Cumulative Scenario.

**Response to Comment 179-17:**

See Responses to Comments 179-4, 179-11, 179-13, and 179-16.

The amount of sediment needing to be removed from the reservoir for flood control purposed is based on restoring the reservoir to the design capacity necessary for flood control storage or to safely contain future sediment inflow (volume for two DDEs below the spillway elevation of 1,040.5 feet) and protecting downstream communities from flooding. The amount is in no way related to other projects proposed in the area.

**Response to Comment 179-18:**

The CEQA definition of a responsible agency refers to any agency which has discretionary approval power over the project, discretionary approval being that in which an agency can use its judgment in deciding whether and how to carry out or approve a project as distinguished from ministerial situations

where the public agency merely has to determine whether a project is in conformity with applicable statutes, ordinances, or regulations. Ministerial permits are based only upon fixed City standards, with no subjective decisions required for approval.

An easement granted in 1919 and revised in 1965 by the City of Pasadena to LACFCD encompassing Devil's Gate Dam and Reservoir states the easement is for the purpose of flood control and water conservation. The easement states "Grantor does hereby grant to Grantee a perpetual easement for reservoir, water conservation and flood control purposes, including the right to construct, reconstruct, inspect, maintain, repair and operate a dam, spillway, reservoirs, tunnels, by-passes, channels embankments, protection works, and appurtenant structures for the purposes of controlling, confining, storing and conserving water in, over and across real property hereinafter described." The goal for the Sediment Removal Project is to maintain the reservoir for the purpose of controlling, confining, and storing water within the easement boundaries; and, therefore, the Proposed Project activities fall under the latitude of the easement granted.

Due to the location of the Proposed Project within the limits of the City of Pasadena, ministerial permits, such as hauling permits, will be required from the City; however, the conditions outlined in the easement granted to LACFCD do not necessitate discretionary authority from the City for the Proposed Project. The Los Angeles County Flood Control District was created by State legislation to implement the State-designated objectives of flood control and water conservation within the boundaries of the District. When implementing these State-designated objectives, LACFCD is not subject to local ordinances. The purpose of the Proposed Project is to restore and maintain flood capacity at the Devil's Gate Reservoir, which would directly further LACFCD's regional flood control objective. Accordingly, the Proposed Project would not be subject to the provisions of the City of Pasadena's ordinances.

**Response to Comment 179-19:**

The California Regional Water Quality Control Board denied a permit for the emergency project without prejudice, with the understanding that LACFCD would be initiating an EIR process for a project which would restore the required level of protection. As part of Proposed Project approval, LACFCD will obtain the necessary permits from the California Regional Water Quality Control Board.

**Response to Comment 179-20:**

The Proposed Project and all of the alternative boundaries fall well within and do not exceed the 258-acre easement boundary. As stated in Response to Comment 179-18, the Proposed Project does not exceed the legal rights of the easement that was granted to LACFCD. The Devil's Gate Water Conservation Project and any related easement rights are not part of the Proposed Project and would be analyzed in a separate environmental document. LACFCD as Lead Agency will be responsible for the implementation and management of adopted mitigation measures. Responsible Agencies and required permits and approvals were described in Section 2.8 of the Draft EIR.

The purpose of the Proposed Project is to restore and maintain flood capacity at the Devil's Gate Reservoir, which would directly further LACFCD's regional flood control objective. Accordingly, the Proposed Project would not be subject to the provisions of the Pasadena's City Trees and Tree Protection Ordinance.

See Response to Comments 179-4, 179-6, and 179-19.

**Response to Comment 179-21:**

The Draft EIR Alternatives Analysis was a comprehensive analysis of each of the alternatives and the impact each would have on the community or environment. Although the section is lengthy, it is provided to present the potential impacts of each of the alternatives. In addition, the analysis compares the impacts of the alternative to the Proposed Project and each of the other alternatives to provide a comparison for the reader. This is to show how each alternative compares to the Proposed Project, the other alternatives, and the No Project Alternative in terms of environmental impacts. The Draft EIR also provided summary discussions and comparisons of each alternative for an easy to read overview of the analyses. Tables ES-2 and ES-3 are provided to outline the specifics of each alternative, as well as provide a comparison of impacts. In addition, Table 4.3-1 in the Alternatives Analysis also provides a comparison of alternatives.

**Response to Comment 179-22:**

See Response to Comments 179-21.

The findings of the EIR are that Alternative 3 is the Environmentally Superior Alternative. As shown in the Draft EIR, Section 4.6, Alternative 3 receives an in-depth analysis which present the potential impacts of each of the alternative and compares the impacts of the alternative to the Proposed Project and each of the other alternatives; providing ample information as to why this alternative was found to be the Environmentally Superior Alternative. Section 4.11 is a summary of these findings. The Draft EIR does not determine and has not designated any of the alternatives, including the Proposed Project, as the "Preferred Alternative." With the completion of the Final EIR, an alternative will be chosen and be presented to the Board of Supervisors as the Preferred Alternative. Any of the alternatives analyzed in the Draft EIR can be chosen as the Preferred Alternative.

Tables ES-2 and ES-3, and Table 4.3-1 in the Alternatives Analysis provides a comparison of the environmental impacts of each of the alternatives.

**Response to Comment 179-23:**

Exhibits noted. The Draft EIR analyzed a range of sediment removal amounts that would provide the capacity necessary to achieve the Proposed Project objectives.

The need for the large-scale sediment removal project is primarily due to the sediment deposited in the reservoir after the Station Fire. The Proposed Project will support sustainability by establishing a reservoir configuration more suitable for routine maintenance activities, thereby reducing or avoiding future large-scale sediment removal projects. See Responses to Comments 179-4, 179-8, and 179-9.

The Draft EIR analyzed six alternatives, including the No Project Alternative; and Alternative 3, Configuration D was determined to be the environmentally superior alternative that reduced impacts while still meeting the project objectives.

**Response to Comment 179-24:**

See Response to Comments 179-3 and 179-4.

As discussed in the Draft EIR, Section 4.5, under Alternative 2, Configuration C, during the reservoir management phase, access to Devil's Gate Reservoir will be similar to existing conditions.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. With sediment removal operations moving efficiently, it is reasonable to assume a project duration of no more than five years. It is likely that under the Proposed Project, sediment removal operations may take less than five years; however, for a more conservative analysis, a five-year duration was assumed. As with the Proposed Project, sediment removal under Alternative 2, Configuration C will occur between Summer 2015 and Summer 2020; however, sediment removal under this Alternative could potentially have a longer duration than under the Proposed Project due to the larger amount of sediment to be removed. It is still expected that this amount of sediment can be removed within the five-year time frame.

**Response to Comment 179-25:**

As discussed in the Draft EIR, Section 3.6, Biological Resources, "...in 2011 these resources were severely impacted by sediment deposition. Most of the vegetation and trees on the Proposed Project site were dead, washed out, or buried under sediment, reducing the amount and quality of vegetation communities and wildlife habitat." In order to achieve a more conservative analysis of the potential impacts to biological resources from the Proposed Project, 2013 conditions were also taken into account. Therefore, the information presented is correct and does not warrant a change.

**Response to Comment 179-26:**

The Draft EIR, Section 3.4, Aesthetics recognizes the San Gabriel Mountains as part of the vista that can be seen from the various viewpoints surrounding the reservoir.

**Response to Comment 179-27:**

See Response to Comment 179-25. The Draft EIR does accurately state the expected impacts of the Proposed Project, Management Option 1. As stated in the Draft EIR, vegetation conditions on the Proposed Project site will change annually from disturbed to low and dense. Due to the rapid growth of herbaceous plants, it is expected that during the majority of the year the Proposed Project site will be appear vegetated. Therefore, Management Option 1 will result in a lower degree of contrast than seen during sediment removal and will result in a less than significant impact to scenic vistas. The impacts to aesthetics are, however, identified as potentially significant during the sediment removal phase.

**Response to Comment 179-28:**

See Responses to Comments 179-25, 179-26, and 179-27. Although projects within the Hahamongna Watershed Park Master Plan are designed to take advantage of the scenic characteristics at the site, no City or County documents list the project site as a designated scenic resource. The Draft EIR does acknowledge that potentially significant, unmitigable impacts to aesthetics will occur during the sediment removal phase; however, the site is not an officially designated scenic vista.

**Response to Comment 179-29:**

Assessments for air quality impacts follow methodology established and authorized by the South Coast Air Quality Management District (SCAQMD). The SCAQMD does not require project-specific ambient air monitoring before or during project construction. CEQA requires mitigations to be monitored, and

LACFCD will maintain sufficient documentation to allow monitoring of Mitigation Measures MM AQ-1 and MM AQ-2.

**Response to Comment 179-30:**

Baseline monitoring locations are established by the SCAQMD under requirements of the United States (U.S.) Environmental Protection Agency (EPA) and the California Air Resources Board (CARB), and the locations used in the analysis were the nearest established monitoring sites for each particular pollutant. Project-specific ambient monitoring is not required.

**Response to Comment 179-31:**

Given the estimated emissions did not reach the threshold for significance for particulate matter; no project-specific mitigations were required. Compliance with SCAQMD Rule 403 is sufficient to moderate and alleviate impacts from particulate matter. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities including excavation, grading, material loading, and hauling would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with SCAQMD's fugitive dust regulations.

**Response to Comment 179-32:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the EPA's 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised in the Final EIR; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, will be reduced to less than significant.

**Response to Comment 179-33:**

Each project is responsible only for its own contribution to the overall air quality. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, the Proposed Project's impacts to air quality, including its contribution to cumulative impacts, will be reduced to less than significant.

Regional events such as events at the Rose Bowl and wildfires are outside the purview of LACFCD. No nexus would require LACFCD to provide ambient monitoring for regional events.

**Response to Comment 179-34:**

Exhibit noted. Existing biological resources, including special status plant and animal species, are discussed in Section 3.6.2 of the Draft EIR. Impacts to biological resources, including special status plant and animal species, are discussed in Section 3.6.6. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). With implementation of these mitigation measures, direct impacts to biological resources would be less than significant.

The National Park Service is conducting a “special resource study” of the area known as the “Rim of the Valley Corridor.” This is the area that generally includes the mountains encircling the San Fernando, La Crescenta, Santa Clarita, Simi, and Conejo valleys of Los Angeles and Ventura counties in southern California. The purpose of this special resource study is to determine whether any portion of the Rim of the Valley Corridor study area is eligible to be designated as a unit of the national park system or added to an existing national park (NPS 2014).

This special resource study will provide recommendations to Congress but would not change current management without further action from Congress. Each of the alternatives considered in this study respects and retains the authorities of existing local, state, and federal agencies.

The area that Congress directed the NPS to study (study area) is not proposed for a national park. It is simply an area in which the NPS is asked to evaluate natural and cultural resources and opportunities for public use and resource preservation. It does not mean that all the land within the study area has nationally significant natural and cultural resources. Resources found to be nationally significant must also meet NPS criteria for suitability and feasibility to be considered for inclusion in the national park system.

As the NPS evaluates resources in the study area, often the focus of the study is narrowed. If significant resources are identified, the NPS will identify a range of options or alternatives to protect these resources and provide for public enjoyment.

The preliminary study findings of the Rim of the Valley Corridor Special Resource Study have not identified the Devil’s Gate Reservoir or the Hahamongna Watershed Park as nationally significant natural and cultural resources. The nearest nationally significant resources identified in this study are the Jet Propulsion Laboratory (JPL) and the Rose Bowl. The Proposed Project does not involve either of these resources.

**Response to Comment 179-35:**

Exhibit noted. See Response to Comment 179-34. Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area. The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant. Additionally, Proposed Project alternatives that significantly reduce impacts to existing vegetation have been evaluated.

The Proposed Project is not located in a currently adopted Significant Ecological Area (SEA). The Los Angeles County Department of Regional Planning is currently in the process of updating the SEA Program. The Proposed Project is located within the Proposed Altadena Foothills and Arroyos SEA. Regional Planning’s SEA updates including the Proposed SEAs have not been adopted, nor are they covered under the current Hillside Management Area and SEA Ordinance.

The SEA does not change the land use designation or the zoning of a property. The intent of the proposed SEA regulations is not to preclude development but to allow limited, controlled development

that does not jeopardize the unique biotic diversity within the County. Under the Ordinance for the Proposed SEA, safety activities and existing permitted uses are exempt.

As discussed in the Draft EIR, Section 3.12.6, Land Use and Planning, the Proposed Project will not have any significant impacts or conflict with the applicable land use plans, policies, or regulations of adopted plans.

**Response to Comment 179-36:**

See Responses to Comments 179-34 and 179-35.

**Response to Comment 179-37:**

See Responses to Comments 179-14, 179-15, and 179-34. Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). As discussed in the Draft EIR, Subsection 3.12.3, Applicable Regulations, the HWPMP emphasizes protection of recreational and natural resources as well as the management of flood control for the downstream watershed. Key to determining the consistency of the project with the HWPMP is the conformance with the plans Goals and Objectives. As identified in the Applicable Regulations portion of the Existing Conditions, Goal 2 and Goal 6 are the most crucial in determining conformance. These Goals focus on the basin being "managed to provide protection to the developed and natural downstream areas and providing a safe and secure park." The Proposed Project will manage the flood control basin for protection of the downstream areas by improving and maintaining the flood capacity behind Devil's Gate Dam. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

The Spirit of the Sage Council Settlement pertains to City's implementation of the HWPMP. The Proposed Project is not one of the HWPMP projects.

**Response to Comment 179-38:**

See Response to Comment 179-37.

**Response to Comment 179-39:**

Exhibit noted. LACFCD notes that the HWPMP is an important policy document for the area, including the Proposed Project site. Analysis of consistency with the HWPMP was included in the Draft EIR, Section 3.12 Land Use and Planning. The Proposed Project will not permanently destroy, render useless, or eliminate any of the projects mentioned. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

**Response to Comment 179-40:**

The cumulative analysis contains projects as determined by LACFCD and the surrounding cities and communities to have a potential cumulative effect due to overlapping timeframes of the projects. Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable

foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130. Although the scope of the Multi-Benefit/Multi-Use (MBMU) Project is being redone, the project was identified by the City of Pasadena as needing to be included in the cumulative impact analysis.

Since the scope of the MBMU Project is being redone, the specifics of any potential tree or vegetation removal are not available; however, the Draft EIR states that it is possible that this project could result in impacts to special status species, riparian habitat and other sensitive natural communities; the movement of native resident or migratory wildlife species; and city-protected trees, resulting in significant cumulative impacts. Implementation of Mitigation Measures MM BIO-1 through MM BIO-8 will reduce the Proposed Project's contribution to cumulative impacts to a level below significance.

Any impacts to the proposed Perimeter Trail were not included in the Draft EIR, as it is one of the improvements previously proposed under the Hahamongna Watershed Park Multi-Benefit/Multi-Use (MBMU) Project, not an existing trail at the site. No designated trails will be permanently closed due to implementation of the Proposed Project. See Response to Comment 179-14.

**Response to Comment 179-41:**

See Response to Comments 179-14 and 179-40.

**Response to Comment 179-42:**

Mitigation Measure MM LAN-1 reduces the temporary impacts to trails during the sediment removal period. Once sediment removal is complete, the reservoir will be reopened for recreational use. None of the designated trails will be permanently impacted; thus, no mitigation measures are required for permanent impacts. See Response to Comment 179-14.

**Response to Comment 179-43:**

As discussed in mitigation measures MM-BIO-6 through MM-BIO-8, a combination of onsite and offsite habitat restoration and enhancement will occur. This will include allowing riparian and other sensitive habitat to reestablish. Habitat restoration/enhancement will include use of willow cuttings for reestablishment and exotic species removal. Ruderal habitats within the basin shall be utilized whenever possible as mitigation sites. The LACFCD is continuing to work closely with CDFW and the U.S. Army Corps of Engineers (USACE) to identify appropriate sites for restoration and enhancement that will offset impacts and allow for sensitive habitat to recover naturally within the Proposed Project site but also to conserve and protect mitigation areas.

**Response to Comment 179-44:**

See Response to Comment 179-43.

**Response to Comment 179-45:**

See Response to Comment 179-43.

**Response to Comment 179-46:**

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft EIR, carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 has even further reduced the project's footprint of 120 acres down to 71 acres and would avoid excavation of the western branch, which was previously the only potential for conflict with the City's proposed westside spreading basins.

As stated in the Draft EIR, the Proposed Project will remove accumulated sediment deposits within the reservoir. This means the percolation characteristics of the reservoir will stay the same, if not improve; and the reservoir will still permit penetration of rainfall and percolation of local runoff to replenish the groundwater basin. Sediment removal will restore Devil's Gate Reservoir to its current design standard of the ability to contain two DDEs. As such, the reservoir will have the ability to contain more of the local runoff, which in turn could result in more runoff penetrating into the ground in the Proposed Project area and subsequently recharging the groundwater basin. In addition, by keeping the reservoir clear of future sediment deposits, the Proposed Project will reduce the potential for accumulated sediments to negatively impact the percolation rate.

**Response to Comment 179-47:**

LACFCD recognizes that the area is an important area for recreation, as discussed in Section 3.15, Recreation/Public Services. Information regarding MACH 1 has been added to the Final EIR. LACFCD notes that MACH 1 is a therapeutic riding program that is a PATH-certified facility. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. Therefore, the maximum impacts to the recreational users of Hahamongna Watershed Park would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving the Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 179-48:**

The Draft EIR, Section 3.15, discusses the recreational users of the Hahamongna Watershed Park and analyzes the impacts to them.

**Response to Comment 179-49:**

The Draft EIR, Section 3.14 Noise and Vibration provides a comprehensive evaluation of noise from the Proposed Project. The analysis provides construction noise levels for the nearby sensitive receptors, for

both onsite noise and project traffic noise; however, as noted in the Draft EIR, the project will comply with all noise ordinances; thus, impacts will be less than significant. Vibration impacts were mitigated through Mitigation Measure MM N-1.

**Response to Comment 179-50:**

The Draft EIR analyzed the noise impacts from onsite construction equipment through utilization of the FHWA's Roadway Construction Noise Model (RCNM). The RCNM was developed through noise measurements taken of various types of construction equipment operating during the construction of the Central Artery Tunnel project in Boston. The RCNM accounts for all types of noise created from off-road equipment, including warning alarms. The Draft EIR found that through adherence with all applicable noise regulations, the Proposed Project would result in a less than significant impact from onsite construction noise impacts.

The Draft EIR was prepared based on the methodology recommended by the State of California, which provides a set of CEQA checklist questions. The first checklist question for noise asks if the Proposed Project would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance. As detailed in the Draft EIR, the City of Pasadena's General Plan and Municipal Code noise ordinance exempts construction noise that occurs during allowed times, so construction noise was not quantified in addressing this impact. Construction noise was quantified, however, in the analysis of the third noise question that addresses temporary increases in ambient noise levels.

The Proposed Project was designed to limit the backing up of trucks, as the trucks will enter at one access road and exit at a separate access road to encourage circular flow. The backup beeps on the trucks and equipment are an Occupational Safety and Health Administration (OSHA) requirement, with the priority being to protect the safety of both the workers onsite and the general public.

It should be noted that construction activities would be temporary and would not occur year-round. The sediment removal would occur throughout the reservoir in phases, not continuously adjacent to all of the surrounding areas. Therefore, the maximum exposure to construction noise would be much shorter than the five year-duration of the sediment removal phase of the Proposed Project.

**Response to Comment 179-51:**

Impacts to recreation were adequately analyzed the in Draft EIR, Section 3.15, Recreation/Public Services.

**Response to Comment 179-52:**

See Response to Comment 179-14.

**Response to Comment 179-53:**

See Responses to Comments 179-14, 179-41, and 179-42. As noted in the Draft EIR, maintenance roads within the basin are used by LACFCD, Southern California Edison (SCE), and the City of Pasadena, among others, for operations and maintenance of Devil's Gate Reservoir and other facilities in the area. The Draft EIR notes that these roads are used as unofficial trails when reservoir water levels and conditions permit. These maintenance roads are not designated as trails by the City of Pasadena or any other public

agency. For safety, LACFCD encourages all recreational users of Devil's Gate Reservoir to use the designated trails.

**Response to Comment 179-54:**

See Responses to Comments 179-14, 179-41, 179-47, and 179-52.

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft Environmental Impact Report (EIR), Section 3.15, LACFCD recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. The Proposed Project boundary overlaps with only two, unofficial holes on the disc golf course, not half as stated in the commenter's letter. Where possible, LACFCD will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area. In addition, Alternative 3, Configuration D, Option 2 will also avoid all currently existing Oak Grove Disc Golf Club holes.

**Response to Comment 179-55:**

See Responses to Comments 179-14, 179-47, and 179-54.

**Response to Comment 179-56:**

Exhibit noted. See Responses to Comments 179-14, 179-47, 179-53, and 179-54. The trails were designated by the City of Pasadena, as shown on the City of Pasadena Department of Public Works' Arroyo Seco Trail Map. The names do not correspond to the Hahamongna Watershed Park Master Plan trail names, as many of those trails were proposed as part of the Hahamongna Watershed Park Master Plan and are not officially existing trails at this time. As seen on the Arroyo Seco Trail Map, the maintenance roads within the reservoir are not considered trails by the City of Pasadena Department of Public Works. Baseline recreation opportunities, including the use of maintenance roads as unofficial trails, were described in the Draft EIR, Section 3.15, Recreation/Public Services.

**Response to Comment 179-57:**

The Draft EIR, Section 3.16, and Appendix J, Traffic Report, adequately analyzed the traffic impacts of the Proposed Project. This analysis studied freeway segments, on/off-ramps, and the local roadways that could potentially be impacted.

**Response to Comment 179-58:**

As discussed in the Draft EIR, Section 3.16, and Appendix J, Traffic Report, the volumes on Interstate 210 (I-210), on/off-ramps, and the local roadways within the study area included those potentially impacted by the Proposed Project. The analysis included a conservative project condition volume that accounts for expansion and regional growth within the study area. The volumes account for redistribution of traffic.

**Response to Comment 179-59:**

LACFCD notes the suggestions made by Caltrans in their scoping letter. Although the broad suggestion was made to avoid peak traffic hours, Mitigation Measures MM TRA-1 and MM TRA-2 are provided to reduce the specific significant impacts that the Proposed Project would cause on the haul routes. LACFCD will continue to work with local organizations and the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the project site.

**Response to Comment 179-60:**

The Devil's Gate Water Conservation Project was included in the cumulative traffic analysis. The Project Year 2014 Model also included an annual increase factor of 4.5 percent, totaling 9 percent for 2 years. This is a conservative estimated growth factor to account for any construction improvements and cumulative projects expected to occur in the surrounding area.

**Response to Comment 179-61:**

Any haul routes, access roads, and staging areas to be used for the Proposed Project are clearly stated in the Draft EIR, Section 2.5.1. The air quality management requirement of limiting vehicular activity to established unpaved roads (haul routes) refers to the offsite hauling of sediment. No new permanent offsite roads will be constructed for the Proposed Project. Onsite, existing maintenance roads within the Proposed Project area will be used as appropriate; however, truck traffic within the sediment removal area will be subject to grading activities at any given time or will vary with the conditions at the site. All traffic and recreational impacts, including those associated haul routes, access roads, and staging areas associated with the Proposed Project, have been analyzed in Sections 3.15 and 3.16, respectively.

**Response to Comment 179-62:**

As noted in the Draft EIR, Section 2.5 Proposed Project Description, trucks will utilize two access roads (one existing and one upgraded) at the southern portion of the reservoir. Only a small portion of the access roads entering and exiting the reservoir will be paved. Please see section 2.5.1 of the Draft EIR for further information on the access roads.

**Response to Comment 179-63:**

See Response to Comment 179-62. The Traffic Impact Analysis considered the freeway segments that would be impacted by the proposed haul routes. Since trucks would remain on the freeway through the referenced cities, including East Pasadena, Arcadia, and Monrovia, no intersections would be impacted in those areas. While the majority of the sediment disposal and associated truck traffic is expected to go to the disposal sites east of the Proposed Project, the Draft EIR also analyzed the use of disposal sites west of the Proposed Project. This will allow for flexibility in case one particular route is temporarily unusable.

Reduced hours and reduced rate alternatives can decrease the efficiency of the sediment removal operations and increase the project duration. LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for

sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

See Responses to Comments 179-14, 179-60, 179-61, and 179-62.

Response to Comment 179-64:

See Response to Comment 179-10. Many of the projects listed in the Hahamongna Watershed Park Master Plan will not be implemented until after the Proposed Project sediment removal phase is complete. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

**Response to Comment 179-65:**

Table ES-1 of the Draft EIR lists all Mitigation Measures proposed for the Proposed Project. These Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers (USACE), and the Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to ground disturbing activities. Mitigation locations will comply with CDFW recommendations as follows: first, onsite; second, offsite within the Arroyo Seco Watershed; and third, offsite within the greater Los Angeles River watershed. If offsite mitigation sites are needed, several offsite areas within the Arroyo Seco/Los Angeles River watershed are being considered for restoration. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal.

See Response to Comments 179-4 and 179-34.

The County of Los Angeles Board of Supervisors will be the agency that provides approval of the Project and EIR. The Final EIR for the Proposed Project has incorporated all feasible mitigation measures and has mitigated significant impacts to the extent feasible. Prior to implementation of the Proposed Project, the County of Los Angeles Board of Supervisors must consider the EIR; must certify the EIR; and must adopt the Findings of Fact, Mitigation Monitoring Program, and a Statement of Overriding Considerations.

**Response to Comment 179-66:**

See Response to Comments 179-4, 179-18, 179-23, 179-32, 179-54, and 179-65.

The Draft EIR, Section 3.6.6, describes the expected vegetation post sediment removal. A detailed restoration plan will be prepared and will include and address noxious weed management, monitoring, and success criteria. Oak tree root protection zones will delineated with flagging approximately 6 feet from the canopy drip line and monitored for avoidance.

Mitigation Measure MM LAN-1 is provided for temporary impacts to land use and recreation. No permanent impacts will occur to designated recreational facilities.

**Response to Comment 179-67:**

See Response to Comments 179-14, 179-18, 179-20, 179-32, 179-54, and 179-66.

Response to Comment 179-68:

See Response to Comment 179-4.

Response to Comment 179-69:

Exhibit noted. See Response to Comments 179-14 and 179-40.

Figure 3.15-2: Devil's Gate Area Designated Trails depicts the existing trails within the reservoir. This figure is based on the City of Pasadena Department of Public Works' Arroyo Seco Trail Map.

**Response to Comment 179-70:**

See Response to Comments 179-14 and 179-40.

As noted above, the source of the trail names and locations is the City of Pasadena Department of Public Works' Arroyo Seco Trail Map. Names for trails referred to as secondary trails on the Arroyo Seco Trail Map were taken from the HWPMP Exhibit 2-12 Hiking and Equestrian Trails.

**Response to Comment 179-71:**

See Response to Comments 179-14 and 179-41.

**Response to Comment 179-72:**

Exhibit noted. See Response to Comment 179-25.

**Response to Comment 179-73:**

See Response to Comment 179-4.

**Response to Comment 179-74:**

As discussed in the Draft EIR, Section 4.5, Alternative 2, Configuration C, the degrading of LOS at intersections, freeway segments, and freeway on- and off-ramps described above under TRANSPORTATION-2 could affect buses using the existing roadway network. This would be a potentially significant impact. This impact would be increased compared to the Proposed Project due to the increase in sediment removal volumes and the associated increase in removal duration. No increased

conflict with bike and pedestrian facilities is associated Alternative 2, Configuration C or the Proposed Project.

**Response to Comment 179-75:**

See Response to Comment 179-24.

**Response to Comment 179-76:**

While it is a combined junior/senior high school, this school is identified as **La Cañada High School by the La Cañada Unified School District** and is therefore correctly identified in the Draft EIR. The Child Education Center has been added to the Final EIR, see Section 3.5 Air Quality, under Sensitive Receptors.

**Response to Comment 179-77:**

Cumulative projects described under Air Quality-6, are the projects that could be under construction during the same time period (Hahamongna Watershed Park MBMU Project, Metro Gold Line Foothill Extension, Arroyo Seco Canyon Project, and Devil's Gate Water Conservation Project). The temporary use of the Rose Bowl by the NFL is not a construction project. In addition, cumulative air quality impacts associated with traffic is based on cumulative traffic which included the temporary use of the Rose Bowl by the NFL. Also, as discussed in the Draft EIR, all cumulative projects would be required to comply with the SCAQMD's air pollution control measures and rules.

**Response to Comment 179-78:**

See Response to Comment 179-69.

**Response to Comment 179-79:**

See Response to Comment 179-4.

**Response to Comment 179-80:**

Additional information regarding the MACH 1 facility has been added to the Final EIR, see Section 3.12 Land Use and Planning under 3.12.2 Existing Environmental Setting and Section 3.15 Recreation/Public Services under 3.15.2 Existing Environmental Setting..

**Response to Comment 179-81:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 , Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

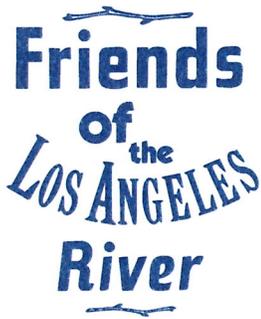
LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**Response to Comment 179-82:**

LACFCD has taken community input into consideration when drafting the Alternatives. Outside experts, especially those on the Stakeholder Task Force, were consulted during the formation of the LACFCD's Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts, cities, and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR. All comments and exhibits are noted and will be provided to the County of Los Angeles Board of Supervisors.



January 21<sup>st</sup>, 2014

Gail Farber, Director, L.A. County  
Dept. of Public works  
P.O. Box 1460  
Alhambra, CA 91802

Comment Letter #180

**RE: Devil's Gate Reservoir Sediment Removal Draft EIR**

Dear Ms. Farber,

As President and Founder of Friends of the Los Angeles River (FoLAR), I am submitting comments regarding the Draft Environmental Impact Report (DEIR) for the Devil's Gate Reservoir Sediment Removal and Management Project issued by the Los Angeles County Department of Public Works on October 23, 2013. Comment 180-1

Comment 180-2

The DEIR fails to identify and quantify the downstream flood threat as well as steps that could be taken to reduce that threat. This is a major concern to FoLAR as it could impact the now and future plans of the Los Angeles River. The DEIR acknowledges that there will be impacts on air quality, yet the DEIR is unclear that steps will be taken to reduce impacts to biological resources and the surrounding communities including the Los Angeles River. We at FoLAR urge to County to find ways to work with natural forces in their management strategy, and to cooperate with the stakeholders to achieve this goal. The DEIR fails to provide genuine alternatives to the project by considering alternate methods of sediment management. The DEIR provides no rationale for permanent destruction of more than 50% of the biologically diverse habitat within the basin, a key piece of wildlife corridor revitalization planned in the US Army Corps Arroyo Seco Study and documented breeding home to avian endangered and sensitive species. To summarize, there are serious gaps in the current DEIS. I strongly urge you to reject the DEIR in its current form and instruct LA County Flood Control District to perform the required further environmental analysis. Alternatives considered in the DEIR vary as to the amount of sediment to be removed (2.4 – 4.0 million cubic yards), where the excavation would occur, and different routes the trucks might take. All of the alternatives include a permanent 50- to 120-acre sediment maintenance area in the streamzone that will be stripped of vegetation each fall. Alternatives do not consider other methods of sediment removal, amounts or additional timeframes for achieving the target reservoir capacity within the Hahamongna basin, part of the Los Angeles River Watershed. The Devil's Gate Reservoir Sediment Removal and Management Project will have important implications for the management of rivers and flood facilities in Southern California for many decades to come, including those downstream. Comment 180-3  
Comment 180-4  
Comment 180-5  
Comment 180-6

Sincerely,

Lewis MacAdams  
President/Founder

**FoLAR**

570 W. Ave 26 Suite 250 Los Angeles, CA 90065-1047

Tei: 323-223-0585

[www.folar.org](http://www.folar.org)

E-mail: [contact@folar.org](mailto:contact@folar.org)



## **Response to Comment Letter #180 (Friends of the Los Angeles River)**

### **Response to Comment 180-1:**

Thank you for your input. This comment has been noted and will be provided to the Los Angeles County Board of Supervisors for their consideration. The comments have been noted and have been responded to below.

### **Response to Comment 180-2:**

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and Caltrans to execute any necessary evacuations or freeway closures.

LACFCD is undertaking this project to restore acceptable levels of flood protection to the downstream communities.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's)

2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities. The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

**Response to Comment 180-3:**

See Response to Comment 180-2. Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area. The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an

optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 180-4:**

LACFCD notes that the commenter does not support the Draft EIR in its current form.

**Response to Comment 180-5:**

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” However, “[a]n EIR is not required to consider alternatives which are infeasible” (CEQA Guidelines Section 15126.6(a)) or “which could change the fundamental nature of the proposed project.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.*(1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project's significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

As noted above, the alternatives analysis does include other methods of sediment removal as seen in Alternative 4, Sluicing. The alternatives do not consider an extended time frame for removing the sediment, as one of the Proposed Project objectives is “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.”

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 180-6:**

Comment noted.

Hugh Bowles  
1030 Shelly Street  
Altadena, CA 91001  
[hsbowles@yahoo.com](mailto:hsbowles@yahoo.com)

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

January 17, 2014

**Re: Response to Draft EIR for the Devil's Gate Reservoir Sediment Removal and Management Project.**

To the Reservoir Cleanouts Program:

This letter covers questions on the environmental review contained in the DEIR for the clean out debris from behind the Devil's Gate Dam.

I have lived in the vicinity of the project site for 24 years. During that period I have engaged with the County and City on approaches to work with not against the natural processes in the basin and to alleviate impacts on the local community. This started with a letter to Ron Perdigo, then director of LACODPW, in 1993 requesting that the banks of the spreading basins were not mown until after the nesting and nursery season for wildlife. Subsequent engagement involves addressing issues with inappropriate projects and non-compliance with the CEQA process. In 2013 I raised issues with the City of Pasadena's application for a \$1MM grant to construct a playing field in Hahamongna, this assisted the transfer of that money from a natural area to John Muir High School. I was awarded the Council of Arroyo Seco Organizations "Citizen Activist" award for 2013.

I divided the letter into sections. Each section has numbered questions in need of an answer. In the response, please indicate the section and question number being answered.

**A. Consideration of Alternatives:**

In the scoping meetings for the project there was a recommendation that the County hire experts in the field to assist with less impactful alternatives to the proposed project. This did not occur. Other than the 'No Project' alternative all solutions provided by the County have the same impacts. The County claims the impacts cannot be mitigated by

any solution; an exception is the offsite mitigation for habitat loss for which the County provides no mitigation plan. The County attempts no mitigation for noise, traffic, pollution, and ruination of what the City of Pasadena – the owners of the land – describe as “one of the last remaining natural areas in the region”. When asked at the DEIR public meetings why the County did not seek outside help to develop a plan with less environmental impact, the response was: “We consider ourselves to be the experts. We do this all the time.”

Questions:

1. Why did the County fail to use the federal emergency funds – the project is federally funded – to seek expert assistance to find a more environmentally sensitive method for clearing the debris? From the scoping meetings, it was clear this is what the community wanted.

2. Why did the County fail to consider less impactful alternatives?

3. If the County did consider less impactful alternatives and rejected them, why did this occur? If these alternatives did not meet the County’s objectives, what was the reason?

**B. Environmental Impacts:**

The proposed habitat loss behind the Devil’s Gate dam is the inner core of a segment of contiguous habitat that allows larger mammals like coyote’s and bobcats to breed. The presence of these mammals creates a unique balance within the ecosystem of the project site – for example, 50% of nest predation for the California quail stems from ground squirrels. Coyotes, bob cats, and red tailed hawks breed in the basin behind Devil’s Gate dam and naturally control the ground squirrels; this enables a population of California quail to live in the basin. Ground nesting birds like the California quail are key indicator species reflecting the health of the natural environment. The project will leave a fragmented habitat unable to maintain its current diversity.

The County’s plan includes actively discouraging protected bird species – red tailed and red shouldered hawks, Cooper’s hawks – from nesting in the basin. Once the project is complete, even if nesting habitat on the perimeter of the project site is intact, the habitat providing a primary food source will be gone. The project will likely extirpate populations of protected species from the basin – under the law this would constitute a ‘take’ of those species.

1. If the County does this kind of project “all the time”. What projects has the County completed where mitigation for habitat loss was conducted either off site or on site?

2. How long did these projects last, and what was the budget?

Comment 181-9

3. Who certified that the mitigation for these projects was adequate?

Comment 181-10

4. For the Devil's Gate project, how will the habitat loss be calculated?

Comment 181-11

5. Who counts the number of trees destroyed?

Comment 181-12

6. How much of the restoration will be on site, how much off site?

Comment 181-13

7. Where are the offsite locations and how large? Where are the onsite locations?

Comment 181-14

8. What consultation has the County done with the trustee agencies to mitigate for the possible 'take' of protected species from the basin as part of the project?

Comment 181-15

9. How does the County's mitigation plan provide for an equivalent restoration of habitat to support similar species diversity as currently found in Hahamongna?

Comment 181-16

10. Why is there no detailed mitigation plan in the EIR?

**C. Flood Control:**

Comment 181-17

Historically, the downstream flood damage occurred before the stream below the dam was channelized. The EIR appears to assume the issues of flooding and property damage are the same as prior to channelization.

**Questions:**

Comment 181-18

1. What calculations did the County do on the capacity of the stream below the dam to absorb high flows?

Comment 181-19

2. What assessment of downstream capacity did the County make in the calculation of how much debris needs to be removed from behind the dam? Did the capacity downstream influence the amount of debris that needed to be moved within the project period?

Comment 181-20

3. What was the scientific basis for doubling the size of the project once the Board of Supervisors demanded an EIR be completed?

Comment 181-21

When the County reinforced the dam in 1998, the spillway was lowered. This was a conscious decision on the part of the County to reduce the capacity of the dam.

Comment 181-22 | 1. What was the scientific thinking behind the lowering of the spillway?

Comment 181-23 | 2. Having purposely reduced the capacity of the dam, why does the County now have to restore the dam capacity to that prior to when the spillway was lowered?

Comment 181-24 | 3. Why is raising the spillway to the former level not being considered as an alternative to reduce the amount of debris removal?

#### **D. Watershed management**

The Station Fire was a human made environmental disaster. The impact was not just to the area behind the Devil's Gate Dam but the whole watershed.

On Sunday, January 12 2014, I spoke with an Angeles National Forest fire crew. I asked if there were efforts to mitigate the possibility of a 100% burn of the watershed again. They responded that it depended on funding and the funding depends on the local and federal agencies communicating. I asked if it was feasible to take measures to reduce the chance of future 100% burns. The fire crew responded:

- Comment 181-25 |
- a) The chance of a 100% burn in the foreseeable future is remote. The vegetation recovery is significantly sparser than the vegetation that burnt.
  - b) Even after 20 years the chance of a fire as damaging as the Station Fire would be remote.
  - c) With the correct funding it is "totally feasible" to create the necessary fire breaks to protect local cities and reduce the likelihood of a 100% burn occurring again.

#### **Questions:**

Comment 181-26 | 1. Is the County working with the Forest Service to reduce the chance of a 100% burn of the watershed? If not, why not?

Comment 181-27 | 2. Has the County assessed the likelihood of a 100% burn in the watershed again over the next 20 years?

Comment 181-28 | 3. What evidence does the County have that if there was a serious burn in the watershed again, that heavy rains would bring into the basin an equivalent amount of debris as the Station Fire?

Comment 181-29 | 4. The DEIR assumes there could be a 100% burn of the watershed, plus two DDEs bringing an equivalent amount of debris into the basin as the Station Fire. As the County claim to be "the experts" what expert calculations were made to conclude that this is a likely scenario within the next 5 years? Why would a fire crew from the Angeles National Forest imply that the scenario used by the County would be highly unlikely? Why are they wrong?

## **E. Water Quality and Conservation:**

As part of the scoping process, the Raymond Basin Management District requested that the debris removal also assist with aquifer re-charge.

Question:

1. Has any consideration been given to this request? If not, why not?

On the approval of the Hahamongna Watershed Park Plan in August 2003, many development type projects on the east side of the Park were removed – widening of roads, parking lots, construction of playing fields. Council Member Joyce Streator proposed the motion to remove these projects: the basis was why would the City bring more traffic into an area that provided the City's water supply? It was inappropriate to risk traffic residues entering the water supply. The projects were removed on this basis.

The City of Pasadena receives aquifer pumping credit based on how much water it diverts from the stream into spreading ponds. However, a study by Converse Consultants West in 1997 states that the porosity of the spreading ponds is "by orders of magnitude" less than the surrounding soils in the basin. Maintaining the basins with heavy equipment compacts the soils rendering them impervious.

A further study in 2000 by Philip Williams and Associates points out that the replenishment of the aquifer is most effective during periods when water flows in the stream and collects for short periods behind the dam. They estimated that the natural stream could absorb almost all the City's current diversion before reaching the dam. The Study estimated that in a normal year aquifer re-charge could be improved by up to 160 % if re-charge occurred through the stream in conjunction with holding water for short periods behind the dam.

The City cannot claim pumping credit for water flowing in the stream and the County is not a party to the 40 year old spreading agreement. However, the scientific evidence suggests that the porous alluvium underlying the stream, and the periodic ponding of water behind the dam, is critical to aquifer re-charge. Water in the spreading basins may evaporate, but water absorbed by the stream is underground.

The proposed project will likely have two impacts on the re-charge process:

- a) The running of heavy equipment in the basin will compact the underlying soils; this will reduce the ability of the stream and water behind the dam to replenish the aquifer. This is a similar scenario as found in the spreading basins; the impact of the proposed project will be more intense.

Comment  
181-30

Comment  
181-31

Comment  
181-31  
continued

b) Increased traffic in the basin was not acceptable to the City of Pasadena in 2003 due to issues of water quality. The same applies to the proposed project. The residue from truck and heavy equipment traffic will impact the quality of the water that does seep into the aquifer from the stream or the dam.

Based on this analysis the project has the potential to: "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".

#### Questions:

Comment  
181-32

1. There is no assessment of the long term impact to water conductivity, and aquifer replenishment in the DEIR. Based on the scientific evidence that suggests there could be a reduction in the re-charge capability in the basin, why has the County not considered this as an impact?

Comment  
181-33

2. What mitigation measures are being taken to prevent run off from the equipment in use in the basin from entering the water supply? Will there never be any fuel spills, or oil leaks over 5 years?

### **F. Noise and Traffic:**

During the scoping meetings the community expressed a desire that the ingress and egress for the project should be on the old construction road to the west of the dam, away from the local community.

Comment  
181-34

The project proposes to cut a new access off Windsor to the basin on the east side of the dam for ingress purposes. This is immediately adjacent to the local Pasadena/ Altadena neighborhood.

1. What is the reasoning for this approach?
2. What effort will be made to mitigate the pollution effects of trucks entering the basin adjacent to the neighborhood?

### **G. Recommendations:**

To rectify inadequacies in the current DEIR the County Board of Supervisors should direct staff to:

Comment  
181-35

1. Use the emergency federal funds to hire known experts in the field with experience in looking at less damaging alternatives.

2. Partner with the federal and local trustee agencies and the City of Pasadena to work out a watershed based approach to address the issues .

This should include a plan to:

a. Mitigate the risk of a 100% burn of the watershed occurring in the future.

b. Remove/flush debris from the basin in a timeframe that takes into account:

i. The low likelihood of 2 DDE events with equivalent debris flows occurring within the current proposed project period – 5 years.

ii. The downstream capacity from the dam to absorb high flows.

iii. The need to preserve the conductivity of soils in the basin to maintain aquifer re-charge.

iv. The importance of preserving "one of the last remaining natural areas in the region".

c. Develop a full mitigation plan that the public can respond to and comment on.

The project should avoid turning one man made environmental disaster into a second man made environmental disaster.

Sincerely yours,



Hugh Bowles

cc:

LA County Board of Supervisors

Pasadena City Council.

Michael Beck, Pasadena City Manager

Arroyo Seco Foundation

Pasadena Audubon Society

California Department of Fish and Game

U.S. Forest Service

Tony Zampielo, Raymond Basin Management District

Chris Holden, State Assembly Member

**Response to Comment Letter #181 (Hugh Bowles)**

**Response to Comment 181-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 181-2:**

The Draft Environmental Impact Report (EIR) analyzes long-range maintenance of the reservoir under the Reservoir Maintenance phase of the Proposed Project and Alternatives. Outside experts, especially those on the Stakeholder Task Force, were consulted during the formation of LACFCD's Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders including concerns for long-term habitat preservation and impacts to air quality, traffic, and noise. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities.

Table ES-1 of the Draft EIR lists all 17 of the Mitigation Measures proposed for the Proposed Project. These Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

As with any project that involves California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted

jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 181-3:**

See Response to Comment 181-2. No federal funds have been or will be used to fund the Proposed Project.

**Response to Comment 181-4:**

See Response to Comment 181-2.

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route. Other alternatives were not carried forward as they did not minimize impacts in relation to the Proposed Project and/or did not meet Proposed Project objectives.

Alternative 3, Configuration D was determined to be the environmentally superior alternative that minimizes impacts while still meeting Proposed Project objectives. Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller

than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

**Response to Comment 181-5:**

See Response to Comments 181-2 and 181-4.

**Response to Comment 181-6:**

See Response to Comment 181-2. Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area. The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant.

Health of the environment is determined through many indicators, including water quality, biodiversity, and food sources. Although bobcat and coyote were observed and likely forage in the area and do contribute to ground squirrel population control, breeding areas for bobcats and coyotes were not identified within the Proposed Project area. The species recorded during surveys specifically for the Proposed Project are presented in the Biological Technical Report (BTR) in Appendix D of the Draft EIR. As discussed in the Draft EIR, Section 3.6.6, Sensitive Wildlife, to avoid harm or take of any special status wildlife species, mitigation measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will be implemented. These include conducting preconstruction surveys, having a biological monitor on site during construction, and implementing measures to avoid impacts to sensitive species. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant.

**Response to Comment 181-7:**

LACFCD routinely completes projects that are permitted by the various regulatory agencies and require mitigation for habitat loss. Mitigation is completed either on or off site or a combination of the two locations. Three of the larger cleanout projects that have been completed by LACFCD in the past 20 years which required mitigation are listed below:

- San Gabriel Reservoir Emergency Post-Fire Sediment Removal Project, 2004 – 2006, at a cost of approximately \$35 million
- Cogswell Reservoir Phase II, 1995 – 1996, at a cost of approximately \$15 million
- Big Tujunga Reservoir Cleanout, 1994 – 1995, at a cost of approximately \$7 million.

**Response to Comment 181-8:**

See Response to Comment 181-7.

**Response to Comment 181-9:**

These projects underwent the California Environmental Quality Act (CEQA) process and required permitting with jurisdictional agencies. With these projects, a Mitigation, Monitoring, and Reporting Plan (MMRP) was approved as part of these processes by either CDFW, RWQCB, USACE, or the United States Forest Service (USFS), as applicable.

**Response to Comment 181-10:**

See Response to Comment 181-2. Methodology for analyzing impacts to biological resources, including impacts to habitat, was discussed in Section 3.6.5 of the Draft EIR. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation ratios and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation and to satisfy permitting requirements.

**Response to Comment 181-11:**

As noted in the Draft EIR, Mitigation Measure BIO-7, a qualified biologist shall conduct a tree survey within the project footprint to identify trees that will be removed or potentially affected by the Proposed Project and trees that can be avoided.

**Response to Comment 181-12:**

See Response to Comment 181-2. Mitigation locations will comply with the CDFW recommendations as follows: first, onsite; second, offsite within the Arroyo Seco Watershed; and third, offsite within the greater Los Angeles River watershed. Several offsite areas within the Arroyo Seco/Los Angeles River watershed are being considered for restoration if offsite mitigation sites are needed.

**Response to Comment 181-13:**

See Response to Comments 181-2 and 181-12.

**Response to Comment 181-14:**

See Response to Comment 181-2. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement.

**Response to Comment 181-15:**

See Response to Comment 181-2.

**Response to Comment 181-16:**

See Response to Comment 181-2.

**Response to Comment 181-17:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Hydrologic and hydraulic analyses took into consideration the Arroyo Seco's current configuration. Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and Caltrans to execute any necessary evacuations or freeway closures.

**Response to Comment 181-18:**

See Response to Comment 181-17.

**Response to Comment 181-19:**

See Response to Comment 181-17.

**Response to Comment 181-20:**

See Response to Comment 181-17. In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cy was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to CEQA. This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an Environmental Impact Report (EIR) for a comprehensive sediment

removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

**Response to Comment 181-21:**

The spillway was rehabilitated in order to pass the Probable Maximum Flood, as required by the State Division of Safety of Dams (DSOD). The rehabilitation entailed lowering the spillway bottom elevation, thereby constructing the spillway ports. The reservoir capacity below the existing spillway ports (elevation of 1,040.5 feet) is the appropriate parameter for determining the currently available capacity for meeting the sediment volume requirements for the dam. The current capacity in the reservoir below the spillway is 1.3 million cy. This is only 32.5 percent of the required storage capacity and only 65 percent of one DDE. Please note that additional sediment deposits have accumulated within the reservoir easement above the elevation of 1,040.5 feet. This accumulated sediment has the potential to be washed toward the dam during significant storm events and further reduce the available capacity below the spillway.

**Response to Comment 181-22:**

See Response to Comment 181-21.

**Response to Comment 181-23:**

See Response to Comment 181-21.

**Response to Comment 181-24:**

See Response to Comment 181-21.

**Response to Comment 181-25:**

See Response to Comment 181-17. Many factors affect the potential amount of sediment that will be deposited in a reservoir. These include the location and size of the watershed, the amount of the watershed that is developed, the amount that is undeveloped and subject to wildfire, the portion of the watershed that is "controlled" by other debris-catching facilities such as other dams or debris basins, and the frequency and intensity of storm events.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. Due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately

2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. The 3.55 million cy of sediment that was deposited between 1935 and 1943 came in after only 31 percent of the acreage in the upper Arroyo Seco was burned. The 2009 Station Fire burned 68 percent of the acreage in the upper Arroyo Seco, not 100 percent as the commenter states. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur. Capacities are based on a 50-year-intensity storm, or a storm that is estimated to happen once every 50 years, a 2 percent chance of occurring.

**Response to Comment 181-26:**

The watershed north of the Proposed Project site, including the Angeles National Forest, is outside the purview of LACFCD.

**Response to Comment 181-27:**

See Response to Comment 181-25.

**Response to Comment 181-28:**

See Response to Comments 181-17 and 181-25.

In order for the removal project to be efficient, and therefore reduce impacts and costs, the amount of sediment removed every year needs to exceed the amount of sediment deposited. If the reservoir is left in its current state, the flood risk to downstream communities would be left at an unacceptable level.

**Response to Comment 181-29:**

See Response to Comments 181-17, 181-25, and 181-28.

**Response to Comment 181-30:**

As stated in the Draft EIR, Section 3.11, the Proposed Project will remove accumulated sediment deposits within the reservoir. This means the percolation characteristics of the reservoir will stay the same, if not improve; and the reservoir will still permit penetration of rainfall and percolation of local runoff to replenish the groundwater basin. Sediment removal will restore Devil's Gate Reservoir to its current design standard of the ability to contain two DDEs. As a result, the reservoir will have the ability to contain more of the local runoff, which in turn could result in more runoff penetrating into the ground in the project area and subsequently recharging the groundwater basin. In addition, by keeping the reservoir clear of future sediment deposits, the Proposed Project will reduce the potential for accumulated sediments to negatively impact the percolation rate.

**Response to Comment 181-31:**

See Response to Comment 181-30. As stated in the Draft EIR, Section 3.11, the Proposed Project activities involving construction equipment will be temporary and involve the limited transport, use, disposal, and storage of fuel and lubricating oil, which are regulated by various agencies. Adequate best management practices (BMPs) will be utilized; and adherence to the regulations set forth by the County, State, and federal agencies will reduce the potential for impacts to water quality to a less than significant level. With adherence

to regulations and permit requirements and implementation of project-specific BMPs, impacts related to otherwise substantially degrading water quality would be less than significant.

**Response to Comment 181-32:**

See Response to Comment 181-30.

**Response to Comment 181-33:**

See Response to Comment 181-31.

**Response to Comment 181-34:**

See Response to Comment 181-2. As noted in the Draft EIR, Section 2.5.1, trucks will utilize two access roads (one existing and one upgraded) at the southern portion of the reservoir. Both access roads directly access Oak Grove Drive, not Windsor Avenue. The idea for the access road on the east side of the reservoir is taken directly from the Hahamongna Watershed Park Master Plan (HWPMP), page 3-57. This allows for a circular route through the reservoir for sediment removal.

**Response to Comment 181-35:**

See Response to Comments 181-2, 181-3, and 181-4.

**Response to Comment 181-36:**

See Response to Comments 181-2, 181-10, 181-17, 181-25, and 181-30.

**Response to Comment 181-37:**

Comment noted.

**From:** [Jim Saake](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, January 19, 2014 8:56:20 AM

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Dear DPW administrators,

I am writing to comment on the Draft EIR for the proposed sediment removal project at Devils Gate Reservoir in Pasadena/La Canada.

I have been a homeowner in La Canada since 1990.

I am **OPPOSED** to the current project plan. It is NOT the right solution based on the cost and environmental impact.

Below is an Op-Ed article that was published in the Los Angeles Times on Jan.17, 2014. I am in agreement with a more moderate solution to managing the sediment and mitigating the risk of a 100 year flood.

These days, the risk of a massive flood seems far from reality as California faces record drought conditions.

Respectfully submitted,  
Jim Saake

+++++

[latimes.com](http://latimes.com)

*Op-Ed*

***A smarter way to attack L.A.'s sediment problem***

***Massive, once-a-decade removal projects behind the county's dams are the wrong approach.***

*By Christle Balvin*

*January 17, 2014*

*California's coastal mountains have a compulsion to get to the sea. They are constantly sending sand and sediment downstream to the beaches. Or at least they're trying to. But today, a system of 14 dams along the foothills of the San Gabriels prevents much of the sand from reaching the shore.*

*The result is a slowly eroding coastline, a network of ugly concrete storm channels where streams once flowed, and an ever-increasing accumulation of earth behind the dams.*

*Southern California rivers are notoriously unpredictable. Raging torrents in January can be dry arroyos in July, which makes flood control difficult.*

*In the 1930s, after a period of major flooding in the Los Angeles basin, a group of talented engineers attempted to tame the area's rivers by creating the system of dams and channels we have today. Once viewed as an innovative solution to protecting lives and property downstream, these inland dams are now exploding with tons of accumulated sediment and a diminishing number of nearby places to dump it.*

*At the Hahamongna basin behind and adjacent to Devil's Gate Dam in Pasadena, where a hotly contested sediment removal project by the flood control division of the L.A. County Department of Public Works is being debated, the county has proposed removing as much as 4 million cubic yards of sediment. The project, which would destroy a thriving willow forest, would require one double-loaded dump truck to leave the excavation site each minute, six days a week between April and December, for five years. The projected cost is \$68 million. And that is for just one dam.*

*Few of those who have studied the county's system of dams would question the need for some sediment removal to protect the public safety downstream and the integrity of the dams themselves. The situation was exacerbated by the Station fire, which left denuded hillsides that washed into dam basins during winter storms, adding some 1.6 million cubic feet of sediment to the Hahamongna basin alone. But there is growing concern about the way the county manages sediment removal and water conservation.*

*Allowing sediment to accumulate for more than a decade, as happened at Devil's Gate, and then playing catch-up with a massive removal project is causing strong opposition. The area is heavily used by hikers and mountain bikers, and an adjacent park has a busy Frisbee golf course and soccer field. The area abuts residential neighborhoods and is directly across the street from La Cañada High School.*

*Because many of the county's dams are similarly located in multi-use areas, the objections being voiced about Devil's Gate are likely to be raised again and again as the county considers managing its other sites. Many of those objecting question the wisdom of stopping the flow of sediment behind dams, only to truck it back up into foothill canyons where it doesn't belong and is unlikely to stay put.*

*Treating sand and sediment as something of value, the way the L.A. County Sanitation District treats sludge, would be a better way. Rather than dump sludge as a waste product, the district processes it for use in the vegetable fields of Central California.*

*The mountains will continue to seek the sea. And the sole purpose of L.A. County's dams should not be to stop the flow. New and creative solutions are desperately needed for managing the sediment that accumulates behind dams and the water that is diverted and often wasted over*

*spillways and in concrete channels.*

*That is why many of those commenting on the environmental impact report now circulating for Devil's Gate are asking for a fuller evaluation of other solutions before embracing a costly and environmentally reckless plan. We've called for the appointment of a blue-ribbon committee to work with county engineers on fully evaluating the options. If we don't come up with a long-range, comprehensive plan for managing both sediment and the valuable rainwater that collects behind dams, we'll find ourselves in this boat all over again in the not-too-distant future.*

*Massive, once-a-decade removal projects are the wrong approach. As Norman Brooks, professor emeritus of environmental and civil engineering at Caltech, put it in a statement to the county: "In the long run, a more uniform rate of removal might be preferred over the present situation with large amounts of 'catch-up.'"*

*Let's stop catching up and start planning for the future.*

*Christle Balvin is president of Hintz & Balvin Communications, which helped design earlier plans for Hahamongna. Her involvement today is as a community member.*

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**Response to Comment Letter #182 (Jim Saake)**

**Response to Comment 182-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

**Response to Comment 182-2:**

Comment and article noted.

**Response to Comment 182-3:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Since the dam was built, several periods have occurred in which a large amount of sediment was deposited in the reservoir in a short time frame. Approximately 1.3 million cy of sediment came into the reservoir in just two storm seasons after the 2009 Station Fire. Over 12.0 million cy of sediment has come into the reservoir since the dam was constructed. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events.

If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. The most sediment that was deposited during a five-year period is 3.1 million cy, which occurred between 1937 and 1942. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

**From:** [John Favre](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Silt removal proposal for Hahamongna Basin  
**Date:** Friday, January 17, 2014 3:21:27 PM

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Comment 183-1

If the risk of damage from an epic flood can be controlled, then silt removal could take place over an extended period of time. To avoid overwhelming the neighborhood with trucks, here is a conceivable alternative. Use the flood control channel during dry seasons, at night, to truck the silt to the ocean. Use a conveyor device down the face of the dam, load the silt there, clear the natural brush between Brookside Park and the Colorado St. Bridge, and build a workable ramp below the Colorado St. Bridge.

John Favre  
530 S. Arroyo Blvd.  
Pasadena, 91105

Sent from my iPad

**Response to Comment Letter #183 (John Favre)**

**Response to Comment 183-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The purpose of the Proposed Project is to remove sediment from Devil's Gate Reservoir to restore the design capacity and establish a reservoir management system to maintain the flood control capacity of the reservoir.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities. Trucking the sediment to the ocean would, in fact, cause greater impacts, as the distance to the ocean is much further than the distance to the sediment disposal sites. Additionally, the flood control channels were not constructed to handle truck traffic. A conveyor belt system was considered in the Alternatives Analysis; see Section 4.10.1 of the Draft Environmental Impact Report (EIR). This alternative was rejected as it would not avoid or substantially reduce any significant environmental effects.

**From:** [John Favre](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [bbogaard@cityofpasadena.net](mailto:bbogaard@cityofpasadena.net)  
**Subject:** Truck route  
**Date:** Monday, January 20, 2014 7:40:47 AM

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Comment 184-1 | Here is a truck route to avoid residential areas completely: exit Hahanongna on the southeast and go directly to the 210; go south to the 134; exit at San Rafael and go north towards Linda Vista; turn right through the Cal Trans access under the 134 Freeway Bridge (possibly adding here a sound wall to protect the El Circulo compound); go south on the bird sanctuary along the west bank; build a ramp into the flood control channel and drive down and on to the sea. Use the route only at night in the dry season.

John Favre  
530 S. Arroyo Blvd.  
Pasadena

Sent from my iPad

**Response to Comment Letter #184 (John Favre)**

**Response to Comment 184-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. As described in the Draft Environmental Impact Report (EIR), the proposed and alternative haul routes would briefly access Windsor Avenue between Interstate 210 (I-210) on- and off-ramps and Oak Grove Drive. Both the proposed and alternative haul routes use main thoroughfares and do not travel into the residential areas.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Project site will have a potentially significant impact. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site. Working only at night would potentially increase impacts associated with aesthetics due to the need for construction lighting, with biological resources due to the potential disruption of nighttime wildlife activity, and with noise due to noncompliance with local noise ordinances. Additionally, the flood control channels were not constructed to handle truck traffic.

**From:** [JUDITH WRIGHT](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Sunday, January 19, 2014 12:03:30 PM

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Have you ever been to Hahamonga? Have you seen the beauty of the place, noted how scarce such loveliness is, allowed yourself to feel the serenity and the peace?

The County plan to destroy the area is simply intolerable. It can't be allowed to happen. There is no excuse for it, no rational, no possible way that such an area can be destroyed. It can't be remediated. You can't just go somewhere and build another. It is unique, sacred to anyone who believes we share this earth with other creatures; sacred to anyone who believes we have obligations to the future.

Don't do it. Don't allow it. Go back and listen, not only to the alternatives but to the land itself. Don't destroy you own soul by allowing this action to proceed. And don't destroy our souls as well.

We can do better. We must do better. This can't be allowed to happen!

Judith Wright  
Los Angeles

Comment 185-1

**Response to Comment Letter #185 (Judith Wright)**

**Response to Comment 185-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

LACFCD goes to great lengths to lessen project impacts. The Draft Environmental Impact Report (EIR) analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders, including concerns for long-term habitat preservation. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns, while adequately reducing flood risk to downstream communities.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**From:** [L Barlow](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [Mary Barrie](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 20, 2014 3:52:33 PM

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Please consider me a signatory to the letter from Friends of Hahamongna, submitted January 19, 2014

I was part of the early conceptual design team for the Hahamongna Watershed Park that found the concept of development to be inadvisable. A slow, careful sediment management program for Devil's Gate Dam that uses natural processes can restore flood protection while protecting the habitat and wildlife.

From: Friends of Hahamongna - Elizabeth Bour, Mary Barrie, Nina Chomsky  
Contact: Mary Barrie, <meb787@aol.com>  
RE: Comments: Draft Environmental Impact Report for Devil's Gate Reservoir Sediment Removal and Management Project  
DATE: January 19, 2014

#### I. Introduction

Friends of Hahamongna hereby submits its comments on the Los Angeles County Department of Public Works (LACDPW) Devil's Gate Reservoir Sediment Removal Project at Hahamongna Watershed Park. We have reviewed the Draft Environmental Impact Report (DEIR) and related official documents about this proposed project and related projects. One or more of us has attended all of the County presentations.

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:: design :: collaboration :: innovation

Laurie Barlow, AIA  
1107 Fair Oaks Ave. #14  
South Pasadena, CA 91030

<http://www.barlowcoveb.com/>  
<http://greenswardcivitas.blogspot.com/>

Comment 186-1

## Response to Comment Letter #186 (Laurie Barlow)

### Response to Comment 186-1:

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter, Laurie Barlow, is a signatory on the Friends of Hahamongna Comment Letter.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points of slow sediment management programs like Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

## Comments/Questions With Respect to Devil's Gate Dam (Hahamongna) Sediment Removal DEIR

26-Year La Canada Resident Linda S. Klibanow

4574 Belita Ln., La Canada, CA 91011

(About a block from Hahamongna Watershed Park And La Canada High School)

**(1) No notice to the neighborhood community or the park users.**

***Why was there effectively no notice provided to neighborhood residents and park users?*** Signage regarding the project and DEIR should have been posted at park entrances, meeting areas- and delivered to immediately adjacent property owners/residents. This was deliberately not done. Notices placed were quickly removed. This weekend there was an event at Hahamongna of the Oak Grove Disc Golf Association—no visible notice at any park entrances or parking areas.

**(2) Notably the DEIR notes as non-mitigable THREATS ensuing from the project damage to air quality and traffic.**

**(a) TRAFFIC**

Local residents would be up in arms since already there are major traffic difficulties in the immediately adjacent areas. Oak Grove Avenue between Foothill and Berkshire, and from the intersection of Foothill and Viro(at the High School) up to St. Bede's already is a traffic nightmare for local residents (those living on and off Viro Road) due to the fact that this areas is a cluster of schools- La Canada High School (the middle school being on the same campus), St. Francis, Flintridge Prep, Hillside, and the daycare at the bottom of Foothill and Viro where children play outside all day) as well as a primary access road for NASA's Jet Propulsion Laboratory. Indeed, the City of La Canada has recently been called to respond to the difficulties residents have even exiting from their driveways at certain times of day.

***Was there any objective traffic simulation devised to assess the impact of a double belly dusty dirt hauling truck departing every minute 10 hours a day 6 days a week...?*** THIS IS SIMPLY UNWORKABLE. Children will be unable to attend school and residents will be unable to get to work, leaving aside for the moment their difficulty breathing.

(b) BREATHING

As we know air quality already is a problem. I have hiked Hahamongna several days a week for 26 years. The unsettling and dispersal of very soft porous sediment (possibly including toxics from JPL—since we are all part of a federal Superfund Site already) to neighborhood residents is an ***unwarrantable assault*** on not only ***quality of life***, but also an ***unnecessary- reckless- imposition of potentially fatal respiratory consequences***.

Economically, children will be pulled out of schools and residents seeking escape to cleaner air will be unable to sell their homes (with related real estate value declines). Resident equines are equally sensitive to respiratory stressors and the numerous equestrian operations in the area of economic and far more than economic value to the community will suffer likely irremediable injuries.. Such equestrian activities, and the Tom Sawyer children’s camp programs, comprise critical yet delicate and endangered components of the community’s tradition, identity and vibrancy.

***Has anyone done a best science prediction of the associated adverse health effects? Interruption of school attendance? Feasibility of school athletic programs? Children being able to play outside at the local day care and school premises? Residents able to navigate through the endemic traffic quagmires associated with this lunatic plan?***

**(3) Destruction of Spiritual Value of Nearly Natural Place**

Why is anything natural (the wildlife, diversity of bird species, plant species, insect, amphibian, etc., etc.) deemed of such little to null value that it’s not part of the DPW’s equation? This is a microcosm of our destruction of the planet blinded by the almighty dollar. And who will get the economic value of what is removed? Sediment for beaches? Rockery for landscaping?

This place (Hahamongna) is an integral component of life for many-- what the DEIR terms “passive recreation” (is the definition one of not involving money?). Park users include hikers, bicyclists, equestrians, bird watchers, picnickers, frisbee golf players, naturalists, botanists, walkers. The place is a holy respite. 26 years ago I purchase my home because I could walk to Hahamongna (then Oak Grove) Park. When initially diagnosed with cancer, I walked there to hear bird song, feel sunshine, wind through trees. Sure, you can hear freeway traffic and see buildings from most vantage points, but such accessible wildness should be treated with reverence and be protected from unnecessary damage.

***How is the sediment removal plan reconcilable with local open space/nature preservation, Arroyo Seco restoration goals democratically promulgated into civic obligations and requirements?***

**(4) Bogus Science and Alarmist Tactics for Ulterior Motives**

The so-called “justification” for all of the above irremediable destruction is comprised of *bogus* assessments of potential adverse weather events and associated flooding risks and, *actually*, more the product of **funding matters (*the dollar driving the decision, rather than the scientific evidence and weighing of human values and priorities*)**. The “objective rationale” seems to lack substance and to be effectively debunked by local area experts regarding water and sediment.

***What are the interrelationships between the Devil’s Gate Sediment Removal Project and the plans to transfer water to Eaton Canyon? Why are these not addressed in the Devil’s Gate DEIR?***

**(5) What Justifications Possibly Exist For Not Following The Expert-Recommended, Far Less Calamitous But More Effective “Go Slow, Go With the Flow” Approach?**



**Response to Comment Letter #187 (Linda Klibanow)**

**Response to Comment 187-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Per California Environmental Quality Act (CEQA) Guidelines Section 21902 (b)(3), notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:

- publication in a newspaper of general circulation in the area affected by the Proposed Project
- posting of notice by the lead agency on and off site in the area where the Proposed Project is to be located
- direct mailing to the over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll

The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the Los Angeles County Department of Public Works (LACDPW) website

Therefore, notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

**Response to Comment 187-2:**

Air quality impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or

exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 187-3:**

See Response to Comment 187-2.

**Response to Comment 187-4:**

See Response to Comment 187-2. Potential impacts due to the Proposed Project's truck trips, including double dump trucks, were analyzed in the Draft EIR, Section 3.5, Air Quality, and Section 3.16, Transportation and Traffic. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts. Asthma-related issues are one of the noncancer acute impacts that the significance thresholds were developed to protect. The HRA found that the Proposed Project would result in a less than significant acute non-cancer risk for all alternative scenarios.

The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need.

**Response to Comment 187-5:**

See Response to Comments 187-2 and 187-4. As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

The JPL Groundwater Cleanup Project is an ongoing project and considered to be part of existing conditions. As discussed in the Draft EIR, Section 3.10, no significant impacts associated with the

Proposed Project due to the inclusion of the Hahamongna Watershed Park area on the NPL Superfund List are expected, as the contamination is found in the local groundwater table, not in the sediment.

Potential effects to horses stalled near the Proposed Project site would be similar to the construction-related impacts from emissions associated with sediment removal to nearby residents and Hahamongna recreational users. It should be noted that construction activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays); so the maximum construction impacts would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

Comment regarding economic impacts to surrounding homeowners and schools has been noted.

**Response to Comment 187-6:**

See Response to Comments 187-2, 187-4, and 187-5.

**Response to Comment 187-7:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species, to restore and enhance riparian and sensitive habitats, and to reduce any potential impacts to biological resources to less than significant.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at LACFCD sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.

**Response to Comment 187-8:**

As noted in the Draft EIR, Section 3.12 Land Use and Planning, impacts associated with applicable land use plans and policies would be less than significant with incorporation of mitigation measure MM LAN-1. Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

**Response to Comment 187-9:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries to protect human values of life and property.

LACFCD's standards for determining adequate levels of flood protection are scientifically based on hydrologic design procedures and sedimentation design criteria found in the January 2006 LACDPW Hydrology Manual and the March 2006 LACDPW Sedimentation Manual.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

**Response to Comment 187-10:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** [Altadena Heritage](#)  
**To:** [reservoircleanouts](#)  
**Subject:** attn: water resources division, reservoir cleanouts  
**Date:** Monday, January 20, 2014 2:38:49 PM

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Dear Director Farber,

Comment 188-1 | As a concerned citizen who understands the need to protect public safety and the challenges of managing urban water systems in our particular environment beneath the crumbling San Gabriel Range, I write to you in belief that it is possible to develop a better project to deal with sediment behind Devil's Gate than is presented in any of the four alternatives discussed in the draft EIR.

Comment 188-2 | Further, I ask that you consider and plan not just for Devil's Gate, but also for the dozen or so more debris basins that LACPWD is responsible for, in a holistic, system-wide way — not with an emergency, short-term mentality. Let's design something for the present and future that considers multiple benefits, multiple users, and makes best use of integrated resource management of water and power, as well as the wonderful habitats of Hahamongna Watershed Park in the Arroyo Seco, and other important environments in the LA basin.

Comment 188-3 | Many well informed, community and science-based comments have been submitted, I ask that you please take the reasonable questions these raise very seriously, particularly those from the Sierra Club, Arroyo Seco Foundation, Altadena Heritage, and City of Pasadena. Let's come up with a world class plan.

Thanks for your attention,  
Michele Zack, Altadena  
Local historian, hiker, community leader

**Response to Comment Letter #188 (Michele Zack)**

**Response to Comment 188-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Six alternatives were analyzed in the Draft Environmental Impact Report (EIR), including the No Project Alternative required by the California Environmental Quality Act (CEQA); the Sluicing Alternative; and Alternative 3 which is considered to be the Environmentally Superior Alternative.

**Response to Comment 188-2:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 1 provides a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. This Alternative also would provide a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

**Response to Comment 188-3:**

LACFCD recognizes each of the comment letters received during the public review period. All comments are noted and will be provided to the County of Los Angeles Board of Supervisors.



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January 19, 2014

To: Gale Farber, Director, Department of Public Works  
 Christopher Stone, Assistant Deputy Director, Water Resources Division  
 ATTN: Reservoir Cleanouts Program  
 P.O. Box 1460  
 Alhambra, CA 91802-1460

Re: Los Angeles County Department of Public Works Sediment Removal in  
 Hahamongna Watershed Park (Devil’s Gate Dam)—Draft Environmental Impact Report

Dear Ms. Farber and Mr. Stone,

On behalf of our over 1500 members, the Board of the Pasadena Audubon Society thanks you for the opportunity to comment and ask questions regarding the DEIR issued by the Los Angeles County Department of Public Works on October 23, 2013. For the last four months, we have read, researched, and discussed the DEIR, and at our January 8<sup>th</sup>, 2014 Board meeting, we unanimously approved the sending of this letter. Because the impacts of the proposals outlined in the DEIR are devastating and for the most part unable to be mitigated, we find all of the alternative proposals (with the possible exception of “No Project”) to be unacceptable and therefore ask the Department of Public Works to rethink their sediment management program, especially in Hahamongna Watershed Park. It needs to be responsible and sustainable, not destructive to one of the most valuable local resources we have. We are especially concerned because recent events such as the unnecessary destruction of the Arcadia Woodlands indicate that we must be very cautious regarding sediment removal and its consequences. We urge the County to find ways to work with natural forces and with the stakeholders to achieve the goal of sustainable, responsible, and ecologically sound sediment management.

**Hahamongna – An Unparalleled Environmental Treasure**

Hahamongna Watershed Park, at the foot of the San Gabriel Mountains, is a rare and unique environmental resource, unparalleled in our region for its importance for water and biological resources. For many decades Pasadena and its residents have worked hard to protect and enhance the natural character of this alluvial canyon and its rich riparian and streamzone habitat. Major community-based planning efforts and city policy documents, such as the Arroyo Seco Master Plan and Open Space Element of the General Plan, have been developed to reflect Pasadena’s commitment found in the UN Urban Environmental Accords, adopted by the city, to protect critical habitat, such as that found in Hahamongna. Those accords also commit the city to take major steps to reduce green house gases. The County’s plan as outlined in the DEIR will severely undermine Pasadena’s efforts to improve air quality as to render them non-existent. The land itself provides key habitat for many species of birds and other animals. Much of the land in

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Comment 189-1

Comment 189-2



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question is made up of willow and mule fat. It is difficult to find this much contiguous willow and mule fat in Southern California, and Pasadena residents have worked hard to protect this habitat from destruction.

We see two categories of problems: problems with the project itself and problems with the DEIR.

**Problems with the Project**

The Pasadena Audubon Society has identified the following problems with the project proposed by the County. Any single one of these concerns is significant enough to warrant review by impact of this project on area residents; taken together, they offer a compelling argument that the project as proposed is unacceptable.

**Significant Increases in Air and Noise Pollution:** The County’s sediment removal project will pollute the air. 425 trucks per day (that is 50 trucks per HOUR) will drive through local neighborhoods and on the 210 freeway. The trucks will operate for nine months or more per year, six days a week. These diesel trucks, which will not meet current EPA standards, let alone the more rigorous standards of the future, will cause unacceptable levels of air pollution, noise, and odor.

According to Dr. Frank Gilliland, the Hastings Professor with the Division of Environmental Health in the Department of Preventive Medicine at the University of Southern California, “[e]veryone in Pasadena will be exposed to elevated levels of air pollution, especially diesel exhaust from the heavy truck traffic and off-road equipment used on the site” and “[c]hildren and pregnant women are vulnerable groups for the adverse effects of elevated levels of air pollution and diesel exhaust. A large scientific body of evidence has shown the diesel exhaust exposure is associated with adverse pregnancy outcomes, increased risk for asthma, reduction of lung development and adverse effects on neurodevelopment.” Dr. Gilliland also cites the increased risk of lung cancer caused by diesel. This level of risk, unmitigated by the County in any way, is simply unacceptable for our region.

**Questions: What is the County’s rationale for increasing lung cancer, asthma, and emphysema rates in Pasadena and environs? Why is the County not using clean trucks that do not significantly raise cancer rates?**

**Significant Increases in Traffic:** The County’s sediment removal project will significantly increase traffic. The proposed schedule of a ten-hour work day six days a week operation will impact the affected communities with constant sound pollution and increased traffic. The freeway onramp the project trucks will access is a main artery for residents of the affected communities. Trucks moving through that area during rush hour would impose an increased traffic burden. The interchanges to the 134 West and the 210



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East are already backed up during morning rush hour. Also, the Woodbury/Arroyo access to the 210 is adjacent to an elementary school and additional morning traffic in the area could negatively impact the access and safety of students and parents entering the school.

Comment 189-5  
continued

**Questions: How will the County mitigate this increased traffic? How will it guarantee the safety of school children who attend schools adjacent to the work site? What contingency plans has the County developed for traffic accidents? For example, how will the County respond if and when a serious accident occurs on the 210 freeway, especially in the transition tunnel, as happened several weeks ago? Where will the trucks go if the freeway is closed?**

***Permanent Loss of Significant and Critical Habitat:*** The County's sediment removal project permanently destroys 50-120 acres of regionally significant willow and mulefat riparian forest. Because this forest is quite large, it is very unusual in our region, and it provides critical habitat for a variety of animals and birds, including nesting Yellow Warbler, which is a species of Special Concern in California; in 2012, 'Least' Bell's Vireo, which is a federally endangered species, nested here for the first time. Other animals found here include mountain lion, bobcat, mule deer, gray fox, gopher snake, pacific tree frog, and other reptiles and mammals. The project destroys other types of habitat as well, including freshwater marsh, alluvial scrub, and chaparral. All of these types of habitat are rare in Pasadena and must be protected.

Comment 189-6

**Question: How does the County justify the permanent loss of this significant habitat, especially knowing that it provides resources for key species and that less destructive means of removing the sediment are available?**

***Absent or Inadequate Mitigation of Habitat Loss:*** The County offers no mitigation plan. This is unacceptable. Because this lost habitat is riparian, it should be replaced at a ratio of between 3:1 and 5:1; not 1:1 as proposed in the DEIR. Much of the mitigation is planned to take place off-site, not in the Hahamongna basin. This means we will lose our park, and, again, this is not acceptable.

Comment 189-7

**Questions: How can we, the public, be expected to comment on a mitigation plan that doesn't exist yet? How can the County justify such a low mitigation rate? Does the County not recognize the value of riparian habitat?**

### **Problems with the Draft Environmental Impact Report**

The Pasadena Audubon Society has identified the following problems with the draft EIR issued by the County of Los Angeles.

Comment 189-8

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***The DEIR provides no scientific rationale.*** The County never makes a science-based case for the need to remove 2.4 to 4 million cubic yards of sediment. Originally, the Board of Supervisors authorized the DPW to analyze and develop methods to remove 1.67 million cubic yards. But now the DPW claims they need to remove 2.4 to 4 million cubic yards without saying why the amount has increased. Also, the DPW never makes the case for the need to remove it within five years.

Comment 189-9

**Questions: Where is the science to justify this project? Where is the science to show that the sediment must be removed within five years? Where is the science to show that the County needs to remove up to four million CY? Why did the project more than double from 1.67 CY to potentially four million CY? Where is the science to show how much sediment we can expect to come down in a major rain event? Has anyone from the County measured how much loose sediment is in the Arroyo Seco Watershed? When will we see cost/benefit analysis of each project alternative? How is the huge cost justified? Where is the science that shows the risk from flooding? How often does the flow reach a dangerous threshold? When was the last time that the flow reached a dangerous threshold?**

***The DEIR provides no rationale for permanent destruction of habitat.*** The County also never makes a case for the need to permanently clear-cut 50-120 acres of willow-mulefat forest, which is particularly rich in biological and environmental values. This constitutes destruction of more than 50% of the Hahamongna/Devil's Gate Basin.

Comment 189-10

**Questions: Why do all the alternate plans in the DEIR necessitate turning much of Hahamongna Watershed Park into a maintenance yard? Where is the scientific justification for this? Or is the justification one of convenience? Does the County's easement give it the right to destroy the property and eliminate its purposes of habitat and recreation?**

***The DEIR does not address the health effects of air pollution.*** As Dr. Gilliland says, "[t]he DEIR does an inadequate job of reviewing research findings on the health effects of air pollution, especially diesel exhaust, on health. There is not even one study described or referenced in the DEIR that shows the connection between diesel exhaust and lung cancer or other adverse health outcomes such as asthma." We are also concerned that the DEIR makes no mention of the nature of the dust created by this project. Because the Station Fire is listed as a chief cause of the sediment, it would seem that the sediment should be assessed for micro-ash, as its particularly abrasive nature could create health concerns of its own. This section of the DEIR needs to be redone because of its inadequate response to these concerns.

Comment 189-11



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**Question: Why does the DPW virtually ignore the connection between diesel exhaust and lung cancer and asthma? Has the County assessed the nature of the sediment to ascertain if its makeup includes micro-ash?**

Comment 189-11  
continued

*The DEIR incorrectly states that there are no measures to mitigate these exposures.* As Dr. Gilliland points out, “[t]his statement is factually incorrect as there are many measures to reduce exposures. The Ports of Los Angeles and Long Beach have demonstrated effective interventions to reduce impact. The DEIR indicates that increases in diseases among the people of Pasadena are acceptable and unavoidable consequences of the project. This approach is completely inadequate and indicated the DEIR needs to be completely redone with adequate consideration of the health consequences of the project.” Again, we submit that this section of the DEIR is completely inadequate and must be redone. We do not agree that these exposures are acceptable for our residents and park users.

Comment 189-12

**Questions: Why did the DPW reject using “clean” trucks to move sediment? Since the health impacts are real and serious, ie. scientifically proven, then shouldn’t the DPW take a more careful look at other less toxic means of moving sediment such as FASTing?**

Comment 189-13

*The DEIR ignores or underutilizes studies* that show adverse effects of noise, studies that show the objectionable nature of the odors associated with these trucks, and studies that show a link between diesel trucks and lung cancer. These lung cancer studies are what led the state of California to declare diesel particulate matter as a Toxic Air Contaminant. The DEIR does not address this adequately.

**Questions: Where are references to any of the 30 studies that show a connection between diesel exhaust and cancer rates? Where are references to studies that show dangers of dust, particularly dust that is emitted from an EPA clean-up site?**

Comment 189-14

*The DEIR does not respond to concerns raised by the California Regional Water Quality Control Board.* In March 2011, when the County applied for a permit to complete a smaller sediment removal project in Hahamongna Watershed Park, the California Regional Water Quality Control Board denied the permit, asking the County to “identify cleanout alternatives sufficient to protect public safety other than 'return to design capacity.’” They also asked the County to “identify the immediate, public safety, capacity need which allows proper function of the flood control system and the corresponding sediment removal need” and use that to “develop an alternative(s) for this amount of sediment removal.” They asked the County to “identify cleanout alternatives which would minimize the 50-acre impact and identify alternatives for phasing the



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Comment 189-14  
continued

project to minimize impacts over time,” and to “identify alternatives which include lesser initial volumes but repeated cleanouts over several periods including two years and five years” and to “analyze these alternatives for cumulative impacts to habitat and affected species using the habitat.” This is exactly what we have been asking for too, and we are stunned that the County responded to these concerns with an even larger, more draconian plan.

**Question: Why is the County ignoring the concerns raised by the California Regional Water Quality Control Board?**

Comment 189-15

*The biological section of the DEIR has serious flaws.* For example, it reports only 50 species of birds for the basin while Pasadena Audubon reports over 206 (reported on ebird.org). The report claims that no Yellow Warblers, a “species of special concern,” have nested there, but Pasadena Audubon Society members have mapped many singing males and photographed parents feeding young in the willow woodlands, all evidence of nesting Yellow Warblers. (Please see Appendix A, “Hahamongna Vulnerable Species.”) The report does not list all wildlife species expected to occur, only what few were seen. The biologist did not consult with local organizations, like the Pasadena Audubon Society, who regularly conduct surveys in Hahamongna. Because the ‘Least’ Bell’s Vireo did not nest in 2013, possibly as a result of work done by Edison during a critical period, the DEIR does not see it as an issue. This federally endangered bird nested there in 2012, but if the willow forest is destroyed, it is unlikely that it would return. The report also seems confused about species and subspecies, and plays down listed species at every turn. Astonishingly, it ignores the fact that Hahamongna Watershed Park is part of the Altadena Arroyos & Foothills Significant Ecological Area in the current iteration of the Los Angeles County Master Plan. This indicates that the County finds the area to contain valuable “significant biological resources” and wildlife corridors. These flaws cause us to doubt the credibility of the biological information as it is presented in the DEIR, and cause us to wonder if the true biological value of Hahamongna is being purposefully downplayed.

**Questions: Why does the list of birds not include the 150+ other species we know to be there? Where are maps that show the nesting areas of Yellow Warbler? Why does the report confuse current and former names for species such as the Western Toad AKA California Toad? Why does the report not refer to the Coast Patch-nose Snake as a federally listed snake and as a California Species of Special Concern? Why does the report ignore the fact that a federally-listed bird species, the ‘Least’ Bell’s Vireo, nested in the basin in 2012? Why did the biologists not consult organizations, such as ours, that regularly conduct surveys in Hahamongna? Did the biologists consult with the California Native Plant Society regarding plant species of Special Concern? Why does the report ignore the County’s designation of Hahamongna Watershed Park as a Significant Ecological Area?**

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Comment 189-16

***The DEIR ignores recreation impacts.*** The DEIR found that "Recreation impacts were found to be less than significant." We know this is not true. The presence of a large industrial operation in the bottom of the Hahamongna basin, causing massive dust and noise impacts, will dissuade many local residents from ever experiencing the magic of Hahamongna, and will reduce the number and enjoyment of those who go there for a restorative nature experience. The Pasadena Audubon Society conducts its monthly bird walk in Hahamongna and has done so for years. This project destroys most of the area where we conduct this walk. PAS conducts monthly bird walk here because of the biodiversity, something the County never addresses. The children in the Tom Sawyer Camps utilize this area, building forts and hiking, and the Rose Bowl Riders ride through here every day. Hikers and dog walkers crisscross the basin, while disc golfers enjoy the nearby oaks. Clearly, this area is critical for a broad spectrum of people.

**Question: Did the County ask the Pasadena Audubon Society, the California Native Plant Society, the Rose Bowl Riders, Tom Sawyer Camps, the disc golfers, and any of the local residents who walk through Hahamongna if this project would have an impact on their recreation in the basin?**

### Solutions

***The County needs a "forever plan," one that is sustainable and does not permanently destroy one of the most important open spaces in the region.***

The County argues for the need to remove sediment because of the Station Fire, and while we do not dispute that some sediment needs to be removed, despite the lack of any science to support removing any sediment, we see no compelling argument in the DEIR for removing it in five years. Most of the debris that is going to come down due to the Station Fire has already done so, and the Devil's Gate Dam reservoir still has capacity, though admittedly it is difficult to know how much capacity as the numbers we see from the County shift markedly, like a moving goal post.

The Pasadena Audubon Society urges the County to adopt the proposal offered by Tim Brick, Managing Director of the Arroyo Seco Foundation: Go Slow, Go with the Flow, Let the Habitat Grow, and Keep Costs Low. This plan will mean fewer trucks, less dust, less air pollution, less noise, less habitat destruction, and lower costs.

**Go Slow:** The County makes no case for removing the sediment in three-five years. This sediment has been building up for almost 100 years, and the basin has never been fully cleaned out. We would like you to take a longer time, ten-twenty years, which would eliminate the need for the Big Dig approach. The Go Slow approach would allow the sediment to be removed in less destructive ways. Instead of removing 800,000-1,200,000 cubic yards of sediment per year, the County could remove 167,000 cubic yards per year, and then annually remove what is necessary based on the amount of inflow. As long as the County removes more than what flows in, they will increase the capacity of the dam.

**Go with the Flow:** The County should allow more of the sediment to flow through the dam using sluicing or FASTing (Flow-Assisted Sediment Transport). The County has

Comment 189-17



## PASADENA AUDUBON SOCIETY

*Founded April 1904*

1750 N. Altadena Drive

Pasadena, CA 91107

WWW.PASADENAAUDUBON.ORG

↑ been sluicing sediment through Devil's Gate Dam for years, and we would like to see more. If the County proceeds slowly, then it may utilize large storms more effectively to sluice sediment, and can coordinate with the Army Corps of Engineers on its plans to restore habitat in the Los Angeles River. The County can conduct pilot programs to determine the effects of increased sluicing downriver. Sluicing returns sediment to where it belongs: the river. This sediment is not a waste product but can be used as an integral part of the restoration of the Arroyo Seco and the Los Angeles River.

**Let the Habitat Grow:** The County makes no case for keeping 50-120 acres of riparian habitat permanently denuded. This rich riparian habitat should be allowed to grow so it can continue to provide a home for local flora and fauna, and provide recreation for the many stakeholders who use Hahamongna. Vegetation also slows down the water flow, allowing it to percolate into the aquifer.

**Keep Costs and Impacts Low:** This \$100 million project can cost a lot less if the County uses the SLOW method. By sluicing more sediment through the dam and working with nature instead of against it, the costs of this project can be greatly reduced. If the County removed more of the sediment with sluicing, that means that the County will need fewer trucks, which will save money. If the cost is spread out over ten or twenty years, this provides the County and the City an opportunity to reexamine the process and promote best practices from an economic, engineering, and environmental standpoint. More importantly, this project can serve as a model for other projects, and perhaps the County can find ways to work with nature on the other projects, thereby reducing the costs of sediment removal countywide. The County has estimated costs the range of at \$3-5 billion over the next 20 years, but as this has become an ongoing maintenance expense, the County needs find ways to reduce this cost permanently. The SLOW method also relies much less on cancer-causing noise-polluting diesel trucks and more on the natural systems that work for free.

↑ Again, we thank you for the opportunity to comment on the DEIR for the sediment removal in Hahamongna Watershed Park. The Pasadena Audubon Society does not accept any of the alternative proposals in the DEIR, but we hope that we can use this, along with the hard lessons of the Arcadia Woodlands, as opportunities to improve how sediment is managed and for increased engagement with stakeholders.

Sincerely,

Deni Sinott (signed)  
President  
Pasadena Audubon Society

Comment 189-17  
continued

Comment 189-18



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Mickey Long (signed)  
Vice President  
Pasadena Audubon Society

Laura Garrett (signed)  
Conservation Chair  
Pasadena Audubon Society

CC: LA County Supervisor Michael Antonovich  
Pasadena Mayor Bill Bogaard  
Pasadena City Councilmember Terry Tornek  
Scott Harris, California Fish & Wildlife  
Christine Medak, US Fish & Wildlife  
Samuel Unger, California Regional Water Quality Control Board  
Los Angeles Mayor Eric Garcetti

## **Response to Comment Letter #189 (Pasadena Audubon Society)**

### **Response to Comment 189-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's concern with the Proposed Project and the disapproval of all of the alternatives except for the No Project Alternative.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that approximately 13,000 cubic yards (cy) of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

### **Response to Comment 189-2:**

LACFCD recognizes the local planning documents written for the area, including the City of Pasadena Open Space Element and the Hahamongna Watershed Park Master Plan.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has

conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts. As discussed in the Draft EIR, Section 3.5, impacts related to odors were determined to be less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Mitigation Measures MM BIO-1 through MM BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters will result in the coordination of appropriate mitigation measures for sediment removal.

**Response to Comment 189-3:**

Comment noted. See Response to Comments 189-1 through 189-18.

**Response to Comment 189-4:**

See Response to Comment 189-2.

**Response to Comment 189-5:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments along any of the Haul Routes.

As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to traffic conditions by the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant.

While the majority of the sediment disposal and associated truck traffic is expected to go to the disposal sites east of the Proposed Project, the Draft EIR also analyzed the use of disposal sites west of the Proposed Project. This will allow for flexibility in case one particular route is temporarily unusable.

LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 189-6:**

See Response to Comment 189-2.

**Response to Comment 189-7:**

See Response to Comment 189-2.

**Response to Comment 189-8:**

The comments on the Draft EIR are noted and have been responded to as bracketed out.

**Response to Comment 189-9:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

For Devil's Gate Dam, the DDE was previously calculated as 1.67 million cy. That previous calculation was based on the presence of debris-retaining structures including Browns Canyon Dam, located within the Angeles National Forest upstream of Devil's Gate Dam. These structures filled with sediment decades ago and no longer provide capacity to "control" any portion of the watershed. A subsequent analysis determined that the correct DDE, based on the absence of sediment control facilities in the Forest, is 2.0 million cy. Following the Station Fire, LACDPW reviewed the DDE calculations and confirmed that 2.0 million cy is the current and appropriate volume for the DDE.

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cy was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to CEQA. This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. From the construction of the dam in 1920 up to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD. Surveys were taken before and after the Station Fire, in January and April 2009, April 2010, and March 2011. The changes in elevations within the reservoir before and after the Station Fire were used to determine the amount of sediment that flowed into the reservoir in the storm seasons following the Station Fire. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average water year storm seasons. Additionally, over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir.

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and the California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

The last 50-year design storm event recorded at Devil's Gate was during the 1968-1969 storm year.

.Under CEQA, the lead agency is not required to analyze an economic impact associated with a project in the EIR; as Section 15131(a) of the CEQA Guidelines states: "Economic or social effects of a project shall not be treated as significant effects on the environment." Moreover, CEQA allows economic analysis in the administrative record only if the basis for infeasibility, and thus rejection of a mitigation or alternative, is economic, as described in CEQA Guidelines Sections 15091(a)(3) and 15364.

**Response to Comment 189-10:**

See Response to Comments 189-1 and 189-9. Neither the Proposed Project nor the alternatives involve turning the reservoir into a maintenance yard. The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

As discussed above, Alternative 3 affects the least amount of habitat and has smaller maintenance areas.

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

As described in Section 2.1.4 of the Draft EIR, through easements granted in May 1919 and March 1965, the City of Pasadena granted the LACFCD, under a perpetual easement, the right to construct, reconstruct, inspect, maintain, repair, and operate Devil's Gate Dam, its spillway, bypasses, tunnels, and

other support facilities as may be necessary for the construction and maintenance of a reservoir capable of impounding the waters of the Arroyo Seco for purposes of storage and control, and to control such waters as may be necessary in the prevention of damage by flood (City of Pasadena 1919/1965).

**Response to Comment 189-11:**

See Response to Comment 189-2.

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

As part of the geotechnical study for the Proposed Project, a subsurface exploration was performed at four representative locations within the reservoir. Although a distinct ash layer was not observed, a "burn layer" within otherwise "clean" sediments was encountered at depth at three locations. Representative sampling of the burn layer was performed, and the samples were subjected to various environmental laboratory tests to evaluate the presence and concentrations of pertinent and regulated contaminants of concern. None of the contaminants that were detected in the sediment samples exceeded regulatory screening levels for this project and would not be characterized as hazardous.

The airborne transport of dust, including "micro ash," to offsite locations will be controlled during earth removal operations through the Proposed Project's use of best management practices, such as spraying the material with water. In addition, dust monitoring at the property boundaries will confirm the effectiveness of the water spraying. During offsite transport, the sediment will be covered in each truck to further reduce the potential for dust.

**Response to Comment 189-12:**

See Response to Comments 189-2 and 189-11.

**Response to Comment 189-13:**

See Response to Comment 189-2.

**Response to Comment 189-14:**

The California RWQCB denied without prejudice a permit for the emergency project, with the understanding that LACFCD would be initiating an EIR process for a project which would restore the required level of protection. As part of project approval, LACFCD will obtain the necessary permits from the RWQCB.

**Response to Comment 189-15:**

Many local organizations, including the Pasadena Audubon Society, Hahamongna Watershed Park Advisory Committee, the Urbanwild Network, and the Arroyo Seco Foundation, were contacted about the Proposed Project prior to the Draft EIR being prepared. In January 2012, a representative of the Pasadena Audubon Society was contacted for information the Society has concerning birds observed in the Proposed Project area. The information provided was used in preparing the biological resources section of the Draft EIR. Species with the potential to occur within the Proposed Project and species that were identified during surveys are presented in the biological survey reports in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records and species lists of occurrence were used as additional data; but since these are positive-sighting databases, this data was used only in support of the analysis from the previously identified factors. Based on the results of the Biological Technical Report (BTR), additional protocol-level focused surveys were conducted for Proposed Project as described in Section 3.6.2, Special Status Plant Species and Special Status Animal Species of the Draft EIR.

As shown in Table 3.6-3 in the Draft EIR, both least Bell's vireo and yellow warbler are listed as present within the Proposed Project site. Additional sightings will not affect their status as present, which was accounted for in the Draft EIR within the Proposed Project site, and do not add any additional constraints to those mentioned in the analysis in the Draft EIR. The current Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 account for these species being present and will serve to protect and avoid impacts to these species and other breeding birds and will reduce impacts to less than significant.

The species recorded during surveys specifically for the Proposed Project are presented in the Biological Technical Report (BTR) in Appendix D of the Draft EIR. The coast patch-nosed snake was observed on site, and the State and federal status has been included in the Draft EIR. As discussed in the Draft EIR, Section 3.6.6, Sensitive Wildlife, to avoid harm or take of any special status wildlife species, mitigation measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will be implemented. These include conducting preconstruction surveys, having a biological monitor onsite during construction, and implementing measures to avoid impacts to sensitive species. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant.

Species names used in the Draft EIR were consistent with the Master Watershed Plan for the Hahamongna Watershed by request of the City of Pasadena to maintain consistency with the Master Plan. Species names have been updated, and duplications of species have been eliminated in the Final EIR. Status listings for sensitive species have been updated, as appropriate.

The Proposed Project is not located in a currently adopted Significant Ecological Area (SEA). The Los Angeles County Department of Regional Planning is currently in the process of updating the SEA Program. The Proposed Project is located within the Proposed Altadena Foothills and Arroyos SEA. Regional Planning's SEA updates, including the Proposed SEAs, have not been adopted, nor are they covered under the current Hillside Management Area and SEA Ordinance.

The SEA does not change the land use designation or the zoning of a property. The intent of the proposed SEA regulations is not to preclude development but to allow limited, controlled development

that does not jeopardize the unique biotic diversity within the County. Under the Ordinance for the Proposed SEA, safety activities and existing permitted uses are exempt.

As discussed in the Draft EIR, Section 3.12.6, Land Use and Planning, the Proposed Project will not have any significant impacts or conflict with the applicable land use plans, policies, or regulations of adopted plans.

**Response to Comment 189-16:**

See Response to Comments 189-2, 189-11, 189-15. LACDPW has also reached out to recreational users, including the Pasadena Audubon Society, Rose Bowl Riders, Tom Sawyer Camps, Oak Grove Disc Golf Club, and MACH-1.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, LACFCD will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for temporary removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft EIR, carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area, reducing the project footprint of 120 acres down to 71 acres. Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes. The Oak Grove area of Hahamongna Watershed Park and the associated facilities would remain open during sediment removal and would continue to provide active recreational facilities to the area.

**Response to Comment 189-17:**

See Response to Comments 189-1 and 189-9.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**Response to Comment 189-18:**

Comment and attachment noted.

**From:** [Ross Plesset](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Comment re: Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 20, 2014 3:12:59 PM

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Dear Sir/Madam:

Comment 190-1 | As a resident of Los Angeles County I strongly oppose the county's current plan to restore the Devil's Gate Dam and back the alternative plan supported by the Arroyo Seco Foundation, which is by far more environmentally-sound and would allow sediments to flow to the sea shore where they are needed.

Comment 190-2 | The county plan would be devastating for the beautiful, rich, and biologically-diverse land surrounding the dam

Thank you very much for your time and attention.

Sincerely,

Ross Plesset  
2240 1/2 Lake Shore Avenue  
Los Angeles, CA 90039

## **Response to Comment Letter #190 (Ross Plesset)**

### **Response to Comment 190-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter opposes the Proposed Project and support's the Arroyo Seco Foundation's proposed alternative.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

### **Response to Comment 190-2:**

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV

Comment Letter #191



January 17, 2014

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

**Devil's Gate Reservoir Sediment Removal and Management Project  
Draft Environmental Impact Report Comments**

Dear Ms. Farber:

Comment 191-1

The Santa Monica Mountains Conservancy staff offers the following comments on the proposed Devil's Gate Reservoir Sediment Removal and Management Project proposing the removal of as much as 4 million cubic yards of sediment. The proposed project neither works with natural forces nor integrates key input from stakeholders. The impacts of this massive earth-moving project will have enormous environmental, and public impacts. The impacts cannot be mitigated. Therefore we ask the Department of Public Works to reconsider its sediment management program.

**Natural Integrated Approach**

Comment 191-2

The Draft Environmental Impact Report (DEIR) does not make a sufficient science-based argument for the need to remove 2.4 to 4 million cubic yards of sediment. The DEIR is also deficient in making a case for the need to remove this much sediment within a five-year period. The DEIR does not identify or document an immediate flood threat to the Arroyo Seco downstream of the dam that warrants rushing this project.

A DEIR map illustrates areas where there may be a downstream flood channel capacity problems in the event of a fifty-year flood, but it does not describe either what the flooding effects are likely to be in the deficient areas or what steps the County Flood Control District is taking to deal with channel capacity. County records reveal that the dam has stored greater amounts of sediment in the past and currently still has about 47 percent capacity. With a low probability of a massive sediment flow similar to the two years after the Station Fire, there does not appear to be a need to remove 2.4- 4 million cubic yards of sediment in 5 years.

Comment 191-3 | An integrated approach that works with nature must be analyzed in a CEQA document. Simply extending a time-frame for this project would create a more sustainable sediment management program: A 20-year project will reduce the amount of sediment built up behind Devil's Gate Reservoir and minimize all negative environmental impacts. The County should remove 160,000 cubic yards for ten years instead of the proposed removal of 800,000-1,200,000 cubic yards each year for the shorter project. After ten years the sediment management program can adapt the base amount based on inflow into the basin. As long as the County removes more than what flows in, the capacity of the dam will increase.

Comment 191-4 | While the County has used sluicing or flow-assisted sediment transport (FAST) in the past, it has not included it in this proposed program. The County can incorporate this natural hydraulic process to reduce the levels of sediment in the dam. By proceeding with a natural integrated approach the County may utilize large storms more effectively to sluice sediment. Sluicing returns sediment to where it belongs - the river and beaches. The Arroyo Seco and Los Angeles River restoration efforts need sediment. This natural integrated approach provides a low cost, sustainable, low pollution management program rather than the County's proposed big dig.

### **Permanent Loss of Significant Habitat**

Comment 191-5 | Thirteen-hundred-acre Hahamongna Watershed Park, a rare and unique environmental resource, is one of southern California's most spectacular alluvial canyons. Much of the land in the proposed impact area supports willow and mule fat. It is difficult to find an equivalent amount of contiguous willow and mule fat in Southern California. The County's sediment removal project would permanently destroy 50-120 acres of regionally significant willow and mulefat riparian habitat.

Given all of the significant habitat found in Hahamongna Watershed Park, how does the County justify the permanent loss of this significant habitat that provides resources for key species when less destructive and less costly means of removing the sediment are available? The DEIR provides no rationale for permanent destruction of habitat as opposed to a slower, smaller, and longer project. A natural integrated program will create only small areas of temporary biological disturbance and will not require a permanently denuded maintenance area of up to 120-acres after the initial removal.

### **Inadequate Habitat Mitigation**

Comment 191-6 | The DEIR does not include a mitigation plan. Mitigation measures MM BIO 1-8 contain the underpinnings of a fully vested mitigation plan but these measures alone are not enough to constitute a mitigation plan. The Conservancy cannot comment on a mitigation plan not found in the DEIR.

Comment 191-7 | MM BIO - 6, MM BIO - 7, and MM BIO - 8 all propose replacing vegetation on a 1:1 ratio. How can such a low mitigation rate be justified for the pristine riparian, woodland, and Riversidean Alluvial Fan Sage Scrub habitat found at Hahamongna Watershed Park? MM BIO - 8 states that mitigation will occur in a combination of onsite and offsite locations. The odds seem stacked against the County being able to find 120 suitable acres to perform appropriate mitigation.

Comment 191-8 | Should you have any questions or clarification requests, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128.

Sincerely,



RORIE SKEI  
Chief Deputy Director

## **Response to Comment Letter #191 (Santa Monica Mountains Conservancy)**

### **Response to Comment 191-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Outside experts, especially those on the Stakeholder Task Force, were consulted during the formation of the Los Angeles County Flood Control District's (LACFCD's) Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft Environmental Impact Report (EIR).

The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders including concerns for long-term habitat preservation and recreational usage. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities.

The reservoir management portion of the Proposed Project will work with natural forces. After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that approximately 13,000 cubic yards (cy) of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

As noted in the Draft EIR, Section 3.4, Aesthetics, the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

All other potential California Environmental Quality Act (CEQA) impact categories were found to be fully mitigated or not require further evaluation in the Draft EIR.

**Response to Comment 191-2:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

The scope of the project is to restore capacity to Devil's Gate Reservoir, a critical flood control facility in the Los Angeles River Watershed. Providing new flood control downstream is outside the scope of this project and is inconsistent with the Proposed Project objectives. LACFCD takes a system-wide approach to flood control management. For that reason, the main objectives of the project are to satisfactorily reduce flood risk, create a configuration suitable for routine operations and maintenance, and reduce the possibility of clogging the outlet works of the dam. Once the sediment removal project is completed, the increased risk of downstream flooding will be removed.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. From construction of the dam in 1920 up to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir.

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and the California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 191-3:**

See Response to Comment 191-2.

In order for the removal project to be efficient, and therefore reduce impacts and costs, the amount of sediment removed every year needs to exceed the amount of sediment deposited. As stated above, historically, approximately 130,000 cy a year was deposited in Devil's Gate Reservoir annually since 1920.

If only 160,000 cy a year were removed, the potential flooding risk and construction activities would be unnecessarily increased.

**Response to Comment 191-4:**

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

See Response to Comment 191-1.

**Response to Comment 191-5:**

See Response to Comments 191-1 and 191-4. The Draft EIR identifies the impacts associated with the removal of riparian and other sensitive habitat. The Draft EIR also identifies habitat restoration mitigation measures which will reduce these impacts to less than significant. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. A footprint any smaller would decrease the volume removed and the ultimate capacity of the reservoir, which would fail to meet Proposed Project objectives.

**Response to Comment 191-6:**

Mitigation Measures BIO-1 through BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal.

**Response to Comment 191-7:**

See Response to Comment 191-6. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation ratios and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to the CDFW and USACE for review and approval prior to project implementation and to satisfy permitting requirements. Mitigation locations will comply with CDFW recommendations as follows: first, onsite; second, offsite within the Arroyo Seco Watershed; and third, offsite within the greater Los Angeles River watershed. If offsite mitigation sites are needed, several offsite areas within the Arroyo Seco/Los Angeles River watershed are being considered for restoration.

**Response to Comment 191-8:**

LACFCD notes that Paul Edelman is the contact person regarding this comment letter.

**From:** [Simon Penny](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [Anita Ghazarian](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Thursday, January 16, 2014 9:18:14 PM

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To - Department of Public Works

From - Simon Penny, 2911 Sterling place, Altadena 91001.

Re - Devil's Gate Reservoir Sediment Removal and Management Project

To whom it may concern,  
as an immediately local resident with a life-long engagement with environmental, resource and energy issues, I would like to voice my opinions on the Devil's Gate Reservoir Sediment Removal and Management Project and the various plans proposed.

The issues that concern me regarding the project include:

1. dust issues and related health issues
2. vermin issues
3. traffic issues
4. property values
5. ecological impact

1. Dust is an ongoing issue in the upper Arroyo. Especially since the station fire, and especially in summer, the slightest breeze picks up superfine ash and dust which has settled in the arroyo and lifts it over the neighbourhood. In my experience and the experience of neighbors, this has led to an increase in allergy related conditions. Five years of constant earth-moving in the Arroyo will create a semi-permanent environmental health hazard.

2. Movement of vast tonnages of earth in the Arroyo will inevitably lead to the displacement of enormous numbers of rodents and other vermin which will enter adjacent properties.

3a. The prospect of huge numbers of heavy trucks entering and leaving 210 at Windsor/Arroyo exit will create a noise and traffic hazard, and will inevitably create congestion on this main egress route. Note that this exit is already subject to closure during Rosebowl activities.

3b. The 210 south connector tunnel under the 134 is jammed many hours of the day. The additions of hundreds of heavy trucks will make this part of 210 south virtually impassable, creating knock-on congestion effects on surrounding surface streets.

4. The combination of factors 1,2 and 3 will lead to reduction of property values in an already depressed, but currently improving part of Altadena.

5. Five years heavy trucking up and down the 210 will inevitably lead to added traffic noise and air pollution loads impacting local residents.

By sheer quantity of fill removed, Alternative 3 seems the most intelligent. However, the innovative sluicing approach of Alternative 4 would appear to best address all of my concerns, as:

- a. it minimizes dust creation, working in the rain while the other alternatives would presumably stop during rain.
- b. it would minimise vermin disruption.
- c. it would mitigate entirely all of my traffic related concerns.
- d. it is remarkably energy efficient and will cause minimal petrochemical pollution.

There are clearly questions regarding sedimentation in the channel further downstream, but logic would commend the solution to us. After all, it is the way sediment from the mountains has been removed,

Comment 192-9  
continued

↑ since long before human settlement in the area.

yours sincerely,  
Simon Penny (Professor, UCI)

**Response to Comment Letter #192 (Simon Penny)**

**Response to Comment 192-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The commenter's concerns, including those listed in the comment, have been noted and have been responded to below.

**Response to Comment 192-2:**

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft Environmental Impact Report (EIR), Section 2.5.1, Sediment Removal Phase, Project Schedule.

Dust impacts from the Proposed Project were carefully evaluated. As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. As discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal, the Proposed Project would result in less than significant dust emissions due to the Proposed Project's full compliance with the SCAQMD's Rule 403.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts. Asthma-related issues are one of the noncancer acute impacts that the significance thresholds were developed to protect. The HRA found that the Proposed Project would result in a less than significant acute noncancer risk for all alternative scenarios.

**Response to Comment 192-3:**

As with many projects that involve the movement of sediment, temporary wildlife displacement will occur. Although rodents were observed during the surveys, it is not anticipated that enormous numbers of rodents will be displaced. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 192-4:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. Los Angeles County Flood Control District (LACFCD) will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site. This will include coordination of sediment transport activities with Rose Bowl special events.

As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant.

**Response to Comment 192-5:**

As part of the Draft EIR, a Traffic Impact Analysis (Appendix J of the Draft EIR) was conducted that detailed the impacts of the Proposed Project along the haul routes and surrounding intersections and discussed in Section 3.16 of the Draft EIR. The volumes on Interstate 210 (I-210), the on- and off-ramps, and the local roadways within the study area included those potentially impacted by the project. The analysis provided a conservative project condition volume that accounts for expansion and regional growth within the study area. The volumes also account for redistribution of traffic. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments, along any of the Haul Routes.

**Response to Comment 192-6:**

Comment regarding economic impacts to surrounding property values has been noted.

**Response to Comment 192-7:**

See Response to Comments 192-2 and 192-3. Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**Response to Comment 192-8:**

LACFCD notes the commenter's preference for Alternative 4. Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an

optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 192-9:**

See Response to Comment 192-8.

**From:** [Tracy Hirrel](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Dam  
**Date:** Friday, January 17, 2014 2:56:17 PM

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Comment 193-1

I urge you to slow down the sediment removal at Devil's Gate Dam. As a member of the Diggers Garden Club I am concerned about the environmental impact it will have on our area. Many thanks for your consideration.

Sincerely,  
Tracy G. Hirrel  
trahir@aol.com

**Response to Comment Letter #193 (Tracy Hirrel)**

**Response to Comment 193-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter prefers a slower alternative.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

**From:** [Vivian Geiseler](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Saturday, January 18, 2014 12:36:24 PM

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Good afternoon,

I'd like to express my support for the Save Hahamongna group and their intentions to remove sediment in a sustainable way. Please consider their approach and keep sustainability in mind when reaching a final decision.

Warmly,  
Vivian Geiseler  
Pasadena resident

Comment 194-1

## Response to Comment Letter #194 (Vivian Geiseler)

### Response to Comment 194-1:

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in suggested plans, such as the Arroyo Seco Foundation's four-point "Slow Program" recommended by the Save Hahamongna organization are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.



January 20, 2014

*Via E-Mail*

Los Angeles County Flood Control District, [reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov)

**Re: Draft Environmental Impact Report: Sediment removal plan for Devil's Gate Dam**

The West Pasadena Residents' Association (WPRA), which represents an area of 7,000 households and has nearly 1,000 members, strongly opposes the LA County Flood Control District's crash plan to clean out Devil's Gate Dam.

The plan, to remove as much as 4 million cubic yards of sediment from the Devil's Gate Dam over a 5-year period, results in substantial impacts on aesthetics, biology, transportation, and air quality which the DEIR says cannot be mitigated. The impacts are far too devastating to the environment and the surrounding communities. WPRA recommends that the plan be scaled down significantly and completed over a much longer period of time, with smaller amounts of sediment removed each year, for as long as it takes. If the County proceeds at a slower pace, the damaging impacts will be greatly reduced and, in fact, somewhat mitigated.

In the proposed plan, air quality is ignored. There would be a truck a minute entering the freeway system 6 days each week. These are double-bed diesel trucks, which you said, during at least one of the public meetings, would not meet current air quality standards. This is not acceptable. All the vehicles that are ultimately used must adhere to the air quality standards in effect at that time.

The Hahamongna Watershed Park has become an important wildlife area. After the 2009 Station Fire destroyed vast wildlife habitat in the mountains above the Park, its importance was further increased. Hahamongna has become one of the richest riparian and woodland habitats in Los Angeles County. The City of Pasadena and its citizens worked hard to develop the Hahamongna Watershed Park Master Plan, and it remains the City's underlying document for managing water resources, habitat, recreation, flood and sediment management and cultural resources. The sediment removal plan proposed by LA County ignores and obliterates this document.

WPRA recognizes that something needs to be done to restore the storage capacity at Devil's Gate Dam. The County needs to reevaluate its plan and develop a project that will be the first of a new generation of sustainable flood management projects, with a measured approach, that only temporarily disturbs small areas and maintains the important, beautiful environment of Hahamongna.

Thank you,

William Urban  
WPRA President

Comment 195-1

Comment 195-2

Comment 195-3

Comment 195-4

**Copies:**

City of Pasadena City:

Councilmember Steve Madison [smadison@cityofpasadena.net](mailto:smadison@cityofpasadena.net)

Michael Beck [mbeck@cityofpasadena.net](mailto:mbeck@cityofpasadena.net)

Steve Mermell [smermell@cityofpasadena.net](mailto:smermell@cityofpasadena.net)

Mark Jomsky [mjomsky@cityofpasadena.net](mailto:mjomsky@cityofpasadena.net)

WPRA Board Members:

[board.wpra@wpra.net](mailto:board.wpra@wpra.net)

## **Response to Comment Letter #195 (West Pasadena Residents Association)**

### **Response to Comment 195-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes West Pasadena Residents Association's opposition to the Proposed Project.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

As noted in the Draft EIR, Section 3.4, Aesthetics, the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish site in the management area of the Proposed Project between maintenance activities.

**Response to Comment 195-2:**

See Response to Comment 195-1. Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5.

**Response to Comment 195-3:**

Analysis of consistency with the Hahamongna Watershed Park Master Plan was included in the Draft EIR, Section 3.12 Land Use and Planning. As noted in the Draft EIR, Section 3.12 Land Use and Planning, impacts associated with applicable land use plans and policies would be less than significant with incorporation of mitigation measure MM LAN-1. Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP).

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

**Response to Comment 195-4:**

See Response to Comment 195-3.

**From:** [asif@reelenergy.com](mailto:asif@reelenergy.com)  
**To:** [reservoircleanouts](#)  
**Subject:** Comments on the EIR for the Sediment Removal Project  
**Date:** Monday, January 20, 2014 11:25:10 PM

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To Whom It May Concern,

Here are my comments on the Draft EIR and the Sediment Removal Project.

Comment 196-1 | Upon review of the EIR I am not satisfied with analysis of the biodiversity. I don't feel adequate time was provided to properly assess the variety of species in the affected region. I strongly recommend an additional EIR be conducted by another company, preferably a new entity that doesn't have a long history with the county and therefore able to provide a true independent analysis.

Comment 196-2 | Upon review of the EIR I would like a deeper explanation on the most favored sediment removal alternatives and how they affect the Pasadena water supply.

Comment 196-3 | In the draft EIR I did not find a detailed analysis of the particulates in the sediment and what occurs when these particulates are kicked up into the air due to all the trucks and removal? What will be the air quality in the immediate vicinity?

Comment 196-4 | Given the particulates in the sediment and fumes from all the trucks, which will have significant impact on air quality how will the county compensate those suffering from asthma, respiratory issues and small children who may also develop respiratory problems? Will the county provide alternative housing if medical issues arise and cover medical expenses? If the affects are long term who should be sued or named in a lawsuit?

Comment 196-5 | Given the current drought conditions, changing climate, what is the percent likelihood for a catastrophic flood?

Comment 196-6 | The EIR failed to address with the on-going drought conditions that a habitat might never return to Hahamongha per their restoration plan. Given California entering a drought phase Hahamongha might become perpetual a desert with no chance of restoration. Please address this scenario? Will the restoration plan include watering if its dry year to maintain or stimulate new habitat?

Comment 196-7 | The EIR claims nesting birds will return or be minimally affected. As sediment removal will occur during critical nesting times and due to the truck volume, noise and pollution, won't this permanently scare away birds? What other projects of this scale have resulted in the return of rare birds. If the drought continues will the birds ever come back.

Comment 196-8 | Who financially benefits from the sediment removal plan, please name what trucking, hauling companies will do the work and please detail their relationships to the county and their involvement in the EIR process

Comment 196-9 | The EIR failed to address in detail the affects of cities/towns where dams have been completely removed and rivers restored and allowed to run naturally. Has this been explored?

Comment 196-10 | Did the EIR address the erosion of Southern California beaches and the interruption of this natural process.

Comment 196-11 | The EIR failed to address to why the sediment removal can't happen over 20+ years. Instead it just says the 3 year plan will have severe impacts on quality of life in the immediate vicinity. Please provide alternative plans that don't have severe impacts.

Comment 196-12 | What is the true cost of this project, the immediate sediment removal and then maintaining it for the next 20+ years. Given this number what are other alternatives ?

Asif Ahmed  
626.379.4475

## **Response to Comment Letter #196 (Asif Ahmed)**

### **Response to Comment 196-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Draft Environmental Impact Report (EIR), Biological Technical Report (BTR), and focused surveys provide a thorough description of existing conditions for biological resources (See the Draft EIR, Section 3.6; Appendix D, Biological Reports). These reports and related impact analyses were based on thorough field surveys conducted in 2010 and 2013, including general biological surveys, focused sensitive plant surveys, focused least Bell's vireo surveys, and federal and state jurisdictional waters surveys.

### **Response to Comment 196-2:**

Alternative 3, Configuration D, the Environmentally Superior Alternative, is discussed in detail in the Draft EIR, Section 4.6. As stated in the Draft EIR, with the removal of accumulated sediment deposits within the reservoir, the percolation characteristics of the reservoir will stay the same, if not improve; and the reservoir will still permit penetration of rainfall and percolation of local runoff to replenish the groundwater basin. Sediment removal will restore Devil's Gate Reservoir to its current design standard of the ability to contain two design debris events (DDEs). As such, the reservoir will have the ability to contain more of the local runoff, which in turn could result in more runoff percolating into the ground in the Proposed Project area and subsequently recharging the groundwater basin. In addition, by keeping the reservoir clear of future sediment deposits, sediment management will reduce the potential for accumulated sediments to negatively impact the percolation rate.

### **Response to Comment 196-3:**

Air quality impacts were analyzed in the Draft EIR in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

### **Response to Comment 196-4:**

See Response to Comment 196-3. As part of the Draft EIR analysis, a Health Risk Assessment (HRA) was prepared that analyzed the cancer-related and noncancer acute (short-term) and chronic (long-term)

impacts to the nearby sensitive receptors in the project vicinity. The HRA found the Project would result in less than significant impacts for both the cancer-related and noncancer-related impacts.

**Response to Comment 196-5:**

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a design debris event (DDE) would result in storm flows with sediment flowing over the spillway. Capacities are based on a 50-year-intensity storm, or a storm that is estimated to happen once every 50 years, a 2 percent chance of occurring each year.

**Response to Comment 196-6:**

After the Station Fire in 2009, the following two storm seasons brought 1.3 million cy of sediment into the reservoir, raising the ground elevations within the reservoir and burying most of the established vegetation. Since then, vegetation, has reestablished within the reservoir, including in the areas that will remain in place and/or possibly be used as mitigation sites under Alternative 3. The sediment removal efforts aim to restore the historic elevations within the reservoir to the conditions existing prior to the impacts caused by the Station Fire.

After the sediment removal project, ground elevations within the reservoir will be in either present or historic levels and will have exposure to flowing stormwater. The habitat restoration plan will include and address monitoring and success criteria, as required by the regulatory agencies.

**Response to Comment 196-7:**

See Response to Comment 196-6. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Bird species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed. Vegetation clearing will occur outside bird nesting season.

**Response to Comment 196-8:**

The construction contractors have not been hired yet. LACFCD uses a formally advertised sealed bid process for public works construction contracting. The goal of the process is to award a contract to the lowest cost “responsive” and “responsible” bidder. California Public Contract Code mandates the use of an advertised bid process for construction contracting. Contractors and service providers must meet certain qualification requirements to be considered by the County for selection and contract award.

More detailed information on the County’s construction bidding process can be found in the *County of Los Angeles Countywide Construction Policy Guidelines* available online at the following location: [http://dpw.lacounty.gov/aed/construction\\_manual.pdf](http://dpw.lacounty.gov/aed/construction_manual.pdf)

**Response to Comment 196-9:**

As discussed in Section 4.10.3 of the Draft EIR, removal of the Devil's Gate Dam was considered but rejected due to its inconsistency with Proposed Project objectives, as well as the potential safety concerns. This alternative would fail to meet the Proposed Project objectives and would result in greater additional impacts than the Proposed Project (geology, hazards, hydrology, and public services).

The scope of the Proposed Project is to restore capacity for Devil's Gate Reservoir. Removing the dam would remove the only flood attenuation mechanism that is in place along the Arroyo Seco. Areas downstream of the dam would be at high risk of flooding during storm events. Also, removal of the dam would cause sediment to move downstream and accumulate within and adjacent to the channel. Sediment accumulation in the channel would reduce the capacity of the channel in those areas and would further increase the likelihood of flooding. Additionally, flood control operations for the Los Angeles River rely on peak flow attenuations from Devil's Gate Dam.

**Response to Comment 196-10:**

See Response to Comment 196-10. The Proposed Project will not decrease the current amount of sediment that flows downstream and therefore would not contribute to the erosion of beaches. Also as noted in the Sediment Management Strategic Plan (SMSP), "Without human intervention, most southern California beaches would naturally be narrow and rocky. The wide beaches in southern California were created and have been maintained by various agencies through artificial beach nourishment projects (also referred to as beach fill projects) and the construction of protective coastal structures since the 1930s." In addition, the SMSP states, "Since the Los Angeles River changed course in 1825, the largest waterway reaching this region of the coast is Ballona Creek, which has an estimated annual sediment yield of less than 50,000 cubic yards and delivers generally fine-grained sediment that is not appropriate for beach nourishment." For general information on beach nourishment, please see Section 6.5.1 of LACFCD's Sediment Management Strategic Plan Sediment Management Strategic Plan, which can be viewed here:

<http://dpw.lacounty.gov/lacfcd/sediment/files/FullDoc.pdf>

**Response to Comment 196-11:**

See Response to Comment 196-5. LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 196-12:**

The estimated cost for the Proposed Project and for Alternatives 1, 2, 3, and 5 would range from \$80 million for the Proposed Project to \$65 million for Alternative 3. LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs. The remaining cost will be covered by LACFCD funds. Due to the variety of factors, including the indeterminate locations of the sediment fallout and requirements for removing sediment from these locations, the cost for Alternative 4 cannot be calculated.

County of Los Angeles Department of Public Works

Water Resources Division

Attn: Reservoir Cleanouts Program

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

reservoircleanouts@dpw.lacounty.gov

Dear Sir/Madam:

Attached please find my comments on the proposed Devil's Gate Dam cleanout EIR, filed as an individual citizen who both uses this area almost daily recreationally and is concerned about the adverse effects on the community of this proposed project. Thank you for your consideration of these comments, and I look forward to your responding to the concerns I have expressed, as well as those of others.

Comment 197-1

Sincerely,

/s/

William Christian  
1450 Arroyo View Drive  
Pasadena, CA 91103

Comments submitted by email and through regular mail.

Comments on:

Los Angeles County, Department of Public Works  
Flood Control District (LACFCD)

Devil's Gate Reservoir Sediment Removal and Management Project (Proposed Project)  
Draft Environmental Impact Report (DEIR)

## Introduction

My name is William Christian. I am a homeowner in the Linda Vista area of Pasadena. I enjoy the area that would be affected by the sediment removal project for recreation almost daily. I run and walk along the trails and appreciate the vibrant riparian area above and below the dam. I believe that the project as proposed would virtually destroy the beauty and values of the area that I and many others have come to enjoy. The project would also significantly harm the community in other ways, including congesting traffic, degrading air quality, and causing noise, all without a clear justification for this project.

Comment 197-2

Surprisingly, other than baldly asserting that such risks exist, the existing DEIR contains no factual analysis of the flooding risks that building sediment in the dam presents and the project would seek to avert. This is a fatal flaw in the DEIR, since flood risk is the sole legitimate public purpose for the expenditure of perhaps one hundred million of taxpayer funds.

Comment 197-3

Assuming that sediment removal is needed, LACFD should substantially revise the DEIR to include both an evaluation of other less harmful alternatives to move sediment from behind Devil's Gate Dam, as well as a complete analysis of whether dam removal could accomplish that removal while maintaining a reasonable level of flood protection for downstream residents.

Comment 197-4

## Project Objectives and Alternatives

The goal of the project is clear: "The goal of the Proposed Project is to restore and maintain flood capacity at Devil's Gate Reservoir to meet its intended level of flood protection for the communities downstream." (EIR, Executive Summary, ES-1) The easement from the City of Pasadena to the LACFCD limits the District to use of the Devil's Gate area for flood control and water storage.

Comment 197-5

Other project objectives and goals—largely having to do with how, how much and when sediment would be removed and where it would be placed) are clearly subsidiary and justified only if the primary goal is itself necessary and justified, and can be accomplished best or only by the Proposed Project's (as well as those those of Alternatives 1-5) aggressive, destructive and unduly expensive plans.

Comment 197-6

The California Environmental Quality Act (CEQA) and guidelines require analysis of alternatives to the Proposed Project or alternative means to reach the legitimate goal of the project proponent. The DEIR described alternatives fail to comply with CEQA in

restricting the range of project alternatives to sediment removal options without considering other ways to achieve the county’s flood protection goal.

The DEIR evaluation of alternatives also is unreasonably subjective, lacking adequate—or, in some instances, any-- factual foundation and coherent analysis for its conclusions.

As just one example, the DEIR evaluation of the No Project alternative (#6) concludes that it is environmentally inferior to other alternatives with respect to effects on aesthetics, recreation, biological resources, riparian habitat, wildlife connectivity, and federally protected wetlands—based solely on the summary opinion of the authors that sediment deposition will continue over time and adversely affect these values. A fair analysis would evaluate the almost total destruction of wetlands and listed species habitat, the practical severing of the wildlife migration corridor from the upper to lower Arroyo Seco, loss of much recreational use and enjoyment, and alteration of the Devil’s Gate Dam from a relatively undisturbed riparian zone to an largely permanent industrial area under every other alternative, and weigh those adverse changes against the likelihood that these would be overridden by the amount of future sediment deposition, within any reasonable time period.

The DEIR also rejected, without analysis, the dam removal alternative “due to its inconsistency with project objectives, as well as the potential safety concerns. This alternative would fail to meet the project objectives and would result in greater/additional impacts than the Proposed Project (geology, hazards, hydrology, and public services)”. And, “Since no flood control mechanism would be in place, areas downstream of the dam **could** experience sediment accumulation and intermittent flooding. These areas would include both natural and man-made settings and would include the lower Arroyo Seco, the Rose Bowl, and potentially some residential areas. DEIR 4.10.3 (emphasis added)

The lack of substantive data and analysis in the DEIR’s evaluation of alternatives is pervasive, but significantly worsened by an obvious subjective bias in favor of large-scale sediment removal that infects the entire DEIR.

However, perhaps the most fundamental flaw in the DEIR is the lack of any fact-based analysis of downstream flood risk, and the absence of consideration of alternative (and less expensive) ways to avert or minimize any risks that may exist. It is not clear what level of risk actually exists, whether data is available on this issue, and whether approximately the same level of risk is presented, irrespective of how much sediment is removed from behind the dam.

Alternatives that should be considered in a new--or revised—CEQA analysis include:

1. A more objective analysis of whether there is a need to remove sediment, and the advantages of allowing natural processes to continue. The No Project Alternative analysis in the DEIR is seriously defective. It should include, as mitigation, whether parapet walls or other downstream flood protection measures could reduce or eliminate flood risk at a much smaller environmental and financial cost.

Comment 197-11

2. Dam removal should be considered as an alternative, including measures to protect downstream residents and assets from harm.

Comment 197-12

3. Slower and much less complete removal of sediment, including whether further modifications (apertures) to the dam face could accelerate transfer of significant quantities of sediment without the need for large scale mechanical removal.

Comment 197-13

**Biological Resources**—A number of federally listed and state and federal special status species were detected on site during very limited survey periods by the District’s contractor. The Hahamongna area that would be adversely affected by the Proposed Project contains extremely valuable habitat for a number of these species, and for other, more common plants and animals. The DEIR concludes that, after unspecified 1:1 mitigation combined with management actions, the effects on biological resources and wetlands would be less than significant. This is clearly incorrect. The Proposed Project would almost completely sever an extremely important animal migration corridor. Habitat types that exist in the area above and below the dam are rare and cannot be replaced by acquisition or restoration on site or in other locations in the Arroyo Seco watershed. CEQA’s command that adverse effects be fully mitigated requires the District to more fully state how it would compensate for loss of habitat and connectivity values caused by the massive excavation of the Hahamongna area. Additionally, if the project were to move forward as proposed (in any of the alternatives except #6), the District will have to obtain an incidental take permit under the federal Endangered Species Act (or risk prosecution under Section 9 of the ESA) and a Section 404 permit from the US Army Corps of Engineers, each a sufficient federal nexus triggering the requirement to conduct an environmental review under the federal National Environmental Policy Act.

Comment 197-14

**Effects on the JPL Superfund Site**—The JPL superfund site plume abuts the Proposed Project removal area. The DEIR dismisses concerns that the excavation may affect the isolation of the hazardous substance plume, but does not fully analyze the issue. Based on a total of only 4 reported soil borings, which found hydrocarbons, pesticides and other hazardous substances at “below regulatory thresholds”, the DEIR avoids any further discussion of potential public health impacts of the proposed project. No discussions or consultations with relevant regulatory agencies are reported. This issue should be thoroughly explored, additional, deeper borings conducted, and the potential impacts on the JPL plume and remediation explored.

Comment 197-15

**Air Quality, Noise, Traffic, Aesthetics, Recreation**—The Proposed Project will impose significant, lasting, irremediable harm on the Pasadena and LaCanada communities with respect to each listed category. The current DEIR does not sufficiently address the size and nature of these effects. Since adequate actions are not available to fully mitigate these effects, the Proposed Project, including all Alternatives 1-5, cannot go forward.

Comment 197-16

Thank you for the opportunity to comment on this document and a project that, if carried out as proposed, would have devastating effects on a unique community resource and life in our communities.

William Christian  
1450 Arroyo View Drive  
Pasadena, CA 91103  
[billchristian43@gmail.com](mailto:billchristian43@gmail.com)  
626-441-8171

**Response to Comment Letter #197 (William Christian)**

**Response to Comment 197-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The comments in the letter are noted, and have been responded to below.

**Response to Comment 197-2:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft Environmental Impact Report (EIR), Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. Los Angeles County Flood Control District (LACFCD) will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

The Draft EIR acknowledges the significant, unmitigable impact to aesthetics; however, after sediment removal activities are complete, habitat restoration would take place in the reservoir and would improve the visual condition of the area.

**Response to Comment 197-3:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

**Response to Comment 197-4:**

See Response to Comment 197-3.

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” However, “[a]n EIR is not required to consider alternatives which are infeasible” (CEQA Guidelines Section 15126.6(a)) or “which could change the fundamental nature of the proposed project.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.*(1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project’s significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

As discussed in Section 4.10.3 of the Draft EIR, removal of the Devil’s Gate Dam was considered but rejected due to its inconsistency with Proposed Project objectives, as well as the potential safety concerns. This alternative would fail to meet the Proposed Project objectives and would result in greater additional impacts than the Proposed Project (geology, hazards, hydrology, and public services).

The scope of the project is to restore capacity for Devil’s Gate Reservoir. Removing the dam would remove the only flood attenuation mechanism that is in place along the Arroyo Seco. Areas downstream of the dam would be at high risk of flooding during storm events. Also, sediment would move downstream and accumulate within and adjacent to the channel due to the removal of the dam. Sediment accumulation in the channel would reduce the capacity of the channel in those areas and would further increase the likelihood of flooding.

**Response to Comment 197-5:**

See Response to Comments 197-2 and 197-4. As described in Section 2.1.4 of the Draft EIR, through easements granted in May of 1919 and March of 1965, the City of Pasadena granted the LACFCD, under a perpetual easement, the right to construct, reconstruct, inspect, maintain, repair, and operate Devil's Gate Dam, its spillway, bypasses, tunnels, and other support facilities as may be necessary for the construction and maintenance of a reservoir capable of impounding the waters of the Arroyo Seco for purposes of storage and control, and to control such waters as may be necessary in the prevention of damage by flood (City of Pasadena 1919/1965).

**Response to Comment 197-6:**

See Response to Comments 197-2 and 197-4.

**Response to Comment 197-7:**

With the No Project Alternative, the continued deposition of sediment in the reservoir is a fact, not an opinion. Without a large-scale cleanout, sediment will continue to build up in the reservoir. Approximately 1.3 million cy of sediment came into the reservoir in just two storm seasons after the 2009 Station Fire. Over 12.0 million cy of sediment has come into the reservoir since the dam was constructed. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events.

The Draft EIR also recognizes the impacts that the other alternatives will have on the environment and community.

**Response to Comment 197-8:**

The purpose of the Devil's Gate Dam is to protect downstream areas from flooding. The removal of this dam would remove all flood protection for the downstream areas. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway, also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam. Without the dam, these two landmarks would be seriously impacted. See Response to Comment 197-4.

**Response to Comment 197-9:**

See Response to Comments 197-3 and 197-4.

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and the California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

**Response to Comment 197-10:**

See Response to Comments 197-4 and 197-7.

**Response to Comment 197-11:**

See Response to Comments 197-4 and 197-8.

**Response to Comment 197-12:**

See Response to Comments 197-4 and 197-8.

**Response to Comment 197-13:**

Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area. The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant.

Mitigation Measures BIO-1 through BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, a Streambed Alteration Agreement, and an Incidental Take Permit, if needed. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal.

**Response to Comment 197-14:**

As discussed in the Draft EIR, Section 3.10, U.S. EPA included Hahamongna Watershed Park area on the National Priorities List (NPL) Superfund List due to the presence of detected volatile organic compounds (VOCs) and perchlorate in groundwater originating from the Jet Propulsion Laboratory (JPL) property. The impacted groundwater is at 200 feet below ground surface (bgs); and, as with the Proposed Project,

the concentrations of VOCs, organochlorine pesticides, petroleum hydrocarbons (diesel and hydraulic/motor oil range and aromatics), and semi-volatile organic compounds (SVOCs) detected in soil samples that were collected from Devil's Gate Reservoir are below regulatory thresholds. No perchlorates, the substance of concern from JPL, were found in the soil sample analysis. As discussed in the Draft EIR, Section 3.10, no significant impacts associated with the Proposed Project due to the inclusion of the Hahamongna Watershed Park area on the JPL Superfund List are expected, as the contamination is found in the local groundwater table, not in the sediment. Therefore, no significant impacts associated with the Proposed Project or Alternatives are expected.

Also as described in the Draft EIR, Section 3.10, databases maintained by various State and federal regulatory agencies were reviewed for the project site and properties within the immediate vicinity of the site, in accordance with the CEQA statute (Section 21092.6 of the Public Resources Code).

**Response to Comment 197-15:**

See Response to Comment 197-2.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Under CEQA, the lead agency can approve a project with one or more significant effects on the environment. Section 15021(d) of the CEQA Guidelines states: "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment." Prior to implementation of the Proposed Project, the County of Los Angeles Board of Supervisors must consider the EIR; must certify the EIR; and must adopt the Findings of Fact, Mitigation Monitoring Program, and a Statement of Overriding Considerations.

**Response to Comment 197-16:**

LACFCD notes that the commenter is opposed to the Proposed Project and many of the alternatives proposed.

**From:** [Bill Weisman](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 20, 2014 11:42:04 PM

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Date: January 20, 2014

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

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

Comment 198-1

These comments are being submitted in regards to the Draft Environmental Impact Report (DEIR) for the Devil's Gate Reservoir Sediment Removal and Management Project issued by the Los Angeles County Department of Public Works .

Comment 198-2

Today we deal with sediment by loading it onto trucks, transporting it to another location, and then either piling it up, or dumping it into a pit. This paradigm is unsustainable. Eventually, we will run out of places to deposit sediment, and transportation costs will continue to increase as haul routes lengthen and fuel costs rise. The environmental impacts to air quality and noise levels associated with large numbers of truck trips over many years are significant, and, in many cases, cannot be mitigated. It is time to abandon this current stopgap method of sediment management, and begin to learn how to implement a new sustainable paradigm to allow our stormwater conveyance systems to sluice sediment downstream to the ocean and beaches.

Comment 198-3

The DEIR alternatives are too narrowly focused on an aggressive removal schedule of large amounts of sediment over a relatively short period of time. The DEIR also provides no alternatives to permanent removal of many acres of riparian habitat in the streamzone, and stripping all vegetation each fall from a 50- to 120-acre sediment maintenance area. To address these issues, consideration should be given to alternatives that remove smaller amounts of sediment over longer periods of time. A realistic risk

Comment 198-4

analysis should be performed; one that takes into account the increased stormwater absorption capacity of the watershed due to regrowth following the Station Fire. Then we can assess whether a removal schedule involving hundreds of thousands of cubic yards of sediment per year over a period of ten to twenty years might be more appropriate than one that contemplates removing millions of cubic yards over a period of four to five years.

Comment 198-5

In summary, the DEIR and its alternatives describe a project that will have significant long-term deleterious environmental impacts - both to the residents of the area in air and noise pollution, and the birds and animals whose habitat will be reduced or destroyed. I strongly urge the Department of Public Works to reject the DEIR in its current form, and instruct the Los Angeles County Flood Control District to perform the further required environmental analyses that would support a sustainable long-term

Comment 198-5  
continued

↑ sediment management strategy based on:

- Sluicing sediment downstream to the ocean
- Removing smaller quantities of sediment over a longer timeframe
- Minimizing habitat destruction
- Minimizing the amount of trucks and truck trips required to haul sediment.

Sincerely,

William D. Weisman  
5001 Carolyn Way  
Glendale CA 91214

**Response to Comment Letter #198 (William Weisman)**

**Response to Comment 198-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 198-2:**

The available pits and disposal sites, as outlined in the Proposed Project Description, have enough capacity for the sediment that is planned to be removed.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations, potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport (FASTing) will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

As an integral part of the annual maintenance at Devil's Gate, annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that approximately 13,000 cubic yards (cy) of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites. Please see Section 2.5.2 of the Draft Environmental Impact Report (EIR) for more information on future maintenance.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**Response to Comment 198-3:**

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which

would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” However, “[a]n EIR is not required to consider alternatives which are infeasible” (CEQA Guidelines Section 15126.6(a)) or “which could change the fundamental nature of the proposed project.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.*(1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project’s significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project’s footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project’s footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 198-4:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam’s lowest spillway was determined to be the standard acceptable level of risk at Devil’s Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 County of Los Angeles Department of Public Works Hydrology Manual and the March 2006 County of Los Angeles Department of Public Works

Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. The most sediment that was deposited during a five-year period is 3.1 million cy, which occurred between 1937 and 1942. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

**Response to Comment 198-5:**

See Response to Comments 198-2 and 198-3.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Elizabeth Garrison](#)  
**To:** [reservoircleanouts](#)  
**Subject:** "Devil"s Gate Reservoir Sediment Removal and Management Project"  
**Date:** Monday, January 20, 2014 9:07:57 PM  
**Attachments:** [Hahamongna Comment.pages.zip](#)

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"Devil's Gate Reservoir Sediment Removal and Management Project"

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

January 15, 2014

To whom it may concern,

Comment 199-1

I have been an avid user/lover of the Arroyo Seco trails beginning in 1973 when I began ownership of a horse I kept down at Arroyo Seco Stables in Highland Park. And I've watched change occur over the years to this contested landscape. Most importantly, witnessing a tipping point of spiritual change reached when Devil's gate dam and environs were renamed Hahamongna. And, over time, Hahamongna has become a place of great beauty. It's importance to the community increases with each passing year.

Comment 199-2

I've attended several meetings centered around the subject of reservoir cleanouts. Completely blindsided by the LACDPW's 'DIER.' It's draconian and your representatives are vague at best. And when you go to each of the team members during their circular 'chat it up' period, one quickly discovers these members don't have a working knowledge of what the other members are up too. No integration between players. We deserve better.

Comment 199-3

Many will write in giving you plenty of reasons to understand why this plan is a hulking collection of bad ideas (air quality; think Owens Valley - traffic issues, habitat destruction etc). What I'd like to do in my comment, is instead introduce the idea of good design. Start listening to other reasonable voices. You are proposing a deep dig that will leave massive birms on the sides of the dam. What about creating a lake there - nothing terribly deep but one fed by a serpentine stream. Maybe creating birms on the edges of that re-worked mountain stream. Such small birms could be replanted with sight specific merridian plants. A start to understanding those possibilities might be to look into the leading pioneers of the eco-art movement, the collaborative team of Newton and Helen Mayer Harrison. They did a wonderful job in creating the stream bed that now runs through the Arroyo underneath the Colorado Street Bridge on both sides of the encapsilated river.

<http://theharrisonstudio.net>

Comment 199-4

Another sugestion I have, and one that would make the nature lovers of the San Gabriel Valley happy, is if the county uses this sediment as a barginning chip with Vulcan. Their business has blocked the most beautiful waterfall hike in our publicly owned mountains; Fish Canyon. They are not good neighbors. They use access to our public lands as a barginning chip and if anyone questions them, what little limited access they do provide to the community, they remove - as if they were privalliges 'we the people' had to earn through silence. It's vindictive. There alternative trail provided by Vulcan, no one uses because it's akin to climbing Mount Everest.

Comment 199-5

In closing, I would like to say, the choices made for 'us' will no longer be tolerated by a trustful public. We are educated and we demand inovative solutions that are transparent and not agenda driven.

Sincerely,  
Elizabeth Garrison  
Highland Park Ca. 90042

[lizgarrison@sbcglobal.net](mailto:lizgarrison@sbcglobal.net)

**Response to Comment Letter #199 (Elizabeth Garrison)**

**Response to Comment 199-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As noted in Section 2.1, Project Location, of the Draft EIR, Devil's Gate Dam and Reservoir is within the City of Pasadena's Hahamongna Watershed Park.

**Response to Comment 199-2:**

The Draft Environmental Impact Report (EIR) provided a detailed and thorough analysis of the Proposed Project and alternatives as required by the California Environmental Quality Act (CEQA) and requested by the public during the scoping period.

Los Angeles County Flood Control District (LACFCD) notes that the commenter was not satisfied with the community meetings. LACFCD held three community meetings to inform the public of the Proposed Project, Alternatives, and the results of the Draft EIR. The meetings included a presentation, workshops where the public could ask specific questions about the project and potential impacts, and the ability to submit formal comments. Members of the public were able to ask questions or pose comments either in a group setting after the presentation or at the individual workshop stations. Workshop stations were established that focused on specific resource issues so the public could easily focus on the issues of most interest to them.

**Response to Comment 199-3:**

Due to the nature of a dam and reservoir system, as the Arroyo Seco enters the reservoir, the slope naturally flattens and stabilizes within the reservoir. As a part of the sediment removal project, the cut plan mimics these historic slopes by incorporating 3:1 side slopes and varying but gradual bottom slopes, all of which are shallow and stable.

Holding water behind the dam permanently, as a lake, is not a part of the Proposed Project objectives and is outside the scope of this project; however, with the exception of the suggestion of the lake, this alternative most closely resembles Alternative 3, Configuration D. In Alternative 3, the proposed cut at the northern end of the reservoir is approximately 25:1, a very shallow slope, which mimics the historic slopes in that area of the reservoir. This configuration provides two stream channels and will allow for more onsite mitigation, including replanting of slopes. Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, providing a greater distance between the Oak Grove area of Hahamongna Watershed Park and the excavation area (see Section 4.6 of the Final EIR). Additionally, vegetation mitigation is expected to occur on site, which would be similar to the commenter's proposal once the main sediment removal project is completed.

**Response to Comment 199-4:**

Fish Canyon and its associated trails are outside the jurisdiction of LACFCD. The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the

majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in the Draft EIR in Section 2.0, Project Description.

For further information regarding beneficial uses for sediment at LACFCD sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.

**Response to Comment 199-5:**

LACFCD notes the commenter's opinions. The purpose of CEQA is to provide transparency during the decision-making process. In addition, LACFCD has made an effort to be transparent throughout the EIR process in meeting with stakeholders, elected officials, and organizations, as well as holding multiple community meetings to discuss the Draft EIR. Once the Final EIR is completed, a set of informational presentations will be held to discuss the document before it is presented to the Board of Supervisors.

January 21, 2014

County of Los Angeles  
Department of Public Works  
Water Resources Division  
ATTN: Reservoir Cleanouts Program  
PO Box 1460  
Alhambra, CA 91802-1460  
reservoircleanouts@dpw.lacounty.gov

RE: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

Dear Department of Public Works, Water Resource Division,

Thank you for the opportunity to comment on the draft EIR for the DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT. I can't imagine what a herculean task you have ahead deciding how best to assess and implement the sediment removal project.

I have been a part of Tom Sawyer Camp ever since I was four years old. I was a camper for 10 years and a camp counselor for 6 years. The watershed has had a huge impact on my life and one of my favorite parts of camp was always being able to hike there during the day. As a counselor, I was able to see how much joy it brought to the campers I was in charge of. I also ran cross country and track at La Canada High School and many days we would run down in the watershed during trail runs. It is very popular trail for local high school to run around. The watershed is an area that is not normally appreciated and there are so few of these places in Southern California.

While we support the sediment clean up in general, we are concerned about the impact as defined in the DEIR on summer camp and are requesting the following modifications: 1) No sediment removal in the willow forest and alluvial scrub areas during the months of June, July, and August; 2) A phased approach that allows for places within the project area that can continue to be used for recreational purposes; 3) A longer timeline for the project to help minimize impact on those who use the park; and, 4) Preservation of the willow forest and the alluvial scrub area from denuding and/or from being used as permanent maintenance zones.

Tom Sawyer Camps has been in operation since 1926 and has been using Hahamongna Watershed Park as for the last 70 years (since 1944).  
Approximately 1250 of our campers and 150 staff use this site each summer,

Comment 200-1

Comment 200-2

Comment 200-3

Comment 200-3 continued  
which now includes three generation of campers. This park is critical to our day camp programs and heavy truck traffic during the summer months and denuding the willow forest and alluvial scrub areas would have a critical negative impact on the program, the campers and the staff.

Comment 200-4  
Camp is an antidote to bullying, isolation, over reliance on technology and many other challenges facing our youth. At Hahamongna, campers age 3-14 have critical exposure to wilderness adventure. During the summer, they hike, ride horses, build secret forts, observe wildlife, play games, sing songs, build self reliance and self esteem, and develop friendships that last a lifetime. We rely heavily on the access, peace and beauty of the willow forest and the alluvial scrub areas for these experiences, along with other areas of the park. Hahamongna is home to generations of staff and campers whose lives have been directly and dramatically enriched by this natural refuge, including mine.

Comment 200-5  
Tom Sawyer Camps is a very important program and my request could easily go unnoticed but I believe the impact that camp has on the children of tomorrow is significant. Summer in the watershed is a rare and unique opportunity for children to be away from noise and disruption and engage with nature and outdoor adventure in a safe, peaceful, and joyful manner. We hope you will see the value of camp and make every attempt to minimize the impact the sediment clean up will have during the summer months and for the generations of children to use the park in the years to come.

Thank you for allowing me the opportunity to share my concerns and needs. Please feel free to contact me if you have any questions.

Sincerely,

Erick Lankey  
4829 Burgoyne Lane  
818-304-1277  
lankeyrunner@sbcglobal.net

**Response to Comment Letter #200 (Erick Lankey)**

**Response to Comment 200-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 200-2:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

During the summer months, sediment is expected to be the driest. Due to the reduction in water weight, each truck can haul more sediment per load during these months. This increases efficiency and decreases project duration, which also decreases impacts and cost. Skipping these crucial dry months would extend the project duration.

Los Angeles County Flood Control District (LACFCD) proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir with two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 200-3:**

See Response to Comment 200-2. Access to the Oak Grove area of Hahamongna Watershed Park will not be limited by the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on

operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

LACFCD also notes the commenter's concerns with traffic impacts relating to traveling to and from the Oak Grove area of Hahamongna Watershed Park. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. Additionally, construction traffic will not pass the Berkshire Place intersection with Oak Grove Drive and thus will not approach the Oak Grove Drive/Foothill Boulevard intersection used for ingress and egress to the Oak Grove area of Hahamongna Watershed Park.

**Response to Comment 200-4:**

See Response to Comment 200-2. LACFCD notes the use of Devil's Gate Reservoir by Tom Sawyer Camps, especially the willow forest and alluvial scrub areas.

**Response to Comment 200-5:**

See Response to Comment 200-2. LACFCD notes that Tom Sawyer Camps is an important resource to children and is going to great lengths to keep impacts to a minimum. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**From:** [Erik Hillard](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [Peggy Casey](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 20, 2014 7:00:00 PM

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Dear DPW LA County..

We are residents of Altadena very close to the Devil's Gate Reservoir. We are very concerned about the plans to remove sediment from the area and believe further study needs to be done to develop a modern approach the solution. Many other groups and individuals have pointed out the problems and issues with the current plans and we do not need to repeat those.

LA is one of the great cities of the world and we want new ideas for the sediment issues than a 1930s approach to our drainage & sediment flows.

Thank you.

Best,  
Erik Hillard & Peggy Casey  
3461 Canyon Crest Rd  
Altadena, CA 91001  
323 259 9390

Comment 201-1

**Response to Comment Letter #201 (Erik Hillard)**

**Response to Comment 201-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the residents' concerns with the Project.

The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. LACFCD is going to great lengths to keep costs and impacts to a minimum. The Draft Environmental Impact Report (EIR) analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities. Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft EIR, carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Park and the excavation area. Additionally, the limited maintenance area for Alternative 3 further reduces habitat impacts by allowing for site replanting and mitigation to take place within the reservoir footprint.

**From:** [Gaby Johnston](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 8:01:58 AM

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Dear DPW Administrator,

I am writing to comment on the draft EIR for the proposed sediment removal project at Devi's Gate Reservoir in Pasadena/La Canada.

I am very much against the plan that is being discussed.

I was at the protest and saw the tremendous community support for a more moderate and sensible solution to this problem.

The draft EIR proposes a radical and expensive solution that will disrupt the community and cause environmental damage for many years.

Please consider the approach outlined by the Arroyo Seco foundation which balances the need for flood control while still preserving the quality of life in Pasadena and La Canada.

Respectfully,

Gabrielle Johnston

Comment 202-1

Comment 202-2

Comment 202-3

## **Response to Comment Letter #202 (Gabrielle Johnston)**

### **Response to Comment 202-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project. LACFCD is going to great lengths to keep costs and impacts to a minimum. Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft Environmental Impact Report (EIR), carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, thereby providing a greater distance between the Oak Grove area of Hahamongna Park and the excavation area. Additionally, the limited maintenance area for Alternative 3 further reduces habitat impacts by allowing for site replanting and mitigation to take place within the reservoir footprint.

### **Response to Comment 202-2:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

### **Response to Comment 202-3:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR selected Alternative 3 as the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**From:** [geraldine Manlin](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 10:18:04 AM

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Please don't do this unnecessary sediment removal. Although some of your constituents need jobs, this is not a good fit. Devil's Gate Dam is a unique spot that is fine just the way it is. Let's get some rain, a lot of rain and then see what happens. This is not the 1920's. Thank you. Geri Johnston - Born and raised in La Canada.

Comment 203-1

## **Response to Comment Letter #203 (Geraldine Johnston)**

### **Response to Comment 203-1:**

Thank you for your input. This comment has been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's opposition to the Proposed Project.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries. LACFCD is undertaking the Proposed Project to restore acceptable levels of flood protection to the downstream communities.

A reservoir storage design capacity of two DDEs below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. Due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft Environmental Impact Report (EIR) selected Alternative 3 as the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir

footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

**From:** [Gregg](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Monday, January 20, 2014 7:25:24 PM

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Hello,

Comment 204-1 | I am sending in my comments regarding the proposed sediment removal and management project in the Hahamongna area behind Devil's Gate Reservoir.

Comment 204-2 | I have lived in Pasadena for 36 years, and have lived adjacent to Hahamongna Park for 21 years. The park is my backyard neighbor. Actually, we do not even have a back yard fence, so we can walk down the hill and be in the natural area in seconds. Our back yard experiences a multitude of migratory birds that are drawn by the natural area in the Arroyo. We also have seen in our back yard coyotes, bobcats, foxes, deer and recently a black bear. These animals live in our neighborhood because of the natural areas all around. The natural area in Hahamongna has grown, allowing more natural area for these residents to thrive. It is not time to shrink the park.

Comment 204-3 | As residents, my wife and I use the park for hiking and biking every week. We go mostly on the weekends, but my wife has been recovering from cancer, and she walks around the entire park most days. We have many routes through the park following old roads, trails, and even animal trails. Basically, it is a 5 mile loop from our home near the end of Altadena Drive, down and across the JPL bridge, following the JPL fence, up into Hahamongna, then down through the natural area or across the dam to the other side and back home. We enjoy the trails and animals within the reservoir area. The recent fires and sediment that came down have greatly changed the watershed, but the natural area that has built up in the basin is a wonderful habitat for the wildlife that we enjoy.

Comment 204-4 | The forest that has grown 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. The current plan for sediment removal goes "overboard". Why was NOTHING done in the 20 years since I moved in to this area? Well, not nothing, but VERY LITTLE, and just near the face of the dam. And now you want to clear acres of land? That seems too much.

Comment 204-5 | I do support removal of minimal sediment 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 proposed could be removed. Reducing the amount of sediment removal would reduce some of the concerns with noise, pollution, and number of trucks. Redevelop the canyon up to where the new JPL parking structure is being built. That will allow for the sediment that you fear is coming down soon to deposit.

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. Not having a regular schedule of maintenance is what has caused this problem.

Comment 204-6 | The natural area that has developed should be left alone; and efforts should be focused on the sediment, not nature. The size of the trees that have grown in the area near the dam is testament to how long it has been since sediment maintenance has been done. We support a more environmentally friendly and sustainable plan. Go slower. Please? There is no need for the speed and severity of your draconian plan. Let the wildlife live in this new natural area that we enjoy so much.

Thank you for your consideration.

-gregg

Gregg and Helen Oelker  
3285 Crestford Dr  
Altadena, CA 91001

**Response to Comment Letter #204 (Gregg Oelker)**

**Response to Comment 204-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 204-2:**

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 204-3:**

See Response to Comment 204-2.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 204-4:**

As noted in Section 2.2.1, LACFCD History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cubic yards (cy) of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

LACFCD has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average storm seasons. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

In March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of protection of two design debris events (DDEs). LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the project was given the name Devil's Gate Sediment Removal and Management Project. The purpose of the Proposed Project is to restore the necessary capacity in Devil's Gate Reservoir and to establish a reservoir configuration more suitable for routine maintenance activities. Therefore, the need for future large-scale sediment removal projects will be reduced or avoided.

The current remaining capacity in the reservoir is 1.3 million cy, whereas a reservoir storage design capacity of two DDEs, or 4.0 million cy, below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. If the reservoir is left in its current state, the flood risk to downstream communities would be left at an unacceptable level.

**Response to Comment 204-5:**

See Response to Comments 204-2 and 204-4. After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two DDEs below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

**Response to Comment 204-6:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**From:** [Joseph Evelyn](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Comments on Devil's Gate Reservoir Sediment Removal and Management Project Draft EIR dated October 2013  
**Date:** Tuesday, January 21, 2014 10:52:37 AM

Comment 205-1

1. The DEIR is a comprehensive, well written, and informative document describing the effects of the sediment removal alternatives under consideration for Devil's Gate Reservoir. The following comments are provided to clarify certain flood risk reduction aspects of the proposed project as well as propose a more in-depth formulation and evaluation of alternatives based on water transport of sediment (sluicing and slurry pipeline) to the Pacific Ocean.

Comment 205-2

2. The DEIR uses the terminology "flood risk reduction". For clarity it is suggested that the terminology "flood risk reduction" be clearly defined and differentiated from the frequently used phrases "flood protection" and "flood control". "Flood protection" and "flood control" can imply total or complete protection from all flood events regardless of size or the downstream location of interest. Whereas the phrase "flood risk reduction" more accurately conveys the concept that the operation of the dam results in a reduction in the size and frequency of occurrence of downstream floods and floodplain inundation as compared to the without dam condition. The volume of reservoir storage space available and operation of the dam's outlet works determine the extent of downstream flood risk reduction. Large flood events may exceed the capability of the dam to reduce downstream flood magnitude and floodplain inundation to non-damaging levels.

Comment 205-3

3. The DEIR states that Devil's Gate Dam provides flood risk reduction along the Arroyo Seco downstream of the dam. Flood risk reduction from dam operations also extends along the Los Angeles River from its confluence with the Arroyo Seco to the Pacific Ocean. The magnitude of the flood risk reduction along the Arroyo Seco and the Los Angeles River from dam operations progressively diminishes as the uncontrolled drainage area below the dam increases with distance downstream of the dam.

Comment 205-4

4. The rationale for the size of the sediment removal project is somewhat ambiguous. Paragraph 2.4 (Project Goals and Objectives) in the DEIR states "The Proposed Project will remove sediment from Devil's Gate Reservoir to restore the design capacity (volume for two DDEs below the spillway elevation of 1,040.5 feet) and establish a reservoir management system to maintain the flood control capacity of the reservoir." The DEIR should clarify whether the primary design objective is to restore the original reservoir storage volume (4,601 acre-feet), or to enable the dam to capture and store two Design Debris Events (DDE) of approximately 2 million cubic yards (1,240 acre-feet) each. Neither Chapter 4 (Policy on Levels of Protection) of the LACDPW Hydrology Manual dated January 2006 nor Chapter 2 (Public Work's Policy Levels for Flood Protection) in LACDPW's Sedimentation Manual, Second Edition, dated March 2006, prescribe design storage requirements of two DDEs for dams.

Comment 205-5

5. It would be informative for the DEIR to include a table and chart in paragraph 2.2.1 (LACFCD History) depicting the historical sediment management of the reservoir. For each year with sediment related data the table and chart would present in acre-feet the reservoir capacity, sediment deposited, sediment removed by sluicing, sediment removed by excavation, and sediment remaining in storage. This information would provide perspective with regard to size of currently proposed sediment removal volumes and Reservoir Management actions versus historical sediment removal actions.

Comment 205-6

6. Los Angeles County Flood Control District (LACFCD) commitments to the US Army Corps of Engineers (USACE) regarding maintaining the level of flood risk reduction along the lower Los Angeles River have a bearing on the minimum amount of sediment removal from Devil's Gate Dam that should be considered. LACFCD is required to manage stormwater runoff within the Los Angeles County Drainage Area (LACDA) system so as not to reduce the 133-year design flood level of flood risk reduction for the lower Los Angeles River. In accordance with Article II, paragraph Q of the *Project Cooperation Agreement between Department of the Army and Los Angeles County Flood Control District for Construction of the Los Angeles County Drainage Area*,

*California Flood Control Project* dated August 7, 1995, LACFCD committed “to ensure that the quantity or concentration of stormwater inflow does not reduce the authorized level of flood protection”.

The LACDA watershed encompasses 1450 square miles and contains a system of dams, debris basins, and channels along the Los Angeles and San Gabriel Rivers that provide flood risk reduction. Devil’s Gate Dam is one component of this system. Modifications to the lower Los Angeles River channel were constructed during the late 1990’s and early 2000’s by the USACE to increase the hydraulic capacity of the river. The hydrologic basis for USACE planning and design of the lower Los Angeles River channel modifications assumed Devil’s Gate Dam would have a minimum of 2,087 acre-feet (3.367 million cubic yards) of storage space available for flood risk reduction above the water conservation pool (reference paragraph 5.1.3 and Table 29 of the USACE *Los Angeles County Drainage Area Final Feasibility Interim Report, Part I Hydrology Technical Report, Base Conditions, December 1991*). A decision to adopt a sediment removal alternative with a smaller volume would necessitate compensating for the effect of the reduced flood space in Devil’s Gate Reservoir by some combination of increased hydraulic capacity in the lower Los Angeles River, the addition or reallocation of reservoir storage space for flood risk reduction elsewhere in the LACDA system, and changes in LACDA reservoir system operation.

7. LACFCD in conjunction with the USACE needs to develop a comprehensive plan for the long-term management of sediment deposition within the LACDA system. The geologic processes that produce sediment inflows from the San Gabriel Mountains will continue in the future just as local sediment disposal sites will gradually be filled to capacity in the coming decades. Given the built-out landscape of the greater Los Angeles floodplain the long-term sediment management plan needs to address how the LACDA system of dams, debris basins, and channels can be operated so that sediment produced by the mountains can be transported to the ocean in a sustainable, cost effective, and environmentally acceptable manner. The plan may include structural modifications of LACDA system components, changed operational procedures, and additional real estate interests (fee or easements). Implementation of the long-term sediment management plan will also require an understanding of the issues by the public and their political representatives. With the long lead times in implementing any such plan it is not too early to address the issue and develop a workable strategy for the future. The benefits of developing a long-term sediment management plan include the ability of local agencies and the public to make future land use, transportation facility, and utility placement decisions consistent with the plan.

8. The DEIR addresses the use of the Arroyo Seco Channel and the Los Angeles River to transport Devil’s Gate sediment to the Pacific Ocean in the discussion of Alternative #4 (Sluicing), the Slurry Pipeline Alternative(eliminated without a detailed evaluation), and FAST operations. However the treatment of water transport of sediment methods (Sluicing Alternative #4, the Slurry Pipeline Alternative, and FAST operations) in the DEIR is incomplete and uneven. The formulation and evaluation of the sluicing and slurry pipeline alternatives is based on an “all or nothing” approach in which all the sediment to be removed from the reservoir has to be done by these means alone. The DEIR then points to deficiencies of these methods as a basis for eliminating them from consideration. The DEIR dismisses these alternatives largely based on the lengthy period of time (many decades) it would require for dam outflows to carry the sediment to the Los Angeles River. The DEIR thereby misses a potentially beneficial means of removing a sizeable portion of the sediment from the reservoir in a manner that could reduce the adverse effects of the proposed excavation and trucking approach with respect to air quality, traffic, noise, GHG emissions, and dust.

9. The annual Reservoir Management operations that are a part of current LACFCD operations and all alternatives are not described in sufficient detail in the DEIR to know how much sediment would normally be removed from the reservoir by water transport. The evaluation of water transport of sediment in the DEIR cites no problems or issues with Reservoir Management activities that place indeterminate quantities of sediment in the Arroyo Seco Channel but

Comment 205-6  
continued

Comment 205-7

Comment 205-8

Comment 205-9

highlights the potential problems of needing to excavate and truck out sediment deposits in the Arroyo Seco Channel, Los Angeles River, and Port of Long Beach resulting from the sluicing and slurry pipeline alternatives. The DEIR also cites potential environment problems such as air quality impacts with the sluicing and slurry pipeline alternatives but does not address any such issues with the water transport of sediment from the dam for the Reservoir Management operations. This is an uneven treatment of water transport of sediment methods. Inclusion in the DEIR of the table and chart described in comment #5 would be informative with respect to the magnitude of sediment removed by Reservoir Management operations.

10. The evaluation of the Sluicing Alternative uses the results of a hydraulic analysis in Appendix K (*Final Detailed Sediment Transport Capacity Analysis for the Arroyo Seco Channel, Devil's Gate Reservoir Sediment Removal and Management Project*, dated January 7, 2013) of the DEIR. Appendix K describes the application of a recognized sediment transport model (FLUVIAL 12) for 3 scenarios (or 3 conditions) to determine the effectiveness of clear water flushing flows from the dam in transporting sediment deposits (from sluicing) along the Arroyo Seco from the dam to the Los Angeles River. The flushing flows used in the sediment transport model were either a "typical" dam release pattern (based on dam operations records from October 15, 2006 to April 15, 2007) or a continuous dam release of a magnitude and duration required to transport the sediment deposited in the Arroyo Seco Channel. The sediment transport modeling leaves out of the analysis the flow contribution from the uncontrolled drainage area (15 square miles) downstream of the dam. The analysis should be conducted using the full historical record of Arroyo Seco flows from streamgauge records and dam operations. This period-of-record analysis would provide a more accurate assessment of the sediment transport delivery potential of the Arroyo Seco Channel than selecting a typical or average flow regime based on only dam releases.

11. The sluicing and slurry pipeline alternatives could be formulated so they would be feasible by relying on these methods to the extent that water is available in the quantities needed to completely transport sediment downstream. If sluicing or slurry pipeline methods can be used in conjunction with the proposed excavation and trucking approach in a combined alternative then the advantages of both approaches could be realized, and adverse environmental effects reduced.

12. The Slurry Pipeline alternative should not be eliminated as infeasible in the DEIR without a more thorough formulation and evaluation. Paragraph 4.10.2 of the DEIR cited concerns related to insufficient water for flushing sediment through the Arroyo Seco Channel and Los Angeles River, and the likely need to reload sediment deposited in these channels in order to transport them to designated disposal site(s). The DEIR including Appendix K did not address quantitatively the flow conditions or sediment transport along the Los Angeles River yet relied on the perceived inability of the Los Angeles River to transport the sediment in deciding the Slurry Pipeline alternative was infeasible. The drainage area of the Los Angeles River at its confluence with the Arroyo Seco Channel is 511 square miles as compared to about 47 square miles for the Arroyo Seco watershed at this location. Therefore flood discharges on the Los Angeles River are typically an order of magnitude or more, and of longer duration, than characteristic of flows on the Arroyo Seco.

13. The Slurry Pipeline alternative could be formulated to use an appropriately sized floating hydraulic (suction) dredge operating in the reservoir pool. By controlling the water surface elevation of the reservoir pool the floating dredge could be maneuvered to locations within the reservoir where sediment is to be removed. Water for the slurry pipeline operation would come from flood inflows impounded by the dam and from water pumped upstream from the Los Angeles River to the dam in a pipeline located in or adjacent the Arroyo Seco Channel. Even low flows on the Los Angeles River during the summer months should be sufficient to support a slurry pipeline operation. During the winter flood season (October to April) the pipelines could be temporarily removed until the following non-flood season. The dam outlets (either sluice gate openings or conduits with slide gates) could be temporarily fitted with a closure that enabled the slurry pipeline and freshwater pipeline to pass through the dam. To address the

Comment 205-9  
continued

Comment 205-10

Comment 205-11

Comment 205-12

Comment 205-13

Comment  
205-13 continued

concern of deposition of sediment within the Arroyo Seco Channel, the slurry pipeline could be extended the entire length of the Arroyo Seco Channel to the Los Angeles River.

Comment 205-14

14. An appropriately formulated slurry pipeline alternative has significant advantages. Slurry pipeline transport of bulk materials is a mature technology that has been used worldwide in the mining industry for many years. Use of a hydraulic (suction) dredge in combination with a slurry pipeline would be particularly effective in transporting the finer sediment sizes found close to the dam embankment. It may be possible to use an electric hydraulic dredge which should reduce the adverse environmental aspects of traditional earthmoving equipment and trucking. Pumping of Los Angeles River water upstream to the dam could be accomplished using electric pumps and be conducted primarily during off-peak hours to minimize energy costs. A slurry pipeline approach could be used in conjunction with the proposed excavation and trucking approach to take advantage of the strengths of each approach in removing sediment from the reservoir. A dredge could be used to remove the sediment closer to the dam while the proposed excavation and trucking may be more suited to the upstream portion of the reservoir area. It is recognized that placing larger quantities of sediment in the Los Angeles River will result in more sediment deposition at the mouth of the Los Angeles River. More frequent dredging of the harbor area is likely however the long-term capacity of offshore placement sites for dredged material is much greater than local pits and engineered fill sites within the LACDA watershed.

Thanks for the opportunity to comment on the DEIR for Devil’s Gate Reservoir Sediment Removal.

Joseph Evelyn  
527 Knight Way  
La Canada, CA 91011

January 21, 2014

**Response to Comment Letter #205 (Joseph Evelyn)**

**Response to Comment 205-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 205-2:**

“Flood Risk Management” is defined in County of Los Angeles Department of Public Works (LACDPW) 2013 Sediment Management Strategic Plan (SMSP) as “Various activities and regulations that help reduce or prevent damages caused by flooding.” Removing sediment from the Devil’s Gate Reservoir is a flood risk management activity used to reduce the downstream flooding risk.

Differing levels of “flood protection” are required based on regulations and standards. For example, State of California jurisdictional dams must be constructed to provide a level of flood protection that can safely pass the Probable Maximum Flood. The term “flood control” is used interchangeably with “flood risk management;” however, Los Angeles County Flood Control District (LACFCD) acknowledges that natural events in exceedance of regulations and design standards are possible given the power and unpredictability of nature.

The Sediment Management Strategic Plan (March 2013) can be viewed here:

<http://dpw.lacounty.gov/lacfcd/sediment/files/FullDoc.pdf>

**Response to Comment 205-3:**

Comment noted.

**Response to Comment 205-4:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam’s lowest spillway was determined to be the standard acceptable level of risk at Devil’s Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 LACDPW Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil’s Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

As stated in the EIR “The Proposed Project will remove sediment from Devil’s Gate Reservoir to restore the design capacity (volume for two DDEs below the spillway elevation of 1,040.5 feet).” By restoring two DDEs of capacity below the spillway elevation of 1,045.5 feet, the Project will also be restoring capacity to the total reservoir storage volume.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

**Response to Comment 205-5:**

The County of Los Angeles Department of Public Works' 2013 SMSP included sediment history data to demonstrate the volume of sediment deposited into the dams and used that data along with statistical analysis to develop projected 20-year sediment volumes for County facilities. The sediment history provided for Devil's Gate Dam (pages 8-42 and 8-43 of the Sediment Management Strategic Plan) correctly shows the sediment volumes accumulated at the dam; however, a slight adjustment must be made to understand the current capacity in the dam. The column titled "Reservoir Capacity at Elevation 1,054 ft" provides the remaining capacity when considering the original spillway elevation of the dam. The spillway was rehabilitated in the late 1990s in order to pass the Probable Maximum Flood. The rehabilitation entailed lowering the spillway bottom elevation, thereby constructing the spillway ports. The reservoir capacity below the existing spillway ports (elevation of 1,040.5 feet) is the appropriate parameter for determining the currently available capacity for meeting the sediment volume requirements for the dam.

**Response to Comment 205-6:**

Goal number 5 of the Draft EIR is listed as "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." Alternative 3, designated as the Environmentally Superior Alternative in the Draft EIR which also achieves Proposed Project objectives, aims to remove 2.4 million cubic yards (cy) of sediment within five years of construction commencement. This would bring the total storage capacity at Devil's Gate Dam and Reservoir up to 3.7 million cy or approximately 2,300 acre-feet. With a project of this size and duration, LACFCD anticipates no changes to the Los Angeles County Drainage Area system.

**Response to Comment 205-7:**

In recent years, LACFCD has identified new challenges in managing sediment. In particular, the wildfires occurring in 2007 and 2009 burned a large portion of the County and have led to an increased inflow of sediment and debris within LACFCD facilities. This has put pressure on the remaining capacity of existing sediment placement sites, where LACFCD has traditionally placed sediment. As a result, LACFCD has developed a 20-year Sediment Management Strategic Plan (Strategic Plan) for years 2012 through 2032 that pursues new alternatives which can reduce the environmental and social impacts of sediment management.

The Strategic Plan represents the results of a continuing dialogue about sediment management between the LACFCD and numerous stakeholders, including the United States (U.S.) Army Corps of Engineers (USACE), in the region. The Strategic Plan provides an overview of sediment management issues, evaluates various strategies to help identify optimal solutions for sediment management, and identifies

general steps that should be pursued to meet the LACFCD's mission. The Strategic Plan is guided by the following key objectives:

- Maintaining flood risk management and water conservation
- Recognizing opportunities for increased environmental stewardship
- Reducing social impacts related to sediment management
- Identifying ways to use sediment as a resource
- Ensuring LACFCD is fiscally responsible in decision-making

The Strategic Plan is a living document that is open to other alternatives and may be revised in the future as conditions change. This Strategic Plan is intended to be an advisory document. Development of specific cleanout plans for the LACFCD's numerous facilities will be guided by the Strategic Plan. During the development of these specific cleanout plans there will be opportunities for additional public input, including from the local communities affected by each cleanout.

When the County of Los Angeles Board of Supervisors instructed LACFCD to prepare an EIR, project development was begun in accordance with the required level of protection. At that time LACFCD also began receiving feedback on the concurrent Strategic Plan and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the project was given the name Devil's Gate Sediment Removal and Management Project.

Additionally, for this Proposed Project, after the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 205-8:**

See Response to Comment 205-7.

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, "[a]n EIR is not required to consider alternatives which are infeasible" (CEQA Guidelines Section 15126.6(a)) or "which could change the fundamental nature of the proposed project." (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.* (1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 15126.6(f)(3)). Additionally, an

alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project's significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

Alternative 4, Sluicing is addressed and analyzed in the Draft EIR. The Slurry Pipeline Alternative was not carried forward for further analysis because it would not reduce impacts. Flow Assisted Sediment Transport, or FASTing, is included in the reservoir maintenance phases of the Proposed Project, as well as the alternatives. As detailed in the Sediment Transport Capacity Analysis (Appendix K), neither sluicing nor FASTing would be able to move the necessary amount of sediment out of the reservoir to restore full capacity within the required time frame.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 205-9:**

See Response to Comment 205-7. Future maintenance activities would not increase or decrease the current amount of sediment that flows downstream. As with the ongoing use of FASTing, future FASTing operations would naturally remove sediment of finer particle size from the reservoir, through the dam, and on to the ocean.

FASTing keeps fine sediment that is suspended in flows moving through the dam and Arroyo Seco as opposed to dropping out in the Reservoir. Sluicing on the other hand, attempts to resuspend sediment into slower moving flows through the use of mechanical agitation. This process is often not as successful as FASTing as the larger granulated sediment being transported by the slower flows has greatly increased potential to drop out prior to reaching the ocean. This is the reason why sluicing has more potential impacts to the Arroyo Seco than FASTing does.

**Response to Comment 205-10:**

While performing additional analysis on a larger range of historic records would produce a variety of outlying data, for planning purposes, a recent, "typical" year of flow data was chosen to provide a representative view of what types of flows could be expected in the near future.

Additionally, Page 8 of the analysis in Appendix K of the Draft EIR provides further reasoning for the omission of the downstream inputs:

"This analysis has been performed under the assumption that the natural stormwater flows occurring in the Arroyo Seco Channel over the period of time being analyzed are governed entirely by the conditions at the outlet of the Devils Gate Dam. Due to the extremely long duration of analysis, and the subsequent amount of hourly flow data, conventional routing methods used to confluence the Dam outflows with additional downstream tributaries as the Channel extends downstream were not a feasible option for this analysis. Omitting the effects of additional downstream inflows into the Channel may reduce the

sediment transport capacity of the Channel, particularly in the most downstream reaches of the Channel as the area of the additional tributaries increases. However, omitting these effects will have a negligible effect on the sediment transport capacity of the Channel in the most upstream reaches, such as in the most upstream natural reach of the Channel where additional tributary areas are negligible and stormwater flow rates are entirely governed by the Dam outflow. Given that the previously performed sediment transport capacity analysis indicated a large volume of sediment would settle out in this natural upstream portion of the Channel, the results presented herein are anticipated to produce an accurate model of the sediment transport characteristics of the Channel, particularly for the previously identified problem areas.”

**Response to Comment 205-11:**

See Response to Comments 205-7, 205-8, and 205-10.

**Response to Comment 205-12:**

See Response to Comments 205-8 and 205-10, above.

As discussed in Appendix K – Sediment Transport Analysis, the accumulated sediment within Devil’s Gate Reservoir cannot be sufficiently transported down the length of the Arroyo Seco Channel with the average quantity of water received. As demonstrated in the analysis, it is likely that sediment loads will fall out rapidly after leaving Devil’s Gate Reservoir and remain in the channel before reaching the confluence with the Los Angeles River. This sediment would eventually need to be excavated and trucked out from the Arroyo Seco Channel. Therefore, the flows within the Los Angeles River were not taken into account.

**Response to Comment 205-13:**

See Response to Comment 205-8, 205-10, and 205-12.

The analysis for the slurry pipeline in Section 4.10.2 of the Draft EIR assumed that the process “involves allowing the water to build up behind the dam, conducting operations to suspend the sediment in the water, and transporting the sediment slurry downstream of the dam in a pipeline.” A floating hydraulic dredge operating in the reservoir would fall in line with the outlined plan. Please see Section 4.10.2, Slurry Pipeline Alternative, of the Draft EIR. This alternative was rejected due to the high risk to downstream habitat as well as the limitations of being able to quickly and efficiently move sediment out of the reservoir. This alternative would fail to meet the project objectives and would result in greater/additional impacts than the Proposed Project.

Additionally, pumping water from the Los Angeles River to the top of Devil’s Gate Reservoir, 11 miles upstream over approximately 800 feet in elevation, would be cost prohibitive and could potentially have additional environmental impacts and regulations.

**Response to Comment 205-14:**

See Response to Comment 205-13.

**From:** [Joseph Johnston](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 10:30:10 AM

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To whom it may concern,

The L.A. County plan for the Devil's Gate Reservoir is hugely degrading to the natural water shed environment within the Reservoir and surrounding park. In addition the increase in traffic, destruction to roads, and noise pollution for the community and local schools is unacceptable and ludicrous.

The Arroyo Seco Foundation solution for the sediment situation at the Devil's Gate Reservoir is by far a more logical idea. It is less expensive and impacting to the taxpayers funding this venture, and offers a more ecologically sound solution. Let's do the right thing and not the easy one.

Sincerely, Joseph A. Johnston, La Crescenta

## **Response to Comment Letter #206 (Joseph Johnston)**

### **Response to Comment 206-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's objection to the Proposed Project.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant.

### **Response to Comment 206-2:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR selected Alternative 3 as the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

Marietta Kruels  
835 West Mariposa Street  
Altadena CA 91001  
818-468-4239

1/19/2014

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

To Whom it may concern:

Comment 207-1  
Having paid attention to the Devil's Gate Dam for some thirty years, I have, of course, actively watched the ever changing plans to conduct sediment removal since the 2009 Station Fire. The confusing part is why the number of cubic yards and affected acreage have consistently been increasing. In a quest for facts on the dam specifications with updated 1995-8 retrofit data, I have found this information missing. Other than the 1920 specs that are mentioned in this DEIR, I have been unable to locate this information nor the retrofit data. Google searches have led me to sites on the DPW's own website that are no longer available. And, this information is not available independently on the DPW's site. During 1995-8, there was a dam retrofit. The spillway was lowered and this may have been due in no small part to DPW's desire to forego maintenance and allow a greater sediment fill to remain. An intentional decrease in sediment removal lowers the size of the reservoir capacity and the fix was to lower the spillway and add additional tunnels to allow for quicker, immediate releases of storm water. DPW's choice to ignore the retrofit specifications and, instead, rely on the 1920 original dam spec's and a return to original 1920 "design capacity", is not acceptable. The retrofit design capacity, along with any potential flaw that further reduced that capacity must be used in order to arrive at the correct conclusions. Why has this been ignored?

Comment 207-2  
It is because of this that I arrive at the flaws of the original "initial study" of this DEIR. The ever shifting amount of sediment removal necessary is highly questionable. This is proven out by DPW's own statements, documents and public comments as well as other governmental documents. I am attaching two such

documents on which I am relying and am asking for responses to these in light of each and every premise contained within them and the DEIR. The first is the 3/18/2011 California Regional Water Quality Board (CRWQB)'s denial of a water quality certification of a 12/1/2010 application. The second is the Proposition 1E application for flood grant money for the Devils Gate and Eaton Stormwater Flood Management Project, of which, I am only attaching pertinent sections as is the document is very large and, obviously, you already have a complete copy of this application and its related attachments. For the record, the Eaton Canyon/Devils Gate diversion project was awarded \$28million.

My reliance on these documents and the information contained therein continues to bring into question the quantity of sediment to be removed and acreage to be disturbed and possible reasons why the magnitude continues to increase. Starting with the CRWQB's denial of the original request to remove 1.6million cubic yards of sediment within a 50 acre area, this denial also comes with a list of suggestions and all of this with the knowledge of the Station Fire's sediment issues. The denial reads "...we cannot conclude that impacts to water of the US have been appropriately avoided and minimized and that the project would not result in an unacceptable degradation of water quality..." The denial acknowledges the activities necessary to provide proper function of the flood control system in accordance with its "original" design which I would question (updated "retrofit" specs should be used). Although this denial calls out for alternatives and analysis, it also clearly states

"1) LACFCD shall identify cleanout alternatives sufficient to protect public safety other than "return to design capacity."...

2) LACFCD shall identify cleanout alternatives which would minimize the 50-acre impact and identify alternatives for phasing the project to minimize impacts over time ... LACFCD shall identify alternatives which include lesser initial volumes but repeated cleanouts over several periods including two years and five years...

The final analysis should include the rationale for the determination that the proposed project is the most appropriate design which meets project needs and that there are not other, more appropriate, project designs which avoid or minimize impacts to waterways while also meeting project needs..."

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/401\\_water\\_quality\\_certification/final\\_letters/Documents/2011/10-170DenialWQC.pdf](http://www.waterboards.ca.gov/losangeles/water_issues/programs/401_water_quality_certification/final_letters/Documents/2011/10-170DenialWQC.pdf)

CRWQB's approvals must be met in order to obtain a CWA Section 401 certification. While it appears that this DEIR accomplishes requests made in CRWQB' denial letter, it ignores the basic demand - to look to reduce the amount of sediment to be removed, reduce acreage to be disturbed and space the project

Comment 207-3  
continued

out over time. The DEIR goes the opposite way ignoring the denial comment "... we cannot conclude that impacts to water of the US have been appropriately avoided and minimized and that the project would not result in an unacceptable degradation of water quality..." Instead of seeking to reduce sediment volume to be removed and acreage to be disturbed and using repeated cleanouts over several periods over years, this DEIR doubles down on all three. The base numbers of the DEIR are the ones contained in this Water Quality Certification application and denial. The DEIR ignores the requests of the CRWQB to reduce and instead the sediment removal volume ranges up to 250% of the application's 1.6million cubic yards to 4million, acreage ranges up 150% of the application's 50 acres to 125, and the request to have repeated cleanouts over several periods turns into nonstop, whenever sufficiently dry, don't stop 'til you drop cleanout. Why have these basic requests in this denial letter been ignored in the DEIR? Why did the DEIR instead go in direct opposition to all these suggestions? And, yet, the CRWQB's approval is still required as acknowledged under 2.8.2 of the DEIR.

Comment 207-4

The next document is the application for Proposition 1E grant money for the Devil's Gate and Eaton Stormwater Flood Management Project.  
[http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted\\_Applications/P1E\\_Round2\\_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20\(201243210009\)/Devil%20s%20Gate%20and%20Eaton%20Stormwater%20Flood%20Management%20Project%20Proposal.pdf](http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted_Applications/P1E_Round2_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20(201243210009)/Devil%20s%20Gate%20and%20Eaton%20Stormwater%20Flood%20Management%20Project%20Proposal.pdf)  
This grant application has 5 projects, the first 3 improve Eaton Spreading Grounds, #4 is the pipeline and pumps, and #5 is the 2,000,000 cubic yards of sediment to be removed from Devil's Gate Dam area. Clearly, Devil's Gate's sediment removal is a big part of this project.  
  
[http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted\\_Applications/P1E\\_Round2\\_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20\(201243210009\)/Attachment%203%20-%20Att3\\_SWF\\_WorkPlan\\_1of2.pdf](http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted_Applications/P1E_Round2_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20(201243210009)/Attachment%203%20-%20Att3_SWF_WorkPlan_1of2.pdf)  
As described in this document  
(page 3-12) Devil's Gate Water Conservation  
Based on the proposed future configuration of Devil's Gate Reservoir, an estimated 4,500 AF can be captured annually for water conservation by conveying it to the Eaton Wash Spreading Grounds (and possibly to Arroyo Seco Spreading Grounds in the future) for infiltration and recharge to the Raymond Basin. Devil's Gate Reservoir area covers approximately 175 acres (0.27 square miles) and has a design storage capacity of 4,600 acre-feet (AF).  
(page 3-14) Phase V: Devil's Gate Reservoir Sediment Removal and Management

Removing 2 million cubic yards of sediment from the reservoir area by means of either trucking, sluicing, flow assisted sediment transport, or a combination thereof  
Establishing a reservoir configuration more suitable for routine maintenance activities including sediment management

[http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted\\_Applications/P1E\\_Round2\\_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20\(201243210009\)/Attachment%207%20-%20Att7\\_SWF\\_TechJust\\_1of2.pdf](http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted_Applications/P1E_Round2_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20(201243210009)/Attachment%207%20-%20Att7_SWF_TechJust_1of2.pdf)

See page 8, second chart which clearly states: Measure of Benefit Claimed (Name of Units): Acre-Foot Per Year with project to be 4,500 ac ft.

It is very revealing as it states "based on the proposed future configuration of Devil's Gate Reservoir, an estimated 4,500 AF can be captured annually ... by conveying it to the Eaton Wash Spreading Grounds..." Clearly, the "proposed future configuration" is planning for the capture and storage of 4,500 AF of water (clearly only when storms generate this quantity). This water transfer not only requires storage in the Arroyo Seco, but a 30-36 inch 5 mile pipeline, several pumps along the way, a pump to be installed either at the upstream face of the dam or in an intake tunnel, and major improvements to the Eaton Spreading Grounds. The Eaton Spreading Grounds improvements have mostly been completed. The preferred pipeline route is mostly an easterly route following Woodbury Road, Lake Avenue and New York Drive. This will mainly affect Altadena residents, especially on New York which is an extremely narrow, residential street with high traffic volume. Unfortunately, the water benefit derived will benefit few, if any, Altadenans. While both areas, the Arroyo Seco and Eaton Wash, are in the Raymond Basin Aquifer, the Arroyo Seco/Hahamongna area is in the "Monk Hill" area of the Basin which serves at least one La Canada Flintridge water purveyor, 3 Altadena water purveyors and Pasadena. The Eaton Wash area of the Basin is in the "Pasadena Subarea" and may minimally serve Altadena through the Pasadena Water Department but most if not all the benefit will go to Pasadena. Allowing water to settle in the Monk Hill area will benefit all users and the entire Raymond Basin aquifer.

So here is my premise and question:

Water transfers cannot occur during storm events. Eaton Canyon generates its own storm water which first must use the spreading grounds or be discharged. This can be several months each year. The Devil's Gate Dam area will have to store the water during these wet months and then continue to store the diminishing pond as water is transferred slowly to the Eaton Canyon Spreading Grounds. There is not

Comment 207-5  
continued

enough storage capacity at Eaton Canyon to hold this water. The water will be transferred slowly and allowed to percolate. So how much room does it take to store 4,500 AF of water? There are 1,613 cubic yards in an acre foot.  $1,613 \text{ cu yds} \times 4,500 \text{ AF} = 7,258,500 \text{ cu yds}$ . This is almost the size of the original design capacity of the 1920 dam, 7.4million cu yds (and this is born out in one of the above documents stating that it has a design storage capacity of 4,600 acre-feet). Interesting isn't it. What does this pond look like - spread over 50 acres, it would be 90 feet deep and over 100 acres it would be 45 feet deep. And, to prevent undermining of water on the sides, it would be a lot deeper if the ponds are earthen ponds and not concrete. This would be a huge, deep pond of water at its maximum and an equally large crater when dry. Due to the highly related nature of these two projects, the combined effects have not been sufficiently addressed or analyzed and have been largely hidden from the public. CEQA requires that these related projects' cumulative impacts be combined and studied together. Why has this not been handled as a combined project?

Comment 207-6

Why would DPW want to use the entire reservoir to hold water for diversion? Wouldn't having a large pond of water endanger flood control and take up the space and during a DDE would double the danger to the downstream area and the dam? How is this protecting the intent of Devil's Gate Dam flood control when it may, in fact, impede or heighten the flood danger? Would this additional load potentially compromise the integrity of the Dam using the 1995-8 retrofit specifications? Would this not increase the seismic safety issues? What other unintended consequences might this cause?

Comment 207-7

I do not deny that having water to replenish the aquifer is a noble cause. But, why, if it is safe to hold water in Devil's Gate Dam, would you want to transfer this water to Eaton Canyon? The percolation in both areas, the Arroyo Seco and Eaton Canyon, is similar. All Raymond Basin users would benefit if the water is allowed to recharge within the Arroyo Seco/Hahamongna area. Why would you want to spend \$10-15million dollars and disrupt the neighborhoods with a 5 mile pipeline?

Comment 207-8

Also, another California entity, California Department of Fish and Wildlife (CDFW), requires that a Section 1600 Streambed Alteration Agreement be obtained. These two California Departments will undoubtedly be coordinating documentation and relying on each other's comments. Why is this being ignored?

Comment 207-9

The third document of interest is the study by the United States Army Corp of Engineers (USACE) Arroyo Seco Watershed, Los Angeles County CA Feasibility

Study. It is the Army Corp. from whom a Section 404 Permit must be obtained. And this, well publicized soon to be complete study is not even mentioned in the DEIR. This study of the Arroyo Seco Watershed continues to be an ongoing plan. See Congressman Adam Schiff's website:

<http://schiff.house.gov/s20091/schiff-secures-federal-funds-for-arroyo-seco/>

Congressman Schiff's website states:

The focus of the study is to address flood and stream management, habitat, water resources, and ecosystem restoration issues within this vital Southern California watershed. This funding will allow the Corps to conduct technical assessments of ecosystem restoration and watershed management programs to identify projects which will improve the management and conditions of the watershed. The Arroyo Seco Watershed Management Plan is a project supported and coordinated by the County of Los Angeles to develop a comprehensive, environmentally friendly approach to manage the Arroyo Seco Watershed.

Once again, this DEIR is looking for a one solution fix for an area with many stakeholders, including the Army Corp of Engineers. Would you explain how the DEIR alternatives fit in with the County's support of this Watershed Management Plan as underlined above?

Clearly, there are many other issues either not fully considered or entirely ignored within this DEIR. Undoubtedly, others will comment on these but I still would like to ask why the following items were not appropriately considered and would like these items individually addressed:

- Trail Closures – The only 2 east west trails will be closed during all construction hours and may be closed on off hours as well.
- JPL parking structure – This construction will cause the closure of the Arroyo Seco's western most trail between JPL's bridge and Rose Bowl Riders. When combined with the first bullet point, this completely closes off east west trail use in Hahamongna.
- Complete degradation and elimination of all plants and small animals within the construction area
- Air, Noise, and Visual Pollution much of which is ignored or not fully addressed or mitigated.

There is not enough time for me to go into all of the shortcomings and, while I will acknowledge the need for sediment removal now and in the future, I stand by the California Regional Water Quality Board's 3/18/2011 denial letter and their request that this project be reduced in both acreage affected and sediment removed

Comment 207-16  
continued

and that the project be spread out over time of 2-5 years removing much smaller amounts of sediment. Why would this not be the preferred alternative?

Comment 207-17

I will look forward to your responses to all my comments and questions.

Sincerely,



Marietta Kruells

Cc:

- LA County Board of Supervisors
- Pasadena City Council
- Michael Beck, Pasadena City Manager
- Arroyo Seco Foundation
- Pasadena Audubon Society
- California Department of Fish and Game
- U.S. Forest Service
- Tony Zampello, Raymond Basin Management District
- Chris Holden, State Assembly Member
- California Regional Water Quality Board



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Acting Secretary for  
Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown J  
Governor

March 18, 2011

Mr. Christopher Stone  
Los Angeles County Flood Control District  
900 S. Fremont Ave.  
Alhambra, California 91803

**DENIAL WITHOUT PREJUDICE OF WATER QUALITY CERTIFICATION FOR PROPOSED DEVIL'S GATE DAM AND RESERVOIR SEDIMENT REMOVAL PROJECT (Corps' Project No. 2010-01122-CO), ARROYO SECO, CITY OF PASADENA, LOS ANGELES COUNTY (File No. 10-170)**

Dear Mr. Stone:

On December 1, 2010, the Los Angeles Regional Water Quality Control Board (Regional Board) received an application for a Clean Water Act (CWA) Section 401 Water Quality Certification of the proposed Devil's Gate Dam and Reservoir sediment removal project (Devil's Gate Project) from the Los Angeles County Flood Control District (LACFCD). On December 13, 2010, Regional Board staff, Valerie Carrillo, and LACFCD staff conducted a joint inspection of the project site. The Regional Board sent a request for more information (RFI) for the proposed project application on December 14, 2010 and a response to the RFI was sent by LACFCD dated December 30, 2010. In addition, we have received a revised 'Avoidance and Minimization' Figure dated February 24, 2011.

At this time, we are unable to issue the Certification for the Devil's Gate Project, as proposed, because we cannot conclude that impacts to waters of the United States have been appropriately avoided and minimized and that the project would not result in an unacceptable degradation of water quality. Therefore, I hereby deny your application without prejudice pursuant to §3859(d) of Title 23 of the California Code of Regulations (23 CCR) because it is inadequate.

As described in the application for the proposed Devil's Gate Project and in the response to the RFI, LACFCD is proposing to remove 1.6 million cubic yards of sediment, vegetation and debris from a 50-acre area within the Devil's Gate Reservoir, in the City of Pasadena. The application and supporting documents indicate that the sediment removal activities are required to provide proper function of the flood control system in accordance with its original design in order to protect public safety. The 2009 Station Fires caused significant erosion and contributed significant sediment loading within the Devil's Gate Reservoir basin and resulted in diminished

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flood control capacity. Additional considerations associated with required sediment removal activities include limited capacity at sediment placement sites; truck traffic; and potential environmental impacts of maintenance projects.

In our review of your application and the additional materials, we do not find that the potential significant impacts have been minimized to the fullest degree possible and we do not find an analysis of alternatives, which should include alternatives in terms the overall size of the project (the volume of materials to be removed and the acreage impacted) and the timing and staging of the impact. Alternatives need to be identified and adequately analyzed for a project, such as the one proposed, to proceed. Mitigation for unavoidable impacts can be considered when the most appropriate alternative has been identified.

Before a CWA Section 401 Certification can be issued for the proposed Devil's Gate Project, you must demonstrate that appropriate alternatives, in terms of the amount of material to be removed and in terms of the timing or phasing of the removal of materials, were considered. These alternatives should include as a minimum:

- 1) LACFCD shall identify cleanout alternatives sufficient to protect public safety other than 'return to design capacity.'

LACFCD has proposed a "total cleanout" to bring the project back to its original design contours which were developed when the reservoir was constructed. Based on past cleanout history for this basin, LACFCD has removed sediment from the reservoir in this manner approximately every ten to fifteen years and then the reservoir has been allowed to fill and provide riparian habitat.

We anticipate that the 'total cleanout' alternative will then permit LACFD to not conduct work in this basin for the next ten to fifteen years. The Regional Board is not aware of other plans for the long-term maintenance of this basin.

LACFCD shall identify the immediate, public safety, capacity need which allows proper function of the flood control system and the corresponding sediment removal need. With this basis, LACFCD shall then develop an alternative(s) for this amount of sediment removal. Alternatives may include a long-term maintenance plan or only the short-term plan allowing for the long-term plan to be developed at a later date.

- 2) LACFCD shall identify cleanout alternatives which would minimize the 50-acre impact and identify alternatives for phasing the project to minimize impacts over time.

Given a 1.6 million cubic yards removal and the associated 50 acres of habitat loss (or other amount as identified, above), LACFD shall identify alternatives which include lesser initial

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volumes but repeated cleanouts over several periods including two years and five years. LACFCD shall analyze these alternatives for cumulative impacts to habitat and affected species using the habitat.

**When considering the alternatives, the evaluations should analyze all significant impacts including the potential environmental impacts including permanent or temporary loss of habitat, and potential for erosion. The final analysis should include the rationale for the determination that the proposed project is the most appropriate design for this project which meets project needs and that there are not other, more appropriate, project designs which avoid or minimize impacts to waterways while also meeting project needs.**

In addition, as acknowledged in your letter of December 30, 2010, the issuance of a CWA Section 401 certification will await complete fees, final CEQA determination, and a detailed compensatory mitigation plan,

You may choose to revise or submit any pertinent updated information in the future. Additional fees may be required, pursuant to 23 CCR §3833(4), if the revised application is not filed within twelve months of the date of this action; the revised application does not correct the procedural problems which led to this denial without prejudice; or the project has changed significantly in scope or its potential for adverse impact.

We remain committed to working with LACFCD to develop the best short-term and long-term plans for this Dam and Reservoir, and for the other reservoirs in this region.

Should you have questions concerning this Certification action, please contact Valerie Carrillo, Section 401 Program, at (213) 576-6759 or LB Nye at (213) 576-6785.

Sincerely,



Samuel Unger, P.E.  
Executive Officer

cc:

Michael D. Antonovich, Los Angeles County Supervisor  
Bill Orme, State Water Resources Control Board  
Eric Raffini, US Environmental Protection Agency  
Cherry Oo (File No. 2010-00833-CO), US Army Corps of Engineers  
Sarah Rains, California Department of Fish and Game  
Kelly Schmoker, California Department of Fish and Game

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### Proposal Full View

[Print](#)

#### Applicant Information

Organization Name Los Angeles County Flood Control District \*  
 Tax ID 95600092  
 Proposal Name Devil's Gate and Eaton Stormwater Flood Management Project \*  
 Proposal Objective The Project will improve District facilities to better manage stormwater runoff from the Arroyo Seco and Eaton Wash watersheds and achieve the following goals: 1) reduce the likelihood and extent of flood damage to downstream communities, 2) increase recharge into the local groundwater basin and, 3) improve public safety by remediating seismic safety issues. \*

#### Budget

Other Contribution	\$0.00
Local Contribution	\$49,757,651.00
Federal Contribution	\$0.00
Inkind Contribution	\$0.00
Amount Requested	\$30,000,000.00 *
Total Project Cost	\$79,757,651.00 *

#### Geographic Information

Latitude \* DD(+/-) 34 MM 10 SS 40  
 Longitude \* DD(+/-) 118 MM 7 SS 55

Longitude/Latitude Clarification Location Lake Avenue and E Woodbury Road in Altadena, CA  
 County Los Angeles \*  
 Ground Water Basin Raymond  
 Hydrologic Region South Coast  
 Watershed Los Angeles River

#### Legislative Information

Assembly District 41st Assembly District \*  
 Senate District 25th Senate District \*  
 US Congressional District District 27 (CA) \*

#### Project Information

Project Name	Devil's Gate and Eaton Stormwater Flood Mana
Implementing Organization	Los Angeles County Flood Control District
Secondary Implementing Organization	Not Applicable
Proposed Start Date	6/1/2009
Proposed End Date	6/2/2025
Project Scope	The Project will improve District facilities to better manage stormwater runoff from the Arroyo Seco & Eaton Wash watersheds
Project Description	<p>The Devil's Gate and Eaton Stormwater Flood Management Project (Project) includes improvement of three existing Los Angeles County Flood Control District facilities and the construction of a new interconnecting pipeline. The existing facilities are the Devil's Gate Dam and Reservoir located within the Arroyo Seco Watershed; and the Eaton Wash Dam, and the Eaton Wash Spreading Grounds located within the Eaton Wash watershed. These facilities, which are operated and maintained by the Los Angeles County Flood Control District (District), serve to control the stormwater runoff from their respective watersheds to prevent downstream flood damage. The facilities within the Eaton Wash watershed also serve to conserve the captured stormwater by recharging it into the underlying Raymond Groundwater Basin (Raymond Basin). The Devil's Gate Dam and Reservoir currently has no associated facilities to conserve captured stormwater. Proposed improvements include restoring reservoir capacity at Devil's Gate Reservoir by removing sediment; Improving seismic performance and operational capabilities, and constructing a new toe drain and erosion protection measures at Eaton Wash Dam; and enlarging and enhancing operations of the Eaton Wash Spreading Grounds. The proposed pipeline will provide a connection from the Devil's Gate Dam and Reservoir to the Eaton Wash facilities to enable conservation of stormwater captured at the Devil's Gate Dam and Reservoir.</p>
	The Project will improve District facilities to better manage stormwater runoff from

Project Objective	the Arroyo Seco and Eaton Wash watersheds and achieve the following goals: 1) reduce the likelihood and extent of flood damage to downstream communities, 2) increase recharge into the local groundwater basin and, 3) improve public safety by remediating seismic safety issues.
<b>Project Benefits Information</b>	

Project Objective

**Budget**

Other Contribution	0
Local Contribution	49757651
Federal Contribution	0
Inkind Contribution	0
Amount Requested	30000000
Total Project Cost	79757651

**Geographic Information**

Latitude DD(+/-)	34	MM 10	SS 40	
Longitude DD(+/-)	-118	MM 7	SS 55	
Longitude/Latitude Clarification		Location		Lake Avenue and E Woodb
County Los Angeles Ground Water Basin Raymond Hydrologic Region South Coast WaterShed				
Los Angeles River				

**Legislative Information**

Assembly District	41st Assembly District
Senate District	25th Senate District
US Congressional District	District 27 (CA)

**Section : Applicant Information Question Tab**

APPLICANT INFORMATION QUESTION TAB

**Q1. PROPOSAL DESCRIPTION**

**Provide a brief abstract of the Proposal, including a listing of individual project titles.**

The Devil's Gate and Eaton Stormwater Flood Management Project (Project) includes improvement of three existing Los Angeles County Flood Control District facilities and construction of a new interconnecting pipeline. The existing facilities are the Devil's Gate Dam and Reservoir located within the Arroyo Seco Watershed; and the Eaton Wa Dam, and the Eaton Wash Spreading Grounds located within the Eaton Wash watershed. These facilities, which are operated and maintained by the Los Angeles County Flo Control District (District), serve to control the stormwater runoff from their respective watersheds to prevent downstream flood damage. The facilities within the Eaton Wa watershed also serve to conserve the captured stormwater by recharging it into the underlying Raymond Groundwater Basin (Raymond Basin). The Devil's Gate Dam and Reservoir currently has no associated facilities to conserve captured stormwater. Proposed improvements include restoring reservoir capacity at Devil's Gate Reservoir by removing sediment; improving seismic performance and operational capabilities, and constructing a new toe drain and erosion protection measures at Eaton Wash Dam; an enlarging and enhancing operations of the Eaton Wash Spreading Grounds. The proposed pipeline will provide a connection from the Devil's Gate Dam and Reservoir to the E Wash facilities to enable conservation of stormwater captured at the Devil's Gate Dam and Reservoir. The project is broken down into the following phases: - Phase I, Eaton W Spreading Grounds Improvements - Phase II, Eaton Wash Dam Rehabilitation Project - Phase III, Eaton Wash Spreading Grounds Intake Improvement and Basin Enlargeme Phase IV, Devil's Gate Water Conservation - Phase V, Devil's Gate Reservoir Sediment Removal and Management

**Q2. PROJECT DIRECTOR**

**Provide the name and details of the person responsible for executing the grant agreement for the applicant. Persons that are subcontractors to be paid by the grant cannot be listed as the Project Director.**

Gail Farber, Chief Engineer, (626)458-4002, GFARBER@dpw.lacounty.gov

**Q3. PROJECT MANAGEMENT**

**Provide the name and contact information (including email) of the Project Manager from the applicant agency or organization that will be the day-to-day contact on this application.**

Alma Fuentes, Civil Engineer, (626)458-6158, AFUENTES@dpw.lacounty.gov

**Q4. APPLICANT INFORMATION**

**Provide the agency name, address, city, state and zip code of the applicant submitting the application. Also provide the name and contact information of the person filling out the online application.**

Los Angeles County Flood Control District, 900 South Fremont Avenue, Alhambra, CA 91803-1331

**Q5. ADDITIONAL INFORMATION**

Provide the IRWM funding area(s) in which projects are located.

<http://www.water.ca.gov/irwm/grants/fundingarea.cfm>

The Project is located in the Los Angeles-Ventura Funding Area

**Q6. RESPONSIBLE REGIONAL WATER QUALITY CONTROL BOARD(S)**

List the name of the Regional Water Quality Control Board (RWQCB) in which your proposal is located. For a region that extends beyond more than one RWQCB boundary, list the name of each Board.

[http://www.waterboards.ca.gov/waterboards\\_map.shtml](http://www.waterboards.ca.gov/waterboards_map.shtml)

Los Angeles Regional Water Quality Control Board

**Q7. ELIGIBILITY**

Is the application from an IRWM region approved in the Region Acceptance Process (RAP)? To verify, see RAP website: <http://www.water.ca.gov/irwm/grants/rap.cfm>. If yes, include the name of the IRWM region. If not, explain.

Yes, this application is submitted by an agency which is part of the approved Greater Los Angeles County Region.

**Q8. ELIGIBILITY**

Please specify whether the applicant is a local public agency or non-profit organization as defined in Appendix B of the 2012 Guidelines.

Yes, the applicant is a local public agency.

**Q9. ELIGIBILITY**

List the urban water suppliers that will receive funding from the proposed grant. Please provide the agency name, a contact phone number and e-mail address. Those listed must submit self certification of compliance with CWC §525 et seq. and AB 1420, see Attachment 10. If there are none, so indicate and answer "NA" for Q10 and Q11.

The applicant is not an urban water supplier and the funding will not be received by any urban water suppliers.

**Q10. ELIGIBILITY**

Have all of the urban water suppliers, listed in Q9 above, submitted complete Urban Water Management Plans (UWMPs) to DWR? Have those plans been verified as complete by DWR? If not, explain and provide the anticipated date for having a complete plan. Answer "NA" if no urban water supplier identified in Q9 above.

Not applicable.

**Q11. ELIGIBILITY**

Have any urban water suppliers listed in Q9 recently submitted AB 1420 compliance tables and supporting documentation to DWR for a different grant program on or after November 1, 2012? If so, please list the urban water supplier and the grant program. An urban water supplier must submit AB 1420 compliance documentation to DWR. If the urban water supplier has not submitted AB 1420 documentation, or that documentation was determined to be incomplete by DWR, the urban water supplier's projects will not be considered eligible for grant funding. Refer to Section III.B of the 2012 Guidelines for additional information.

Answer "NA" if no urban water supplier identified in Q9 above.

Not applicable.

**Q12. ELIGIBILITY**

Does the Proposal include any groundwater projects or other projects that directly affect groundwater levels or quality? If so, provide the name(s) of the project(s) and list the agency(ies) that will implement the project(s).

Answer "NA" if the Proposal does not include groundwater projects or other projects that directly affect groundwater levels or quality.

Yes, all components of the proposed project will allow the Los Angeles County Flood Control District to increase the amount of water conserved and recharged into the Raym Basin by over 4,100 acre feet per year. The Los Angeles County Flood Control District will implement the Project.

**Q13. ELIGIBILITY**

For the agency(ies) listed in Q12, how has the agency complied with CWC §10753 regarding Groundwater Management Plans (GWMPs), as described in Section III.B of the 2012 Guidelines?

Answer "NA" if the Proposal does not include groundwater projects or other projects that directly affect groundwater levels or quality.

Raymond Basin is an adjudicated groundwater basin which is governed by the judgment dated February 22, 1984. See Attachment 10 for a copy of the judgment.

**Q14. ELIGIBILITY**

List the agricultural water suppliers that will receive funding from the proposed grant. Please provide the agency/organization name, a contact phone number and e-mail address. If there are none, so indicate and answer "NA" for Q15.

No agricultural water suppliers will receive any funding awarded to this grant proposal.

**Q15. ELIGIBILITY**

Have all of the agricultural water suppliers, listed in Q14 above, submitted complete Agricultural Water Management Plan to DWR? Have those plans been verified as complete by DWR? If the plan has not been submitted, please indicate the anticipated submittal date. Answer "NA" if no agricultural water suppliers were identified in Q14 above.

li bl

**Q16. ELIGIBILITY**

List the surface water diverters that will receive funding from the proposed grant. Please provide the agency/organization name, a contact phone number and e-mail address. If there are none, so indicate and answer "NA" for Q17 below.

No surface water diverters will receive any funding awarded to this grant proposal.

**Q17. ELIGIBILITY**

Have all of the surface water diverters, listed in Q16 above, submitted surface water diversion reports in compliance with requirements outlined in Part 5.1 (commencing with §5100) of Division 2 of the CWC? If not, explain and provide the anticipated date for meeting the requirements. Answer "NA" if no surface water diverters identified in Q16 above.

Not applicable.

**Q18. ELIGIBILITY**

List the groundwater users that will receive funding from the proposed grant. Please provide the agency/organization name, a contact phone number and e-mail address. If there are none, so indicate and answer "NA" to Q19.

No groundwater users will receive any funding awarded to this grant proposal.

**Q19. ELIGIBILITY**

Have all of the groundwater users, listed in Q18 above, met the requirements of DWR's CASGEM Program: <http://www.water.ca.gov/groundwater/casgem/>? If not, explain and provide the anticipated date for meeting the requirements. Answer "NA" if no groundwater users were identified in Q18 above.

Not applicable.

**Section : Application Attachments Tab**

## APPLICATION ATTACHMENTS TAB

**ATTACHMENT 1: AUTHORIZATION AND ELIGIBILITY REQUIREMENTS**

Upload Authorization and Eligibility documentation here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

Last Uploaded Attachments: Att1\_SWF\_Eligible\_1of1.pdf

Upload additional Authorization and Eligibility documentation here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

**ATTACHMENT 2: PROOF OF FORMAL ADOPTION**

Upload Proof of Formal Adoption documentation here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

Last Uploaded Attachments: Att2\_SWF\_Adopt\_1of1.pdf

Upload additional Proof of Formal Adoption documentation here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

Upload additional Proof of Formal Adoption documentation here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

**ATTACHMENT 3: WORK PLAN**

Upload the Work Plan here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

Last Uploaded Attachments: Att3\_SWF\_WorkPlan\_1of2.pdf

Upload additional work plan components here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

Last Uploaded Attachments: Att3\_SWF\_WorkPlan\_2of2.pdf

Upload additional work plan components here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Upload additional work plan components here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

#### ATTACHMENT 4: BUDGET

Upload the Budget documents here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

Last Uploaded Attachments: Att4\_SWF\_Budget\_1of2.pdf

Upload additional budget components here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

Last Uploaded Attachments: Att4\_SWF\_Budget\_2of2.pdf

Upload additional budget components here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

Upload additional budget components here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 character.

#### ATTACHMENT 5: SCHEDULE

Upload the Schedule here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Last Uploaded Attachments: Att5\_SWF\_Schedule\_1of1.pdf

Upload additional schedule components here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Upload additional schedule components here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

#### ATTACHMENT 6: MONITORING, ASSESSMENT, AND PERFORMANCE MEASURES

Upload Monitoring, Assessment, and Performance Measures here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Last Uploaded Attachments: Att6\_SWF\_Measures\_1of1.pdf

Upload additional Monitoring, Assessment, and Performance Measures here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Upload additional Monitoring, Assessment, and Performance Measures here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

#### ATTACHMENT 7: TECHNICAL JUSTIFICATION OF PROJECTS

Upload Technical Justification of Projects here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Last Uploaded Attachments: Att7\_SWF\_TechJust\_1of2.pdf

Upload additional Technical Justification of Projects here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Last Uploaded Attachments: Att7\_SWF\_TechJust\_2of2.pdf

Upload additional Technical Justification of Projects here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

#### ATTACHMENT 8: BENEFITS AND COST ANALYSIS

Upload Benefits and Cost Analysis here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Last Uploaded Attachments: Att8\_SWF\_BenCost\_1of2.pdf

Upload additional Benefits and Cost Analysis documentation here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Last Uploaded Attachments: Att8\_SWF\_BenCost\_2of2.pdf

Upload additional Benefits and Cost Analysis documentation here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

#### ATTACHMENT 9: PROGRAM PREFERENCES

Upload Program Preference documentation here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Last Uploaded Attachments: Att9\_SWF\_Preference\_1of1.pdf

Upload additional Program Preference documentation here, if necessary.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

#### ATTACHMENT 10: GWMP, AB 1420, AND WATER METER COMPLIANCE INFORMATION

If your proposal does not include 1) a groundwater project or a project that directly affects groundwater levels or quality, or 2) an urban water supplier who would receive grant funding, you MUST still upload a document that indicates this attachment is not applicable to your proposal. If the upload field to this attachment is left blank, your proposal cannot be saved or completed.

Upload GWMP, AB 1420, and Water Meter Compliance documents here. Ensure file name is consistent with Section V of the Stormwater Flood Management PSP.

Max file size: 50 MB per file. Up to five files can be uploaded to this upload field. Max file name: 50 characters.

Last Uploaded Attachments: Att10\_SWF\_SelfCert\_1of1.pdf

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## Devil's Gate and Eaton Stormwater Flood Management Project

and lower watersheds of the Arroyo Seco Channel and provides significant storage capacity for stormwater runoff originating from approximately 20,416 acres (31.9 square miles) of mostly undeveloped land north in the San Gabriel Mountains. The Raymond Basin underlies the dam and reservoir area.

Devil's Gate Reservoir area covers approximately 175 acres (0.27 square miles) and has a design storage capacity of 4,600 acre-feet (AF). Devil's Gate Dam is a Concrete Gravity Arch Structure. It is 100 feet high, 310 feet long, and 30 feet wide at its crest and 99 feet wide at its buttress. The dam is under the jurisdiction of the California Department of Water Resources Division of Safety of Dams (DSOD).

Completed in 1920, the Devil's Gate Dam and Reservoir facility was the first flood control facility built by the Los Angeles County Flood Control District to provide flood protection to the Cities of Pasadena, South Pasadena, and Los Angeles. It continues to serve this function today by capturing sediment washed into the reservoir by storm flows, attenuating storm flows, and subsequently controlling water releases to the downstream Arroyo Seco Channel. The Dam protects an inundation area of 1,783 acres including 3,590 parcels, and 10.3 million square-feet of structures. Downstream of Devil's Gate Dam, the lower half of the Arroyo Seco watershed is distinctly different from the upper watershed. The stream is mostly channelized downstream and the watershed is highly urbanized.

### Eaton Wash Dam and Reservoir

Eaton Wash Dam and Reservoir is a stormwater and flood management facility located in the City of Pasadena, approximately 15 miles northeast of downtown Los Angeles. The dam separates the upper and lower watersheds of Eaton Wash and provides significant storage capacity for stormwater runoff originating from a drainage area of 7,949 acres (12.4 square miles) of mostly undeveloped land in the upstream San Gabriel Mountains. The Raymond Basin underlies the dam and reservoir area.

Eaton Wash Reservoir has a capacity of 956 AF. Eaton Wash Dam is an Earthfilled Structure with a clay core. The dam is 62 feet high, 1,525 feet long, has a bottom width of 375 feet and a crest width of 15 feet. The dam is under the jurisdiction of DSOD. The Sierra Madre (0.5 miles to the northeast), Raymond Hill (3 miles to the southeast), and San Andreas (21 miles to the northeast) fault zones are all possible sources of seismic activity that could affect Eaton Wash Dam. The dam protects and inundation area of 828 acres including 1,791 parcels, and 8.8 million square-feet of structures.

The United States Army Corps of Engineers finished construction on Eaton Wash Dam in 1937 and ownership of the dam was subsequently transferred to the District. The facility was constructed to provide debris storage, flood control, and water conservation. It continues to

## Devil's Gate and Eaton Stormwater Flood Management Project

intake gates are closed, the water continues through the drop inlet until it ends and then the water flows back into the main wash.

To aid the water diversion into the Spreading Grounds, Flood Maintenance Staff do two things within the wash. First, they place sandbags across the vehicle access slab. This blocks water from flowing across the slab and instead causes it to drop into the inlet channel. Second, they place wooden flashboards across the drop inlet channel, just downstream of the Spreading Grounds intake gates to block water from continuing to the end of the drop inlet. This forces the water to flow into the Spreading Grounds intake gates. The sandbags and flashboards cannot adequately divert flows up to 125 cfs.

Second, the original design of the Spreading Grounds includes a levee (and sewer line) between Basins No. 1 and No. 2. There is significant seepage through the levee from one large basin to the other. Because of this, the inflow into the basins must be constricted and monitored carefully to avoid levee failure.

Third, a corrugated metal pipe that conveys flow from the intake canal to the shallow basins south of Sierra Madre Avenue was heavily damaged and no longer conveys flows to shallow Basins No. 4 through 14. The loss of use of Basins 4 through 14 also limits available storage capacity.

A recent study determined that addressing the three problems indicated would significantly increase overall groundwater recharge based on historical releases from Eaton Dam.

### Project List

The Devil's Gate and Eaton Stormwater Flood Management Project is the sole Project being submitted with this proposal. The Project has multiple components that satisfy the program eligibility requirements of the Proposition 1E grant and will meet the goals discussed previously. While each component on its own provides benefits, it is through their linkages and synergies that the benefits are optimized to meet the overall goals and objectives. The Project will be constructed in phases. The following information describes the status of each of the Project's components.

#### Devil's Gate Reservoir

To restore reservoir capacity to address the post-Station Fire sediment impacts at Devil's Gate Dam, the Devil's Gate Reservoir Sediment Removal and Management Project will remove an estimated 2,000,000 cubic yards of sediment from the reservoir. This will reduce the level of flood risk to downstream communities along the Arroyo Seco. Removal of sediment will enable the reservoir to capture future sediment inflows and attenuate major storm inflows

## Devil's Gate and Eaton Stormwater Flood Management Project

The Devil's Gate Reservoir Sediment Removal and Management Project will also establish a reservoir configuration that will be more suitable for future routine maintenance activities including sediment management. This will enable the timely removal of sediment in locations, such as those near the dam's valves that are critical to dam safety.

### Devil's Gate Water Conservation

Based on the proposed future configuration of Devil's Gate Reservoir, an estimated 4,500 AF can be captured annually for water conservation by conveying it to the Eaton Wash Spreading Grounds (and possibly to Arroyo Seco Spreading Grounds in the future) for infiltration and recharge to the Raymond Basin.

This proposed Project element includes installing a pump house and intake on the upstream face of Devil's Gate Dam and an outlet in Eaton Wash. Approximately 5 miles of pipeline will be installed through the City of Pasadena and County Unincorporated road rights-of-way. The pipeline will allow water to be directed from the Devil's Gate Reservoir where no downstream recharge facilities exist, to the Eaton Wash Spreading Grounds for conservation. A split valve connected to the pump will also allow for a possible future connection to the upstream Arroyo Seco Spreading Grounds. The Arroyo Seco Spreading Grounds, owned and operated by the City of Pasadena capture limited runoff from the upper Arroyo Seco above the dam, but cannot currently utilize water captured at the dam. All of the facilities in this region recharge the Raymond Basin. This proposed Project element will increase local groundwater supplies in the Raymond Basin and reduce the region's reliance on water imports, without compromising flood control functions of the dams.

### Eaton Wash Dam

Remediation of the seismic deficiencies will be completed through the Eaton Wash Dam and Reservoir Rehabilitation Element. This will consist of removing the existing seismically deficient outlet tower, gate control house, trashrack, and the metal footbridge. Once these major components are removed, rehabilitation of the outlet gates, replacement of the debris racks, addition of a hydraulic power system with a shelter building and control systems, and structural modification of the outlet works will be completed. The dam embankment will be improved by installation of erosion protection measures on the downstream face. Also, the risk of a piping failure of the embankment will be reduced by the construction of a toe drain on the downstream face.

Additionally, this Project will improve the water quality of water conservation releases from the dam by constructing a concrete apron from the gate intakes to the upstream wing walls and fifty-feet of rip-rap stone to provide erosion protection. One of the four outlet gates will be sized to match the Spreading Grounds intake capacity and will be raised to take flow from a higher elevation within the reservoir that would be less turbid.

## Devil's Gate and Eaton Stormwater Flood Management Project

Work Plan

### Status

The following is a table of the specific Project components that are included in this Proposal. The table includes abstracts of each Project component, the current status of each Project component's percent completion of design, and the implementing agency:

Project Component	Abstract	Status (% Design Completion)	Implementing Agency
<u>Phase I</u> Eaton Wash Spreading Grounds Improvements	Combine spreading basins, repair pipeline, construct interbasin structures	100	District
<u>Phase II</u> Eaton Wash Dam Rehabilitation Project	Seismic remediation and mechanical and control systems upgrades	100	District
<u>Phase III</u> Eaton Wash Spreading Grounds Intake Improvement and Basin Enlargement	Replace diversion structure from channel, expand spreading basin, install landscaping improvements	100	District
<u>Phase IV</u> Devil's Gate Water Conservation	Construction of a pump and pipeline from Devil's Gate Dam to Eaton Wash	30	District
<u>Phase V</u> Devil's Gate Reservoir Sediment Removal and Management	Removal of 2 million cubic yards of sediment, establishment of reservoir configuration	30	District

**Devil’s Gate and Eaton  
Stormwater Flood Management Project**

**Technical Justification**

Project Name: <b><u>Phase III-Eaton Wash Spreading Grounds Intake Improvement and Basin Enlargement</u></b>			
Measure of Benefit Claimed (Name of Units): Acre-Foot Per Year			
Additional Information About this Measure: Flows are based on a high-rainfall year expected to occur 1 in 10 years			
(a)	(b)	(c)	(d)
Physical Benefits			
Measure of Benefit Claimed	Without Project	With Project	Change Resulting from Project
			(b) – (c)
Flow in Eaton Wash Flood Control Channel	5893	5793	100



Project Name: <b><u>Phase IV- Devil’s Gate Water Conservation</u></b>			
Measure of Benefit Claimed (Name of Units): Acre-Foot Per Year			
Additional Information About this Measure: Flows are based on an average rainfall year			
(a)	(b)	(c)	(d)
Physical Benefits			
Measure of Benefit Claimed	Without Project	With Project	Change Resulting from Project
			(b) – (c)
Flow in Arroyo Seco Flood Control Channel	6900	2400	4500

**Water Supply**

The Project will maximize conservation of local ground water resources. In addition to providing a local sustainable groundwater supply, this will generate cost savings through avoided purchase of imported water. Attachment 8 has additional information regarding the cost savings. The following table lists the quantity of additional groundwater the Project can supply on a yearly average basis. The following tables list the quantity of additional groundwater that each phase will conserve during an average rainfall year. This was determined by modeling each component’s proposed attributes with historical stream flow/dam release data. The stream flow data is in **Appendix 7-B**.

**Schiff Secures Federal Funds for Arroyo Seco**

October 1, 2009



Thursday, October 01, 2009

Contact: Sean Oblack (202) 225-4176

**SCHIFF SECURES FEDERAL FUNDS FOR ARROYO SECO**

Washington, D.C. – Today, the House passed the Energy and Water Appropriations Act, which included federal funds secured by Rep. Adam Schiff for the Arroyo Seco. The bill allocates \$224,000 to allow the Army Corps of Engineers to complete a Watershed Management Plan Feasibility Study.

"Restoration and conservation of our scarce open spaces is vitally important to ensuring a good quality of life," Schiff said. "This funding will help ensure that the Arroyo Seco returns to its natural state – an environmental gem. Once it's restored, it will provide enjoyable open space and recreation areas for generations to come."

The focus of the study is to address flood and stream management, habitat, water resources, and ecosystem restoration issues within this vital Southern California watershed. This funding will allow the Corps to conduct technical assessments of ecosystem restoration and watershed management programs to identify projects which will improve the management and conditions of the watershed.

The Arroyo Seco Watershed Management Plan is a project supported and coordinated by the County of Los Angeles to develop a comprehensive, environmentally friendly approach to manage the Arroyo Seco Watershed. The project is supported by the Arroyo Seco Foundation, North East Trees, the California Coastal Conservancy, the Mountains Recreation and Conservation Authority, and the cities in the watershed.

## **Response to Comment Letter #207 (Marietta Kruells)**

### **Response to Comment 207-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As noted in the Draft Environmental Impact Report (EIR), Section 2.2.1, Los Angeles County Flood Control District (LACFCD) History in the Draft EIR, "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, LACFCD completed a construction project that seismically rehabilitated Devil's Gate Dam. The rehabilitation project also enlarged the spillway to safely pass the tributary watershed's updated Probable Maximum Flood, the required level of flood protection, without overtopping the dam. After project completion, the DSOD restriction was removed, restoring use of 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."

As noted in the Draft EIR, the seismic rehabilitation project resulted in the Devil's Gate Dam meeting current maximum credible earthquake design standards and probable maximum flood design standards.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

For Devil's Gate Dam, the DDE was previously calculated as 1.67 million cy. That previous calculation was based on the presence of debris retaining structures including Browns Canyon Dam, located within the Angeles National Forest upstream of Devil's Gate Dam. These structures filled with sediment decades ago and no longer provide capacity to "control" any portion of the watershed. A subsequent analysis determined that the correct DDE, based on the absence of sediment control facilities in the Forest, is

2.0 million cy. Following the Station Fire, LACDPW reviewed the DDE calculations and confirmed that 2.0 million cy is the current and appropriate volume for the DDE.

As stated above, LACDPW's criterion is that reservoir sediment levels be maintained at a level equivalent to two design debris events below spillway; however, in response to the Station Fire, an emergency project to remove only 1.67 million cy was initially proposed. The volume of 1.67 million cy is the previously published DDE and was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). In March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs.

**Response to Comment 207-2:**

See Response to Comment 207-1. Attachments noted. The California Regional Water Quality Control Board denied a permit for the emergency project without prejudice, with the understanding that LACFCD would be initiating an EIR process for a project which would restore the required level of protection. As part of Proposed Project approval, LACFCD will obtain the necessary permits from the California Regional Water Quality Control Board.

The Proposition 1E grant will fund only a portion of the Proposed Project. Therefore, only a portion of the Proposed Project was included in the grant application. As identified in the grant application, the preferred alternative would be identified through the Draft EIR.

**Response to Comment 207-3:**

See Response to Comments 207-1 and 207-2.

**Response to Comment 207-4:**

See Response to Comment 207-2. The Proposed Project does not require the implementation of the Devil's Gate Water Conservation Project in order to achieve the Proposed Project's objective to satisfactorily reduce flood risk, create a configuration suitable for routine operations and maintenance, and reduce the possibility of plugging at the face of the dam. The Devil's Gate Water Conservation Project does not require the implementation of the Proposed Project to be carried out. Neither project is a foreseeable consequence of or a future expansion of the other project; therefore, these projects are separate projects per CEQA.

The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

**Response to Comment 207-5:**

See Response to Comment 207-4.

**Response to Comment 207-6:**

See Response to Comment 207-4. The Proposed Project does not involve holding water in the entire reservoir. As discussed in the Draft EIR, Section 2.2.1, the Devil's Gate Reservoir captures stormwater, sediment, and debris during storm events and retains stormwater to prevent high flow rates from overwhelming the downstream flood control channel. The stormwater can then be released in a controlled fashion.

**Response to Comment 207-7:**

See Response to Comment 207-4.

**Response to Comment 207-8:**

As noted in the Draft EIR, Section 2.8 Required Permits and Approvals, a Section 1600 Streambed Alteration Agreement will be obtained. LACFCD is currently coordinating with the California Department of Fish and Wildlife (CDFW) regarding the Section 1600, as well as other potential permits.

**Response to Comment 207-9:**

As noted in the Draft EIR, Section 2.8 Required Permits and Approvals, a Section 404 Permit will be obtained from the United States (U.S.) Army Corps of Engineers (USACE). LACFCD is currently coordinating with USACE regarding the Section 404 Permit. In addition, LACFCD is a local sponsor of the USACE's *Los Angeles County's Arroyo Seco Watershed Ecosystem Restoration Study*, and the study was used in the preparation of the Draft EIR.

**Response to Comment 207-10:**

See Response to Comment 207-9. LACFCD continues to coordinate with USACE concerning Arroyo Seco Watershed Management.

**Response to Comment 207-11:**

LACFCD notes the commenter's disapproval with the analysis in the Draft EIR. The comments have been responded to below.

**Response to Comment 207-12:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper

east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 207-13:**

See Response to Comment 207-12.

**Response to Comment 207-14:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 207-15:**

The Draft EIR addresses impacts to aesthetics, air quality, and noise.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

**Response to Comment 207-16:**

See Response to Comments 207-1 and 207-2.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft EIR, affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the

reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout.

**Response to Comment 207-17:**

Responses to all comments received on the Draft EIR will be incorporated into the Final EIR.

**From:** [Mark Hunter](#)  
**To:** [reservoircleanouts](#)  
**Subject:** My comments on the Devil's Gate / Hahamongna DEIR  
**Date:** Monday, January 20, 2014 3:52:34 PM

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These are my comments on the DEIR. My contact information is:  
 Mark Hunter  
 2056 Rancho Canada Pl  
 La Canada, CA 91011

- Comment 208-1 | 1. On the official web site at <http://dpw.lacounty.gov/lacfcd/sediment/prj.aspx?prj=1>, there is a link, "Frequently Asked Questions have been added FAQs" which, when clicked, simply pops up a page saying "Coming Soon". Why weren't the FAQs listed as promised?
- Comment 208-2 | 2. Section 2.2.1 of the DEIR describes past sediment removal projects. The accumulated total of three different projects, just over 200,000 cubic yards, is only 5% of the proposed project's 4 million cubic yards. If the reservoir was so compromised that another million cubic yards would push it into the danger zone, then why was there no alarm during the years prior to 2009? How is it that the inflow of 1.3 million cubic yards since the Station Fire has triggered an urgent need to remove 3 million cubic yards? Why the sudden alarm? Were the previous DWP engineers simply asleep or incompetent? Why the massive discrepancy between these two numbers?
- Comment 208-3 | 3. That section also notes the the inflow since the Station Fire has reduced "the available capacity to less than one DDE [Dynamic Debris Event]". I submit that the Station Fire itself, which the DEIR notes burned "approximately 100 percent of the undeveloped portion" of the Arroyo Seco watershed above Hahamongna, was itself a DDE, and that watershed is incapable of producing any larger event than that in the near future. The DEIR notes that "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 million cy." What scientific basis does DPW use to forecast a larger event than the two years that followed the Station Fire? None of this is detailed in the DEIR.
- Comment 208-4 | 4. The DPW has recent experience at conducting ecologically devastating projects based on poor math skills. Please explain what happened in the Arcadia Woodlands, when an entire grove of oaks up to 300 years old was bulldozed based on an urgent need to deposit sediment, and then no sediment was ever deposited? Answer, please, why the public should believe that the same engineers and managers responsible for that blunder should be trusted to come up with the right numbers for Hahamongna. Why is the scientific basis for the DDE number reduced to one sentence? Why is the need for two DDE's worth of capacity limited to one sentence, in a DEIR that is hundreds of pages long? If these numbers are valid, why is it that no one in DPW proposed significant action before the Station Fire?
- Where is the science???
- Comment 208-5 | 5. Why does the DEIR envision an area 50 to 100 acres in size being scraped bare, and then scraped bare again each year, when this area supports such rich plant life and wildlife, including endangered species? The presence of vegetation has a

Comment 208-5 continued negligible effect on reservoir capacity. I understand that a vegetated area poses additional challenges to keep dam facilities from being clogged, but why should the entire habitat be destroyed just to ease the burden on dam maintenance? The value of the current habitat, for the thousands of people who use and enjoy it, far outweighs the extra expense of protecting dam facilities from vegetation. Therefore, why is the basin being scraped bare?

Comment 208-6 6. Why was the biological survey that was conducted so limited in duration and scope? Why did DPW not reach out to the many individuals and organizations who have conducted surveys in Hahamongna before?

Comment 208-7 7. Why was the option of sluicing sediment to the ocean rejected? Indicate whether this option was studied only by theoretical calculations or by actual experimentation. I have heard, second-hand, that DPW has actually conducted sluicing from Devil's Gate Dam on a small scale. Is this true? What were the results? Provide details.

Comment 208-8 8. Why is there a current project to build a pipeline that carries water from the Arroyo Seco to Eaton Canyon? If sluicing proves to be a viable partial solution to sediment removal, all of the Arroyo Seco's water should be available for that task. Who on the Devil's Gate team has reviewed the pipeline project and commented on it?

**Response to Comment Letter #208 (Mark Hunter)**

**Response to Comment 208-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Since the comment letter was written, the Frequently Asked Questions (FAQs) have been posted on the Los Angeles County Flood Control District (LACFCD) website. Posting of FAQs was done to facilitate the public's understanding of the Proposed Project. It is not a requirement of the California Environmental Quality Act (CEQA) to post FAQs.

**Response to Comment 208-2:**

As noted in the Draft Environmental Impact Report (EIR), Section 2.2.1 LACFCD History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cubic yards (cy) of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

LACFCD has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average storm seasons. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

In March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two design debris events (DDEs). At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

The current remaining capacity in the reservoir is 1.3 million cy, whereas a reservoir storage design capacity of two DDEs, or 4.0 million cy, below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. If the reservoir is left in its current state, the flood risk to downstream communities would remain at an unacceptable level.

**Response to Comment 208-3:**

See Response to Comment 208-2. LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A DDE refers to a quantity of sediment, not the acreage of a fire. A reservoir storage design capacity of two DDEs below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, and between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of the LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

**Response to Comment 208-4:**

See Response to Comments 208-2 and 208-3. All LACFCD projects comply with the requirements of CEQA, and all necessary permits are obtained before any action is taken on a project.

**Response to Comment 208-5:**

See Response to Comment 208-2. In order to remove the necessary amount of sediment from the reservoir, some vegetation must be removed, as the vegetation sits atop many layers of accumulated sediment.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically

reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 208-6:**

The Draft EIR, Biological Technical Report (BTR), and focused surveys provide thorough and accurate existing conditions for biological resources (Draft EIR, Section 3.6; Appendix D, Biological Reports). The field surveys were conducted in 2010 and 2013 and included general biological surveys, focused sensitive plant surveys, focused least Bell's vireo surveys, and federal and state jurisdictional waters surveys, as described in Section 3.6 of the Draft EIR.

Many local organizations, including the Pasadena Audubon Society and the Arroyo Seco Foundation, were contacted about the Proposed Project prior to the Draft EIR being prepared. LACDPW reached out to representatives of several organizations in August 2011 to receive their opinions on the Proposed Project and what they wanted to see in the Proposed Project's EIR. These included representatives from the Pasadena Audubon Society, the Hahamongna Watershed Park Advisory Committee, the Urbanwild Network, and the Arroyo Seco Foundation. These and many other local organizations, agencies, adjacent residents and businesses, and interested individuals received the Notice of Preparation (NOP) for the Draft EIR in September 2011. Comments and information received during the scoping process (see Appendix A of the Draft EIR) were taken into consideration for the analysis and formulation of alternatives and mitigation. In addition, in January 2012, a representative of the Pasadena Audubon Society was contacted for information the Society has concerning birds observed in the Proposed Project area. The information provided by these organizations and individuals was used in preparing the biological resources section of the Draft EIR. Species with the potential to occur within the Proposed Project and species that were identified during surveys are presented in the biological survey reports in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records and species lists of occurrence were used as additional data; but since these are positive-sighting databases, this data was used only in support of the analysis from the previously identified factors. Based on the results of the BTR, additional protocol-level focused surveys were conducted for Proposed Project as described in Section 3.6.2, Special Status Plant Species and Special Status Animal Species of the Draft EIR.

**Response to Comment 208-7:**

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. The sluicing analysis was conducted based on typical historical flow rates and, separately, based on ideal flow rates. Please see Section 4.7 and Appendix K of the Draft EIR for further explanation.

Flow Assisted Sediment Transport (FASTing), a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 208-8:**

See Response to Comment 208-7. The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

10604 Walnut Drive  
Shadow Hills, CA 91040  
21 January 2014

Comment Letter #209

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

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

Dear Ms. Farber:

I am a junior at La Canada High School, and have attended Tom Sawyer Camp as a camper for six summers, and as a counselor for two.

Comment 209-1

The Tom Sawyer Camp program depends heavily on the recreational opportunities present in the Hahamongna Basin. The Devils Gate Sediment Removal project, as currently proposed, would be incredibly disruptive to the camp program, not only while the sediment removal is occurring, but also during the post-removal reservoir management.

Comment 209-2

I am particularly disappointed in the mitigations proposed for recreational impacts. There is no other park in the area that could offer anywhere near the unique mix of recreational opportunities present at Hahamongna. There just isn't anywhere like it.

Comment 209-3

Furthermore, to suggest that trails through a vast expanse of mowed vegetation would offer an improvement on the current state of the basin demonstrates a clear lack of understanding for what is there now and how it is utilized. The Tom Sawyer Camp recreational use of the Hahamongna basin depends on the rich habitat, with intermittent berms, bushes, and trees, providing places for people and wildlife alike to hide.

Comment 209-4

And while one could argue that Tom Sawyer Camp is "just" a summer camp for kids, and there are plenty of other summer camp programs to choose from, I would like to note that this program, where kids make forays into a complicated natural environment, provides many benefits to these developing children that are not available elsewhere. Our world is too regimented, too sterile, and we suffer because of it. I have learned and grown a great deal by experiencing nature first-hand in the Hahamongna basin. To cut that experience off from future generations would be a real shame.

Comment 209-5

I urge you to rethink the proposed sediment management project. For the kids. Please!

Sincerely,



Markus Klemm

**Response to Comment Letter #209 (Markus Klemm)**

**Response to Comment 209-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Impacts to recreation were analyzed in the Draft Environmental Impact Report (EIR), Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 209-2:**

See Response to Comment 209-1.

**Response to Comment 209-3:**

See Response to Comment 209-1. Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 209-4:**

As discussed in Section 3.15 of the Draft EIR, the Tom Sawyer Camps is recognized as one of many groups that regularly use the Oak Grove area of Hahamongna Watershed Park. See Response to Comments 209-1 and 209-3.

**Response to Comment 209-5:**

Comment noted.

**From:** [michael.johnston](#)  
**To:** [reservoircleanouts](#)  
**Date:** Tuesday, January 21, 2014 10:58:11 AM

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Comment 210-1

I support the Arroyo Seco foundation plan

## Response to Comment Letter #210 (Michael Johnston)

### Response to Comment 210-1:

Los Angeles County Flood Control District (LACFCD) notes that the commenter supports the Arroyo Seco Foundation's "Slow Program."

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) selected Alternative 3 as the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).



## Pasadena Group

**January 20, 2014**

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

**reservoircleanouts@dpw.lacounty.gov**

**From: Pasadena Sierra Club**

**Re: Draft Environmental Impact Report for Devil’s Gate Reservoir Sediment Removal and Management Project**

Comment 211-1 We have reviewed the Draft Environmental Impact Report for removal of sediment behind Devil’s Gate Dam and welcome this opportunity to submit these comments.

### Overview

Comment 211-2 Hahamongna Watershed Park is one of Pasadena’s most prized environmental sites. Located in northwest Pasadena where the Arroyo Seco emerges from the San Gabriel Mountains, its alluvial canyon and riparian habitat provide a home for a wide variety of plants and animals. Pasadena is committed to preserving its ecological and recreational values. The sediment that Hahamongna accumulates from its hillside watershed has to be managed, but in a way that does the least damage to the environment – with small amounts removed on a regular basis rather than a massive cleanout.

Comment 211-3 This Draft Environmental Impact Report starts with the premise that the Devil’s Gate Dam/Hahamongna basin must have the capacity for two Design Debris Events to ensure that the dam will not be overwhelmed, which could result in downstream flooding. It defines a DDE for Hahamongna as 2 million cubic yards, multiplies that by two, and proceeds to analyze the proposed project’s impacts without serious consideration of less aggressive alternatives.

This basic premise of requiring capacity for two DDEs needs to be examined critically. Would public safety be adequately ensured by removing less than the projected 2.4 to 4 million cubic yards of sediment? What degree of risk would that entail? How much would a smaller, more

Comment 211-3 continued  
gradual approach reduce the environmental impacts? This DEIR is inadequate because it fails to provide the public and decision makers a broad range of reasonable alternatives to balance flood safety and environmental impacts. This failing is reflected in the six “Primary Project Objectives” listed in Sec. 2.4, which refer only to sediment removal, dam operation and flood control with no reference to environmental impacts or even mention of the word “environmental,” although this is a Draft **Environmental** Impact Report.

Comment 211-4  
This DEIR should be supplemented with one or more alternatives for removing smaller amounts of sediment each year, perhaps 150,000 to 200,000 cubic yards a year, over a longer period than four or five years, with a rigorous analysis of the risks of flooding compared with the project proposed in this DEIR, as well as the comparative environmental impacts of those less aggressive approaches. Then decision makers, stakeholders and the community would have the information needed for an informed decision on how to proceed.

## **Assessing the Risk**

The DEIR states that the Design Debris Event is ***“the predicted amount of sediment that can 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 million cy.”***

Comment 211-5  
The first part of that definition has already happened. The 2009 Station Fire burned the entire undeveloped watershed in the San Gabriel Mountains. How likely is a repeat of this fire? Not likely any time soon, since it will take many years for the vegetation to grow into enough fuel to sustain such a devastating fire. Meanwhile, each year the watershed is recovering its ability to hold storm water so it doesn’t rush down hillsides and wash unusual amounts of sediment into the Hahamongna basin. In short, the destructive fire part of the DDE definition, and its effects on erosion of the watershed, seems to be diminishing each year, and unlikely to increase significantly for many years to come.

Comment 211-6  
What about the likelihood of a 50-year design storm event? And what exactly is that for the Arroyo Seco watershed? The DPW Sedimentation Manual defines a DDE as ***“the quantity of sediment produced by a saturated watershed significantly recovered from a burn (after four years) as a result of a 50-year, 24-hour rainfall amount.”***

Comment 211-7  
Is the past any guide? When was the last 50-year design storm event in the San Gabriel Mountains, and what was its 24-hour rainfall? These facts ought to be in a DEIR that hinges on such a storm. (During my 46 years living in Pasadena, the rainiest year I can recall was 2004-2005. I have a backyard rain gauge, and have recorded every rain event since 1993. My notes show nearly 6 inches of rain on Jan. 10, 1995, and 50 inches of rain between mid-October 2004 and February 2005, with more than 5 inches on one day, Oct. 19, 2004. The 24-hour period of Dec. 21-22, 2010 produced 6 inches of rain in Pasadena – there probably was more than that in the mountains -- which, coming so soon after the 2009 Station Fire, must have brought down a lot of the sediment that flowed into the basin. The period Dec. 18-22, 2010, had 13 inches of rain, but that was spread over five days, not 24 hours. Many of us have watched water pouring

Comment 211-7 continued through or over Devil’s Gate Dam during a major storm. Was there any flooding below the dam during or after any of these storms? )

Comment 211-8 What about the potential effects of climate change? While these will be very gradual, they may have some bearing on a 50-year time scale. The science seems to indicate that Southern California will receive less rainfall in the decades ahead because of climate change. How reliable is the science, and what can it tell us about the strength of future storms?

## **Previous Sediment Removals**

The County Flood Control District’s Sediment Management Strategic Plan 2012-2032 indicates that the most recent large sediment removal was 190,000 cubic yards in 1995. As of March 2011 – after the basin had received more than 1.1 million c/y of sediment in the two winters following the Station Fire – this plan listed the reservoir’s capacity at elevation 1054 ft. as 3.2 million c/y. (The spillway floor elevation is 1040 ft.) But, a graph indicates that the storage capacity drops sharply if 1 or 2 DDEs are required,

Comment 211-9 Given the varied figures for the basin’s storage capacity cited in the Strategic Plan, and in other County documents, the Devil’s Gate Dam DEIR must provide a clear set of figures for available storage capacity each year over the last decade or two, how those measurements were made, the amounts of sediment removed in that period, and remaining storage capacity, figured with and without DDEs. These figures would help in judging the urgency of removing any given amount of sediment over the next few years. Has maintenance been neglected? Is the County now “playing catch-up” with a huge project to make up for neglecting more routine sediment removal over the last 15 or 20 years, as one Pasadena City Council member has asserted? Does the inflow of 1.1 million cubic yards of sediment after the Station Fire really require the removal of 2.4 to 4 million cubic yards now?

Comment 211-10 As part of evaluating the effects of the fire and resulting sediment inflow, the DEIR also should describe the modifications to the trash racks and other fixtures on the dam face since the Station Fire and their role in preventing debris from clogging the dam’s outlet works.

## **Related Project Not Analyzed**

Comment 211-11 The DEIR mentions in passing the proposed pump and 30-inch pipeline to move water from just above Devil’s Gate Dam about 5 miles eastward to the Eaton Wash Spreading Grounds. The volume of water moved could range from 2,000 to 4,500 acre feet a year. Because this project is closely related to the Devil’s Gate Dam project, with possible cumulative impacts, these questions must be answered:

1. Would pumping water to Eaton Wash affect the Hahamongna basin’s storage capacity during a storm?
2. Would it decrease the volume of water available for sluicing sediment through Devil’s Gate Dam to the ocean?
3. Was the size and scope of the sediment removal project adjusted to fit it to the Eaton Wash diversion?

## **COORDINATION WITH OTHER AGENCIES**

The projects in this DEIR are not coordinated with the operations or visions of other agencies.

Comment  
211-12

The City of Pasadena maintains Hahamongna Watershed Park in the basin and surrounding higher ground, and City officials appear to be alarmed at the scope of this sediment removal project and its impacts on the park. The County must coordinate with the City to strike the best possible balance between their different missions and objectives.

Comment  
211-13

The U.S. Army Corps of Engineers is working on an Arroyo Seco Watershed Feasibility Study, which will provide long-term management practices to improve watershed health, water quality, and increase water conservation while maintaining flood control. The Army Corps' Arroyo Seco Watershed Feasibility Study scoping document of 2011 sketches potential ecosystem restoration measures for Hahamongna and other sections of the Arroyo, leaving to a later report the specific projects to implement them. The L.A. County Flood Control District is working with the Army Corps on this important study. In May 2013, the County's director of public works, Gail Farber, wrote a letter to Army Corps officials saying that "It is critical that we finalize this effort and move forward with the feasibility portion of the Study, which will allow us to identify potential projects that will benefit the environment and improve the quality of life for the community."

A sediment removal project as aggressive as proposed in the County's DEIR could well reshape the Hahamongna basin and defeat any beneficial projects envisioned by the Army Corps study.

## **Significant Impacts**

### **Air Quality and Pollution**

Comment  
211-14

The DEIR minimizes the potential harm from air quality impacts of this aggressive sediment removal project. Even with best management practices, particulate matter from excavation activities is bound to escape the site and reach adjacent schools and recreational users. The DEIR notes that there are 10 schools within half a mile. This is a large and particularly vulnerable population to expose to any more pollution than absolutely necessary, and a project of this scale would do just that. Exhaust from the stream of diesel-powered trucks – nearly one a minute – will add to the unhealthy air. The DEIR states that the County will try to use trucks meeting the latest emission standards, but can't ensure that all trucks will meet the standards. Scaling the project down would allow the County to use fewer trucks and ensure that they all meet the newest emission standards.

### **Biological Resources**

Comment  
211-15

The DEIR offers scant comfort to those dismayed at the prospect of destroying so much riparian habitat in this semi-natural area in a major City park. The proposed mitigation of 1:1 is too low. Trees and other vegetation in this kind of area should be replaced at a 3:1 ratio or more. And the "management areas" that would be permanently cleared of vegetation, mowed and grubbed every year, would ensure a barren wasteland of 50 or more acres in this prime Pasadena City park. This would be not only an aesthetic loss, as illustrated in the views shown in the DEIR, but a permanent loss of habitat for wildlife and a turn-off for many recreational users.

## Land Use and Planning

The City of Pasadena owns the land, and has granted a permanent easement to the County to build and operate the dam for flood control purposes. Both City and County want to minimize the risk of downstream flooding. But while the County's primary mission is to operate the dam so as to avoid flooding – and to promote water conservation – the City's mission also includes preserving open space, conserving habitat and wildlife, promoting recreation. These obvious objectives are spelled out in the City's General Plan which in a recent update calls for "Zoning Changes: Protect the existing natural open space within the Hahamongna Watershed Park Master Plan area." The 2003 Hahamongna Master Plan calls for developing "a sediment removal plan that minimizes the impact to the basin and to the surrounding neighborhoods" and for "a grading plan that allows habitat restoration and recreational activities to coexist with flood management and water conservation." It also calls for development of "a multi-agency task force to review maintenance, sediment removal, dam operation, permit, and liability issues on a continual basis after this plan is adopted."

These references underline the need for the County and the City to work together to develop a plan that will minimize the risk of flooding, preserve the Hahamongna Watershed Park environment, and have the smallest possible environmental impacts.

## Recreation/Public Services

Recreational activities at Hahamongna and adjacent trails include disc golf, Tom Sawyer Camp, Rose Bowl Riders, MACH 1, hiking, biking, horseback riding, bird-watching, and nature walks. In addition, approximately 10,200 visitors came to Hahamongna Watershed Park during 2010 to utilize the sports and recreational facilities available by permit through the City. These included sporting events and tournaments, City events, picnics, and equine-related clinics and shows.

The sediment removal project would curtail some of these activities by closing trails, and affect others with noise and air pollution. Many recreational users will be dissuaded from using the park by the large-scale, industrial-type of activity. The DEIR notes that these users can go elsewhere for their recreation, and lists the many parks and other sites in the Pasadena community. But Hahamongna is unique in this area, and other sites cannot offer the same experience. The impact on recreation in Pasadena will be significant, in contrast with the DEIR's conclusions. As with other impacts noted earlier, the effects on recreation would be greatly reduced by a less aggressive sediment-removal plan that removed sediment more gradually over a longer period.

Thank you for considering our comments.



Don Bremner, Conservation Chair  
Pasadena Group, Angeles Chapter-Sierra Club

**Response to Comment Letter #211 (Pasadena Sierra Club)**

**Response to Comment 211-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 211-2:**

Los Angeles County Flood Control District (LACFCD) notes that the commenter prefers small amounts of sediment removal on a regular basis.

**Response to Comment 211-3:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

The Draft EIR did consider a reasonable range of alternatives. The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route. The alternative closest to the alternative mentioned in the comment is the No Project Alternative, which includes the use of FASTing and IMP alone, which would not meet Proposed Project objectives. Other alternatives were not carried forward as they did not minimize impacts in relation to the Proposed Project and/or did not meet Proposed Project objectives.

Per the California Environmental Quality Act (CEQA), Section 15124, the statement of objectives should include the underlying purpose of the project. All of the Proposed Project objectives support the

underlying purpose of the project which is: The Proposed Project will remove sediment from Devil's Gate Reservoir to restore the design capacity (volume for two DDEs below the spillway elevation of 1,040.5 feet) and establish a reservoir management system to maintain the flood control capacity of the reservoir. Therefore, the Proposed Project objectives are satisfactory per CEQA.

**Response to Comment 211-4:**

See Response to Comment 211-3. LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 211-5:**

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the dam's construction in 1920 and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. It should be noted that design debris amounts can be produced from a freshly burned watershed with rainfall amounts considerably below capital flood levels (a 5- to 10-year frequency storm). Similarly, higher intensity rainfall could produce more debris. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

**Response to Comment 211-6:**

See Response to Comments 211-3 and 211-5. A 50-year frequency design storm is defined as the magnitude of a storm that is likely to occur once every 50 years. Therefore, the chance of a 50-year storm occurring in any given year is 1 out of 50, or a 2 percent, chance of occurring in any one-year period.

**Response to Comment 211-7:**

The last 50-year design storm event recorded at Devil's Gate was during the 1968-1969 storm year.

The storms of 1969 and 1983 both caused severe damage to the Arroyo Seco Channel; however, only limited localized flooding occurred directly adjacent to the Arroyo Seco due to erosion during these storms. Flooding was limited due to previous sediment removal efforts that ensured correct functioning of the outlet works and maintenance of reservoir capacity.

During the 1969 storm year, damage to improved channels and storm drains consisted mostly of plugging from debris flows but also included major structural damage to the Arroyo Seco downstream of

Devil's Gate Dam. That same storm year, water conservation efforts at the Arroyo Seco Spreading Grounds were impeded due to the heavy debris inflow caused by the storm. From 1966 to 1969, approximately 1,166,000 cy of sediment was deposited into the reservoir, even without a burned watershed. Regular large sediment removal efforts occurred throughout the 1970s following the 1969 storm year, restoring capacity to the reservoir.

During the 1983 storm, portions of the concrete channel bottom of the Arroyo Seco eroded, allowing flows to undermine and damage a 1,100-foot reach of channel between Washington Boulevard and the Rose Bowl in Pasadena.

Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average storm seasons.

**Response to Comment 211-8:**

See Response to Comment 211-5 and 211-6. According to the Unincorporated Los Angeles County Community Climate Action Plan 2020, climate change is expected to increase the frequency, intensity, and duration of extreme storms (County of Los Angeles, Department of Regional Planning, July 2014). Increased winter storm events could also affect peak stream flows and flooding.

**Response to Comment 211-9:**

See Response to Comment 211-3.

The Sediment Management Strategic Plan included sediment history data to demonstrate the volume of sediment deposited into the dams and used that data along with statistical analysis to develop projected 20-year sediment volumes for County facilities. The sediment history provided for Devil's Gate Dam (pages 8-42 and 8-43 of the Sediment Management Strategic Plan) correctly shows the sediment volumes accumulated at the dam; however, the column titled "Reservoir Capacity at Elevation 1,054 ft." can be somewhat confusing with respect to the current capacity in the dam. That column provides the remaining capacity below elevation 1,054 feet, which is the original spillway elevation of the dam. The spillway was rehabilitated in order to pass the Probable Maximum Flood. The rehabilitation entailed lowering the spillway bottom elevation, thereby constructing the spillway ports. The reservoir capacity below the existing spillway ports (elevation of 1,040.5 feet) is the appropriate parameter for determining the currently available capacity for meeting the sediment volume requirements for the dam. The current capacity in the reservoir below the spillway is 1.3 million cy. This is only 32.5 percent of the required storage capacity and only 65 percent of one DDE. Please note that additional sediment deposits have accumulated within the reservoir easement above the elevation of 1,054 feet. This accumulated sediment has the potential to be washed toward the dam during significant storm events and further reduce the available capacity below the spillway.

LACFCD has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average storm seasons. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

In March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of protection of two DDEs. LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the project was given the name Devil's Gate Sediment Removal and Management Project. The purpose of the Proposed Project is to restore the necessary capacity in Devil's Gate Reservoir and to establish a reservoir configuration more suitable for routine maintenance activities. Therefore, the need for future large-scale sediment removal projects will be reduced or avoided.

The current remaining capacity in the reservoir is 1.3 million cy, whereas a reservoir storage design capacity of two DDEs, or 4.0 million cy, below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. If the reservoir is left in its current state, the flood risk to downstream communities would remain at an unacceptable level.

**Response to Comment 211-10:**

Dam modifications were included as part of the existing conditions, as noted in the Draft EIR, Section 2.21, LACFCD History.

**Response to Comment 211-11:**

The Proposed Project does not involve pumping water into Eaton Canyon. The Devil's Gate Water Conservation Project is a separate project from the Devil's Gate Reservoir Sediment Removal and Management Project. The Devil's Gate Water Conservation Project is still in a conceptual design phase and is not currently scheduled for construction; however, this project was included in the cumulative analysis, as noted in the Draft EIR in Table 2.9-1: Cumulative Projects. If the Devil's Gate Water Conservation Project is implemented, operation of both projects would be coordinated. Whether or not the Devil's Gate Water Conservation Project is implemented, the Sediment Transport Capacity Analysis for the Proposed Project found that the storm flows received in the reservoir would not move the necessary amount of sediment out of the reservoir, and the sediment moved downstream would fall out and remain in the Arroyo Seco or Los Angeles River. The Proposed Project's size and scope is necessary to achieve the Proposed Project's objective to satisfactorily reduce flood risk, create a configuration suitable for routine operations and maintenance, and reduce the possibility of plugging at the face of the dam. The Devil's Gate Water Conservation Project would not affect the reservoir's storage capacity.

**Response to Comment 211-12:**

LACFCD is coordinating with local agencies, including the City of Pasadena. Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater cohesion with the HWPMP. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

Analysis of consistency with the HWPMP was included in the Draft EIR, Section 3.12 Land Use and Planning.

**Response to Comment 211-13:**

LACFCD continues to coordinate with the United States (U.S.) Army Corps of Engineers (USACE) concerning Arroyo Seco Watershed Management. As noted in the Draft EIR, Section 2.8 Required Permits and Approvals, a Section 404 Permit will be obtained from USACE. LACFCD is currently coordinating with USACE regarding the Section 404 Permit. In addition, LACFCD is a local sponsor of USACE's *Los Angeles County's Arroyo Seco Watershed Ecosystem Restoration Study*, and the study was used in the preparation of the Draft EIR.

**Response to Comment 211-14:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 211-15:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

As with any project that involves California Department of Fish and Wildlife (CDFW), USACE, and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through

404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal.

As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

The Draft EIR determined that visual impacts associated with reservoir management will be less than significant and, therefore, will not require mitigation. Reservoir management impacts to visual character under both of the Proposed Project's management options will result in a lower degree of contrast than seen during sediment removal. Due to the rapid growth of herbaceous plants, it is expected that during the majority of the year the Proposed Project site will appear vegetated. In addition, as with existing conditions, vegetation conditions on the Proposed Project site, including height and density, would change on a regular basis due to seasonal conditions, water flow/views, water storage, and sediment conditions.

**Response to Comment 211-16:**

See Response to Comment 211-12.

**Response to Comment 211-17:**

See Response to Comment 211-12. Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Peter Kalmus  
 494 Alberta Street  
 Altadena, CA 91001

Gail Farber, Director  
 County of Los Angeles Department of Public Works Water Resource Division  
 Attention: Reservoir Cleanouts Program  
 P.O. Box 1460  
 Alhambra, California 91802-1460  
 CC: Mark Petrella  
 CC: Keith Lilley

Comments on Devil's Gate DEIR

- Comment 212-1 | The proposed project is to excavate and remove 2.9 million cubic yards of sediment behind the Devil's Gate Dam, over an area of 120 acres, over the next 5 years, and deposit it about 20 miles away in Azusa and Irwindale. The means of removal are dump trucks, operated at the rate of about one every minute, 9 hours per day, six days a week.
- Comment 212-2 | An additional potential impact in the aesthetics category is the post-project, permanently denuded maintenance phase. This impact would be very significant to me, and probably to many other members of the community, but it is not included in Table ES-1. How can the post-project visual impact be mitigated, i.e. how can the post project look like a natural wetland landscape (i.e. a willow forest) and not a trashed, denuded field as indicated in the post-project visualizations in the DEIR?
- Comment 212-3 | An additional potential impact in the air quality category is the CO2 released by the loading of sediment and the transport of sediment, and is not included in Table ES-1. How much CO2 will be released by this project? How much impact will this released CO2 have on the climate? How much impact will maintenance activities have on the climate?
- Comment 212-4 | How much is the all-cause mortality of nearby residents, school children, workers, and recreational visitors estimated to increase due to e.g. significant diesel exhaust including particulate matter? This can be estimated. It is irresponsible and immoral to subject the above-mentioned stakeholders to this risk without a comprehensive and state-of-the-art estimate of increase in all-cause mortality. In addition, a morbidity study must also be carried out. The results of these studies must be mailed to every stakeholder, e.g. all business, schools, and residents in the radius of increased mortality or morbidity (if any). In the event of health issues caused by this project, the county would be liable for damages.
- Comment 212-5 | I am not convinced that the impact of habitat destruction for the 5 special status species mentioned in Table ES-1 will be "less than significant." It doesn't matter how many qualified biologists are have on the scene; if the habitat is destroyed, these species will have one less place to live. What metric was used to determine that the nearly complete destruction of this unique habitat will be "less than significant"? This metric is not defined in the DEIR.
- Comment 212-6 | What has the rate of sediment removal from FAST been in the past? Was this the maximum possible FAST rate? What could be done to increase the rate of sediment removal through FAST events?
- Comment 212-7 | The DEIR does not make a convincing case as to why the project needs to be completed in 5 years. What is the quantitative risk of flooding, based on the site history and sediment flow models? What sites would be at risk? In the case of floods, what would be the cost of damage? How much flooding would be required before the cost of damage exceeded the cost of this project, and what is the statistical probability of that level of flooding over various timescales, including a longer possible project timescale of 20 years, or 30 years?
- Comment 212-8 | What is the justification for needing to remove 2 DDE?
- Comment 212-9 | Has an alternative of removing the minimum sediment to maintain 1 DDE, and using FAST thereafter, been considered? If so, I would like to see this considered carefully.
- Comment 212-10 | The current plan will have a huge impact on my family's recreation. We use the willow forest for recreation and education approximately once every two weeks. These recreation and education opportunities will vanish completely and permanently if this project is carried out.
- Comment 212-11 | Sluicing has worked successfully in the past at this site. Compared to the DEIR proposal it is essentially free. What is the reason that sluicing or FAST is not the primary means for removing sediment at this time?

- Comment 212-12 | The DEIR trucking proposal will cost \$100 million. Is there a cheaper alternative than the trucking that will still get the job done? Will sluicing as primary removal strategy, with some trucking as secondary strategy if needed (and at a lower volume than sluicing) also get the job done?
- Comment 212-13 | Who stands to profit from the DEIR proposal? How have any benefitting parties been involved in the process of lobbying for the proposed project, drafting the DEIR, or any other participation in this process? Can the county please demonstrate that there has been no such participation by parties who stand to benefit financially?
- Comment 212-14 | Is there an alternative that can allow for most of the habitat to remain? The denuded terrain is a big impact in my opinion. It will look terrible. Every time I ride to JPL in the morning, and ride home at night, I will wince.
- Comment 212-15 | I'm not convinced that the DEIR has adequately examined the possibility of sluicing as the primary method of sediment removal. I would like to see a state-of-the-art appraisal of sluicing, its potential and its limitations, based on recent scientific studies. In the case that some questions on the potential and limitations of sluicing cannot be answered based on the current scientific studies, I would like to see further scientific research done before we rush to spend \$100 million on a project that is understudied and may well prove to be a terrible mistake.
- Comment 212-16 | How much carbon dioxide would the proposed project release into the atmosphere? Has the climate impact of this project, and the continued necessary maintenance, been adequately considered? What would the climate impact of a sluicing-based approach be?

**Response to Comment Letter #212 (Peter Kalmus)**

**Response to Comment 212-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 212-2:**

As noted in the Draft Environmental Impact Report (EIR), Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

The Draft EIR determined that visual impacts associated with reservoir management will be less than significant and, therefore, will not require mitigation. Since impacts are less than significant and do not require mitigation measures, this impact is not included in Table ES-1. Reservoir management impacts to visual character under both of the Proposed Project's management options will result in a lower degree of contrast than seen during sediment removal. Due to the rapid growth of herbaceous plants, it is expected that during the majority of the year the Proposed Project site will appear vegetated. In addition, as with existing conditions, vegetation conditions on the Proposed Project site, including height and density, would change on a regular basis due to seasonal conditions, water flow/views, water storage, and sediment conditions.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 212-3:**

Emissions of carbon dioxide (CO<sub>2</sub>) are detailed in the Draft EIR, Section 3.9 Greenhouse Gas Emissions. As noted in the discussion, impacts related to greenhouse gas emissions are considered less than significant, as CO<sub>2</sub> emissions do not exceed the established South Coast Air Quality Management District (SCAQMD) thresholds. Since impacts are less than significant and do not require mitigation measures, this impact is not included in Table ES-1.

**Response to Comment 212-4:**

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

**Response to Comment 212-5:**

Significant impacts to sensitive species was defined in the Draft EIR, Section 3.6.6, "Would the project 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 Wildlife or the U.S. Fish and Wildlife Service?" In this section significant impacts to sensitive species were identified. These impacts will be reduced to less than significant through implementation of mitigation measures MM BIO-1 through MM BIO-8, which will serve to protect and avoid impacts to wildlife species and will provide for habitat restoration and enhancement.

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule.

**Response to Comment 212-6:**

Flow Assisted Sediment Transport (FASTing), a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 212-7:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE

volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

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Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

All facilities, including open channels, dams, bridges, and debris basins under LACFCD jurisdiction are required to meet the Capital Flood protection level. The Capital Flood is characterized by the Hydrology Manual as "the runoff produced by a 50-year frequency design storm falling on a saturated watershed (soil moisture at field capacity)" (Public Works, Hydrology Manual 2006). A 50-year frequency design storm is defined as the magnitude of a storm that is likely to occur once every 50 years. Therefore, the chance of a 50 year storm occurring in any given year is 1 out of 50, or a 2 percent chance of occurring. "Capital Flood protection also requires adding the effects of fires and erosion under certain conditions" (Public Works, Hydrology Manual 2006).

**Response to Comment 212-8:**

See Response to Comment 212-7.

**Response to Comment 212-9:**

See Response to Comments 212-6 and 212-7.

**Response to Comment 212-10:**

See Response to Comment 212-2.

LACFCD recognizes that the area is an important area for recreation, as outlined in Section 3.15, Recreation/Public Services.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts

to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 212-11:**

See Response to Comments 212-6. Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

**Response to Comment 212-12:**

See Response to Comment 212-11. The estimated cost for the Proposed Project and for Alternatives 1, 2, 3, and 5 would range from \$80 million for the Proposed Project to \$65 million for Alternative 3. Due to the variety of factors, including the indeterminate locations of the sediment fallout and requirements for removing sediment from these locations, the cost for Alternative 4 cannot be calculated.

**Response to Comment 212-13:**

LACFCD is undertaking this project to increase the flood control capacity of the reservoir. The CEQA process is intended to inform and include the public and interested agencies in the process of analyzing the Proposed Project and Alternatives.

The construction contractors have not been hired yet. LACFCD uses a formally advertised sealed bid process for public works construction contracting. The goal of the process is to award a contract to the lowest cost "responsive" and "responsible" bidder. California Public Contract Code mandates the use of an advertised bid process for construction contracting. Contractors and service providers must meet certain qualification requirements to be considered by the County for selection and contract award.

More detailed information on the County's construction bidding process can be found in the *County of Los Angeles Countywide Construction Policy Guidelines* available online at the following location: [http://dpw.lacounty.gov/aed/construction\\_manual.pdf](http://dpw.lacounty.gov/aed/construction_manual.pdf).

**Response to Comment 212-14:**

See Response to Comment 212-2. Alternative 3, Configuration D was determined to be the environmentally superior alternative that reduces impacts while still meeting Proposed Project objectives.

**Response to Comment 212-15:**

See Response to Comment 212-11. A detailed, thorough Sediment Transport Capacity Analysis for the Arroyo Seco Channel, Appendix K in Draft EIR, analyzed the feasibility of sediment transport down the Arroyo Seco. This analysis included consultation with Change Consultants, specifically Howard H. Chang, Ph.D., P.E., of San Diego State University.

**Response to Comment 212-16:**

See Response to Comment 212-3. As discussed in Section 4.7, Alternative 4, Sluicing will potentially generate more overall greenhouse gas emissions than the Proposed Project and therefore is considered environmentally inferior to the Proposed Project due to overall production of greenhouse gas emissions.

10604 Walnut Drive  
Shadow Hills, CA 91040  
21 January 2014

Comment Letter #213

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

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

Dear Ms. Farber:

Comment 213-1 Thank you for extending the comment period for the Draft Environmental Impact Report (DEIR) for the Devils Gate Reservoir Sediment Removal and Management Project.

Comment 213-2 In preparing my comments to the DEIR, I re-read the comments I'd submitted to the Scoping Meeting, and am saddened that these comments are all still relevant. I am disappointed that the comments that I and others made at that time seem to have been completely disregarded in the very statement of the project objectives. Objectives 5 and 6, in particular, virtually ensure that the sediment be trucked to a landfill, and that other real alternatives cannot be selected. The document is rigged, and any discussion of real alternatives is effectively rendered moot because of how the project objectives have been stated. This is certainly not the intent of CEQA, and renders the document inadequate from the start.

Comment 213-3 What is the scientific basis for determining the amount of sediment to be removed from the basin, and the timeframe in which to do the removal? The basin still has some capacity, and sluicing has been successfully utilized in the past, to discharge in excess of a million cubic yards of sediment from behind Devils Gate Dam. If there is no factual emergency driving quick removal of such a large amount of sediment, why *not* employ a method that has worked in the past, and which requires so little effort? Without adequate rationale, it seems foolish to embark on such a costly and destructive project.

Comment 213-4 The DEIR is inadequate in specifying meaningful biological mitigations. Of what use is it to monitor, when the entirety of the habitat is to be razed anyway? It's as though my house were in the way of a freeway project and the mitigation measure is to make sure the bulldozers don't touch my house while I'm in it. That's all well and good, but the minute I step out, the bulldozers obliterate my house, and I'm left with nowhere to go. At the end of the day, of what benefit is that mitigation measure? Additionally, under whose jurisdiction is the biological monitor? If the monitor is employed by the County, does this not create a conflict of interest?

Comment 213-5 The DEIR is inadequate in specifying meaningful recreational mitigations. The existing willow forest is unique habitat for wildlife, and provides unique recreational opportunities for people. An expanse of vegetation that is mowed annually does not provide much in the way of

Comment 213-5  
continued

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

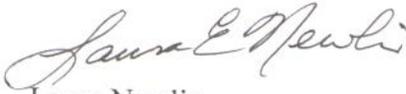
Comment 213-6

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

Thank you for your attention.

Sincerely,

  
Roger Klemm

  
Laura Newlin

c Supervisor Antonovich

## Response to Comment Letter #213 (Roger Klemm & Laura Newlin)

### Response to Comment 213-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

### Response to Comment 213-2:

Per the California Environmental Quality Act (CEQA), Section 15124, the statement of objectives should include the underlying purpose of the project. All of the Proposed Project objectives support the underlying purpose of the project which is: The Proposed Project will remove sediment from Devil's Gate Reservoir to restore the design capacity (volume for two design debris events (DDEs) below the spillway elevation of 1,040.5 feet) and establish a reservoir management system to maintain the flood control capacity of the reservoir. Therefore, the Proposed Project objectives are satisfactory per CEQA.

Pursuant to Section 15126.6(a) of the CEQA Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, "[a]n EIR is not required to consider alternatives which are infeasible" (CEQA Guidelines Section 15126.6(a)) or "which could change the fundamental nature of the proposed project." (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.* (1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An Environmental Impact Report (EIR) need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project's significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

Comments and information received during the scoping process (see Appendix A of the Draft EIR) were taken into consideration for the analysis and formulation of alternatives and mitigation. The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

### Response to Comment 213-3:

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public

Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, and between 1959 and 1966 over 1.75 million cy of sediment was deposited and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of the LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur.

As discussed above, since the dam's construction in 1920 and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD; but this removal was not done through sluicing, as suggested by the commenter. A Sediment Transport Capacity Analysis was conducted to determine how sediment would move through the Arroyo Seco and Los Angeles River under a sluicing alternative. Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations, potentially including the two soft-bottom portions of the channel. As discussed in Section 4.7 and in the Sediment Transport Capacity Analysis (Appendix K), most of these downstream locations would be in the Arroyo Seco, with deposits primarily occurring in and around the two soft bottom areas. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

**Response to Comment 213-4:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

A detailed restoration plan will be prepared and provided to California Department of Fish and Wildlife (CDFW) and United States (U.S.) Army Corps of Engineers (USACE) for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and Regional Water Quality Control Board (RWQCB) jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will serve to protect and avoid impacts to wildlife. The biological monitors will be local biologists with knowledge of the flora and fauna found on site and will be hired as contractors for the Proposed Project. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation and monitoring for the Proposed Project. The monitors will document and report compliance and noncompliance issues with the protection measures outlined in the CDFW/USACE/RWQCB permits and the agency-approved mitigation monitoring plan.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 213-5:**

See Response to Comment 213-4.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna

Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 213-6:**

See Response to Comment 213-3.

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at LACFCD sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan, which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

Outside experts, especially those on the Stakeholder Task Force, were consulted during the formation of LACFCD's Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts, cities, and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

The Proposed Project will not decrease the current amount of sediment that flows downstream and therefore would not contribute to the erosion of beaches. Also as noted in the Sediment Management Strategic Plan (SMSP), "Without human intervention, most Southern California beaches would naturally be narrow and rocky. The wide beaches in Southern California were created and have been maintained by various agencies through artificial beach nourishment projects (also referred to as beach fill projects) and the construction of protective coastal structures since the 1930s." In addition, the SMSP states "Since the Los Angeles River changed course in 1825, the largest waterway reaching this region of the coast is Ballona Creek, which has an estimated annual sediment yield of less than 50,000 cubic yards and delivers generally fine-grained sediment that is not appropriate for beach nourishment."

For more information see: <http://dpw.lacounty.gov/lacfcd/sediment/dcon/429.pdf>

**ROSS S. HECKMANN**  
1214 Valencia Way  
Arcadia, California 91006-2406  
(626) 256-4664  
Fax: (626) 701-5022  
E-mail: [RossS.Heckmann@gmail.com](mailto:RossS.Heckmann@gmail.com)

Comment Letter #214

January 22, 2014

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

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

Dear Ms. Farber:

The Draft Environmental Impact Report is inadequate because it fails to present any genuine alternatives to that of an unnecessarily sudden, drastic, and massive removal of sediment, and fails to adequately evaluate the negative impacts resulting therefrom and consider how those impacts could be mitigated. Those negative impacts include:

- 1) the destruction of dozens of acres of forest that provide critical habitat for birds and wildlife, without a sufficient mitigation plan;
- 2) a massive increase in traffic, resulting in a substantial increase in air pollution and noise;
- 3) a substantial diminution in the value of the area to recreational users, including those like myself who have enjoyed its peaceful, natural beauty.

The Draft Environmental Impact Report (“DEIR”) is inadequate because it fails to demonstrate why a substantially less sudden, drastic, and massive removal of sediment having substantially less adverse impacts would not be sufficient both to maintain the reservoir and to cause the danger of flooding to be kept to an acceptable level of risk. The alternative plan set forth in the Arroyo Seco Foundation’s January 21, 2014, letter to you, would appear to be an example of a less drastic alternative that the DEIR failed to consider. Why was no such less drastic option given serious consideration in the DEIR? Why was the DEIR and its purported alternatives drafted in such a way so as to virtually foreordain an alternative entailing such unnecessary drastic, virtually unmitigated, destruction?

Please reject the DEIR in its current form, and cause it to be redrafted to genuinely consider both other alternatives and how to minimize adverse impacts resulting from the project.

Very truly yours,

/s/  
\_\_\_\_\_  
Ross S. Heckmann

## **Response to Comment Letter #214 (Ross Heckmann)**

### **Response to Comment 214-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” However, “[a]n EIR is not required to consider alternatives which are infeasible” (CEQA Guidelines Section 15126.6(a)) or “which could change the fundamental nature of the proposed project.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.* (1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the Environmental Impact Report (EIR) must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project’s significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

Mitigation Measures BIO-1 through BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project’s Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), United States (U.S.) Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. Los Angeles County Flood Control District (LACFCD) has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset

impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, a Streambed Alteration Agreement, and an Incidental Take Permit, if needed. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant

communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

The Draft EIR determined that visual impacts associated with reservoir management will be less than significant and, therefore, will not require mitigation. Since impacts are less than significant and do not require mitigation measures, this impact is not included in Table ES-1. Reservoir management impacts to visual character under both of the Proposed Project's management options will result in a lower degree of contrast than seen during sediment removal. Due to the rapid growth of herbaceous plants, it is expected that during the majority of the year the Proposed Project site will appear vegetated. In addition, as with existing conditions, vegetation conditions on the Proposed Project site, including height and density, would change on a regular basis due to seasonal conditions, water flow/views, water storage, and sediment conditions.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 214-2:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) selected Alternative 3 as the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**Response to Comment 214-3:**

LACFCD notes that the commenter opposes the Draft EIR in its current form.

**Los Angeles County Flood Control District  
 Devil's Gate Reservoir Sediment Removal and Management Project  
 RE: comments for Devil's Gate Sediment Removal Project  
 Submitted by email to [reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov)**

Comment 215-1 | Thank you for the opportunity to comment on this complex project. My wife and I live near to the Devil's Gate Dam and use the area north of the dam for hiking, nature walks, and other outdoor recreation.

Comment 215-2 | I General comments: The public suffers the combined adverse effects of this project: air pollution, traffic, noise, loss of natural habitat and recreational area. They can and should be combined in a single loss function to be jointly minimized rather than considering each problem and its mitigation separately.

Comment 215-3 | The project is **too large**; it grew from to a planned removal of 1.5 million cubic yards (in 2011) to a much larger project where the largest of the 4 alternatives (alternative 2) would remove 4 million cubic yards of sediment, and would impose much greater hardship on those living near to the 210 freeway.

Comment 215-4 | This is a warm weather project- sediment removal and extensive truck traffic would be limited or absent from October to April- the project would be most active during the time that children and adults spend more time outdoors and during the ozone season, when ozone pollution is maximal. Particulate pollution doesn't have a single seasonal maximum, but is generally greatest in summer and fall.

Comment 215-5 | We can't rely exclusively on theoretical calculations of predicted air pollution because a. we have no data about near roadway pollutant concentrations and b. Excessive levels of some pollutants are more harmful than others. Particulates are more injurious than ozone pollution; the smallest particulates are the most injurious. We must collect real time near roadway air pollution data in the first project year and scale the project back if there is a greater than 10% increase in any of the major air pollutants.

Comment 215-6 | **Alternative 3, Configuration D is the best plan**; it should be stretched out to 7 years with no trucks loading and leaving the reservoir before 9 AM to reduce stress on nearby La Canada High School and Hillside school. This would decrease the number of trucks on the road each day and thereby reduce air pollution, health, noise and traffic impacts. Stretching out the project to ten years or more, as suggested by some environmental groups, is not a good idea because it would increase the environmental harm and loss of recreation caused by the project.

Comment 215-7 | **II Background air pollution**  
 The Pasadena area already has excessive air pollution using state and national guidelines. Table 2 of Appendix B, found on page 17, shows that Federal and State air quality standards are exceeded for many pollutants; ozone concentrations are characterized as extreme nonattainment, and fine particulate pollution (PM 2.5) as serious nonattainment. I attach a copy of an EPA air quality map on page 4 showing that the Los Angeles basin and the San Joaquin Valley are the only areas in EPA region 9 not in compliance with EPA air quality standards for fine particulates (PM 2.5) . The data from Table 3.5-2 shows that fine particulates, the most dangerous air pollutants have not improved significantly since 2006. They increased in the boom

Comment 215-7  
continued

years of 2007 & 2008 and then decreased, but 2011 was very similar to the 2006 value and we can predict an increase in 2012 and 2013. A test of slope (Mann trend statistic) shows that it isn't significantly different from zero, i.e. no significant overall change in fine particulates measured in Pasadena, far from the 210 freeway.

Comment 215-8

It is ridiculous to state as the DEIR does that health impacts will be less than significant. Air pollution is currently believed to be a major factor in 10% of Los Angeles County deaths every year. The project, even the reduced and stretched out alternative 3, configuration D which I favor, will increase air pollution with maximal impact on people living close to reservoir and the 210 freeway. This fact that more air pollution in our already seriously polluted region will increase the number of deaths and hospitalizations is discussed under section III below.

Comment 215-9

The presentation in section 3.5 of the DEIR is an optimistic best-case scenario:

- a. Each pollutant is considered separately ignoring interactions between pollutants (see Greenbaum & Shaikh, 2010, Hart, et al, 2011) and their cumulative sum. This is a serious deficiency, see note 1.
- b. While Table 3.5.8 on p 130 appears reassuring because it shows that none of the estimated emissions of ROG, CO, NOx, PM10 & PM 2.5 exceed threshold even without mitigation, we must remember that:
  1. Project air pollution will be added to existing air pollution that is already severe and significantly exceeds state and federal guidelines.
  2. There is evidence that chronic exposure to particulate levels below the national and California standards is associated with increased all-cause mortality (Beelen, et al, 2013). Hence the fact that the standard is not exceeded in the DEIR theoretical model does not mean that the project will have no effect on health and mortality.

Comment 215-10

3. The table does not consider loading site idling by trucks (see note 2), the fact that basal emissions already exceed threshold, and that it relies on computer estimates rather than field data. We can only estimate pollution before the project begins, but there must be collection of real air quality data after the project begins, particularly for residential sites very close to the highway and idling trucks. Data available from the AQMD, <http://www.aqmd.gov/tao/AQ-Reports/AQMonitoringNetworkPlan/Special-Monitoring-Studies.pdf>, suggest that some pollutants fall off rapidly with distance from the freeway; we don't have adequate information on ultrafine particulates and black carbon (an indicator of diesel particulate pollution). Recognition that existing AQMD sites are far from highways and may minimize health risks has stimulated plans for new AQMD monitoring sites near to freeways.

We've known for more than 10 years that the smallest or ultrafine particulates are especially damaging. They have greater ability to enter cells, some enter the brain, and produce relatively more oxidative stress than larger particles do. Much of this work came from the UCLA particle center and involved data from the Los Angeles Basin (Li, et al, 2003) but the AQMD still does not measure ultrafine particles (less than 0.15  $\mu\text{m}$ ) at any site and the DEIR presents lengthy and misleading calculations in Appendix C. They are misleading because they focus on cancer risk, which is only a small part of the health impact of air pollution and because they are limited to calculations based on PM 10 particulates, which are less harmful than the smaller

Comment 215-10  
continued

- particulates and are extrapolated from air quality at the Burbank monitoring station, far from Hahamongna and the 210 freeway.
- c. This section assumes that there are no major changes in traffic on the 210 Freeway. California and the country are emerging from a severe recession with more cars and trucks on the road each year; the baseline is artificially low, see part V. Approved projects that will increase this traffic separate from the Devil's Gate project include the Parsons-Lincoln Property project. The biggest project is the 710 freeway extension project, which is only a possible project, but a very large one.

Comment 215-11

III Health impacts We are told that there will be no significant health impacts from this project, because the calculated pollutant production does not exceed SCAQMD standards. Fann, et al, of the EPA, studied air pollution due to ozone and PM 2.5 particulates, using 2005 data. They estimated that "Among the 10 most populous counties, the percentage of **deaths attributable to PM 2.5 and ozone ranges from 3.5% in San Jose to 10% in Los Angeles County**". These are premature deaths in persons with other health problems, somewhat like deaths from influenza. These premature deaths are a partial estimate of 'sensitive receptors' in CEQA terms. PM 2.5 particulates, which have improved very little in the Pasadena area, cause the great majority of these deaths. Ozone pollution, which has done better, causes some deaths but less than 1/50 as much as PM 2.5 particulates. A more recent paper from MIT, (Caiazzo, et al, Atmospheric Environment 79:2013) estimates an **even larger number of US premature deaths (200,000) due to air pollution** (mostly particulate emissions) and makes the interesting claim that the air quality impact of highways in terms of premature deaths may exceed the number of fatal accidents by about 30%. One might argue that hastening the death of children and elderly with chronic illness is less significant than causing the death of relatively healthy young males (most auto fatalities involve relatively healthy young males) but the point is that air pollution and particularly fine particulates have large health effects.

Comment 215-12

Los Angeles County had 57, 620 deaths in 2009. We could say that 10% of deaths would be 5-6,000 annual deaths in Los Angeles County. Pollution produced by this project will increase the number of premature deaths in persons living near to the 210 Freeway. However, it's impossible to predict just how many more premature deaths will result. This is because the relationship between health and pollutant exposure is probably nonlinear; furthermore we have no data about particulate emissions near the 210 freeway. What is certain (see Beelen paper) is that the project will increase air pollution and decrease health even if the amount of added pollution doesn't exceed SCAQMD standards (as in Table 3.5-4, Regional thresholds of significance, p 81). The public may be willing to accept this because failure to remove a significant amount of sediment may be more dangerous than even the reduced and stretched out sediment removal project that I favor. The County should be honest about this.

Comment 215-13

IV Project impact on recreation is discussed on pages 209-226 of the DEIR. The DEIR notes activities that I and other users of the project area engage in: hiking, biking, horseback riding, and bird-watching/nature activities. Table 3.15-1 lists 27 area recreational facilities but most are irrelevant for Hahamongna area activities. For example, the Annandale Golf Course, Brookside Golf Course, Chevy Chase Golf Course, la Canada- Flintridge Country Club and the Scholl Canyon golf course are irrelevant because *nobody plays golf in the Upper Arroyo*, and 3 of the 5 golf

courses are private clubs open to members only. The Rose Bowl Aquatic Center is a fine place but *we don't swim in the upper Arroyo either* so it is irrelevant. The Rose Bowl stadium is a place to watch athletic events, it is not a venue for any of the active recreational activities mentioned. Urban parks like Pasadena Central and Memorial Parks and the Eagle Rock recreation center are poor substitutes for loss of the upper Arroyo. Villa Parke, listed in the table, is an indoor facility.

Some trails will remain open during the project but the sediment removal activities will disturb the natural ambience and mark them less valuable during the time that the project continues. Substitute facilities such as the Angeles Crest National Forest will be more costly (I can't walk to there). This loss of recreation is a significant harm to frequent Hahamongna visitors. Loss of this recreational resource for ten years is unreasonable and unacceptable.

V Traffic problems will increase. Unfortunately the conventional Level of Service (LOS) methodology used in this DEIR confuses more than it helps, as does the meaningless list of alternative recreational facilities in Table 3.15-1. LOS estimates are technology from the 1950s. The tomtom index shows that traffic in the Los Angeles metropolitan area was the worst of any North American metropolitan area and increased 2% in the most recent report (2<sup>nd</sup> quarter, 2013). Drivers in the Los Angeles basin lost an average of 92 hours per year (assuming a 30 minute commute) compared to 87 hours in San Francisco and 81 hours in Houston. We are told (pages 34-36 of the DEIR) that LOS for certain intersections, such as the Berkshire Place and I-210 Eastbound Ramps intersection, will be worse during the project. This is expected, what is surprising is the small number of intersections predicted to have a significantly worse LOS. We need to estimate the severity of traffic impacts including average changes in freeway speeds at selected points along the 210 freeway and predicted increases in travel time, for example in driving from selected points in Pasadena to points in Arcadia, Duarte, La Canada-Flintridge, Monrovia and vice versa at different times of day.

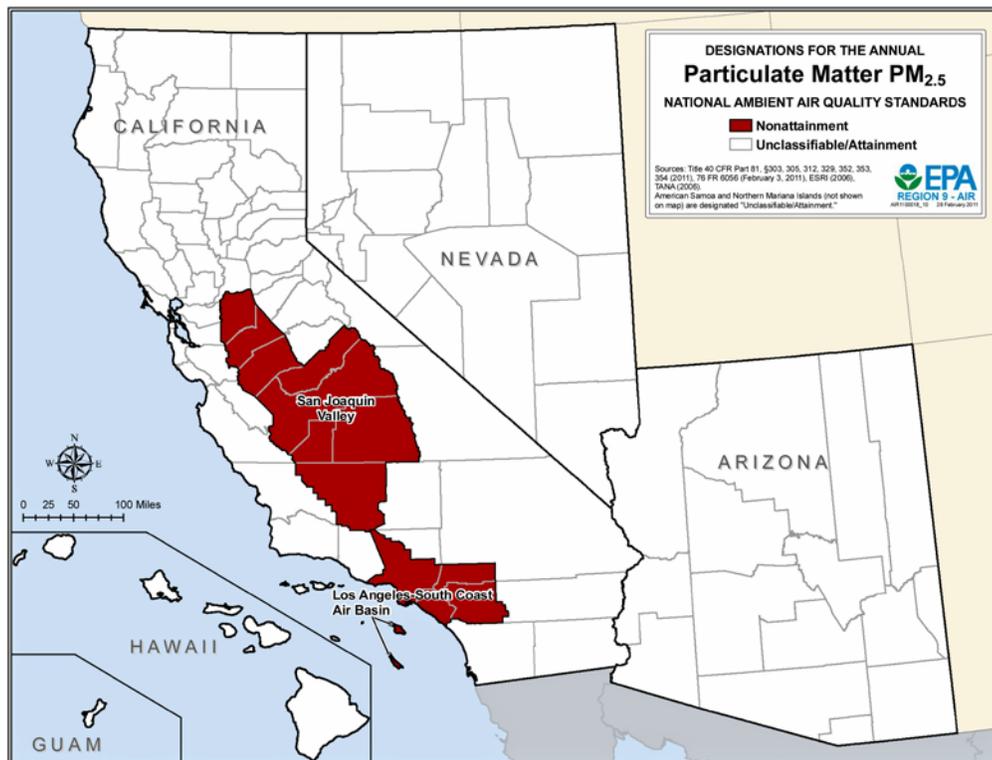
**Summary:** Sediment removal is necessary; alternative 3, configuration D with a longer performance period of seven years and no truck loading before 9 AM offers the best balance of harmful impacts. The project will inevitably have some negative health effects. Pollution data should be gathered from the Berkshire Place and I-210 Eastbound Ramps intersection, within 100 yards of the I-210 between SR 134 and Lake Avenue and within 100 yards of the I-210 between Irwindale Avenue and Azusa Avenue. If any of these stations reveal an average increase during the months of truck traffic of more than 10% in ozone, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM 10 or PM 2.5 adjustments must be made in truck traffic, idling, etc until these values fall below a 10% increase compared to the average value for a two month run-in period before the project begins (we can't compare near roadway measurements to measurements in Burbank which is too far from the action). I have not included monitoring of ultrafine particulates which is necessary for comprehensive analysis of air pollution only because they are not currently measured by the AQMD.

Note 1 Noise from traffic or aircraft is known to aggravate harmful effects of pollution, see Beelen and Babisch references.

Note 2 Idling trucks must be considered because these double dump trucks will be unloaded much more rapidly than they can be filled; idling produces significant emissions that are not included in the DEIR calculations. These extra

Comment 215-17  
continued

emissions will affect those nearest to the Hahamongna site. That's why we need real pollution measurements in addition to predictions of pollutants.



This figure is copied from <http://www.epa.gov/region9/air/maps/index.html>. 2012.

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**S. Robert Snodgrass**

**731 West Washington blvd.**

**Pasadena, CA 91103**

**[bksnodgrass@sbcglobal.net](mailto:bksnodgrass@sbcglobal.net)**

**1/20/2014**

**Response to Comment Letter #215 (S Robert Snodgrass)**

**Response to Comment 215-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 215-2:**

Per the California Environmental Quality Act (CEQA), the impact areas are each analyzed individually; however, Los Angeles County Flood Control District (LACFCD) considers the cumulative effects of other projects that may be occurring at the same time. Impacts are not jointly analyzed, as significance thresholds are set for each of the impact areas, not through a “single loss function.”

**Response to Comment 215-3:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam’s lowest spillway was determined to be the standard acceptable level of risk at Devil’s Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil’s Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cubic yards (cy) was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to CEQA. This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil’s Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the

goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

**Response to Comment 215-4:**

The nature of the project requires the work to be accomplished during dry months.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**Response to Comment 215-5:**

Emissions were calculated using methodologies and formulas from various agencies including the California Air Resources Board (CARB), EPA, and the Southern California Air Quality Management District (SCAQMD). Modeled emissions were compared with applicable SCAQMD thresholds to determine significance. These calculations are the accepted methodology for comparison to significance thresholds, and there is no nexus showing cause to require this project to provide different analyses.

**Response to Comment 215-6:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 215-7:**

The commenter is correct that Pasadena already shows standards being exceeded for many pollutants and that the region is extreme nonattainment for ozone and serious nonattainment for particulate matter smaller than 2.5 micrometers (PM<sub>2.5</sub>). However, the EPA air quality map shows only areas (South Coast and San Joaquin Valley) designated nonattainment with the 1997 PM<sub>2.5</sub> standard. For the 2006

PM<sub>2.5</sub> standard, these two areas are joined by Sacramento, Yuba City-Marysville, San Francisco Bay Area, and a portion of Imperial County with a nonattainment designation. In addition, the commenter attempts to describe a trend for PM<sub>2.5</sub> using the monitoring data presented in the air quality document. Trend analyses with only six years of data are sometimes misleading. Trend analysis graph for all the years PM<sub>2.5</sub> has been monitored in Pasadena (1999 to 2013) shows a definite downward trend in degree of exceedances.

**Response to Comment 215-8:**

See Response to Comment 215-4. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

**Response to Comment 215-9:**

While the commenter is accurate that current work is being done regarding the possibility of a multipollutant approach to air quality regulations, this approach is still in the early stages of efforts. In fact, EPA has a current research project dealing with the subject. A grant titled "Optimization of Multipollutant Air Quality Management Strategies" is currently underway by Texas A&M University with results due in May 2015. Since results of this study are not completed and, therefore, do not affect current official regulations or strategies, this Draft EIR would be remiss in using any undeveloped multipollutant approach.

**Response to Comment 215-10:**

See Response to Comments 215-4 and 215-8. Air quality impacts on the neighboring community were adequately analyzed in the Draft EIR, Section 3.5, Air Quality.

Impacts from trucks idling on the haul routes were included in the analysis. Significant queuing and idling times will not occur during the project. During the sediment removal phase, excavators will be loading sediment into trucks for offsite disposal. All of the trucks will be loaded within the reservoir; and, if a queue of trucks develops, the trucks will stage within the reservoir itself to lessen impacts on the adjacent streets. It is estimated that trucks will briefly idle during loading, but the average loading time per truck is estimated to be one minute. In addition, LACFCD typically requires equipment to shut down if idling time is expected to be more than five minutes. Estimated project idling times were included in the air quality analysis and health risk assessment for the Draft EIR, Section 3.5, and Appendices B and C.

The project-related contribution to local air concentrations of criteria pollutants from on-road and off-road vehicle emissions as well as fugitive dust emissions have been analyzed in the Draft EIR under Section 3.5.6, AIR QUALITY-4 and Impact 4 in the Air Quality Report (Appendix B), which found that the local criteria pollutant concentrations from both the onsite sediment removal activities and onsite maintenance activities would be below the South Coast Air Quality Management District's (SCAQMD's) threshold of significance for carbon monoxide (CO), nitrous oxides (NO<sub>x</sub>), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

**Response to Comment 215-11:**

The Draft EIR does take into account cumulative increase in area traffic. The analysis of air quality impacts associated with truck traffic based traffic flow and distribution on information from the Traffic Report (Appendix J) prepared for the Proposed Project. The Traffic Report took into account future projects as well as a cumulative growth factor. The Interstate 710 (I-710) project was not included in the Draft EIR as a cumulative project, as it was determined to be outside the area of influence. A cumulative growth factor was used in the Traffic Study that accounted for future traffic growth and its cumulative effects. The Devil's Gate Reservoir Sediment Removal and Management Project sediment removal phase is scheduled to be completed by 2020, prior to the initiation of the I-710 tunnel project. At this time the I-710 Extension/Tunnel project is in the preliminary phases, and a project schedule has not been established (Caltrans 2010). The growth factor considered in the analysis provided a conservative project condition volume that accounts for expansion and regional growth.

**Response to Comment 215-12:**

See Response to Comment 215-10. The SCAQMD air emissions thresholds have been developed by the SCAQMD in order to reduce the criteria pollutant concentration in the Basin to within the state and national standards for each pollutant. The EPA is constantly refining the national standards based on new research such as the referenced studies; and on December 4, 2012, the EPA revised primary annual PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS) from 15 µg/m<sup>3</sup> to 12 µg/m<sup>3</sup>. It should be noted that even if the change in the NAAQS results in a reduced SCAQMD standard, the Proposed Project is well below the current regional and local standards for PM<sub>2.5</sub>.

Furthermore, the Draft EIR analyzed the potential health risks associated with PM<sub>10</sub> emissions from diesel exhaust in the HRA provided in the Draft EIR, Section 3.5. The PM<sub>10</sub> diesel truck emissions from the Proposed Project were found to be well below the cancer and noncancer risk thresholds developed by the SCAQMD, and the potential health impacts are well documented in the Draft EIR.

**Response to Comment 215-13:**

Table 3.15-1 provides a list of existing recreational resources in the area in order to provide an outline of existing conditions in the vicinity of the Proposed Project site. Although some of the activities noted in the table do not occur at the Proposed Project site, it is important to note all the existing recreational opportunities available for the area.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing

Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days. Therefore, the maximum impacts to the adjacent recreational facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 215-14:**

The Traffic Report for the Proposed Project followed the Los Angeles County Congestion Management Program (CMP) Guidelines, California Department of Transportation's (Caltrans') Guide for the Preparation of Traffic Impact Studies, the Highway Capacity Manual (HCM), and Intersection Capacity Utilization (ICU) methods. Each methodology is a governing guideline in preparing a traffic impact analysis set forth by each jurisdiction within the project area as applicable to the intersections, on- and off-ramps, and freeway facilities. These methodologies are continually updated and improved upon based on the dynamic nature of traffic. The Traffic Impact Analysis considered the freeway segments that would be impacted by the proposed haul routes. Since trucks would remain on the freeway through the referenced cities, including East Pasadena, Arcadia, and Monrovia, no intersections would be impacted in those areas. While the majority of the sediment disposal and associated truck traffic is expected to go to the disposal sites east of the Proposed Project, the Draft EIR also analyzed the use of disposal sites west of the Proposed Project. This will allow for flexibility in case one particular route is temporarily unusable.

**Response to Comment 215-15:**

LACFCD notes that the commenter prefers the Alternative 3, Configuration D with an extended removal period of seven years and no truck loading before 9 a.m. As noted in the Draft EIR, the Proposed Project as well as Alternative 3 would have less than significant impacts on health. See Response to Comments 215-4 and 215-6, above. As noted above, theoretical calculations are the accepted methodology for comparison to significance thresholds, and there is no nexus showing cause to require this project to provide different analyses. Therefore, onsite monitoring of emissions during project activities is not required.

**Response to Comment 215-16:**

As noted in the Draft EIR, impacts from noise were determined to be less than significant based on the established thresholds.

**Response to Comment 215-17:**

See Response to Comments 215-7, 215-9, 215-10, 215-11, and 215-12. Figure and references noted.



January 21, 2014

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

**Re: Devil's Gate Reservoir Sediment Removal and Management Project**

Dear Ms. Farber:

Comment 216-1 | We at the Arroyo Seco Foundation (ASF) have reviewed the Draft Environmental Impact Report (DEIR) for the Devil's Gate Dam Sediment Removal and Management Project and find it inadequate for numerous reasons:

- Comment 216-2 | • The DEIR fails to provide genuine alternatives to the project;
- Comment 216-3 | • The DEIR fails to consider steps that could be taken to mitigate the negative impacts of the project;
- Comment 216-4 | • The DEIR is not responsive to numerous scoping comments offered by ASF and other stakeholders;
- Comment 216-5 | • The DEIR fails to incorporate an integrated approach to the management of the Devil's Gate Basin, but focuses narrowly on a massive sediment trucking operation;
- Comment 216-6 | • The DEIR fails to consider and protect the rare environmental values found in the Hahamongna basin;
- Comment 216-7 | • The DEIR fails to identify and quantify the downstream flood threat as well as steps that could be taken to reduce that threat;
- Comment 216-8 | • The project, as outlined in the DEIR, does not take into account the fact that the project site rests squarely in the middle of Hahamongna Watershed Park and that it would abuse the property rights of the City of Pasadena and overburden Los Angeles County Flood Control District's (LACFCD) easement;
- Comment 216-9 | • The DEIR fails to appropriately measure the impacts on hydrology, water quality, and recreation; the subsequent dismissal of these impacts as less than significant is gratuitous;



Comment 216-10

- The DEIR fails to provide a plan to mitigate the impacts on noise, land use and planning to levels of less than significant;

Comment 216-11

- The DEIR fails to present a biological mitigation program for the project and offers a completely inadequate 1:1 standard for the replacement or enhancement of invaluable riparian and alluvial canyon habitat.

Comment 216-12

The Arroyo Seco Foundation has worked with the LACFCD for more than twenty years to encourage an integrated watershed-based approach to the management of Devil's Gate Dam and the Arroyo Seco River. As vice-president of the Devil's Gate Multi-Use Project Joint Powers Authority and the Executive Director of Pasadena's Hahamongna Operating Company, ASF's Managing Director Tim Brick played an important role in the rehabilitation of Devil's Gate Dam in 1996-95 as well as in shaping Pasadena's Arroyo Seco Master Plan and the Arroyo Seco Watershed Restoration Feasibility Study, which emphasized the importance of an ongoing sediment management program for the Devil's Gate/Hahamongna Basin. More recently Mr. Brick served on the County of Los Angeles' task force to develop the Sediment Management Strategic Plan for the Los Angeles County Flood Control District.

Comment 216-13

ASF is very concerned that the program outlined in the Devil's Gate Dam Sediment Removal and Management Project (project) DEIR fails to incorporate the important principles of watershed management and integrated water resources planning that have been the focus of these previous efforts extending over more than twenty years.

Comment 216-14

The most fundamental failure of the DEIR is the omission of a detailed evaluation of the potential flood threat that may be a direct result of the accumulation of sediment behind Devil's Gate Reservoir (reservoir) and of a clearly defined plan to reduce that threat. The project description lacks the detail necessary to sufficiently evaluate the impacts of the project, and thus, severely hinders our ability and that of concerned agencies, organizations and citizens to make meaningful comments on the document.

Comment 216-15

This project will have extraordinarily negative environmental impacts on the habitat in the Hahamongna basin behind the dam, the neighborhoods surrounding the reservoir and around the freeways along the route, the Arroyo Seco downstream of the dam and the Los Angeles River, air quality throughout the region, the safety of surrounding schools and the financial resources of taxpayers in Los Angeles County and throughout California. While this project may temporarily increase the storage capacity of the reservoir, it will not solve the sediment problem and does not represent even an attempt to sustainably manage the natural resources of the region in an integrated fashion.

Comment 216-16

There is a sensible, sustainable way to manage sediment in Devil's Gate Reservoir, which the Arroyo Seco Foundation has developed with stakeholders and the communities affected. We call it the Slow Program. This solution would maintain flood protection for downstream communities, reduce negative impacts on the surrounding neighborhoods, and take advantage of the Arroyo Seco's natural ability to transport sediment. It would also protect the rich habitat and



recreational opportunities in Hahamongna Watershed Park. This plan involves four key elements: timing, transfer method, the permanent footprint and the neighborhood impacts of sediment removal:

**Go Slow.** LACFCD has not provided any direct evidence of an immediate flood threat to the Arroyo Seco downstream of the dam. The Sediment Management Strategic Plan, issued by the LACFCD in 2012, reveals that the dam has stored greater amounts of sediment in the past and currently still has about 47% capacity. With very low probability of a sediment flow similar to the two years after the Station Fire, there is no need to remove 4 MCY in five years. A 20-year project will minimize the negative environmental impacts. Instead of removing as much as a million cubic yards each year, LACFCD should remove 160,000 cubic yards. After a suitable storage capacity is restored, sediment removal should be an ongoing maintenance task based on the amount that flows into the basin annually.

**Go With the Flow.** LACFCD should use natural stream flows through the dam to remove sediment from the reservoir to the greatest extent possible. Large quantities of sediment have been removed in the past using this method. Using hydrology and hydraulics will very substantially reduce the need for heavy, noisy, air-polluting diesel trucks on our already overcrowded streets and freeways.

**Let the Habitat Grow.** LACFCD proposes to leave a permanently denuded maintenance area of up to 120 acres after their removal program, but the alluvial Hahamongna basin is now home to some of the richest riparian and woodland habitat in Los Angeles County. The Slow Program will not necessitate this permanent scar, creating only small areas of temporary biological disturbance.

**Keep Costs and Neighborhood Impacts Low.** The Slow Program can reduce the cataclysmic impacts of the project, which will be hard on everyone in this region but especially on residents of Pasadena, Altadena and La Cañada Flintridge. The Slow Program will reduce harmful air pollution levels, noise, dust and traffic impacts that the DEIR describes as unmitigable.

There is no dispute that something needs to be done to restore storage capacity at Devil's Gate Dam, but the solution needs to be ongoing and sustainable, while reducing neighborhood impacts. The purpose should be clearly defined as flood protection in the context of a comprehensive watershed management and restoration program. The sediment in Devil's Gate Dam should be evaluated as a component and product of LACFCD's flood protection program including the ten miles of concrete flood channel downstream of the dam.

We urge the Los Angeles County Flood Control District to go back to the drawing boards and work with the Arroyo Seco Foundation, the cities of the watershed and other stakeholders to develop a true alternative to be evaluated as part of the Final EIR. This alternative should be



Comment 216-18  
continued

designed in a way that integrates water resources, water quality, habitat conservation and restoration, and recreation with the flood protection goals. Such a program, we believe, would be far superior to the one-dimensional sediment-trucking program contained in the current DEIR.

Comment 216-19

The Devil's Gate project should be the first of a new generation of sustainable flood management for Southern California. The Slow Program will ensure that it is.

Sincerely yours,

A handwritten signature in black ink that reads "Tim Brick". The signature is written in a cursive, flowing style.

Tim Brick  
Managing Director



ID	Topic	Page	Comment
1	Introduction - Flood protection	ES-1	What is the "intended level of flood protection"? The DEIR fails to state this clearly. Please define this and specify a reservoir capacity requirement based on this number. This key planning assumption is critical to evaluate both the short-term sediment removal program and the long-term ongoing sediment maintenance program.
2	Project Goals and Objectives	ES-3	<p>The DEIR fails to document the basis for a key planning assumption that it is necessary to restore the design capacity volume for two Design Debris Events (DDE) below the spillway elevation of 1,040.5 feet. What design capacity does this refer to? What is the basis for a standard of two design debris events? Why is the spillway elevation of 1,040.5 feet chosen rather than the historic pre-rehab capacity level of 1054 feet? Is it LACFCD's position that the Devil's Gate Dam rehabilitation that occurred in the 1990's necessitates additional storage capacity in the reservoir? By what process was LACFCD's new standard of two DDEs developed and approved?</p> <p>The project description and objectives should consider the dam and sediment buildup as part of the flood control system and thoroughly evaluate downstream flood threats and facilities as well as other means that can be used to diminish the flood threat.</p>
3	Project Need	ES-3, 11,	The expansion of the spillway for Devil's Gate Dam accomplished by the dam rehabilitation project in 1996-97 was intended to lower the capacity needed in the reservoir. Please evaluate the post-rehab spillway and how that changes the need for the magnitude of sediment removal discussed in the DEIR.
4	Proposed Project Description	ES-4	The project description is insufficient because it only describes the sediment removal and maintenance elements of the County's flood protection program. The description is that of a sediment-trucking project without considering the broader implications and impacts of the project.
5	Air Quality	ES-11, 68, 73, 74, 80, 85, 87, 91-93	<p>The DEIR is inadequate because it fails to adequately address air pollution problems that will be associated with the project and to adopt equipment and procedures that would mitigate them.</p> <p>The DEIR identifies that sensitive populations and the structures that house them (sensitive receptors) are adjacent to and within 1/2 mile of the proposed project area on pp 73-74, and must be considered in the AIR QUALITY-4 Significance Criteria (p 80). In the analysis of this criterion on pp 91-93, the CO and carcinogenic analyses are only performed for impacts on surface streets. Without a clear description of the staging area for vehicles, or potential backups for departing vehicles,</p>



Comment 216-24  
continued

			<p>this analysis is incomplete. Trucks on-site may have significant queuing and idling times, and may create significant impacts on sensitive receptors adjacent to the proposed project area. These impacts should be examined in the DEIR.</p> <p>The DEIR states ""Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NOx emissions; however, the actual vehicles/equipment used may not reach the levels required to reduce the NOx emissions to a level of less than significant for the sediment removal phase. . . . Full implementation of these mitigations could be unachievable. Therefore, impact remains significant." Given the severe health impacts of diesel pollution, LACFCD should use state-of-the-art low-emission vehicles for sediment removal and not rely on the use of vehicles that only meet EPA air quality standards when "feasible."</p>
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Comment 216-25

6	Biological Mitigation	ES-11-13	<p>The DEIR fails to identify a biological mitigation program. Instead it lists a series of guidelines that may be observed, such as a 1:1 replacement of critical habitat.</p> <p>MM BIO-6 lists only Riversidean Alluvial Fan Sage Scrub habitat as a habitat to be restored and/or enhanced. What scientific basis was used to list only this habitat type as appropriate for restoration or enhancement? Will other types of habitat be restored and/or enhanced if destroyed or damaged by this project? Why is the value of this habitat as a significant part of a wildlife corridor not considered? What steps will be taken to preserve the value and function of the wildlife corridor in the project area? Additionally, a 1:1 replacement of habitat is insufficient because it fails to replace the biological value of well-established habitat. What is the basis of this low replacement ratio? 1:1 replacement does not meet the standard of mitigation for areas of environmental sensitivity, where the level of 3:1 to 5:1 is more standard and appropriate. This project should implement habitat restoration at a ratio greater than 3 acres of restoration for each acre of habitat destruction.</p> <p>MM BIO-7 indicates that a biologist will conduct a tree survey prior to ground disturbing activities. Several species in the area to be disturbed could be classified as either shrubs or trees. What will be used as a guideline for determination of tree status? Will all willows and other species with significant representation on site be counted as trees? A seedling does not replace a tree, making a 1:1 replacement ratio for trees removed inadequate restoration.</p> <p>MM BIO-8 lists mitigation measures including habitat restoration, enhancement, and invasive removal as the measures LACFCD will undertake to conduct the proposed 1:1 mitigation. Which of these activities will be prioritized? How will invasive species removal prioritize different species, and will it prioritize removal on site? Will restoration and enhancement include activities beyond use of willow cuttings? Single species plantings are not sufficient to recreate or restore habitat. What</p>
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<p>Comment 216-25 continued</p>			<p>additional measures will be taken, and will LACFCD take on these measures themselves or work with restoration specialists? The activities are also proposed at a 1:1 rate only for 'impacted sensitive habitat and jurisdictional waters.' What measurement will be used to determine what habitat within the impacted area will meet these guidelines? Will any weight be given to habitat composing the wildlife corridor connection in the project area?</p> <p>The DEIR states that attempts will be made to conduct habitat mitigation on-site, but even at the inadequate level of 1:1, it will not be possible for LACFCD to do so because the area of destruction considered in the various alternatives is so great. The DEIR is inadequate because it does not detail a complete habitat restoration program, considering both on-site and off-site components.</p>
<p>Comment 216-26</p>	<p>7 Land Use and Planning</p>	<p>ES-14</p>	<p>The DEIR identifies that the impacts to recreational uses of the project site will be significant. The mitigation measure MM LAN-1 of communication to users and redirection to nearby facilities does not make this a less than significant impact unless there are equable facilities within reasonable distance for existing users. What are the expected costs to users to relocate their activities to nearby facilities? What is the communication plan for making closures and alternatives known to the public?</p> <p>Several long-term programs serving children use the current facilities, including the Tom Sawyer Camp and MACH One program, and would be significantly burdened by the loss of these facilities. Neighborhoods surrounding the facility will also be significantly impacted, as there are no equivalent facilities within walking distance and public transit in the area is limited.</p> <p>LACFCD's communication and outreach, as demonstrated by the release of this DEIR and related communications, have not proven to be effective. A clear plan for the communication of trail and other facility closures should be outlined, and the cost of impacts to these community users should be clearly demonstrated.</p>
<p>Comment 216-27</p>	<p>8 Project Location</p>	<p>7</p>	<p>The description of the Arroyo Seco Watershed is misleading and incorrect. The watershed begins in the San Gabriel Mountains in the Angeles National Forest, and extends approximately 24 miles to the confluence with the Los Angeles River. The Arroyo Seco is a main tributary to the Los Angeles River Watershed.</p>
<p>Comment 216-28</p>	<p>9 Flood Protection</p>	<p>11</p>	<p>Please define the Probable Maximum Flood for the Arroyo Seco. What stream discharge is this flood associated with and what are the potential hazards from this flood? What reservoir discharge level will aggravate flood hazards? What flood hazards will be unaffected by potential reservoir discharges?</p>



Comment 216-28 continued			<p>The DEIR also fails to adequately describe the downstream flood threat and alternative steps that could be taken to enhance flood protection there.</p> <p>The description of the project area is incorrect because it fails to consider the downstream impacts of the program.</p>
Comment 216-29	10	Sediment Accumulation	<p>11</p> <p>Many inconsistencies exist between this DEIR and the LACFCD's Long Term Sediment Management Strategic Plan (March, 2013), such as the sediment yield post-Station Fire, average annual sediment yield and the capacity of Devil's Gate reservoir. These inconsistencies mislead the public about the gravity of the problem the project attempts to address. Please address these inconsistencies and clarify them for the final EIR.</p>
Comment 216-30	11	Reservoir Capacity	<p>11</p> <p>The DEIR states that the storage capacity in the reservoir after the Station Fire and subsequent storms is below one DDE. The Sediment Management Strategic Plan (pp. 8-42 to 8-43) gives different data. Using the County's historic method of calculating reservoir capacity, it indicates that as of the March 2011, there are two DDEs and 3.73 MCY of storage capacity in the basin.</p> <p>Please explain these discrepancies and estimate the current capacity behind the reservoir in terms of percentage and volume. Please also indicate why the historic method of calculating DDEs and storage capacity is not appropriate and why a new standard of two DDEs is required.</p>
Comment 216-31	12	Flood Risk	<p>12</p> <p>The DEIR states that emergency steps have been taken "to minimize the level of flood risk to downstream communities along the Arroyo Seco." What level of flood risk exists with the current sediment accumulation, and what level of flood risk and reservoir capacity is desirable? What are the specific neighborhoods at risk of flood damage with and without the project and what steps are being taken to reduce potential damage?</p> <p>The key planning assumptions regarding the flood threat from sediment buildup at Devil's Gate Dam should be subject to a technically sound risk analysis. LACFCD's assertions that a flood threat is imminent or that it is necessary to have capacity in the dam basin for two Design Debris Events (DDEs) needs to be carefully scrutinized.</p> <p>Pasadena resident Charles ("Charley") Kohlhasse worked for forty years at NASA/JPL leading the design of many deep-space missions during his extended career, including Mariner, Viking, Voyager, and Cassini_ missions. For his sustained robotic exploration contributions over the last 40 years of the 20th century and solid success record, he received the NASA Distinguished Service Medal.</p> <p>Mr. Kohlhasse analyzed the flood threat related to sediment in the Devi's Gate basins and concludes that the probability of a catastrophic event is</p>



<p>Comment 216-31 continued</p>			<p>very remote.</p> <p>He points out that the likelihood a 50 year storm in a ten year period of time is 20%. He states: "If a 50-year event has a probability of 100% of occurring, then the probability for each year would be 2% or 0.02 or 1/50. As independent probability events are multiplied to determine the likelihood of two 50-yr events occurring in the same year, that probability would be 1 chance in 2500 ... not at all very likely. Even assessed over a 10-yr period, the likelihood would only be 10 x (1/2500) or 1/250 ... still very unlikely. And if a second 50-yr event were to occur closely after the first 50-yr event, there would not likely be additional fire debris to raise the sediment level as much as for the first 50-yr event, so the threat level would have been over-estimated. So you really do not need to lower the existing sediment levels unless you are being extremely conservative in avoiding an overflow of the Devils Gate dam. And given the station fire, why not just wait until the next 50-yr event before taking any action to truck out sediment?"</p> <p>Question: How has LACFCD calculated the risk involved and why has it chosen such an expensive and conservative metric?</p>
<p>Comment 216-32</p>	<p>13 Supporting Sustainability</p>	<p>12</p>	<p>A long-term plan for reservoir management would support sustainability but is not sufficient for sustainability on its own. Addressing some maintenance difficulties should be part of a overall strategy of reducing the need for maintenance by improving the function of the flood control system as a part of an Integrated Watershed Management Program, including considerations of water quality, the water basin, groundwater resources, stream health, recreational opportunities, and economic strategies for the watershed. What is the LACFCD's plan for improving overall sustainability of the reservoir and the flood control system? How does this proposed project fit into such a plan?</p>
<p>Comment 216-33</p>	<p>14 Project Access and Staging</p>	<p>16</p>	<p>Please clarify the statement that "empty trucks will be staged within the Proposed Project site." Does this mean that they will be staged there overnight? How many trucks at one time will be allowed in the staging area or on adjoining roads? What other equipment besides trucks will be used to process and transfer the sediment? How big will the staging area for those trucks be, and will the staging area move as the location of sediment removal changes?</p>
<p>Comment 216-34</p>	<p>15 Reservoir Management</p>	<p>21</p>	<p>"It is estimated that an average of 13,000 cy of sediment will potentially be deposited in the reservoir annually after completion of the Proposed Project." Please explain how this number was estimated. According to the Flood Control District's Sediment Management Strategic Plan, the average annual sediment deposition is over 100,000 cy. Such a dramatic underestimate of the average sediment loading of the Devil's Gate basin is misleading and deceptive.</p>



Comment 216-35	16 Project Area	21	<p>The downstream Arroyo Seco River flood control channel is a critical component of the Devil's Gate Dam flood system and should be evaluated as such. Please include the downstream channel in the project area and include the impacts of flooding and the sediment removal program there.</p>
Comment 216-36	17 Cumulative Projects	28	<p>The DEIR is inadequate because it fails to consider a number of closely related projects, including:</p> <ul style="list-style-type: none"> <li>• The NASA/Jet Propulsion Laboratory water contamination well now being planned,</li> <li>• The JPL parking structure,</li> <li>• The Arroyo Seco Canyon Project,</li> <li>• Pasadena's Berkshire Creek Program, and</li> <li>• The cross-town pipeline from the Devil's Gate area to Eaton Canyon proposed by LACFCD; and</li> <li>• The US Army Corps of Engineers (USACE) Arroyo Seco Ecosystem Restoration Study.</li> </ul> <p>The proposed project, when combined with these planned projects, could have a significant net effect on the hydrological functioning of the Arroyo Seco, which must be explored.</p> <p>Since the proposed project to divert water from the Devil's Gate Reservoir to the Eaton Canyon Watershed is a project of LACFCD and was included as part of a successful grant application to the CA Department of Water Resources for flood funding, the pipeline across Pasadena should be fully evaluated in this DEIR.</p> <p>The Feasibility Scoping Meeting Documentation Final Report for the USACE Arroyo Seco Ecosystem Restoration Program, prepared in August 2011, contains a remarkably different description as well as conflicting recommendations for the Devil's Gate/Hahamongna basin. On page 2-3 that document states: "Alteration of the riparian conditions has resulted in fragmented, diminished or eradicated fish and wildlife habitat, and has resulted in water quality impacts that have diminished ecosystem function. For example, in the Hahamongna Watershed Park (HWP), the stream spreads over the floodplain in a braided pattern, as would be expected in a bedload-dominated alluvial system, but current land use does not provide a riparian vegetation border along the braided stream margin. Thus, the water is exposed to direct sunlight and is subject to heating, thereby reducing aquatic habitat quality for native species and contributing to harmful algal blooms." We note that LACFCD is the lead local sponsor of the USACE Arroyo Seco Watershed Ecosystem Restoration study and has expressed support for completing and implementing that program for many years, but the DEIR does not incorporate the principles of integrated watershed and ecosystem management that characterize that program. ASF believes that the USACE program offers the basis for a sediment removal and management program that will be truly sustainable and respect the rare</p>



Comment 216-36 continued			ecosystem values found in the Hahamongna basin. Why was the USACE program not included in the DEIR analysis? Will its findings and recommendations be incorporated into LACFCD's final EIR and sediment management program?
Comment 216-37	18	Regional Water Quality Control Board	26 Please explain in detail the permit denial from the Regional Water Quality Control Board in March 2011 for the 1.67 million cubic yard project proposed by LACFCD for the Hahamongna basin. What measures have been taken to meet the directives of the Regional Board's letter?
Comment 216-38	19	Native Soils	141 Please provide information regarding depths to "native soils" in the basin. What is being used a reference? Will there be any monitoring on site to determine that the data is accurate? This is not only important for evaluating archaeological resources as herein, but also for contamination and management purposes.
Comment 216-39	20	Alternatives Analysis	274-626 The DEIR is inadequate because it fails to analyze true alternatives to the proposed project. Aside from the "no project" alternative, there is no alternative that is significantly smaller in scale or in environmental impacts than the proposed project. Alternatives 1, 2 and 3 are all sediment trucking programs and not true alternatives, simply variations of the proposed project with different footprints and amounts of sediment to be excavated. Dig a hole here; dig a hole there. Dig two bigger holes there. The scope of all three is significantly larger than the November 2010 original project description (1.67 MCY) despite the Regional Water Quality Control Boards directive from March 2011 to consider more modest alternatives that would have less environmental impact. Why does LACFCD fail to abide by this directive?  Alternative 4 (Sluicing Method) gives a narrow definition to sluicing and flow-assisted sediment transport and posits the ridiculous premise that all sediment transport would be accomplished through a passive sediment program that would take forever. Clearly this is a dismissive pseudo-analysis and not a true alternative to the sediment-trucking program outlined by LACFCD.  Alternative 5 (Haul Route Alternative) describes a different route for trucks to leave the Devil's Gate basin and travel to the 210 Freeway, using the Arroyo/Windsor on-ramp primarily instead of the Windsor on-ramp. This is not a true alternative to the project itself, but simply a variation that could be used for the project or any of the three pseudo-alternatives (1-3).
Comment 216-40	21	Sluicing Alternative	469 Alternative 4, the Sluicing Alternative, is poorly conceived and set up to be easily dismissed. ASF has long advocated using the flow of the Arroyo Seco River to transport sediment out of the reservoir, but it is very obvious that, because of long-deferred maintenance, this method cannot transport the entire volume of sediment necessary at this time.



Comment 216-40  
continued

			<p>Alternative 4 suggests that sluicing be used as the only method of sediment removal from the basin, which is clearly infeasible. This alternative should consider maximizing the amount of sediment sluiced given projected future weather conditions. It is specious to assert that since sluicing cannot meet the entire removal need, it is not a viable option or methodology that could significantly reduce negative impacts of sediment removal.</p> <p>Appendix K shows that during a historically "typical" year of stream flow, sluicing 20,000 cubic yards is possible. This result does not justify dismissing sluicing as an alternative. Even in years of typical rainfall levels, sluicing should be maximized to transport about 20,000 cubic yards from the reservoir. During periods of low rainfall levels, no sluicing will be possible, but in years of high rainfall, the potential for flow assisted sediment transport is much greater, and should be exploited.</p> <p>The definition of the historically typical year for the sluicing analysis uses only a narrow and unrepresentative sample of recent years rather than considering the historical variations in hydrology and rainfall and the potential impacts of climate change.</p> <p>Question: Please justify your selection of the "historically typical year."</p> <p>According to Table 8-12 in the LACFCD Sediment Management Strategic Plan, in 1942 over one million cubic yards of sediment were sluiced from the Devil's Gate Reservoir. This magnitude of sluicing will very rarely be possible and should not be depended on, but it does demonstrate the possibility for maximizing sluicing as a removal method. In 1952, 410,000 cubic yards were sluiced from Devil's Gate Reservoir, and in 1979 an additional 250,000 cubic yards were sluiced. The DEIR uses sluicing as a red herring to dismiss alternative removal methods. Sluicing should be considered a viable removal method that can be optimized as a major component of a sediment removal and management program.</p>
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Comment 216-41

22	Haul Route Alternative	521	<p>The Haul Route "alternative" is simply a variation on truck routes and not an alternative to the project. This 'alternative' does not demonstrate a reduction in overall air quality or traffic impacts. Instead of evaluating this minor route difference as an alternative, the LACFCD should evaluate an adaptive route alternative based on the hourly/daily/weekly/monthly haul route on seasons, events, burden, school times, work times, rush hour, and even unforeseeable circumstances.</p>
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Comment 216-42

23	CEQA Process	Appendix A	<p>Stakeholder comments on the Scope of the EIR are presented in Appendix A, but the County provides no responses to those comments. Please address each comment individually and how they were incorporated into the DEIR. At this point it seems that the comments were ignored.</p>
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Comment 216-43

24	CEQA Process	Appendix A	<p>LACFCD has not undertaken a sufficient outreach program to stakeholders about the project and its impacts. Most stakeholders and neighbors of Hahamongna Watershed Park who will be affected by the project remain unaware of it. The three community meetings held did not meet the requirements of CEQA. They were styled to limit public input and exchange on the project, and the meeting facilitators filtered participant input in a prejudicial way. The format of the meeting did not give sufficient opportunity to get answers to key questions that were necessary to understand in order to make effective comments on the DEIR.</p> <p>This DEIR is a massive document that is extremely difficult to review in electronic form, yet few hard copies were made available to the public and only at local libraries where they are difficult to review due to limited hours and availability.</p> <p>Question: Why did LACFCD not provide full and complete hard copies of the DEIR, including appendices, to key agencies and stakeholder organizations?</p>
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## **Response to Comment Letter #216 (Arroyo Seco Foundation)**

### **Response to Comment 216-1:**

Los Angeles County Flood Control District (LACFCD) notes that the Arroyo Seco Foundation finds the Draft Environmental Impact Report (EIR) to be inadequate. The comments have been responded to below.

### **Response to Comment 216-2:**

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” However, “[a]n EIR is not required to consider alternatives which are infeasible” (CEQA Guidelines Section 15126.6(a)) or “which could change the fundamental nature of the proposed project.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.* (1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project’s significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

### **Response to Comment 216-3:**

Table ES-1 of the Draft EIR, lists all 17 of the Mitigation Measures proposed for the Proposed Project. These Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The list of feasible Mitigation Measures is common to CEQA and accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures including conceptual restoration plans.

### **Response to Comment 216-4:**

The purpose of the scoping process was to gather input from outside experts, cities, and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

**Response to Comment 216-5:**

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that approximately 13,000 cubic yards (cy) of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 216-6:**

The Draft EIR does address impacts to both the environment and community. Various mitigation measures are provided throughout the Draft EIR to reduce impacts to the community and the environment.

**Response to Comment 216-7:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

With the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. A 50-year frequency storm event is defined as the magnitude of a storm that is likely to occur once every 50 years. Therefore, the chance of a 50-year storm occurring in any given year is 1 out of 50, or a 2 percent chance of occurring. Flooding with mud/sediment would occur along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110

from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and the California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average storm seasons. Additionally, Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. It should be noted that design debris amounts can be produced from a freshly burned watershed with rainfall amounts considerably below capital flood levels (a 5- to 10-year frequency storm). Similarly, higher intensity rainfall could produce more debris. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

**Response to Comment 216-8:**

LACFCD recognizes that the Proposed Project site is located within Hahamongna Watershed Park, as stated in the Draft EIR, Section 3.12, Land Use and Planning. The scope of the Proposed Project and Alternatives is entirely within LACFCD's 258-acre easement. The Proposed Project will not overburden the easement; it will restore the reservoir to the design capacity necessary for flood control storage or to safely contain future sediment inflow (volume for two DDEs below the spillway elevation of 1,040.5 feet). As noted in the Draft EIR, through easements granted in May 1919 and March 1965, the City of Pasadena granted LACFCD, under a perpetual easement, the right to construct, reconstruct, inspect, maintain, repair, and operate Devil's Gate Dam, its spillway, bypasses, tunnels, and other support facilities as may be necessary for the construction and maintenance of a reservoir capable of impounding the waters of the Arroyo Seco for purposes of storage and control and to control such waters as may be necessary in the prevention of damage by flood. LACFCD has been and will continue to conform to the limits and responsibilities of the easement and will continue to work with the City to minimize impacts associated with the Proposed Project.

**Response to Comment 216-9:**

The Draft EIR adequately addresses impacts from the Proposed Project on Hydrology and Water Quality, as well as Recreation in Sections 3.11 and 3.15 respectively.

**Response to Comment 216-10:**

As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. As discussed in the Draft EIR, Section 3.12 Land Use and Planning, with the implementation of Mitigation Measure MM LU-1, impacts will be reduced to less than significant.

**Response to Comment 216-11:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

As with any project that involves California Department of Fish and Wildlife (CDFW), United States (U.S.) Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation and to satisfy permitting requirements. The plan will include and address noxious weed management, monitoring, and success criteria. Based on MM BIO-8, a combination of onsite and offsite habitat restoration, enhancement, and exotic removal shall be implemented by LACFCD at a 1:1 ratio for impacted sensitive habitat and jurisdictional waters. In addition, five years of success monitoring and reporting will be implemented. Mitigation locations will comply with the CDFW recommendations as follows: first, onsite; second, offsite within the Arroyo Seco Watershed; and third, offsite within the greater Los Angeles River watershed. If offsite mitigation sites are needed, several offsite areas within the Arroyo Seco/Los Angeles River watershed are being considered for restoration.

Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal.

As discussed in the Draft EIR, Section 3.6.6, BIOLOGY-2, Riversidean Alluvial Fan Sage Scrub is considered to be of high priority for inventory by CDFW because of its significance and rarity. To minimize impacts due to loss of Riversidean Alluvial Fan Sage Scrub, Mitigation Measure MM BIO-6 has been provided.

**Response to Comment 216-12:**

LACFCD recognizes that the Arroyo Seco Foundation has worked with LACFCD over the past 20 years and that the organization has been involved in the activities and planning aspects of Hahamongna Watershed Park, including the Arroyo Seco Master Plan and Sediment Management Strategic Plan.

**Response to Comment 216-13:**

See Response to Comment 216-4. The Draft EIR analyzes long-range maintenance of the reservoir under the Reservoir Maintenance phase of the Proposed Project and Alternatives. Outside experts, especially those on the Stakeholder Task Force, were consulted during the formation of the Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives.

**Response to Comment 216-14:**

See Response to Comment 216-7.

The Draft EIR provided a legally adequate project description as per California Environmental Quality Act (CEQA) Guidelines 15124. As described in Section 2.0 of the Draft EIR, the Proposed Project description provides: the precise location and boundaries of the Proposed Project on a detailed map and on a regional map, a statement of objectives sought by the Proposed Project, a general description of the Proposed Project's characteristics, and the intended uses of the EIR.

**Response to Comment 216-15:**

See Response to Comment 216-11. Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments along any of the haul routes.

As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to traffic conditions by the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant.

LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

As discussed in Response to Comment 216-5, FASTing operations will be regularly used to naturally flush sediment through the reservoir area, which will improve the sustainability of the reservoir. Additionally, the Proposed Project alternatives were specifically designed to enable a more sustainable long-term way to manage sediment and habitat in the reservoir area.

**Response to Comment 216-16:**

See Response to Comment 216-22 for the existing reservoir storage capacity.

The “Slow Program,” as proposed by the Arroyo Seco Foundation, is a narrative discussing ways to reduce impacts of sediment removal at Devil’s Gate Reservoir by reducing the sediment removal rate and extending the project duration by using natural stream flows and not disturbing habitat areas, which would keep costs low. Few details and no engineering analysis of the “Slow Program” are provided. While Los Angeles County Flood Control District shares the common goal to minimize impacts due to the Proposed Project, the methods described in the “Slow Program” are inconsistent with other important project objectives.

The “Slow Program” suggests removing sediment from the reservoir over a period of 20 years rather than the Proposed Project’s 5-year duration. Accumulated sediment, including 1.3 million cubic yards (cy) from the Station Fire, has reduced the reservoir’s storage capacity for new sediment, which is delivered with every storm. The reduced storage capacity increases the risk of flooding to downstream communities. It is necessary to remove 2.4 million cy of sediment in order to meet the project objective of “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.”

Removing sediment at a slower rate, as suggested by the “Slow Program,” increases the chances that a major storm and flooding event will occur before the accumulated sediment can be removed. The “Slow Program” proposes to remove approximately 160,000 cy per year for 20 years. Based on historical records, an average of approximately 130,000 cy of sediment enters the reservoir annually. Considering this natural inflow of sediment, the “Slow Program’s” proposed removal amount would never restore the reservoir’s required storage capacity. After 20 years of average sediment inflow, the “Slow Program” would have reduced the accumulated sediment by only 600,000 cubic yards. This would mean that the downstream flood risk would continue to be elevated for 20 years from project initiation and beyond. This is not an acceptable risk for the downstream communities.

While sediment slowly accumulated in the reservoir leading up to 2009, the catalyst for the Proposed Project was the 2009 Station Fire, since subsequent storm events so significantly and quickly reduced the reservoir’s capacity, which in turn, quickly elevated the flood risk. The reservoir does not currently have capacity for a major storm event; therefore, it is urgent to remove the sediment as quickly as possible. Sediment removal over five years will prudently ensure that the risk of downstream flooding will be resolved in a timely manner while also balancing impacts associated with the rate of removal. This is also consistent with the project objective of “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” and “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.”

The “Slow Program” suggests removing sediment from the reservoir by using natural stream flows rather than trucking. The Draft Environmental Impact Report (EIR) thoroughly analyzed sluicing, which uses natural stream flows; and the report concluded that sluicing is not feasible for this reservoir because the reservoir is impacted with such high levels of sediment. According to the Final Detailed Sediment Transport Capacity Analysis for the Arroyo Seco Channel report in Appendix K of the Draft EIR, approximately 20,000 cy of sediment would be successfully conveyed to the Arroyo Seco’s confluence with the Los Angeles River, but over 200,000 cy would be left in the channel. This sediment would affect the channel’s hydraulics and increase the risk for flooding. The analysis shows that, based on average historical rainfall and flow rates, sluicing 2.4 million cy of sediment out of the reservoir and through the Arroyo Seco Channel would take approximately 150 years.

The “Slow Program” also refers to letting the habitat grow as opposed to removing vegetation where the sediment removal will take place; however, if sluicing were used to remove sediment, as proposed by the “Slow Program,” vegetation in the reservoir would still need to be removed. Sluicing requires mechanical equipment to push the sediment currently covered in vegetation into the water flows to transport it out of the reservoir. The process would require the removal of any vegetation growing in the area where sediment deposits will be removed.

As identified in the Proposed Project’s Draft EIR, an alternative (Alternative 3, Option 2) reduces habitat impacts from the Proposed Project’s 120 acres down to 71 acres. This is a 41 percent (49-acre) reduction of vegetation impacts as compared to the Proposed Project. Additionally, with this alternative, 18 of the 71 acres impacted by the sediment removal would be restored with habitat. The remaining 53 acres of impact are required for the reservoir to properly function as corroborated by the City of Pasadena’s Hahamongna Watershed Park Master Plan, which outlines a nearly identical reservoir configuration in terms of area and capacity. Onsite mitigation would occur with vegetation replanting or regrowth above elevation 1,020 feet. Riparian Herbaceous vegetation would be expected to continue to populate and/or reestablish between maintenance activities below this elevation in the reservoir and also temporarily in the management area of the Proposed Project site.

The “Slow Program” claims that its suggested method of removal will keep sediment removal costs low. The project cost of Alternative 3, Option 2, estimated at \$65 million, includes sediment removal and mitigation efforts. Since sluicing has been determined to be an ineffective removal method, removing the same quantity of sediment utilizing trucking over a longer period of time would be less cost effective. Efficiency of the operations, additional annual mobilization and demobilization, clearing and grubbing, and contractor costs all have a negative effect on cost savings. In addition to the basic principles of “economies of scale,” if the project duration were increased, further administration/project management costs and ever rising costs for labor, fuel, and equipment would push the project costs well over the estimated \$65 million.

The Proposed Project and all of the alternatives, as described in the Draft EIR, are designed as long-term plans to meet the project objective of “supporting sustainability by establishing a reservoir configuration more suitable for routine maintenance activities including reservoir management.” After the sediment removal phase is completed, regular sediment removal will occur to prevent gradual accumulation which would otherwise require future major sediment removal projects. Additionally, the habitat restoration areas in the reservoir will be designed to coexist with the maintenance areas, which will provide for a more sustainable and integrated reservoir area than currently exists.

**Response to Comment 216-17:**

See Response to Comments 216-13, 216-15, and 216-16.

**Response to Comment 216-18:**

See Response to Comments 216-13, 216-15, and 216-16.

**Response to Comment 216-19:**

See Response to Comment 216-16.

**Response to Comment 216-20:**

See Response to Comment 216-7.

**Response to Comment 216-21:**

See Response to Comments 216-7 and 216-22.

**Response to Comment 216-22:**

The dam rehabilitation project did not lower the required capacity of the reservoir. The spillway was rehabilitated in order to pass the Probable Maximum Flood. The rehabilitation entailed lowering the spillway bottom elevation, thereby constructing the spillway ports. The reservoir capacity below the existing spillway ports (elevation of 1,040.5 feet) is the appropriate parameter for determining the currently available capacity for meeting the sediment volume requirements for the dam. The current capacity in the reservoir below the spillway is 1.3 million cy. This is only 32.5 percent of the required storage capacity and only 65 percent of one DDE. Please note that additional sediment deposits have accumulated within the reservoir easement above the elevation of 1,054 feet. This accumulated sediment has the potential to be washed toward the dam during significant storm events and further reduce the available capacity below the spillway.

**Response to Comment 216-23:**

See Response to Comment 216-14. The Proposed Project description is intended to describe the action being undertaken and is adequately described in the Draft EIR. The impact analysis associated with the Proposed Project is discussed in Section 3.0 Environmental Analysis of the Draft EIR.

**Response to Comment 216-24:**

See Response to Comment 216-15. During the sediment removal phase, excavators will be loading sediment into trucks for offsite disposal. All of the trucks will be loaded within the reservoir; and, if a queue of trucks develops, the trucks will stage within the reservoir itself to lessen impacts on the adjacent streets. Significant queuing and idling times will not occur during the project. It is estimated that trucks will briefly idle during loading, but the average loading time per truck is estimated to be one minute. In addition, LACFCD typically requires equipment to shut down if idling time is expected to be more than five minutes. Estimated project idling times were included in the air quality analysis and health risk assessment for the Draft EIR, Section 3.5, and Appendices B and C.

Impacts from trucks idling on the haul routes were included in the analysis. Significant queuing and idling times will not occur during the project.

**Response to Comment 216-25:**

See Response to Comment 216-11.

As discussed above, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily

displaced during construction, wildlife would not be physically prevented from moving around and into the basin area. The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant.

As discussed in the Draft EIR, Section 3.6.6, Mitigation Measure MM BIO-6 has been provided to minimize impacts due to loss of Riversidean Alluvial Fan Sage Scrub; however, as discussed in this section, impacts to other habitats, including riparian woodland, Mule fat scrub, and wetland, will also be minimized through implementation of Mitigation Measures MM BIO-7 and MM BIO-8. Based on MM BIO-7, within 90 days prior to ground-disturbing activities, a qualified biologist will conduct a tree survey within the project footprint to identify trees that will be removed or potentially affected by the Proposed Project and trees that can be avoided. LACFCD will replace trees that cannot be avoided. The replacement is expected to be up to 1:1 by acreage. The biological monitor will implement measures to protect the root zone of oak trees that may be impacted immediately adjacent to the project site and along access roads.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 216-26:**

The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park by recreational users such as Tom Sawyer Camps, Oak Grove Disc Golf Club, and MACH-1. Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days. Therefore, the maximum impacts to recreation would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. Where possible, LACFCD will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft EIR, also carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint (see Section 4.6 of the Final EIR). Furthermore, Alternative 3, Configuration D, Option 2 would also avoid all currently existing Oak Grove Disc Golf Club holes.

Under CEQA, the lead agency is not required to analyze an economic impact associated with a project in the EIR; as Section 15131(a) of the CEQA Guidelines states: "Economic or social effects of a project shall not be treated as significant effects on the environment." Moreover, CEQA allows economic analysis in the administrative record only if the basis for infeasibility, and thus rejection of a mitigation or alternative, is economic, as described in CEQA Guidelines Sections 15091(a)(3) and 15364.

**Response to Comment 216-27:**

The comment has been noted, and Final EIR has been revised to state "The Arroyo Seco watershed extends approximately 16 miles in length along the centerline of the watershed and 24 miles along the Arroyo Seco from its origin in the Angeles National Forest to the Arroyo Seco's confluence with the Los Angeles River."

**Response to Comment 216-28:**

See Response to Comment 216-7. State of California laws require that dams be constructed to safely pass the probable maximum flood, which is determined from the probable maximum precipitation, as defined by the National Weather Service.

**Response to Comment 216-29:**

For Devil's Gate Dam, the DDE was previously calculated as 1.67 million cy. That previous calculation was based on the presence of debris-retaining structures including Browns Canyon Dam, located within the Angeles National Forest upstream of Devil's Gate Dam. These structures filled with sediment decades ago and no longer provide capacity to "control" any portion of the watershed. A subsequent analysis determined that the correct DDE, based on the absence of sediment control facilities in the Forest, is 2.0 million cy. Following the Station Fire, LACDPW reviewed the DDE calculations and confirmed that 2.0 million cy is the current and appropriate volume for the DDE.

As stated above, LACDPW's criterion is that reservoir sediment levels be maintained at a level equivalent to two design debris events below spillway; however, in response to the Station Fire, an emergency project to remove only 1.67 million cy was initially proposed. The volume of 1.67 million cy is the previously published DDE and was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). In March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs.

The Sediment Management Strategic Plan included sediment history data to demonstrate the volume of sediment deposited into the dams and used that data along with statistical analysis to develop projected 20-year sediment volumes for County facilities. The sediment history provided for Devil's Gate Dam (pages 8-42 and 8-43 of the Sediment Management Strategic Plan) correctly shows the sediment volumes accumulated at the dam; however, the column titled "Reservoir Capacity at Elevation 1,054 ft." can be somewhat confusing with respect to the current capacity in the dam. That column provides the remaining capacity below elevation 1,054 feet, which is the original spillway elevation of the dam. The spillway was rehabilitated in order to pass the Probable Maximum Flood. See Response to Comment 216-22.

**Response to Comment 216-30:**

See Response to Comments 216-7 and 216-29.

**Response to Comment 216-31:**

See Response to Comment 216-7.

**Response to Comment 216-32:**

See Response to Comment 216-5. Please see the Sediment Management Strategic Plan for an overview of sediment management issues and alternatives. The Sediment Management Strategic Plan can be viewed here:

<http://dpw.lacounty.gov/lacfcd/sediment/files/FullDoc.pdf>

**Response to Comment 216-33:**

The construction equipment required for sediment removal is listed in the Draft EIR, Section 2.5.1, Proposed Project Description, Configuration A, Sediment Removal Phase, Removal Method. The sediment removal equipment will be staged within the reservoir overnight, during sediment removal operations. No staging of sediment removal equipment will take place on city streets. Specifics of the staging area(s) will be dictated by the contractor but will follow all applicable RWQCB requirements. Sediment hauling trucks will be queued within the reservoir during removal activities and will be stored offsite nightly by their respective operators.

**Response to Comment 216-34:**

The average of 13,000 cy of sediment annually refers to the amount estimated, based on past storm events, which would require removal through sediment excavation/trucking offsite. Although FASTing is expected to be an effective means of keeping sediment levels lower in the reservoir, historically an average of 130,000 cy of sediment is deposited in the reservoir annually. An effective FASTing regime will still require an estimated 13,000 cy of sediment to be removed by excavation annually.

**Response to Comment 216-35:**

The Proposed Project involves removal of sediment from the Devil's Gate Reservoir and does not involve removal of sediment from downstream flood control facilities; however, removal of sediment from downstream flood control facilities would be likely under Alternative 4, Sluicing Alternative. Impacts associated with this alternative are discussed in the Draft EIR, Section 4.7.

**Response to Comment 216-36:**

The Draft EIR contains a cumulative impact analysis within each of the subsections of Section 3.0 Environmental Analysis. The cumulative analysis contains projects determined by LACFCD and the surrounding cities and communities to have a potential cumulative effect due to overlapping time frames of the projects. The list of these projects is included in Section 2.9 Cumulative Scenario. Potential projects that were determined to be outside the area of influence or sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130.

The Proposed Project does not require the implementation of the Devil's Gate Water Conservation Project in order to achieve the Proposed Project's objective to satisfactorily reduce flood risk, create a configuration suitable for routine operations and maintenance, and reduce the possibility of plugging at the face of the dam. The Devil's Gate Water Conservation Project does not require the implementation of the Proposed Project to be carried out. Neither project is a foreseeable consequence of or a future expansion of the other project; therefore, these projects are separate projects per CEQA.

The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

LACFCD continues to coordinate with USACE concerning Arroyo Seco Watershed Management. In addition, LACFCD is a local sponsor of the USACE's *Los Angeles County's Arroyo Seco Watershed Ecosystem Restoration Study*, and the study was used in the preparation of the Draft EIR.

**Response to Comment 216-37:**

The California RWQCB denied a permit for the emergency project without prejudice, with the understanding that LACFCD would be initiating an EIR process for a project which would restore the required level of protection. As part of Proposed Project approval, LACFCD will obtain the necessary permits from the RWQCB.

**Response to Comment 216-38:**

Depths to the "native soils" of the reservoir will be determined by using historic contours of the reservoir compared to the existing topography. Construction staking within the reservoir will take place prior to excavation, and periodic surveys will be completed to ensure the limits of excavation are consistent with the design plans.

**Response to Comment 216-39:**

See Response to Comments 216-2, 216-4, and 216-37. Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and

Appendix K of the Draft EIR for further analysis. Alternative 5, Haul Route Alternative provides another haul route option that reduces traffic impacts at two intersections to a less than significant level. Alternative 5 is a reasonable alternative as it substantially lessens one or more significant effects of the Proposed Project and would feasibly attain most of the basic objectives of the Proposed Project; see Section 4.8.

**Response to Comment 216-40:**

See Response to Comment 216-39. LACFCD designated three required characteristics in selecting the “typical” year to be used for Appendix K Final Detailed Sediment Transport Capacity Analysis for the Arroyo Seco Channel. The first requirement was that the total rainfall for the particular year matched the historic average total. Secondly, the inflow data to Devil’s Gate Reservoir had to be readily available in hourly increments for the duration of the chosen storm season, as that information is required for an accurate model. And thirdly, the inflow data for a particular year had to have an average, well distributed number of peaks indicating a series of multiple, distinct storms.

In the process of defining the typical year, annual rainfall data from 1938 to present was analyzed. Of that information, inflow data was readily available in hourly format for most years since 1972 to present. Finally, the inflow data was evaluated for its distribution of rain events. The January 1, 2006, to April 15, 2007, period was chosen due to its being a representative sample for the historic inflow to Devil’s Gate Reservoir.

**Response to Comment 216-41:**

See Response to Comment 216-39.

The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site. This will include coordination of sediment transport activities with unforeseen events.

**Response to Comment 216-42:**

Per CEQA, scoping comments are not required to be responded to in the EIR. Only comments received during the Draft EIR Public Review Period are required to be responded to, and these responses are included in this Response to Comments document. LACFCD took the comments and concerns raised by cities and other agencies and citizens during the scoping process into account when designing the Proposed Project and the Alternatives.

**Response to Comment 216-43:**

Adequate time for public commenting was provided. CEQA requires that the public comment period for a Draft EIR be at least 45 days (CEQA Guidelines § 21091). LACFCD extended this review period initially to 75 days and then further extended the review period to 90 days to allow for additional commenting time.

LACFCD held three community meetings to inform the public of the Proposed Project, Alternatives, and the results of the Draft EIR. The meetings included a presentation, workshops where the public could ask specific questions about the project and potential impacts, and the ability to submit formal comments. Members of the public were able to ask questions or pose comments either in a group setting after the presentation or at the individual workshop stations.

Per CEQA, "Public hearings may be conducted on the environmental documents, either in separate proceedings or in conjunction with other proceedings of the public agency. Public hearings are encouraged, but not required as an element of the CEQA process." Therefore, the community meetings held to inform the public about the Proposed Project and Draft EIR met and exceeded the requirements of CEQA.

The document was made available at eight local libraries, the County Public Works headquarters, and online. In addition, CDs with the documents were made available upon request, and printed copies were made available for purchase at County Public Works headquarters for interested parties.

Per CEQA, "To make copies of EIRs available to the public, Lead Agencies should furnish copies of draft EIRs to public library systems serving the area involved. Copies should also be available in offices of the Lead Agency."

Noticing for the Proposed Project went beyond that required by CEQA Guidelines. The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the LACDPW website

Re: Public Comment on Devil’s Gate Reservoir Sediment Removal DEIR 2014 January 21

To: Director Gale Farber, L.A. County Dept of Public Works

The Devil’s Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report is inadequate because it does not fulfill its mandate. A legitimate DEIR must address the reasonable, legitimate questions and concerns raised by the people who live, work and play in the surrounding communities.

After years of local government meetings, kitchen table dialogues and online conversations, regarding the Devil’s Gate Reservoir, also known as Hahamongna Park, the community’s concerns remain, and repeated questions go unanswered:

What are the potential impacts and possible mitigations regarding the unique educational, natural, outdoor experience and exercise that Hahamongna Park provides such as nature walks, birdwatching, horse-riding, hiking?

What are the potential impacts and possible mitigations regarding the specific forms of health hazards from pollution; specifically the consequences of upturning, dispersing and transporting decades-buried debris: dust, invasive organisms, metals, and other chemicals?

What are the potential impacts and possible mitigations regarding Hahamongna Park’s significant, extensive ecosystem, watershed, view-shed, soil micro-organisms and habitat for plants and wildlife?

What are the potential impacts and possible mitigations regarding the many ongoing Regional projects aimed at protecting what little remains of our recreational trails, urban parks, seasonal wetlands, and wildlife corridors?

What are the potential impacts and possible mitigations regarding the noise, fumes and traffic of earthmoving vehicles operating all day, everyday?

Finally, where are the studies of smaller-scale, alternatives wrt this flood control basin, which the community has repeatedly asked for in meetings and comments?

Additionally, there are many large and small omissions and inaccuracies in the Draft Environmental Impact Report, including:

Lack of analysis of smaller-scale, less impactful alternatives.  
Baseless assumptions regarding the risk of smaller-scale alternatives.

Inadequate survey of wildlife, habitat and ecosystems.  
Characterizations of healthy deciduous trees in winter as “dead.”

Inadequate mitigation plan for replacement of urban/wild parkland.  
Effects of short-sighted flood control policies on water quality, beach erosion, carbon emissions and other longer range, bigger picture issues.

Bev A Huntsberger, Altadena CA.  
(626) 398-5607. bev@phlogiston-inc.com

## **Response to Comment Letter #217 (Bev Huntsberger)**

### **Response to Comment 217-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As discussed in Section 1.0 of the Draft Environmental Impact Report (EIR), the purpose of the California Environmental Quality Act (CEQA) is to disclose to decision makers and to 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. The Draft EIR fulfills this purpose.

This Response to Comments Section of the Final EIR responds to questions and concerns raised by the public. Per CEQA, scoping comments are not required to be responded to in the EIR. Only comments received during the Draft EIR Public Review Period are required to be responded to, and these responses are included in this Response to Comments document. The scoping comments were taken into consideration when drafting the Project Alternatives and analyzing the project impacts.

### **Response to Comment 217-2:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days. Therefore, the maximum impacts to the recreational users of Hahamongna Watershed Park would be much shorter than the five year duration of the sediment removal phase of the Proposed Project.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the

maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 217-3:**

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related acute short-term and long-term impacts.

**Response to Comment 217-4:**

The project impacts to biological resources can be found in the Draft EIR, Section 3.6 Biological Resources. Impacts were found to be less than significant with the incorporation of Mitigation Measures MM BIO-1 through MM BIO-8, which include both monitoring and habitat restoration.

**Response to Comment 217-5:**

See Response to Comment 217-2 and 217-4.

As discussed in Section 3.12 of the Draft EIR, Mitigation Measure MM LAN-1 reduces the temporary impacts to trails during the sediment removal period. Once sediment removal is complete, the reservoir will be reopened for recreational use. None of the designated trails will be permanently impacted; thus, no mitigation measures are required for permanent impacts. Also, the Proposed Project would not contribute to cumulative impacts to future and reasonably foreseeable projects.

**Response to Comment 217-6:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Air quality and noise impacts were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study

and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**Response to Comment 217-7:**

See Response to Comment 217-2. LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

LACFCD analyzed alternatives to the Proposed Project in the Draft EIR, Section 4.0 Alternatives Analysis. The Draft EIR analyzed a range of sediment removal amounts that would obtain the two DDEs. The analysis concluded that Alternative 3, Configuration D was the Environmentally Superior Alternative that would reduce impacts while still meeting Proposed Project objectives. Removing less sediment would not provide the capacity necessary to achieve the Proposed Project objectives.

**Response to Comment 217-8:**

LACFCD notes that the commenter believes there are many omissions and inaccuracies in the Draft EIR. The specific comments have been responded to below.

**Response to Comment 217-9:**

See Response to Comment 217-7. Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project

but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” However, “[a]n EIR is not required to consider alternatives which are infeasible” (CEQA Guidelines Section 15126.6(a)) or “which could change the fundamental nature of the proposed project.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm. (1993)* 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project’s significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency (1991)* 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council (1991)* 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project.

**Response to Comment 217-10:**

See Response to Comment 217-2.

In Section 3.6.1, first paragraph, that statement was referring to the 2011 survey results, “As discussed above, in 2011 these resources were severely impacted by sediment deposition. Most of the vegetation and trees on the Proposed Project site were dead, washed out, or buried under sediment, reducing the amount and quality of vegetation communities and wildlife habitat.” However, immediately following that statement, it continues, “Since publication of the NOP, some of the vegetation and trees have re-established, improving the amount and quality of vegetation communities and wildlife habitat of the Proposed Project site. In order to achieve a more conservative analysis of the potential impacts to biological resources from the Proposed Project, 2013 conditions were also taken into account.” Therefore, the information presented is correct and does not warrant a change.

Table ES-1 of the Draft EIR, lists all 17 of the Mitigation Measures proposed for the Proposed Project. These Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The list of feasible Mitigation Measures is common to CEQA and accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), United States (U.S.) Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404

(b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

**Response to Comment 217-11:**

The Draft EIR analyzes carbon emissions in Section 3.9 Greenhouse Gas Emissions; impacts were found to be less than significant. The Draft EIR analyzes water quality in Section 3.11 Hydrology and Water Quality; impacts were found to be less than significant. The Proposed Project will not decrease the current amount of sediment that flows downstream and therefore would not contribute to the erosion of beaches. Also, as noted in the Sediment Management Strategic Plan (SMSP), "Without human intervention, most Southern California beaches would naturally be narrow and rocky. The wide beaches in Southern California were created and have been maintained by various agencies through artificial beach nourishment projects (also referred to as beach fill projects) and the construction of protective coastal structures since the 1930s." In addition, the SMSP states "Since the Los Angeles River changed course in 1825, the largest waterway reaching this region of the coast is Ballona Creek, which has an estimated annual sediment yield of less than 50,000 cubic yards and delivers generally fine-grained sediment that is not appropriate for beach nourishment."

For more information see: <http://dpw.lacounty.gov/lacfd/sediment/dcon/429.pdf>

**From:** [Dana Kennedy](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's gate EIR  
**Date:** Tuesday, January 21, 2014 1:03:59 PM

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To Los Angeles County Department of Public Works:

As residents of Altadena with a home situated on the edge of an eroding hillside above Hahamongna, we are very concerned about the County's proposed plan to clean out the Arroyo and Hahamongna above Devil's Gate Dam. We are also long-time users of the Park, and do not wish to see its habitat destroyed. We are also VERY concerned about the noise and air pollution that will result from thousands of trucks entering and exiting the park daily for years, not to mention what effect all of that motion may have on the surrounding hillsides. We are strongly opposed to this plan as it stands.

Thank you,

Barbara B. Minton  
Dana B. Kennedy  
Julian Becerra  
Altadena, CA

Comment 218-1

## **Response to Comment Letter #218 (Dana Kennedy)**

### **Response to Comment 218-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's opposition to the Proposed Project.

The Proposed Project involves the removal of accumulated sediment in the Devil's Gate reservoir deposited from stormflows and would not involve or contribute to erosion to surrounding hillsides. As discussed the Geology and Soils subsection Section 3.8.6 of the Draft Environmental Impact Report (EIR), "disturbed sediments are more susceptible to erosion; however, as discussed above in Air Quality, these impacts will be reduced to less than significant through implementation of [Southern California Air Quality Management District] SCAQMD Rule 403 and BMPs." Additionally, sediment removal activities will not be close enough to the toe of the slope on the east side of the reservoir to cause any slope stability issues.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed. Impacts to biological resources would be less than significant.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**From:** [Dave Doody](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Comment: Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 3:44:20 PM

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Gail Farber, Director  
Los Angeles County Department of Public Works  
Attn: Water Resources Division - Reservoir Cleanouts

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

Dear Ms. Farber:

- Comment 219-1 | I learned very late about the opportunity to comment on the Draft Environmental Impact Report for the Devil's Gate Reservoir Sediment Removal and Management Project.
- Comment 219-2 | Please realize that the Draft Environment Impact Report appears inadequate in that it does not give proper weight to longer-term, more sustainable means of sediment removal such as Flow Assisted Sediment Transport (FAST) which has been proven in this location in the past, and which would obviate much of the expensive, environmentally degrading truck-based removal.
- Comment 219-3 | Further, it does not address the effects the project would have on LA County communities in Altadena situated up the canyons - northward up the Arroyo Seco, Millard, and El Prieto Canyons. The natural marine layer atmospheric flow would carry intolerable amounts of noise and probably substantial dust into these residential areas.
- Comment 219-4 | The DEIR also seems to inadequately incorporate long-term biological survey data. I also have concerns about the impact of the extensive trucking on the nearby roads and freeways, which are saturated now at
- Comment 219-5 | rush hour.
- Comment 219-6 | Please respond to this question: Would it be possible to further extend the deadline for public comment? It has only lately come to my attention, and I am in contact with many others who have no idea that the DEIR exists, nor that they have (had) an opportunity to review and comment.

Thank you.

Regards,

Dave Doody  
4239 Canyon Crest Road  
Altadena,  
CA 91001  
626.398.5133  
[dave@SpacecraftKits.com](mailto:dave@SpacecraftKits.com)

**Response to Comment Letter #219 (Dave Doody)**

**Response to Comment 219-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 219-2:**

Flow Assisted Sediment Transport (FASTing), a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft Environmental Impact Report (EIR) for more information on future maintenance.

**Response to Comment 219-3:**

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

The geography was analyzed prior to the performing of the noise calculations provided in the Draft EIR, and it was determined that the geography would have a minimal effect of the nearest homes and other sensitive receptors to the project site. According to California Department of Transportation (Caltrans) Technical Noise Supplement, it is theoretically possible that narrow canyons with steep slopes could result in an increase of noise greater than 3 decibels (dB); however, the slopes would need to be free of vegetation and perfectly vertical. Angled slopes, such as those located at the Proposed Project site, typically do not increase noise levels, since noise reflections are directed skyward. Although temperature and humidity have the potential to affect the propagation of noise, the impacts to noise calculations are typically nominal except for extreme examples, such as the desert with a very high temperature and low humidity, or a very cold and foggy location. Since the climate of Pasadena is moderate, the construction noise was accounted for in the Roadway Construction Noise Model (RCNM) that was utilized in the Draft EIR to calculate the onsite construction noise impacts, and it was accounted for in the FHWA-RD-77-108 model that was utilized in the Draft EIR to calculate the offsite roadway noise impacts. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant.

**Response to Comment 219-4:**

The Draft EIR Biological Technical Report (BTR) and focused surveys provide rigorous existing conditions for biological resources (Draft EIR, Section 3.6; Appendix D, Biological Reports). These reports and related impact analyses were based on thorough field surveys conducted in 2010 and 2013, including

general biological surveys, focused sensitive plant surveys, focused least Bell's vireo and southwestern willow flycatcher surveys, and federal and state jurisdictional waters surveys.

**Response to Comment 219-5:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments, along any of the Haul Routes. Los Angeles County Flood Control District (LACFCD) will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 219-6:**

The California Environmental Quality Act (CEQA) requires that the public comment period for a Draft EIR be at least 45 days (CEQA Guidelines § 21091). LACFCD extended this review period initially to 75 days and then further extended the review period to 90 days to allow for additional commenting time.

The document was made available at eight local libraries, the Los Angeles County Department of Public Works (LACDPW) headquarters, and online. In addition, CDs with the documents were made available upon request, and printed copies were made available for purchase at County Public Works headquarters for interested parties.

Noticing for the Proposed Project went beyond that required by CEQA Guidelines. The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the LACDPW website

**From:** [Edwina Travis Chin](#)  
**To:** [reservoircleanouts](#)  
**Subject:** DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT  
**Date:** Tuesday, January 21, 2014 1:51:14 PM

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January 21, 2014

To: County of Los Angeles Department of Public Works / Water Resources Division  
Attn: Reservoir Cleanouts Program

Re: DEVIL'S GATE RESERVOIR SEDIMENT REMOVAL AND MANAGEMENT PROJECT

To Whom It May Concern:

Comment 220-1 | I am writing to comment on the Draft Environmental Impact Report that has been submitted by the Los Angeles County Department of Public Works regarding sediment removal in the Hahamongna Watershed Park.

Comment 220-2 | I feel that this massive sediment removal plan has failed to adequately address community concerns regarding impacts on natural habitat, air pollution, recreational opportunities and traffic . Additionally, I do not feel that the EIR looks at the overall potential long-term impacts on the site past the initial five-year project period.

Comment 220-3 | As the saying goes, "if all you have is a hammer, everything looks like a nail". In this case, using the lens of sediment removal and flood control to look at the Devil's Gate project has resulted in an EIR report that does not fully take into consideration the importance that this site holds for the local community. Rather, conditions and attributes the community sees as resources (vegetation & wildlife) within the project area are instead presented by the report as impediments.

Comment 220-4 | The area north of Devil's Gate is one of the few remaining significant open space areas in the city of Pasadena, and is important not only for flood control, but also as one of our major wildlife habitat and recreational areas. In recent years, Pasadena has renewed and strengthened its commitment to preserving our natural environment through the adoption of the Arroyo Seco Master Plan, the Open Space Element of the General Plan, and adoption of the UN Urban Environmental Accords. These documents also commit the city to reducing the impacts of vehicular traffic and greenhouse gases.

Comment 220-5 | My main areas of concern that I would like to bring to your attention are Traffic, Air Quality, Recreation, Hydrology and Natural Environment.

Comment 220-6 | **TRAFFIC AND AIR QUALITY**  
The EIR calls for an incredibly high volume of truck traffic: 25 round trips per hour, equaling 425

round trips per day. This would take place for at least 9 and up to 12 hours a day, for 6 days a week. The months of operation would extend from April through December, but could be extended beyond that 7 month period if the weather is dry. All of this would continue for a period of 5 years. The sheer number of trips by heavy machinery will have an adverse affect on our local and regional air quality and affect traffic patterns. The resulting commuter traffic jams created by the increased truck traffic have not been factored into the potential impact on decreased air quality.

Comment 220-6  
continued

### **RECREATION**

The truck traffic and sediment removal machinery will make it almost impossible to use the Hahamongna basin for recreational purposes in the way for which this area was originally intended. Not only will there be noise and dust, but the work will be taking place 6 days a week during the daytime hours when people would be most likely to want to use the area for various outdoor activities. People visit this area to enjoy the scenery, appreciate the relative quiet, and listen to the birds – the sound of heavy machinery would destroy this experience. While there are other recreation areas listed as alternatives to the Hahamongna Basin, the EIR fails to acknowledge the unique experience and environment that this particular site offers, and which is not to be found at any of the other sites. Additionally, with the scraping out of 50 – 120 acres in the middle of the basin, the overall impact of the outdoor experience will be greatly altered.

Comment 220-7

### **HYDROLOGY**

In addition to the Devil’s Gate Reservoir area being important for flood control, it is also an important water storage area for the city of Pasadena. Vegetation cover can help with water infiltration and contribute to increased water retention. Bare earth loses some of this ability to absorb and store water when it is allowed to dry out completely, which would be the result of the intense scraping that is planned. Given the importance of maintaining and protecting our local water supplies, regularly scraping large swaths of vegetation is not the most effective way of managing our water supplies.

Comment 220-8

Tim Brick of the Arroyo Seco Foundation proposes a “Go Slow, Go With The Flow, Let The Habitat Grow, Keep Costs Low” approach. He suggests spreading the sediment removal process over a longer period of time (10 – 20 years), so that a less destructive way of cleaning out the basin can be used instead. By utilizing sluicing (Flow Assisted Sediment Transfer) rather than trucking all of the sediment out, the truck traffic and accompanying problems can be reduced, and the sediment that flows downstream can help replenish the beaches where it is needed. The natural riparian areas should be allowed to grow and continue to serve as a home for local flora and fauna. All of these above practices can help to amortize the costs over a longer period of time, potentially reducing costs of the project. By extending the project, there are opportunities to reexamine the process from economic, engineering and environmental standpoints and then adopt best practices .

Comment 220-9

### **NATURAL ENVIRONMENT**

Some of the questions used by the California Governor’s Office Of Planning and Research in CEQA review is the publication “Thresholds of Significance: Criteria for Defining Environmental

Comment 220-10

Comment 220-10 continued Significance (OPR 1994), which includes the following:

Will this project substantially degrade the environmental quality of the existing wildlife habitat?

Comment 220-11

Under the EIR "Biological Resources" section 3.6, Figure 3.6.2 shows that 51.4 acres is Riparian Woodland (which represents over 40% of the project area.) Riparian Woodlands are relatively rare in California, comprising less than 1 percent of California's total forest acreage, yet they support one of the most diverse communities of plants and animals. All of the EIR proposed alternatives would destroy most (if not all) of the Riparian Woodland habitat within the 120 acre project area. Where is the scientific data to support this level of habitat destruction and degradation? Given this habitat's relative rarity in California, why would we be so eager to destroy it?

Comment 220-12

Will this project threaten to eliminate a plant or animal community?

There are large portions of the project area that would be scraped to bare earth on a regular basis, permanently removing all vegetation and eliminating those areas as habitat for the native and migratory animal communities.

Comment 220-13

Will this project reduce the numbers or range of a rare, threatened or endangered species?

There have been sightings in the Hahamongna basin of the Yellow Warbler (a "State species of special concern") and the Least Bell's Vireo (a federally endangered species). These species are not likely to revisit the area if the proposed destruction of the willow forest area (part of the Riparian Woodlands) is allowed to take place. Also present is the two-striped garter snake which is also a State species of special concern.

Comment 220-14

Will this project achieve short-term goals to the disadvantage of long-term goals?

Because there is such an emphasis on getting a huge amount of sediment removed in relatively short period of time, I feel that this proposed plan is more of a "slash and burn" approach, resulting in extensive damage to the existing plant and animal communities. There is nothing in the report explaining the reasoning behind a five-year project timeframe, nor is there anything in the report that would preclude having the work take place over a longer period of time, with a less drastic scouring of the project area. There is also minimal information on the plans for long-term maintenance, and no indication that there will be the opportunity to regularly review the effectiveness of the maintenance plan to make adjustments as needed.

Comment 220-15

**Will this project have environmental effects that are individually limited – but cumulatively substantial – when viewed in the context of past, current and reasonably anticipated future projects?**

If the focus is on moving dirt and water, then at first glance, the project appears to accomplish its objectives. However, as pointed out previously, there are a number of other factors that are important to the community and which need to be taken into consideration. Under "Section 5 – Other CEQA Considerations" the EIR has listed "significant unavoidable impacts" related to aesthetics, air quality and traffic. Additionally, the EIR states that that "Recreation impacts are less than significant", which I have already disputed above. Lastly, Pasadena already has the Arroyo Seco Master Plan, Hahamongna Master Plan, Open Space Element of the General Plan, and has adopted the UN Urban Environmental Accords and designated this site as "Natural Open Space." It is not clear from the EIR that this proposed plan complies with the objectives and guidelines in the

Comment 220-15 continued Pasadena city documents. As Pasadena is the owner of the property, I feel that consistency with the city's plans is crucial.

Comment 220-16 It is important to note that the Environmental Advisory Commission for the City of Pasadena feels so strongly about the shortcomings of the Devil's Gate Reservoir EIR that they wrote a memo to the Pasadena City Council urging them to meet with LA County to address a number of concerns, including the ones raised in this letter and many other points.

Comment 220-17 I agree that flood and sediment control in the Devil's Gate Reservoir area is an important issue of public safety. However, I don't feel that any of the plan alternatives presented in the current draft EIR do an adequate job of explaining why the sediment removal plan calls for such extensive and drastic removal of existing flora and fauna and why mitigation measures presented are often nebulous (and frequently not listed as being necessary at all.)

Comment 220-18 I would encourage the LA County of Public Works to address the following:

Comment 220-19 · Address the gaps in this report regarding the scientific justification for the numbers in the EIR, particularly with regard to the amount of sediment removal being recommended and the proposed timetable.

Comment 220-20 · Consider the alternate "Go Slow, Go With The Flow, Let The Habitat Grow, Keep Costs Low" work plan suggested by Tim Brick of the Arroyo Seco Foundation.

Comment 220-21 · Work with the City of Pasadena to come up with a long-term plan for the Hahamongna Watershed Park that will be more environmentally sensitive and consistent with Pasadena's existing Arroyo Seco Master Plan, Hahmongna Master Plan, Open Space Element of the General Plan and the area's zoning as Natural Open Space.

Thank you for your consideration of the above.

Sincerely,

Edwina Travis-Chin  
1398 N. Sierra Bonita Ave.  
Pasadena CA 91104

**Response to Comment Letter #220 (Edvina Travis Chin)**

**Response to Comment 220-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 220-2:**

The Draft Environmental Impact Report (EIR) adequately analyzes impacts to natural habitat in Section 3.6 Biological Resources, to air quality in Section 3.5 Air Quality, to recreational opportunities in Section 3.15 Recreation, and to traffic in Section 3.16 Transportation and Traffic. Within each issue analysis, the impacts are discussed in terms of sediment removal phase, which is the initial five-year period, and reservoir management phase, which is after the initial sediment removal and involves the long-term management of the project.

**Response to Comment 220-3:**

Los Angeles County Flood Control District (LACFCD) recognizes the importance of the reservoir to the community, and the Draft EIR analyzes impacts to the vegetation and wildlife. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 220-4:**

See Response to Comment 220-3. LACFCD recognizes that the reservoir is not only important for flood control but is also a significant open space area where unique habitat and wildlife are present. Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP. As discussed in the Draft EIR,

Section 3.12.6, Land Use and Planning, the Proposed Project will not have any significant impacts or conflict with the applicable land use plans, policies, or regulations of adopted plans.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact.

Per Section 3.9.6 of the Draft EIR, impacts to greenhouse gas emissions were found to be less than significant, and impacts to biological resources were found to be less than significant with mitigation incorporated as shown in Section 3.6.6 of the Draft EIR.

**Response to Comment 220-5:**

LACFCD notes the commenter's main areas of concern. The specific comments have been responded to below.

**Response to Comment 220-6:**

See Response to Comment 220-4. The Draft EIR traffic analysis provided conservative roadway condition volumes that accounted for peak hours, expansion and regional growth within the study area. Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts,

depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 220-7:**

See Response to Comments 220-4 and 220-6. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant.

**Response to Comment 220-8:**

As stated in the Draft EIR, the Proposed Project will remove accumulated sediment deposits within the reservoir. This means the percolation characteristics of the reservoir will return to pre-Station Fire conditions if not improve; and the reservoir will still permit penetration of rainfall and percolation of local runoff to replenish the groundwater basin. Sediment removal will restore Devil's Gate Reservoir to its current design standard of the ability to contain two design debris events (DDEs). As such, the reservoir will have the ability to contain more of the local runoff, which in turn could result in more runoff penetrating into the ground in the Proposed Project area and subsequently recharging the groundwater basin. In addition, by keeping the reservoir clear of future sediment deposits, the Proposed Project will reduce the potential for accumulated sediment to negatively impact the percolation rate.

**Response to Comment 220-9:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) selected Alternative 3 as the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**Response to Comment 220-10:**

The Draft EIR used the 2013 California Environmental Quality Act (CEQA) Statutes and Guidelines Thresholds, which include significance thresholds similar to those mentioned in the commenter's letter.

**Response to Comment 220-11:**

See Response to Comment 220-3.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two DDEs below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Sediment removal will restore Devil's Gate Reservoir to its current design standard of the ability to contain two DDEs. If the reservoir is left in its current state, the flood risk to downstream communities would remain at an unacceptable level. In order to remove the necessary amount of sediment from the reservoir, some vegetation must be removed, as the vegetation sits atop many layers of accumulated sediment.

**Response to Comment 220-12:**

See Response to Comment 220-3. Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur

only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.

The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant.

**Response to Comment 220-13:**

See Response to Comments 220-3 and 220-12. Impacts to rare, threatened, or endangered species are discussed in Section 3.6 Biological Resources, under BIOLOGY-1.

**Response to Comment 220-14:**

See Response to Comment 220-11.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

After the sediment removal phase has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 220-15:**

Response to Comments 220-4 and 220-6. The Draft EIR analyzes cumulative impacts under each of the impact area discussions. The cumulative analysis contains projects determined by LACFCD and the surrounding cities and communities to have a potential cumulative effect due to overlapping time frames of the projects. Potential projects that were determined to be outside the area of influence or sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130. As noted in the Draft EIR, Section 3.4, Aesthetics, the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

**Response to Comment 220-16:**

A comment letter was received from the City of Pasadena and is included in this Response to Comments document.

**Response to Comment 220-17:**

See Response to Comment 220-11, above. Table ES-1 of the Draft EIR, lists all 17 of the Mitigation Measures proposed for the Proposed Project. These Mitigation Measures are enforceable and designed to reduce impacts through methods known to be feasible and effective. The Proposed Project's Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. Mitigation measures are implemented for impacts that are potentially significant. Therefore, impacts that are less than significant do not require mitigation.

**Response to Comment 220-18:**

The specific comments have been addressed below.

**Response to Comment 220-19:**

See Response to Comments 220-11 and 220-14.

**Response to Comment 220-20:**

See Response to Comment 220-9.

**Response to Comment 220-21:**

See Response to Comment 220-4.

**From:** [Grace Wang](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 5:02:07 PM

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To: Gale Farber, Director, Department of Public Works  
Christopher Stone, Assistant Deputy Director, Water Resources Division  
ATTN: Reservoir Cleanouts Program  
P.O. Box 1460  
Alhambra, CA 91802-1460

Hi Director Farber,

I fully support the comments made by the Pasadena Audubon Society and oppose the current plan for the following reasons:

- Significant Increases in Air and Noise Pollution
- Permanent Loss of Significant and Critical Habitat
- Absent or Inadequate Mitigation of Habitat Loss

Especially of concern is the inadequacy of the biological section of the report. Of specific concern are raised by the following questions:

Why does the list of birds not include the 150+ other species we know to be there? Where are maps that show the nesting areas of Yellow Warbler? Why does the report confuse current and former names for species such as the Western Toad AKA California Toad? Why does the report not refer to the Coast Patch-nose Snake as a federally listed snake and as a California Species of Special Concern? Why does the report ignore the fact that a federally-listed bird species, the 'Least' Bell's Vireo, nested in the basin in 2012? Why did the biologists not consult organizations, such as ours, that regularly conduct surveys in Hahamongna? Did the biologists consult with the California Native Plant Society regarding plant species of Special Concern? Why does the report ignore the County's designation of Hahamongna Watershed Park as a Significant Ecological Area?

Thank you for your attention.

Grace Wang

## **Response to Comment Letter #221 (Grace Wang)**

### **Response to Comment 221-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Mitigation Measures BIO-1 through BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. These mitigation measures are common to the California Environmental Quality Act (CEQA) and accepted by agencies that would be involved in consultation, negotiation, and final approval of mitigation measures, including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two

branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 221-2:**

Many local organizations, including the Pasadena Audubon Society, Hahamongna Watershed Park Advisory Committee, the Urbanwild Network, and the Arroyo Seco Foundation, were contacted about the Proposed Project prior to the Draft EIR being prepared. In January 2012, a representative of the Pasadena Audubon Society was contacted for information the Society has concerning birds observed in the Proposed Project area. The information provided was used in preparing the biological resources section of the Draft EIR. Species with the potential to occur within the Proposed Project and species that were identified during surveys are presented in the biological survey reports in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records and species lists of occurrence were used as additional data; but since these are positive-sighting databases, this data was used only in support of the analysis from the previously identified factors. Based on the results of the Biological Technical Report (BTR), additional protocol level focused surveys were conducted for Proposed Project as described in Section 3.6.2, Special Status Plant Species and Special Status Animal Species of the Draft EIR.

As shown in Table 3.6-3 in the Draft EIR, both least Bell's vireo and yellow warbler are listed as present within the Proposed Project site. Additional sightings will not affect their status as present, which was accounted for in the Draft EIR within the Proposed Project site, and do not add any additional constraints to those mentioned in the analysis in the Draft EIR. The species recorded during surveys specifically for the Proposed Project are presented in the (BTR in Appendix D of the Draft EIR. The coast patch-nosed snake was observed on site, and the state and federal status has been included in the Draft EIR. As discussed in the Draft EIR, Section 3.6.6, Sensitive Wildlife, to avoid harm or take of any special status wildlife species, mitigation measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will be implemented. These include preconstruction surveys, having a biological monitor on site during construction, and measures to avoid impacts to sensitive species. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant.

Species names used in the Draft EIR were consistent with the Hahamongna Watershed Park Master Plan (HWPMP) by request of the City of Pasadena to maintain consistency with the HWPMP. Species names have been updated, and duplications of species have been eliminated in the Final EIR. Status listings for sensitive species have been updated, as appropriate.

The Proposed Project is not located in a currently adopted Significant Ecological Area (SEA). The Los Angeles County Department of Regional Planning is currently in the process of updating the SEA Program. The Proposed Project is located within the Proposed Altadena Foothills and Arroyos SEA. Regional Planning's SEA updates, including the Proposed SEAs, have not been adopted, nor are they covered under the current Hillside Management Area and SEA Ordinance.

Nevertheless, the SEA does not change the land use designation or the zoning of a property. The intent of the proposed SEA regulations is not to preclude development but to allow limited, controlled development that does not jeopardize the unique biotic diversity within the County. Under the Ordinance for the Proposed SEA, safety activities and existing permitted uses are exempt.

As discussed in the Draft EIR, Section 3.12.6, Land Use and Planning, the Proposed Project will not have any significant impacts or conflict with the applicable land use plans, policies, or regulations of adopted plans.

**From:** [Joyce Dillard](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Comments to Devil's Gate Reservoir Sediment Removal and Management Project due 1.21.2014  
**Date:** Tuesday, January 21, 2014 4:06:30 PM

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The projects removal percentages for the Alternatives are:

Proposed A-70.94%  
Proposed B-70.25%  
Proposed C-110.65%  
Alternative 1-70.25%  
Alternative 2-110.65%  
Alternative 3-67.59%  
Alternative 4-71.03%

There is not enough differential information to conclude that there are true alternatives.

Cost benefit factors are missing as are operations and maintenance factors outside the capital cost.

We disagree and believe the following factors need analysis for this report:

Agriculture and Forest Resources  
Public Services (fire protection, police protection, schools, and other public facilities)

The following should be analyzed in relationship to growth, recreationally and land use and the effects of flooding:

Population and Housing

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031

## **Response to Comment Letter #222 (Joyce Dillard)**

### **Response to Comment 222-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” However, “[a]n EIR is not required to consider alternatives which are infeasible” (CEQA Guidelines Section 15126.6(a)) or “which could change the fundamental nature of the proposed project.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.* (1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the Environmental Impact Report (EIR) must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project’s significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

### **Response to Comment 222-2:**

Under CEQA, the lead agency is not required to analyze an economic impact associated with a project in the EIR; as Section 15131(a) of the CEQA Guidelines states: “Economic or social effects of a project shall not be treated as significant effects on the environment.” Moreover, CEQA allows economic analysis in the administrative record only if the basis for infeasibility, and thus rejection of a mitigation or alternative, is economic, as described in CEQA Guidelines Sections 15091(a)(3) and 15364.

### **Response to Comment 222-3:**

The Draft EIR for the Proposed Project is a full EIR; the only issues not covered in the Draft EIR were issues identified as not significant environmental issues during the Initial Study/Notice of Preparation phase, in order to narrow the focus of the EIR as directed under CEQA Guidelines Section 15063. See Appendix A of the Draft EIR.

These impact areas were scoped out during the Initial Study process. As noted in Appendix A of the Draft EIR, 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. In addition, the Proposed Project site does not contain any forest land or timberland.

In addition, as noted in Appendix A of the Draft EIR, 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. No impacts associated with the need for new or expanded schools are anticipated to result from project implementation, as levels of populations will not be affected; thus, no new schools will need to be built as a result of the proposed project that would cause significant environmental impacts.

**Response to Comment 222-4:**

This impact area was scoped out during the Initial Study process. As noted in Appendix A of the Draft EIR, the Proposed Project involves restoration and maintenance of the existing reservoir and would not stimulate population growth. Recreation and land use are addressed in the Draft EIR in Section 3.15 Recreation and Section 3.12 Land Use and Planning.

As noted in Appendix A of the Draft EIR, 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.

**From:** [Kiley Akers](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Hahamongna / Devil's Gate - A more sustainable plan is needed.  
**Date:** Tuesday, January 21, 2014 4:05:55 PM

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Comment 223-1 | I'm writing to you with regard to saving the Hahamongna Watershed and the proposed sediment removal project put forth by the L.A. County DPW.

I'm of the opinion that sediment can be removed in a more sustainable fashion than what is being suggested by the DPW. The thought of losing habitat, animals, recreation and precious open space is heart breaking.

Comment 223-2 | I also am concerned about the pollution (noise and air) and congestion that may very well result from the proposed project. Two schools are adjacent to Hahamongna.

Comment 223-3 | I am a runner and Coach with Team in Training ( [www.teamintraining.org](http://www.teamintraining.org) ). In a nutshell we train for endurance events and raise funds for The Leukemia and Lymphoma Society. We are in Hahamongna Watershed Park training almost every Saturday. The soft trails free of cars are appreciated. I personally train in the area at least a few times a week. I see many others out their enjoying the space and it's beauty (equestrians, hikers' dog walkers, young people, older people etc.)

Comment 223-4 | My hope is that a more sustainable approach will be taken to remove sediment from behind Devil's Gate. The one proposed by DWP seems too aggressive and destructive to this valuable open space that many enjoy and value. Go slow and go with the flow.

Respectfully,

Kiley Akers

## **Response to Comment Letter #223 (Kiley Akers)**

### **Response to Comment 223-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's opinion that sediment can be removed in a more sustainable fashion.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside of the Proposed Project area or to reestablish once sediment removal activities have been completed.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

### **Response to Comment 223-2:**

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has

conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 223-3:**

See Response to Comment 223-1.

**Response to Comment 223-4:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) selected Alternative 3 as the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**LINDA VISTA-ANNANDALE ASSOCIATION  
P. O. Box 94364  
Pasadena, CA 91109**

**January 20, 2014**

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

**From: Linda Vista-Annandale Association (LVAA)**

**Contact: Nina Chomsky, President; email: president@lvaa.net**

**RE: Comments: Draft Environmental Impact Report for Devil's Gate Reservoir  
Sediment Removal and Management Project**

The Linda Vista-Annandale Association (LVAA) appreciates this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Project entitled Devil's Gate reservoir Sediment Removal Management Project.

Incorporated in 1930, LVAA is a California non-profit, mutual benefit corporation, tax exempt under IRC Section 501(c)(4), and corresponding California law. LVAA is dedicated to the preservation, protection, improvement and development of the Linda Vista~Annandale neighborhood area of Pasadena, and to the promotion of the general welfare of Linda Vista~Annandale residents. LVAA is registered with the City of Pasadena as a recognized neighborhood association.

The Linda Vista~Annandale area consists of roughly 2.5 square miles, extending from the west bank of the Arroyo Seco to the western City of Pasadena limits, and from the Devil's Gate Dam and the 210 Freeway on the north to the 134 Freeway on the south. The Linda Vista-Annandale area runs continuously along the Western edge of

Comment 224-1  
continued

the Central Arroyo portion of the Central Arroyo, and is immediately adjacent to the Rose Bowl.

The neighborhood includes, and LVAA represents, approximately 1,350 single-family homes.

Comment 224-2

**1. Project Description.** The Project description is legally inadequate in that it includes apparent inaccuracies, inconsistencies, and is incomplete, as to the necessary project scope. There are apparently inaccurate, inconsistent or incomplete statements in a number of official LACDPW documents and public meetings and hearings regarding the amount of sediment that will be removed and the remaining capacity for sediment placement behind the dam. It is apparent that the justification for the project, the quantity of sediment to be removed, and the excavation acreage are in dispute. Reference is made to the Comment Letter submitted by Friends of Hahamongna dated January 19, 2014, for a detailed analyses of the apparent inaccuracies, inconsistencies and incomplete aspects of the Project description which make it impossible for the public and decision makers to determine from the DEIR what exactly is the current Dam capacity; what exactly is the current risk of downstream flooding, and, what exactly is the amount of sediment that must be removed to meet Project objectives. Without accurate and reliable information, decision makers cannot determine downstream public safety while preserving and maintaining Hahamongna as well as the communities and residential neighborhoods surrounding the Arroyo Seco by reducing and mitigating significant project impacts.

Comment 224-3

**2. Project Alternatives.** It should be noted that LVAA accepts the proposition that it is necessary to remove sediment from behind Devils Gate dam. However, the DEIR does not identify and analyze a truly environmentally superior alternative, and, therefore, is deficient in that it fails to propose and evaluate alternatives in a legally adequate manner.

Comment 224-4

First, the alternatives section is extremely confusing and difficult to follow. Each alternative is considered separately and its environmental impacts are divided into issue

Comment 224-4  
continued

areas. Despite the 350 page length of the Alternatives section, there is no simple, straightforward narrative discussion which compares and contrasts understandably the several alternatives so that the public and decision makers can make an informed decision as to which alternative would be best. The DEIR alternative described as the Environmentally Superior Alternative gets two short paragraphs and no discussion as to why it was not chosen by the County as the Preferred Project. In the final EIR, all alternatives must be presented in a format which allows the reader to easily compare the environmental impacts of the alternatives.

Comment 224-5

The least objectionable of the alternatives proposed in the DEIR is Alternative 3 (Configuration D), referred to in the DEIR as the Environmentally Superior Alternative. In light of considerable evidence in the public record, however, it is clear that there are far more superior alternatives meeting the project objectives which should be considered in the final EIR.

Comment 224-6

A possible, although less environmentally desirable, non-DEIR alternative would be for LACDPW to return to its initial proposal to remove 1,670,000 cy of sediment which would scour only 50 acres and keep permanently cleared only 15 acres. There is ample evidence in the public record that Flood Control believed this plan to be sufficient to provide flood protection to the downstream communities despite the far more damaging alternatives now proposed in the DEIR.

Comment 224-7

Further, the DEIR fails to consider other possible less impactful alternatives. Los Angeles County's own documents and their historical removal of sediment in the basin prove that a slower, more environmentally sensitive approach can keep the downstream areas safe. LACDPW has never removed more than 750,000 cy of sediment at one time from behind Devil's Gate Dam and yet the downstream communities have been safe for 75 years. In 1977, the year that 750,000 cy of sediment was removed, the amount of sediment in storage was 3.9 mcy or about the same amount in storage now per public record information. Based on the historical record, a sediment removal alternative should have been developed and considered for the removal of a maximum of 750,000 cy of sediment. Removing this amount of sediment along with increased

Comment 224-7  
continued

sluicing and extending the timeframe would meet the stated project goals while reducing the level of impacts and would conform to the goals and objectives stated in the City of Pasadena’s Hahamongna Watershed Park Master Plan (HWPMP). This alternative would also provide for a slow, ongoing process of sediment removal which would avoid the kind of massive, environmentally destructive project now proposed.

Comment 224-8

LVAA joins other community groups in supporting a sediment removal alternative that would phase the removal of sediment over a much longer period of time, remove only the amount of sediment that is necessary, make more use of strategic sluicing, destroy a much smaller area of Hahamongna and cost less. We believe there is a far less impactful alternative that meets the project goals. The concepts advocated by the Arroyo Seco Foundation (ASF) should be used as a basis for the development of a truly environmentally superior alternative. LACDPW must develop a sediment removal plan, preferably in cooperation with impacted jurisdictions, which would promote the multiple goals of the Hahamongna Watershed Park Master Plan rather than addressing only flood control to the detriment of all other purposes served by the Hahamongna park such as habitat preservation and recreation, and to the detriment of adjacent neighborhoods and surrounding communities, particularly the City of Pasadena.

Comment 224-9

LACDPW should make use of the many community suggestions for an effective yet tolerable solution that does not create such a negative impact on the environment and surrounding communities. It is also important the LACDPW take into consideration and fully respect alternatives presented by CEQA Responsible Agencies such as the City of Pasadena.

### **3. DEIR Issues By Category.**

#### **A. Air Quality**

Comment 224-10

Although air quality impacts have been determined to be significant and unavoidable, the impacts have been under-assessed and understated in that the only monitoring performed was at two Source Receptor Areas (SRAs), one in Pasadena, and one in Burbank for the years 2006 through 2011 (Table 3.5-2: Ambient Air Quality Monitoring

Summary). There was no Baseline monitoring for ambient measurements performed on-site or along the transportation routes to sediment placement sites. Since much of the identified air quality impacts are due to diesel exhaust from the trucks and particulate matter (PM) that may be released during the physical destruction/scouring of Hahamongna and the resulting transport, Baseline studies and ongoing monitoring for ambient air quality during the project itself must be performed for all impacted areas. The DEIR air quality impacts and mitigations are also deficient in the following areas:

- Degradation of air quality is a serious public health matter. It is essential that accurate and current baseline studies are conducted and that the EIR accurately state the additional project-related air quality degradation so that decision makers and the public will know the environmental cost of the project on Air Quality. Baseline studies for ambient air quality were performed, for the most part, at an SRA in Pasadena five miles from the project site. For particulate matter (PM<sub>20</sub>) the location for the SRA was in Burbank, eight miles away from the project site and not along the sediment transport routes. In order to appropriately assess the ambient air quality, there should have been baseline study at the site location, and, then ongoing study and mitigation must be required during the project as a specific mitigation measure..

- Further, neighborhood air quality events, such as wildfires that create smoke or large events at the Rose Bowl (including all current proposed “Major Events” at the Rose Bowl including 5-year NFL use) can further degrade air quality. There must be continuous monitoring of the air quality on an ongoing basis during the entire project and when such Major Events occur and, pursuant to adequate mitigation, project-related activities should be suspended if and when the ambient air becomes unhealthy.

- There is limited discussion on mitigating the particulate matter that can and will be released during excavation, loading, and as the sediment is

being transported to sediment placement sites. Although tarps are mentioned as a part of the SCAQMD's Rule 403 standards, there must be a mitigation mandate that appropriate quality tarps are used to cover the truckloads and that best practices for fugitive dust management are implemented. There is also only one water truck proposed for use (DEIR, p. 87). Water trucks in sufficient numbers must be required in the areas of excavation and should be used to water down unpaved access routes. Given that the excavation area is very large, and that there will be up to 425 trucks per day driving on mostly unpaved surfaces, there must be significantly more than one water truck used to minimize fugitive dust.

Comment 224-13  
continued

- According to Table ES-1 of the DEIR, the proposed mitigations may not be possible. The statement under *“Level of significance after mitigation”* is *“Full implementation of these mitigations could be unachievable. Therefore, impact remains significant and unavoidable”*. If mitigation is not possible, it is not legally adequate mitigation. The feasibility of the mitigations must be determined and documented in the final EIR so that decision makers have an understanding of the full impacts on regional air quality.

Comment 224-14

- All actions proposed for the management of particulate matter and fugitive dust, including ongoing monitoring for public health impacts, and the use of tarps and an adequate number of water trucks, must be stated as specific, enforceable, performance-based mitigation measures in the final EIR.

Comment 224-15

**B. Biological Resources.**

The DEIR states that the removal of habitat will have a less than significant impact. Under the proposed project, 120 entire acres of Hahamongna Watershed Park will be completely and permanently cleared of all vegetation, habitat, and candidate, sensitive or special status species. This cannot be described as anything but significant and

Comment 224-16

Comment 224-16  
continued

↑ unavoidable. The DEIR is legally inadequate in that it does not recognize or mitigate significant impacts to Biological Resources.

Comment 224-17

The DEIR does not discuss the fact that Hahamongna Watershed Park is included within the Los Angeles River/Arroyo Seco Corridor, an area the resources of which have been determined “nationally significant through the Rim of the Valley Special Resource Study. The Rim of the Valley Study, spearheaded by Congressman Adam Schiff, studied the significant natural and cultural resources of the mountains encircling the San Fernando, La Crescenta, Santa Clarita, Simi and Conejo Valleys in California. The study, which is ongoing, analyzes two options: the potential creation of a new unit of the national park system or the potential adjustment of the existing boundary of the Santa Monica Mountains National Recreation Area.

Comment 224-18

The DEIR also does not address the long-term impacts of removing up to 120 acres of habitat from the last remaining wildlife corridor connecting the San Gabriel Mountains and the San Rafael Hills and Linda Vista Hills areas which comprise the Linda Vista-Annandale neighborhood. The wildlife corridors which bring numerous species of wildlife and birds into and out of the Linda Vista-Annandale neighborhood support the character and distinctive quality of life of our neighborhood as well as the character of the entire Arroyo from Hahamongna through the Central Arroyo to the Lower Arroyo.

Comment 224-19

According to the 2012 Los Angeles County Department of Regional Planning’s SEA Program the project site is located within the Altadena Foothills and Arroyos Significant Ecological Area (SEA). The Significant Ecological Area (SEA) Program is a component of the [Los Angeles County General Plan Conservation/Open Space Element](#): “SEAs are ecologically important land and water systems that support valuable habitat for plants and animals, often integral to the preservation of rare, threatened or endangered species and the conservation of biological diversity in the County. While SEAs are not preserves, they are areas where the County deems it important to facilitate a balance between development and resource conservation. Development activities in the SEAs are reviewed closely in order to conserve fragile resources such as streams, oak woodlands and threatened or endangered species and their habitat.”

Comment 224-19  
continued

[http://planning.lacounty.gov/assets/upl/sea/2\\_Altadena\\_Foothills\\_Arroyos\\_SEA\\_Spring\\_2012\\_GP.pdf](http://planning.lacounty.gov/assets/upl/sea/2_Altadena_Foothills_Arroyos_SEA_Spring_2012_GP.pdf)

Comment 224-20

Recently, the Arroyo Foothills Conservancy (AFC), announced their on-going efforts to purchase Cottonwood Canyon, a surviving open space area in the Linda Vista-Annandale neighborhood just south of Devil’s Gate Dam, for \$1.6 million , in order to preserve wildlife corridors throughout the San Rafael and Linda Vista Hills, and the Arroyo Seco Canyon, including Hahamongna Watershed Park. The Arroyos & Foothills Conservancy has identified wildlife corridors in the area and Hahamongna Watershed Park as a critical segment of the corridor that allows migration to and from the Angeles National Forest. (See the Corridors Map attached as Exhibit 9 to the Friends of Hahamongna Comment Letter dated January 19, 2014). The proposed project would permanently remove these sections of the corridors that pass through Hahamongna Watershed Park.

Comment 224-21

Since the proposed project will prevent the recovery of any natural vegetation, many species would not return to the area and the wildlife corridor would never recover. Further, through its Master Plans and other planning throughout the Arroyo, Pasadena has made significant investments toward the preservation of unique environmentally sensitive habitat areas. The Final EIR must include specific, performance-based, enforceable mitigations that preserve on-site to the maximum extent feasible the wildlife corridors through Hahamongna as well as all ecologically important habitat for plants and animals.

Comment 224-22

C. Land Use and Planning

The development of the Hahamongna Watershed Park Master Plan (HWPMP) was a years-long collaboration between Pasadena and the community. The Executive Summary of the HWPMP clearly states the goals and guiding principles established by the City that will control the future of Hahamongna. They are as follows:

- *To encourage and promote the stewardship and enjoyment of the Arroyo Seco in Pasadena.*

- *To balance and integrate the interrelated issues of water resources, recreation, natural resource preservation and restoration, and flood management in the Arroyo Seco.*
- *To provide a safe, secure and accessible Arroyo Seco for public enjoyment.*
- *To recognize the importance to Pasadena of the history, cultural resources and unique character of the Arroyo Seco, and to conserve and enhance these assets.*
- *To preserve and acquire open space in or adjacent to the Arroyo Seco.*
- *To recognize that the Arroyo Seco in Pasadena is comprised of distinct geographical areas that are interconnected by a number of resources and features including, but not limited to, water, habitat, geology, recreation, and culture; and that it is part of a larger watershed.*

And the stated Goals include:

- *Preserve, restore, and enhance the native habitats*
- *The Devil's Gate flood control basin will be managed to provide protection to the developed and natural downstream areas.*
- *Conserve and protect the water resources of the Arroyo Seco*
- *Provide diverse recreation opportunities for the Pasadena community*
- *Enrich and promote the unique history and culture of Hahamongna Watershed Park*
- *Provide a safe and secure park*
- *Provide adequate circulation, access and parking*

This project conflicts with a number of the stated Guiding Principles and Goals. It appears that LACDPW is planning for only one of the principles and goals (flood control)

Comment 224-22  
continued

to the detriment of all others. The proposed project, which permanently eliminates natural resources, habitat, wildlife, and much of the recreation, is clearly in conflict with the goals and guiding principles established in the HWP Master Plan.

Comment 224-23

The Hahamongna Watershed Master Plan and MEIR together cost millions of dollars to complete. Capital Improvement funds, grant funds and in some cases, private funds have been set aside and used for project implementation. A number of the completed or proposed projects with the implementation of the proposed project will either be destroyed, rendered useless or eliminated entirely. The DEIR is legally inadequate in that it does not adequately analyze, evaluate and mitigate the conflicts between the project and the HWPMP.

Comment 224-24

LACDPW, in proposing the project, in effect asserts that it has all required legal rights and jurisdiction under the County's Easement with the City of Pasadena to conduct the project. The DEIR is legally inadequate in that it does not include a current Survey establishing the exact boundaries of the Easement and its relationship to the project and all alternatives. The DEIR also is inadequate without a full analysis and evaluation, and, mitigation as necessary, of the legal rights, scope and jurisdiction of the Easement according to its terms, and according to applicable law including applicable California law.

D. Noise.

The Noise section of the DEIR is inadequate in that the Project will expose the Linda Vista-Annandale neighborhood, particularly the northern part of the neighborhood, as well as other residential neighborhoods and the Central Arroyo, to excessive noise that is in violation of CEQA. Specifically:

Comment 224-25

- The DEIR states that Pasadena and Los Angeles County exempt public agencies from Municipal Code noise requirements, (DEIR. p.201). La Canada Flintridge does not have an ordinance setting maximum noise levels during the proposed construction hours. According to the DEIR, "the Proposed Project will comply with all local noise ordinances, and roadway noise impacts will be less than significant". Given the massive size of the



Comment 224-25  
continued

project and the nearly continuous significant construction and traffic noise over up to 5 years that will be created and spread over a wide area, CEQA excessive noise restrictions must be applied in order to adequately asses and mitigate significant impacts on all impacted communities, particularly residential neighborhoods.

Comment 224-26

- The Noise section of the DEIR ignores several physical principles in that it does not take into account the variables that affect sound propagation in the Arroyo, particularly the adjacent Central Arroyo, and the Linda Vista-Annandale neighborhood, which varies with applicable geography characterized by the deep cut canyon that is the Arroyo itself and the surrounding numerous canyons that form the neighborhood land area, temperature, humidity, and frequency.

Comment 224-27

- All noise measurements cited use the “A” weighted method of measurement. However, the frequencies below 500 hertz have a significant impact and effect on the quality of life including public health impacts, and are essentially excluded from the “A” weighted measurements. The lower frequencies are prevalent in construction activities such as those that will take place during the project, and attenuate much less as a function of distance than the higher frequencies.. Thus, the “A: weighted noise measurement methodology ignores the true spectrum of noise that would be generated by this project and its propagation in violation of CEQA.

Comment 224-28

- The true and accurate spectrum of noise that would be generated by this project, and, therefore, the legally adequate spectrum, is the “C” weighted method of measurement with its inclusion of the lower frequencies generated that will arise out of this project.

Comment 224-29

- The traffic baseline noise measurements for the DEIR were taken in the sensitive areas at non-peak traffic hours and then for only 15 minutes at a time. As a result, the current impact of excessive noise is understated,

Comment 224-29  
continued



including the cumulative impacts of such sources of traffic noise as the 210 Freeway.

Comment 224-30



- The DEIR fails to analyze how the project will monitor truck noise to ensure compliance with the California Vehicle Code or the construction equipment on-site as is represented in Table E, DEIR Noise Report, page 25.

E. Transportation/Traffic.

Comment 224-31

The Traffic analysis is legally inadequate in that it fails to analyze, evaluate and mitigate with feasible, performance-based, enforceable mitigations the direct and cumulative impacts of the proposed project schedule of 11-12 work days during the week and 9 hour work days on Saturdays, involving a maximum of 425 double-haul truck round trips per day during project excavation activities, which will increase traffic on haul routes and burden residential and other streets throughout Pasadena and neighboring communities. Specifically:

Comment 224-32



- Normal peak hour traffic will avoid the 134 and 210 Freeways to avoid the congestion caused by the project truck traffic, particularly as it impacts the already overburdened 210 to 134 Freeway transition tunnel, by leaving the Freeways for east-west and north-south Pasadena streets. LVAA is particularly concerned about this predictable impact on Linda Vista Ave. and Lida Street, and the DEIR is inadequate unless the impacts on these residential streets are mitigated.

Comment 224-33



- The DEIR fails to consider, analyze and mitigate the California law requirement that the haul double-load trucks are limited on the Freeways to and from the disposal locations to the right two Freeway lanes only.

Comment 224-34



The Traffic analysis appears to be based on multiple manual and computer mathematical analyses rather than on true and accurate conditions existing in the project area. There are many practical realities and foreseeable impacts that affect traffic and safety that have not been analyzed, evaluated or even addressed in the DEIR which create DEIR inadequacies, including:

- Comment 224-35 • Lack of haul truck and equipment wash down to keep public and project roadways clean;
- Comment 224-36 • Lack of load cover to prevent truck load drop and fugitive dust;
- Comment 224-37 • No provision for street sweeping when or where preventive measures are inadequate;
- Comment 224-38 • No mitigation for public and project area roadway deterioration and repair;
- Comment 224-39 • No mitigation provisions for flagmen, flashing lights, and similar feasible measures for the public safety of passenger and other vehicles were project trucks and equipment enter public streets;
- Comment 224-40 • Treatment in the DEIR of haul trucks with two trailers as the same as passenger vehicles for intersection congestion analysis purposes;
- Comment 224-41 • Failure to treat truck/trailer rate of acceleration on Freeway on-ramps as a congestion matter, and, failure to failure to consider release by the trucks of material on the on-ramps and the Freeway routes;
- Comment 224-42 • Failure to analyze and evaluate, and mitigate, the cumulative impacts which will arise out of Rose Bowl Major Events, including NFL events;
- Comment 224-43 • No attempt to mitigate the significant Levels of Service deficiencies during peak traffic hours as required by CEQA;
- Comment 224-44 • No evidence of any attempt to coordinate traffic impacts and mitigation with Pasadena and adjoining impacted cities and jurisdictions' Transportation Department(s);
- Comment 224-45 • No analyses or mitigation for conflicts with various California Vehicle Code safety requirements.

Comment 224-46 Thank you for your attention to LVAA's concerns and comments. Please contact LVAA's President, Nina Chomsky, if you have any comments or questions.

## **Response to Comment Letter #224 (Linda Vista-Annandale Association)**

### **Response to Comment 224-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the details provided about the Linda Vista-Annandale Association.

### **Response to Comment 224-2:**

The Draft Environmental Impact Report (EIR) provided a legally adequate project description as per the California Environmental Quality Act (CEQA) Guidelines 15124. As described in Section 2.0 of the Draft EIR, the Proposed Project description provides: the precise location and boundaries of the Proposed Project on a detailed map and on a regional map, a statement of objectives sought by the Proposed Project, a general description of the Proposed Project's characteristics, and the intended uses of the EIR. These were all provided in the Draft EIR, Section 2.0, Project Description. The details listed in the Section 2.0, Project Description of the Draft EIR are the correct figures regarding the remaining capacity and the amount of sediment to be removed.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. In order for the removal project to be efficient, and therefore reduce impacts and costs, the amount of sediment removed every year needs to exceed the amount of sediment deposited. Historically, approximately 130,000 cy a year was deposited in Devil's Gate Reservoir annually since 1920.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, due to the dynamic nature of the system and the recent burn of the watershed, the amount could vary greatly. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and the California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

**Response to Comment 224-3:**

Pursuant to Section 15126.6(a) of the CEQA Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, "[a]n EIR is not required to consider alternatives which are infeasible" (CEQA Guidelines Section 15126.6(a)) or "which could change the fundamental nature of the proposed project." (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.* (1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project's significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

The Environmentally Superior Alternative was determined to be Alternative 3, Configuration D, as it reduces impacts while still meeting Proposed Project objectives; see Sections 4.6 and 4.11 of the Draft EIR.

**Response to Comment 224-4:**

The Draft EIR Alternatives Analysis was a comprehensive analysis of each of the alternatives and the impact each would have on the community or environment. Although the section is lengthy, it is provided to present the potential impacts of each of the alternatives. In addition, the analysis compares

the impacts of the alternative to the Proposed Project and each of the other alternatives to provide a comparison for the reader. This is to show how each alternative compares to the Proposed Project, the other alternatives, and the No Project Alternative in terms of environmental impacts. The Draft EIR also provided summary discussions and comparisons of each alternative for an easy to read overview of the analyses. Tables ES-2 and ES-3 are provided to outline the specifics of each alternative, as well as provide a comparison of impacts. In addition, Table 4.3-1 in the Alternatives Analysis also provides a comparison of alternatives.

The findings of the EIR are that Alternative 3, Configuration D is the Environmentally Superior Alternative. As shown in the Draft EIR, Section 4.6, Alternative 3 receives an in-depth analysis which presents the potential impacts of each of the alternatives and compares the impacts of the alternatives to the Proposed Project and each of the other alternatives. This provides ample information as to why Alternative 3, Configuration D was found to be the Environmentally Superior Alternative. Section 4.11 is a summary of these findings. The Draft EIR does not determine and has not designated any of the alternatives, including the Proposed Project, as the "Preferred Alternative." With the completion of the Final EIR, an alternative will be chosen and will be presented to the Board of Supervisors as the Preferred Alternative. Any of the alternatives analyzed in the Draft EIR may be chosen as the Preferred Alternative.

Tables ES-2 and ES-3, and Table 4.3-1 in the Alternatives Analysis provide a comparison of the environmental impacts of each of the alternatives.

**Response to Comment 224-5:**

See Response to Comments 224-3 and 224-4. An EIR is not required to consider alternatives that are infeasible, and an EIR need not consider every conceivable alternative to a project. LACFCD evaluated notable alternatives, including alternate configurations and the method of sluicing. Alternative 3, Configuration D was determined to be the Environmentally Superior Alternative that reduces impacts while still meeting Proposed Project objectives.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater cohesion with the HWPMP. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

**Response to Comment 224-6:**

See Response to Comment 224-2.

For Devil's Gate Dam, the DDE was previously calculated as 1.67 million cubic yards (cy). That previous calculation was based on the presence of debris-retaining structures, including Browns Canyon Dam, located within the Angeles National Forest upstream of Devil's Gate Dam. These structures filled with sediment decades ago and no longer provide capacity to "control" any portion of the watershed. A subsequent analysis determined that the correct DDE, based on the absence of sediment control facilities in the Forest, is 2.0 million cy. Following the Station Fire, Los Angeles County Department of Public Works (LACDPW) reviewed the DDE calculations and confirmed that 2.0 million cy is the current and appropriate volume for the DDE.

As stated above, LACDPW's criterion is that reservoir sediment levels be maintained at a level equivalent to two design debris events below spillway; however, in response to the Station Fire, an emergency project to remove only 1.67 million cy was initially proposed. The volume of 1.67 million cy is the previously published DDE and was considered justifiable as an emergency exemption to CEQA. In March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the project was given the name Devil's Gate Sediment Removal and Management Project.

**Response to Comment 224-7:**

See Response to Comments 224-2 and 224-6. LACFCD has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average storm seasons. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

The current remaining capacity in the reservoir is 1.3 million cy, whereas a reservoir storage design capacity of two DDEs, or 4.0 million cy, below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. If the reservoir is left in its current state, the flood risk to downstream communities would remain at an unacceptable level.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD is coordinating with local agencies, including the City of Pasadena. Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP).

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would have additional impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

**Response to Comment 224-8:**

LACFCD notes that the Linda Vista-Annandale Association supports an alternative that would remove sediment over a longer period of time, make more use of sluicing, and impact a smaller area.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR selected Alternative 3 as the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).

**Response to Comment 224-9:**

LACFCD has taken input from responsible agencies and the community into consideration when drafting the Alternatives. All comments are noted and will be provided to the County of Los Angeles Board of Supervisors.

**Response to Comment 224-10:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump

trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Assessments for air quality impacts follows methodology established and authored by the South Coast Air Quality Management District (SCAQMD). SCAQMD does not require project-specific ambient air monitoring before or during project construction. CEQA requires mitigations to be monitored, and LACFCD will maintain sufficient documentation to allow monitoring of Mitigation Measures MM AQ-1 and MM AQ-2.

**Response to Comment 224-11:**

See Response to Comment 224-10. As noted above, with implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

Baseline monitoring locations are established by SCAQMD under requirements of the EPA and California Air Resources Board (CARB), and the locations used in the analysis were the nearest established monitoring sites for each particular pollutant. There are no requirements for project-specific ambient monitoring.

**Response to Comment 224-12:**

Each project is responsible only for its own contribution to the overall air quality. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, the Proposed Project's impacts to air quality, including its contribution to cumulative impacts, will be reduced to less than significant.

Regional events such as events at the Rose Bowl and wildfires are outside the purview of LACFCD. No nexus would require LACFCD to provide ambient monitoring for regional events.

**Response to Comment 224-13:**

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with SCAQMD's fugitive dust regulations.

**Response to Comment 224-14:**

See Response to Comment 224-10.

**Response to Comment 224-15:**

See Response to Comments 224-10 and 224-13.

**Response to Comment 224-16:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Mitigation Measures BIO-1 through BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. These mitigation measures are common to CEQA and accepted by agencies that would be involved in consultation, negotiation, and final approval of mitigation measures, including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate mitigation measures for sediment removal.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 224-17:**

The National Park Service is conducting a "special resource study" of the area known as the "Rim of the Valley Corridor." This is the area that generally includes the mountains encircling the San Fernando, La Crescenta, Santa Clarita, Simi, and Conejo valleys of Los Angeles and Ventura counties in southern California. The purpose of this special resource study is to determine whether any portion of the Rim of the Valley Corridor study area is eligible to be designated as a unit of the national park system or added to an existing national park (NPS 2014).

This special resource study will provide recommendations to Congress but would not change current management without further action from Congress. Each of the alternatives considered in this study respects and retains the authorities of existing local, state, and federal agencies.

The area that Congress directed the NPS to study (study area) is not proposed for a national park. It is simply an area in which the NPS is asked to evaluate natural and cultural resources and opportunities for public use and resource preservation. It does not mean that all the land within the study area has nationally significant natural and cultural resources. Resources found to be nationally significant must also meet NPS criteria for suitability and feasibility to be considered for inclusion in the national park system.

As the NPS evaluates resources in the study area, often the focus of the study is narrowed. If significant resources are identified, the NPS will identify a range of options or alternatives to protect these resources and provide for public enjoyment.

The preliminary study findings of the Rim of the Valley Corridor Special Resource Study have not identified the Devil's Gate Reservoir or the Hahamongna Watershed Park as nationally significant natural and cultural resources. The nearest nationally significant resources identified in this study are the Jet Propulsion Laboratory (JPL) and the Rose Bowl. The Proposed Project does not involve either of these resources.

**Response to Comment 224-18:**

Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant.

**Response to Comment 224-19:**

The Proposed Project is not located in a currently adopted Significant Ecological Area (SEA). The Los Angeles County Department of Regional Planning is currently in the process of updating the SEA Program. The Proposed Project is located within the Proposed Altadena Foothills and Arroyos SEA. Regional Planning's SEA updates, including the Proposed SEAs, have not been adopted, nor are they covered under the current Hillside Management Area and SEA Ordinance.

The SEA does not change the land use designation or the zoning of a property. The intent of the proposed SEA regulations is not to preclude development but to allow limited, controlled development that does not jeopardize the unique biotic diversity within the County. Under the Ordinance for the Proposed SEA, safety activities and existing permitted uses are exempt.

As discussed in the Draft EIR, Section 3.12.6, Land Use and Planning, the Proposed Project will not have any significant impacts or conflict with the applicable land use plans, policies, or regulations of adopted plans.

**Response to Comment 224-20:**

See Response to Comment 224-18.

**Response to Comment 224-21:**

See Response to Comment 224-16 and 224-18.

**Response to Comment 224-22:**

See Responses to Comments 224-16 and 224-18.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). As discussed in the Draft EIR, Subsection 3.12.3, Applicable Regulations, the HWPMP emphasizes protection of recreational and natural resources as well as the management of flood control for the downstream watershed. Key to determining the consistency of the project with the HWPMP is the conformance with the plan's Goals and Objectives. As identified in the Applicable Regulations portion of the Existing Conditions, Goal 2 and Goal 6 are the most crucial in determining conformance. These Goals focus on the basin being "managed to provide protection to the developed and natural downstream areas and providing a safe and secure park." The Proposed Project will manage the flood control basin for protection of the downstream areas by improving and maintaining the flood capacity behind Devil's Gate Dam. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

**Response to Comment 224-23:**

LACFCD notes that the HWPMP is an important policy document for the area, including the Proposed Project site. Analysis of consistency with the HWPMP was included in the Draft EIR, Section 3.12 Land Use and Planning. The Proposed Project will not permanently destroy, render useless, or eliminate any of the projects mentioned in the comment.

**Response to Comment 224-24:**

As noted in Draft EIR, Section 2.1. Project Location, an easement granted by the City of Pasadena to LACFCD encompassing Devil's Gate Dam and Reservoir in 1919 and revised in 1965 states the easement is for the purpose of flood control and water conservation. The easement states, "Grantor does hereby grant to Grantee a perpetual easement for reservoir, water conservation and flood control purposes, including the right to construct, reconstruct, inspect, maintain, repair and operate a dam, spillway, reservoirs, tunnels, by-passes, channels embankments, protection works, and appurtenant structures for the purposes of controlling, confining, storing and conserving water in, over and across real property hereinafter described." The goal for the Sediment Removal Project is to maintain the reservoir for the purpose of controlling, confining, and storing water within the easement boundaries; and, therefore, the Proposed Project activities fall under the latitude of the easement granted. As noted in the Draft EIR, the Proposed Project and Alternatives are located entirely within the boundaries of the easement. The project will not overburden the easement; it will restore the reservoir to the design capacity necessary for flood control storage or to safely contain future sediment inflow (volume for two DDEs below the spillway elevation of 1,040.5 feet).

**Response to Comment 224-25:**

As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant.

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a 1-decibel (dB) increase on Berkshire Place east of the Interstate 210 (I-210) northbound ramps. A 1-dB increase is well below the 3-dB increase threshold of perception and would therefore not be anticipated to disturb the learning environment. The roadway noise impact analysis provided in the Draft EIR found that the Proposed Project would result in less than significant impacts for all analyzed alternatives.

**Response to Comment 224-26:**

The geography was analyzed prior to the performing of the noise calculations provided in the Draft EIR, and it was determined that the geography would have a minimal effect of the nearest homes and other sensitive receptors to the project site. According to Caltrans Technical Noise Supplement, it is theoretically possible that narrow canyons with steep slopes could result in an increase of noise greater than 3 decibels (dB); however, the slopes would need to be free of vegetation and perfectly vertical. Angled slopes, such as those located at the Proposed Project, typically do not increase noise levels, since noise reflections are directed skyward. Although temperature and humidity have the potential to affect the propagation of noise, the impacts to noise calculations are typically nominal except for extreme examples, such as the desert with a very high temperature and low humidity, or a very cold and foggy location. Since the climate of Pasadena is moderate, the construction noise was accounted for in the

Roadway Construction Noise Model (RCNM) that was utilized in the Draft EIR to calculate the onsite construction noise impacts, and it was accounted for in the FHWA-RD-77-108 model that was utilized in the Draft EIR to calculate the offsite roadway noise impacts.

**Response to Comment 224-27:**

Human hearing is limited not only to a range of frequencies but also in the perception sound pressure throughout that range. The A-weighted scale was developed from averaging the statistics of many psychoacoustic tests involving large groups of people with normal hearing. The internationally standardized A-weighted curve is used worldwide to address environmental noise. Furthermore, the Los Angeles County Noise Ordinance, La Cañada Flintridge Noise Ordinance, and Pasadena Noise Ordinance all rely on the A-weighted decibel. For these reasons, the noise analysis provided in the Draft EIR utilized the A-weighting.

**Response to Comment 224-28:**

As detailed in Response to Comment 224-27, the A-weighting noise levels is the most acceptable noise standard for the Proposed Project.

**Response to Comment 224-29:**

The noise measurements provided in the Draft EIR were taken based on the methodology detailed in the Caltrans Technical Noise Supplement and the noise measurement procedure detailed in the Los Angeles County Noise Ordinance as well as the professional judgment of the noise analyst. The noise measurements in the Draft EIR were adequately taken to appropriately assess the cumulative impacts from traffic noise.

It should be noted that the Proposed Project would create noise only between 7:00 a.m. and 6:00 p.m. Standard Time or between 7:00 a.m. and 7:00 p.m. Daylight Savings Time on weekdays or between 7:00 a.m. and 5:00 p.m. on Saturdays, which are the allowable construction times detailed in the applicable Cities' noise ordinances.

The noise from freeways in southern California is different than most other roadways, since the quietest noise levels from freeways typically occur during the morning and evening rush hours, when the freeways are congested, which greatly reduces the speed of the vehicles and associated noise levels. The noise measurements were taken at a period of the day when traffic was free-flowing on Interstate 210 (I-210) and when construction activities would be anticipated to be at full operation. The duration of the noise measurements were based on the recommended measurement durations detailed in Section 3.3.2 of the Caltrans Technical Noise Supplement.

**Response to Comment 224-30:**

As noted in the Draft EIR, Section 3.14 Noise and Vibration, the Proposed Project will comply with all local ordinances that apply to sediment removal and reservoir management activities taking place during the allowed hours. In addition, LACFCD will monitor Proposed Project activities for compliance including the type of trucks and equipment used.

**Response to Comment 224-31:**

The Traffic Analysis is legally adequate, as it analyzes impacts to roads and freeway segments that would be impacted by the project, evaluates these impacts in the Draft EIR, and provides mitigation that was determined to be feasible for the Proposed Project. Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project Site will have a potentially significant impact. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 224-32:**

See Response to Comment 224-31. The volumes on I-210, the on- and off-ramps, and the local roadways within the study area included those potentially impacted by the Proposed Project. The analysis provided a conservative project condition volume that accounts for expansion and regional growth within the study area. The volumes account for redistribution of traffic.

**Response to Comment 224-33:**

The Traffic Analysis followed the Los Angeles County Congestion Management Program (CMP) Guidelines, Caltrans' Guide for the Preparation of Traffic Impact Studies, the Highway Capacity Manual (HCM), and Intersection Capacity Utilization (ICU) methods. Each methodology is a governing guideline in preparing a Traffic Impact Analysis set forth by each jurisdiction within the project area, as applicable to the intersections, on and off ramps, and freeway facilities. These methodologies are continually updated and improved upon based on the dynamic nature of traffic. In addition, the Draft EIR analyzes the traffic impacts based on established thresholds of significance.

**Response to Comment 224-34:**

See Response to Comments 224-31 and 224-32.

**Response to Comment 224-35:**

See Response to Comment 224-13. In addition, hauling permits will be obtained as necessary from the appropriate localities; and all conditions of said permits will be followed accordingly.

**Response to Comment 224-36:**

See Response to Comment 224-13. SCAQMD Rule 403 requires, "During exporting of materials, using tarps or other suitable enclosures on all haul trucks. Haul loads should have at least 6 inches of freeboard space."

**Response to Comment 224-37:**

See Response to Comment 224-35.

**Response to Comment 224-38:**

See Response to Comment 224-35.

**Response to Comment 224-39:**

See Response to Comment 224-35.

As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to traffic conditions by the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant.

**Response to Comment 224-40:**

Potential impacts due to the Proposed Project's truck trips, including double dump trucks, were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. The capacity analysis considers what is called a Heavy Vehicle Factor. A heavy vehicle, such as a truck or recreational vehicle, utilizes more roadway capacity than a passenger vehicle. Other considerations include the size, slower start-up times, and maneuverability restrictions of the heavy vehicles. Per the Highway Capacity Manual, the Heavy Vehicle Factor is calculated using the percentage of heavy vehicles and adjusts the saturation flow rate of the roadway.

**Response to Comment 224-41:**

As noted in Response to Comment 224-40 above, the analysis of traffic impacts did consider a Heavy Vehicle Factor that took slower start-up times and maneuverability restrictions into consideration. The release of materials on the on-ramps and off-ramps will be controlled through complying with SCAQMD Rule 403, which includes the use of tarps over truck beds to limit the release of materials on roadways.

**Response to Comment 224-42:**

The temporary use of the Rose Bowl by a National Football League (NFL) team was analyzed as a cumulative project in the Draft EIR, as noted in Section 2.9 Cumulative Scenario, and in the Traffic Study, as noted in Section 4 Project Conditions-Year 2014, Project Trip Growth.

**Response to Comment 224-43:**

See Response to Comment 224-31. LACFCD will implement the mitigation measures described in the Draft EIR, Section 3.16.6. Also as discussed in the Draft EIR, Section 3.16.6, potential impact reduction measures could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will be made to coordinate with and receive approval from the jurisdictional agencies to implement the impact reduction measures, but LACFCD cannot guarantee that the measures will be implemented. LACFCD will continue to work with local organizations and the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the project site. The Proposed Project is compliant with CEQA as per Section 15126.4 of the CEQA Guidelines, "If the lead

agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed. Instead, the EIR may simply reference that fact and briefly explain the reasons underlying the lead agency's determination." Per Section 21002 of the CEQA Guidelines, "The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

**Response to Comment 224-44:**

LACFCD held meetings with each city's and jurisdiction's Transportation Department within the Proposed Project area; concerns and requests from each were included in the Traffic Analysis. Extensive meetings were held with the Cities of Pasadena and La Cañada Flintridge regarding other area projects and identification of potential routes. In addition, LACFCD will continue to work with local organizations and the Cities of Pasadena and La Cañada Flintridge and the community of Altadena to minimize traffic impacts around the project site.

**Response to Comment 224-45:**

The Traffic Report (Appendix J of the Draft EIR) followed the Los Angeles County Congestion Management Program (CMP) Guidelines, Caltrans' Guide for the Preparation of Traffic Impact Studies, the Highway Capacity Manual (HCM), and Intersection Capacity Utilization (ICU) methods. Each methodology is a governing guideline in preparing a Traffic Impact Analysis set forth by each jurisdiction within the project area as applicable to the intersections, on- and off-ramps, and freeway facilities. The California Vehicle Code is a guideline to drivers and does not provide guidelines in preparing a Traffic Impact Analysis.

**Response to Comment 224-46:**

LACFCD notes that Nina Chomsky is the contact person for the organization in regard to this comment letter.

**From:** [Frazier, Lisa L](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [savehahamongna@arroyoseco.org](#)  
**Subject:** "Devil's Gate Reservoir Sediment Removal and Management Project"  
**Date:** Tuesday, January 21, 2014 3:38:03 PM

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I'm writing to you with regard to saving Hahamonga Park. I train with the Leukemia & Lymphoma Society's Team in Training for marathons and half-marathons and one of the places that we totally enjoy walking and running is at the Hahamonga Park and Wetlands. I have been informed that there are drastic changes in the planning stage for this area that would destroy the entire area which includes habitats for numerous species of animals and plants, in addition to taking away from not only great trails for us humans to utilize, but for horse riders, as well. Since I sincerely believe that destroying these lands will have a huge environmental impact on the area for years to come, I hope you will take this matter under serious advisement before making your decision.

Respectfully,

*Lisa L. Frazier*

Email: [lisa.frazier1@verizon.net](mailto:lisa.frazier1@verizon.net)  
(213) 687-5131 - Work  
(909) 268-5742 - Cell  
(909) 865-3842 - Home

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\*\*\*\*\*

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

\*\*\*\*\*

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Comment 225-1

**Response to Comment Letter #225 (Lisa Frazier)**

**Response to Comment 225-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed. With implementation of Mitigation Measures MM BIO-1 through MM BIO-8, impacts to biological resources to less than significant.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**From:** [Lou Anne Insprucker](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 3:43:18 PM

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Comment 226-1

Please support the Arroyo Seco Foundation plan. It is moderate and has long-term vision.

***Sincerely,  
L.A. Insprucker  
La Canada, CA***

## Response to Comment Letter #226 (Lou Anne Insprucker)

### Response to Comment 226-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter supports the Arroyo Seco Foundation's proposed alternative.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

The Proposed Project is designed to be a long-term plan. While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. A maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16, Response to Comment 216-16).

**From:** [Mignonne & Allen](#)  
**To:** [reservoircleanouts](#)  
**Subject:** DEVIL'S GATE SEDIMENT REMOVAL AND MANAGEMENT PROJECT  
**Date:** Tuesday, January 21, 2014 1:56:10 PM

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FROM: Mignonne D. Walker  
4250 Beulah Drive  
Flintridge, CA 91011  
oldyeller@earthlink.net

TO: Gail Farber, Director  
County of Los Angeles Department of Public Works  
P.O. Box 1460  
Alhambra, CA 91802-1460  
CC: Mark Petrella  
CC: Keith Lilley

Jan. 20, 2014

COMMENTS ON DEVIL'S GATE DAM DEIR

- Comment 227-1 | The Deir is inadequate
- Comment 227-2 | Why did you change from 1.67Million cubic yards to 2.9 Million cubic yards
- Comment 227-3 | Ca. is in a Drought
- Comment 227-4 | You can't mitigate the diesel double trucks one a minute by our schools in La Canada diesel  
has terrible chemicals autism alzheimers what are you thinking????????????????
- Comment 227-5 | Why is the Rose Bowl included there is no proof it would flood are these SCARE TACTICS ???  
?????????
- Comment 227-6 | NO TO ALL 5 ALTERNATIVES NO  
NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO NO
- Comment 227-7 | WHY WERE THE FOLLOWING NOT EVEN NOTIFIED. AFRAID OF THEIR REACTION?????????????? 10  
schools Residences Stables Camps JPL hikers bikers horseback riders family  
recreation commuters biology camps the wildlife the birds migrating birds at that
- Comment 227-8 | Air Pollution you are using 2008 standards THAT IS NOT RIGHT one double truck a minute what  
about idling trucks Is there a plan for accidents when they occur??????????????
- Comment 227-9 | Noise Pollution what is your plan for that??????????
- Comment 227-10 | Are you selling the Sediment ?????????????? Profits go where ???????????????
- Comment 227-11 | Does the project have a permit from CALIFORNIA REGIONAL WATER QUALITY BOARD ?????????? Does  
Pasadena have a secret water deal planned????????????????? Is there rocket fuel involved??????????????
- Comment 227-12 | You have a scorched earth policy plan they said you would replant the area AND JUST  
HOW ARE YOU GOING TO WATER THESE NEW PLANTS AND HABITAT EXACTLY HOW ARE YOU  
GOING TO DO THAT????????????????????????????????????????????????
- Comment 227-13 | I went to two of the meetings. I was not satisfied with the answers we got. It seems to me you tried

Comment 227-13 to rush this through right before and during xmas. Wow I wonder why?????????????????  
continued

I think you were hoping no one would notice your terrible plan.

Comment 227-14 I am very upset by all of this I get terrible headaches already from diesel pollution and now  
what am I supposed to do Move away for 5 years.

Sincerely, Mignonne Walker

## **Response to Comment Letter #227 (Mignonne Walker)**

### **Response to Comment 227-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Draft Environmental Impact Report (EIR) does adequately analyze the potential impacts associated with the Proposed Project.

### **Response to Comment 227-2:**

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

For Devil's Gate Dam, the DDE was previously calculated as 1.67 million cy. That previous calculation was based on the presence of debris-retaining structures including Browns Canyon Dam, located within the Angeles National Forest upstream of Devil's Gate Dam. These structures filled with sediment decades ago and no longer provide capacity to "control" any portion of the watershed. A subsequent analysis determined that the correct DDE, based on the absence of sediment control facilities in the Forest, is 2.0 million cy. Following the Station Fire, the LACDPW reviewed the DDE calculations and confirmed that 2.0 million cy is the current and appropriate volume for the DDE.

LACFCD's criterion is that reservoir sediment levels be maintained at a level equivalent to two design debris events below spillway; however, in response to the Station Fire, an emergency project to remove only 1.67 million cy was initially proposed. The volume of 1.67 million cy is the previously published DDE and was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). In March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating

ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the project was given the name Devil's Gate Sediment Removal and Management Project.

**Response to Comment 227-3:**

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. The most sediment that was deposited during a five-year period was 3.1 million cy, which occurred between 1937 and 1942. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur.

**Response to Comment 227-4:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

**Response to Comment 227-5:**

Devil's Gate Dam, built in 1920, was the first dam built by LACFCD. The dam allowed for the channelization of and development along the Arroyo Seco. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway, also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam.

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

During a single design event sized storm, the Rose Bowl is not expected to be impacted by flows from the dam; however, if sediment from each storm event is not removed from the downstream floodplain, each subsequent storm would increase the flood risk.

**Response to Comment 227-6:**

LACFCD notes that the commenter does not support any of the five Alternatives. The Draft EIR analyzes six Alternatives in addition to the Proposed Project, including the CEQA-required No Project Alternative.

**Response to Comment 227-7:**

Per CEQA Guidelines Section 21902 (b)(3), notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:

- publication in a newspaper of general circulation in the area affected by the Proposed Project
- posting of notice by the lead agency on and off site in the area where the Proposed Project is to be located
- direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll

The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the LACDPW website

Therefore, notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

As part of the outreach effort, LACDPW has reached out to recreational users, including the Pasadena Audubon Society, Rose Bowl Riders, Tom Sawyer Camps, Oak Grove Disc Golf Club, and MACH-1.

**Response to Comment 227-8:**

See Response to Comment 227-4.

It is estimated that trucks will briefly idle during loading, but the average loading time per truck is estimated to be one minute. In addition, LACFCD typically requires equipment to shut down if idling time is expected to be more than five minutes. Estimated project idling times were included in the air quality analysis and health risk assessment for the Draft EIR, Section 3.5, and Appendices B and C. While the majority of the sediment disposal and associated truck traffic is expected to go to the disposal sites east of the Proposed Project, the Draft EIR also analyzed the use of disposal sites west of the Proposed Project. This will allow for flexibility in case one particular route is temporarily unusable.

**Response to Comment 227-9:**

As noted in Section 3.14.6 of the Draft EIR, the Proposed Project will comply with all local ordinances that apply to sediment removal and reservoir management activities taking place during the allowed hours. In addition, roadway noise impacts will be less than significant. Through implementation of Mitigation Measure MM N-1, the impacts to nearby sensitive receptors from vibrations of onsite construction equipment would be reduced to less than significant.

**Response to Comment 227-10:**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at the LACFCD sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

**Response to Comment 227-11:**

As part of project approval, LACFCD will obtain the necessary permits from the California Regional Water Quality Control Board. The Proposed Project does not involve any water deals or rocket fuel/perchlorates.

**Response to Comment 227-12:**

After the Station Fire in 2009, the following two storm seasons brought 1.3 million cubic yards of sediment into the reservoir, raising the ground elevations within the reservoir and burying most of the established vegetation. Since then, vegetation, has reestablished within the reservoir, including in the areas that will remain in place and/or possibly used as mitigation sites under Alternative 3. The sediment removal efforts aim to restore the historic elevations within the reservoir to the conditions existing prior to the impacts caused by the Station Fire.

After the sediment removal project, ground elevations within the reservoir will be in either present or historic levels and will have exposure to flowing stormwater. The habitat restoration plan will include and address monitoring and success criteria, as required by the regulatory agencies.

As discussed in mitigation measures MM-BIO-6 through MM-BIO-8, a combination of onsite and offsite habitat restoration and enhancement will occur. This will include allowing riparian habitat to establish. Habitat restoration/enhancement will include use of willow cuttings for reestablishment and exotic species removal. Ruderal habitats within the basin shall be utilized whenever possible as mitigation sites. LACFCD is continuing to work closely with California Department of Fish and Wildlife (CDFW) and U.S. Army Corps of Engineers (USACE) to identify appropriate restoration and enhancement that will offset impacts and allow for sensitive habitat to recover naturally within the Proposed Project site but also to conserve and protect mitigation areas.

**Response to Comment 227-13:**

Adequate time for public commenting was provided. CEQA requires that the public comment period for a Draft EIR be at least 45 days (CEQA Guidelines § 21091). LACFCD extended this review period initially to 75 days and then further extended the review period to 90 days to allow for additional commenting time.

LACFCD held three community meetings to inform the public of the Proposed Project, Alternatives, and the results of the Draft EIR. The meetings included a presentation, workshops where the public could ask specific questions about the project and potential impacts, and had the opportunity to submit formal comments. Members of the public were able to ask questions or pose comments either in a group setting after the presentation or at the individual workshop stations.

**Response to Comment 227-14:**

See Response to Comment 227-4.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Peter Kalmus  
494 Alberta Street  
Altadena, CA 91001

Gail Farber, Director  
County of Los Angeles Department of Public Works Water Resource Division  
Attention: Reservoir Cleanouts Program  
P.O. Box 1460  
Alhambra, California 91802-1460  
CC: Mark Petrella  
CC: Keith Lilley

Comments on Devil's Gate DEIR  
January 21, 2014

Dear Ms. Farber,

- Comment 228-1 | The DEIR proposes to excavate and remove 2.9 million cubic yards of sediment behind the Devil's Gate Dam, over an area of 120 acres, over the next 5 years, and deposit it about 20 miles away in Azusa and Irwindale. The means of removal are dump trucks, operated at the rate of about one every minute, 9 hours per day, six days a week.
- Comment 228-2 | After reading the DEIR, I have several questions which I feel are critical to address conclusively before moving forward on this proposal. I respectfully submit that the DEIR is inadequate, at this point, for the project to proceed, and must be reconsidered even at the level of its objectives. I give some few of my reasons below.
- Comment 228-3 | An additional potential impact in the aesthetics category is the post-project, permanently denuded maintenance phase. This impact would be very significant to me, and probably to many other members of the community, but it is not included in Table ES-1. How can the post-project visual impact be mitigated, i.e. how can the post project look like a natural wetland landscape (i.e. a willow forest) and not a trashed and / or denuded field as indicated in the post-project visualizations in the DEIR? To my aesthetic sense, the aesthetic degradation depicted in the DEIR is truly significant, even shocking. These visualizations were a prime motivator for my taking the time to write this comment.
- Comment 228-4 | An additional potential impact in the air quality category is the CO2 released by the loading of sediment and the transport of sediment, and is not included in Table ES-1. How much CO2 will be released by this project? How much impact will this released CO2 have on the climate? How much impact will maintenance activities have on the climate? I do not feel that a thorough EIR can plausibly exclude this impact, and I'm frankly surprised it was excluded.
- Comment 228-5 | How much is the all-cause mortality of nearby residents, school children, workers, and recreational visitors estimated to increase due to e.g. significant diesel exhaust including particulate matter? This can be estimated. I feel that it is irresponsible and immoral to subject the above-mentioned stakeholders to this risk without a comprehensive and state-of-the-art estimate of increase in all-cause mortality. I suspect that such a study, carried out by experts, will find that the average number of days of life lost to vicinity stakeholders will be very significant. In addition, a morbidity study must also be carried out. I am not sure what the legal implications are for a project that will probably shorten the lifespans of those in the vicinity, especially when it appears that there is a viable alternative that would not have this impact, but I feel that at the very least the results of these studies should be mailed to every stakeholder, e.g. all business, schools, and residents in the radius of increased mortality or morbidity (if any). These stakeholders should be given the chance to understand that this project might lower their lifespan, and they should be given time to seek legal advice if they desire. In the event of serious health issues caused by this project, who would be liable for damages?
- Comment 228-6 | I am not convinced that the impact of habitat destruction for the 5 special status species mentioned in Table ES-1 will be "less than significant." It doesn't matter how many qualified biologists are on the scene; if the habitat is destroyed, these species will have one less place to live. I am not a biologist, but I do suspect that if you destroy this habitat, these animals will end up dying; again, this would be independent of whether or not a qualified biologist is present when the habitat is destroyed. What metric was used to determine that the nearly complete destruction of this unique habitat will be "less than significant"? This metric is not defined in the DEIR.
- Comment 228-7 | What has the rate of sediment removal from FAST been in the past? Was this the maximum possible FAST rate? What could be done to increase the rate of sediment removal through FAST events?
- Comment 228-8 | The DEIR does not make a convincing case as to why the project needs to be completed in 5 years. What is the quantitative risk of flooding, based on the site history and sediment flow models? What downstream sites would be at risk? In the case of floods, what would be the cost of damage? How much flooding would be required before the cost of damage exceeded the cost of this project, and what is the statistical probability of that level of flooding over various timescales, including a longer possible project timescale of 20 years, or 30 years?
- Comment 228-9 | What is the justification for needing to remove 2 DDE?
- Comment 228-10 | Has an alternative of removing the minimum sediment to maintain 1 DDE, and using FAST thereafter, been considered? If not, I would like to see this considered carefully. What would be the minimum safe removal amount (if followed by a steady maintenance plan) based on sediment models? I do not think the DEIR adequately addresses these questions.
- Comment 228-11 | The current plan will have a very significant impact on my family's recreation. We use the willow forest for recreation and education approximately once every two weeks. These recreation and education opportunities will vanish completely and permanently if this project is carried out.
- Comment 228-12 | My understanding is that sluicing or FAST has worked successfully in the past at this site at removing large amounts of sediment, but I do not see this history addressed carefully in the DEIR. Compared to the DEIR proposal

- Comment 228-12 continued | it is essentially free. What is the reason that sluicing or FAST is not the primary means for removing sediment at this time?
- Comment 228-13 | The DEIR trucking proposal will cost \$100 million. Is there a cheaper alternative than trucking that will still get the job done? Will sluicing and or FAST as primary removal strategy, with some trucking as as secondary strategy if needed (and at a lower volume than sluicing) also get the job done?
- Comment 228-14 | Do all stakeholders agree on the stated objectives? Is there an alternate set of objectives which will allow for the sustainable management of the dam and the safety of downstream structures, while not requiring the massive removal and trucking outlined in this proposal? I am not convinced that these objectives are the one true set of objectives, and the rest of the DEIR follows from them. It is very easy to eliminate alternative proposals by simply picking objectives that point to the one desired proposal. I would like to see a much more careful justification for these objectives in the DEIR.
- Comment 228-15 | Who stands to profit from the DEIR proposal? How have any benefiting parties been involved in the process of lobbying for the proposed project, drafting the DEIR, or any other participation in this process? Can the DEIR please address this and demonstrate that there has been no such participation by parties who stand to benefit financially?
- Comment 228-16 | Is there an alternative that can allow for most of the habitat to remain, while still allowing the dam to function over the long term? The denuded terrain is a big impact in my opinion. It will look terrible. Every time I ride to JPL in the morning, and ride home at night, I will wince.
- Comment 228-17 | How much carbon dioxide would the proposed project release into the atmosphere? Has the climate impact of this project, and the continued necessary maintenance, been adequately considered? What would the climate impact of a sluicing- or FAST-based approach be? Would the latter approach emit less CO2?
- Comment 228-18 | I'm not convinced that the DEIR has adequately examined the possibility of sluicing or FAST as the primary method of sediment removal. I would like to see a state-of-the-art appraisal of sluicing, its potential and its limitations, based on recent scientific studies. In the case that some questions on the potential and limitations of sluicing cannot be answered based on the current scientific studies, I would like to see further scientific research done before we rush to spend \$100 million on a project that is understudied and may well prove to be a terrible mistake, in the sense that habitat is destroyed that need not have been destroyed, and in the sense that a huge sum of money was spent that need not have been spent, and in the sense that people in the vicinity are subjected to increased mortality and morbidity.

Sincerely,  
Peter Kalmus

**Response to Comment Letter #228 (Peter Kalmus)**

**Response to Comment 228-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft Environmental Impact Report (EIR), Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 228-2:**

The Draft EIR adequately analyzed all California Environmental Quality Act (CEQA)-required issue areas.

**Response to Comment 228-3:**

As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

The Draft EIR determined that visual impacts associated with reservoir management will be less than significant and, therefore, will not require mitigation. Since impacts are less than significant and do not require mitigation measures, this impact is not included in Table ES-1. Reservoir management impacts to visual character under both of the Proposed Project's management options will result in a lower degree of contrast than seen during sediment removal. Due to the rapid growth of herbaceous plants, it is expected that during the majority of the year the Proposed Project site will appear vegetated. In addition, as with existing conditions, vegetation conditions on the Proposed Project site, including height and density, would change on a regular basis due to seasonal conditions, water flow/views, water storage, and sediment conditions.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, Los Angeles County Flood Control District (LACFCD) has added an optional configuration for this Alternative. Alternative 3,

Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 228-4:**

Emissions of carbon dioxide (CO<sub>2</sub>) are detailed in the Draft EIR, Section 3.9 Greenhouse Gas Emissions. As noted in the discussion, impacts related to greenhouse gas emissions are considered less than significant, as CO<sub>2</sub> emissions do not exceed the established South Coast Air Quality Management District's (SCAQMD) thresholds. Since impacts are less than significant and do not require mitigation measures, this impact is not included in Table ES-1.

**Response to Comment 228-5:**

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

**Response to Comment 228-6:**

Significant impacts to sensitive species were defined in the Draft EIR, Section 3.6.6, "Would the project 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 Wildlife or the U.S. Fish and Wildlife Service?" In this section significant impacts to sensitive species were identified. These impacts will be reduced to less than significant through implementation of mitigation measures MM BIO-1 through MM BIO-8, which will serve to protect and avoid impacts to wildlife species and will provide for habitat restoration and enhancement.

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed. Impacts to biological resources would be less than significant.

**Response to Comment 228-7:**

Flow Assisted Sediment Transport (FASTing), a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. After the Proposed Project's main sediment removal has occurred, FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups

of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 228-8:**

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

With the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of

sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of the LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur.

**Response to Comment 228-9:**

See Response to Comment 212-8.

**Response to Comment 228-10:**

See Response to Comments 212-7 and 212-8.

**Response to Comment 228-11:**

LACFCD recognizes that the area is an important area for recreation, as outlined in Section 3.15, Recreation/Public Services.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). Both configuration options of this alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish.

**Response to Comment 228-12:**

See Response to Comments 212-7. Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations, potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

**Response to Comment 228-13:**

See Response to Comment 212-12. Under CEQA, the lead agency is not required to analyze an economic impact associated with a project in the EIR; as Section 15131(a) of the CEQA Guidelines states: "Economic or social effects of a project shall not be treated as significant effects on the environment." Moreover, CEQA allows economic analysis in the administrative record only if the basis for infeasibility, and thus rejection of a mitigation or alternative, is economic, as described in CEQA Guidelines Sections 15091(a)(3) and 15364.

The estimated cost for the Proposed Project and for Alternatives 1, 2, 3, and 5 would range from \$80 million for the Proposed Project to \$65 million for Alternative 3. Due to the variety of factors, including the indeterminate locations of the sediment fallout and requirements for removing sediment from these locations, the cost for Alternative 4 cannot be calculated.

**Response to Comment 228-14:**

Per CEQA, Section 15124, the statement of objectives should include the underlying purpose of the project. All of the Proposed Project objectives support the underlying purpose of the project, which is to restore and maintain flood capacity at Devil's Gate Reservoir to meet its intended level of flood protection for the communities downstream. This requires restoring the design capacity of the reservoir and establishing a reservoir management system to maintain the flood control capacity of the reservoir. Therefore, the Proposed Project objectives are satisfactory per CEQA. Also, based on input received during the public scoping period and in conformance with CEQA Guidelines, several alternatives were developed that meet most of the basic objectives of the project, address diverse concerns of stakeholders, and lessen potentially significant effects of the project.

**Response to Comment 228-15:**

LACFCD is undertaking this project to increase the flood control capacity of the reservoir. The CEQA process is intended to inform and include the public and interested agencies in the process of analyzing the Proposed Project and Alternatives.

The construction contractors have not been hired yet. LACFCD uses a formally advertised sealed bid process for public works construction contracting. The goal of the process is to award a contract to the lowest cost "responsive" and "responsible" bidder. California Public Contract Code mandates the use of an advertised bid process for construction contracting. Contractors and service providers must meet certain qualification requirements to be considered by the County for selection and contract award.

More detailed information on the County's construction bidding process can be found in the *County of Los Angeles Countywide Construction Policy Guidelines* available online at the following location: [http://dpw.lacounty.gov/aed/construction\\_manual.pdf](http://dpw.lacounty.gov/aed/construction_manual.pdf).

**Response to Comment 228-16:**

See Response to Comment 228-3.

**Response to Comment 228-17:**

See Response to Comment 228-4. As noted above, emissions of CO<sub>2</sub> are detailed in the Draft EIR, Section 3.9 Greenhouse Gas Emissions. As noted in the discussion, impacts related to greenhouse gas emissions are considered less than significant, as CO<sub>2</sub> emissions do not exceed the established SCAQMD thresholds. As discussed in Section 4.7, Alternative 4, Sluicing will potentially generate more overall greenhouse gas emissions than the Proposed Project and therefore is considered environmentally inferior to the Proposed Project due to overall production of greenhouse gas emissions.

**Response to Comment 228-18:**

See Response to Comments 228-7 and 228-12. The Detailed Sediment Transport Capacity Analysis for the Arroyo Seco Channel, Appendix K in Draft EIR, analyzed the feasibility of sediment transport down the Arroyo Seco.

**From:** [Richard Rupp](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 11:54:57 AM

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To Whom it may Concern:

We are very concerned about the proposed project to clear sediment from behind Devil's Gate Dam in Pasadena. The assumption driving this seems to be that, with the basin presently over 80% full, removal is imperative. This seems to ignore the fact that the present sediment accumulation is the result of a century - a hundred years' - sediment flow from the mountains to the North, including the disastrous Station fire and two subsequent wet winters, which occurred before flora could regrow and hold the topsoil. This means that future heavy flows from those hillsides are extremely unlikely. Essentially, creating a cleaned-out flood basin at Devil's Gate is closing the barn door after the horses escaped. The chances of debris and sediment flows that would fill the remaining capacity of the basin are miniscule. That debris has already flowed! The hillsides have regrown underbrush on what topsoil is left, and future rains would find little sediment to move.

Secondly, removal of the willow forest presently covering much of the basin would actually create more sediment flow - particularly sediment that would then move to the base of the dam and clog the drain at its base - and if you talk to the workers at the dam, that has been what they regard as their major headache - no one who actually works there is worried about the basin filling up. Those of us who have watched the basin over the last few decades have observed that the area covered with the forest has been immune to significant erosion - even the heaviest rains cut only a narrow channel through the basin as it now stands. The County's plan envisions a "cleaned-out" basin, when in actuality such a basin never has existed, and if it did, it would be MORE, not less vulnerable, to erosion. As for the need for a basin that can accommodate future sediment flows, see above. There aren't going to be any huge ones, at least in the next couple of decades.

Thirdly, what about the side effects of such a foolishly huge project carried out in the heart of a very upscale community, disrupting one of the major recreational spots in the Northeast County? I haven't heard this discussed, but I think that once those trucks start moving, the dust starts flying, and the bulldozers start tearing out the forest and the wildlife habitat it has created, the County and the Flood Control District will find itself with a case of "710 Freeway Syndrome," wherein an engaged, motivated community, with powerful resources and connections, both financially and politically, becomes enraged and starts filing enough lawsuits to guarantee lifetime job security in the County legal department, not to mention protests, petition drives - you name it.

Fourth, the proposed destruction of the wildlife habitat and the recreational area is in itself simply outrageous. The Tom Sawyer day camps, the hikers, the equestrians, the dog walkers and mountain bikers, all would be deprived of using an area that, as taxpaying citizens, belongs to them. If NOT doing this removal actually put anyone, or any community, in imminent danger, of course that is the Flood Control District's mandate - but it is patently not true. Those of us who grew up in this area remember this basin from the 1950's, and it was essentially unchanged for the last 50+ years, until the Station fire and its aftermath caused a huge amount of sediment to flow into it. And, I remember, in those times, the Flood Control District was a lot more aggressive about keeping channels and basins cleared out. I'm thinking of the L.A. river as it goes through Eastern Glendale, down through Lincoln Heights. Fortunes were spent keeping it clear, from the 50's until just a decade or two ago, seemingly wasted fortunes. We have seen that allowing some sediment to accumulate, and trees and brush to grow in the concrete channel itself, has had NO impact upon the channel's ability to move floodwaters. The channels continue to function. Further, the sediment that is held in place by those trees, etc, seems to be pretty immune to erosion. Major flood waters cover the trees, they recede, and the landscape re-emerges, unscathed. And, of course, people have now become so enamored of this newly alive river, in the middle of a concrete channel, that if the District were to propose removal of that sediment it would be buried under the protest. As we have seen, the mayor dedicated one of his first days in office to boating down the L.A. river, in what used to be an ugly concrete basin. And "Save the River" looks like a reality, not a joke. The sentiment that favors letting this habitat grow and prosper is now pretty universal - I'm sure that frustrates the bulldozer salesmen who count the District as their

Comment 229-4  
continued

↑  
customers.

Comment 229-5

So why does the District want, all of a sudden, after 100 years, to denude THIS basin, pollute this community, destroy the wildlife habitat and recreational area, and - by the way - spend a hundred million of our tax dollars to do so? One is tempted to think that the availability of funds and the need for a big project to soak them up is more of a motivating factor than any actual need. Devil's Gate and the basin behind, and the public, and the mandate of the District, would be much better served by a gradual approach. One in which a small amount of sediment is removed every year, then the forest is allowed to heal itself and regrow over the scarred surface, while a small area adjacent is done the year after, and so on. A basin in which sediment is removed gradually (while still at a rate much greater than new sediment is likely to accumulate), and then heal - that is sustainable, affordable, sensible. The end result, even if the District were to remain obsessed with cleaning out all 100 years' accumulation, would be a basin, still covered with a willow forest, still habitat to rare birds, wildlife, and still usable by its owners - that is, us.

Richard F. Rupp  
Chieko N. Rupp

(Lifelong Residents of this Area)

## **Response to Comment Letter #229 (Richard Rupp)**

### **Response to Comment 229-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

As noted in Section 2.2.1, LACFCD History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. The most sediment that was deposited during a five-year period was 3.1 million cy, which occurred between 1937 and 1942. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur.

### **Response to Comment 229-2:**

See Response to Comment 229-1. Historically, gravel mining operations which routinely denuded the reservoir of vegetation have occurred in the reservoir. Vegetation growth in the reservoir is a recent

development, within the last 20 years since mining operations have ceased to exist. Additionally, sediment inflows to the reservoir since the Station Fire have exceeded 18 feet in many locations, burying large swaths of vegetation in the reservoir and creating an unstable sediment condition within the reservoir. Since the 2009 Station Fire, the reservoir has annually received less than average inflows of water; thus, no recent large movements of sediment have occurred within the reservoir.

Sediment flows through the reservoir are not only desired, but are a natural process of the Arroyo Seco. One of the project's objectives is to establish a reservoir configuration more suitable for routine maintenance activities, including reservoir management. Flow Assisted Sediment Transport or FASTing will be used for maintenance after the project's main construction phase has been completed, as described in Section 2.5.2 of the Draft EIR, and will help sediment naturally flow through the system.

When sediment is trapped in the reservoir, it reduces the volume available to provide adequate flood protection. When volume in the reservoir is reduced, sediment then moves to the base of the dam and clogs the valves and gates, which is not desired. Once the large sediment buildup in the reservoir is removed, the risk of clogging the outlet works with sediment is greatly reduced. LACFCD is committed to providing adequate flood control protection which requires anticipating future, larger storms in addition to the drought-like conditions since the Station Fire. By completing a large-scale sediment removal project at Devil's Gate, LACFCD is restoring the reservoir's capacity to previously existing historic levels.

**Response to Comment 229-3:**

LACFCD engaged in many community outreach efforts including a scoping meeting, multiple community meetings during the Draft EIR comment period, conducting briefings with elected officials and stakeholders, reaching out to the cities and many organizations, and submitting press releases and email notices. Outside experts, especially those on the Stakeholder Task Force, were consulted during the formation of the Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

Alternative 3, Configuration D, the Environmentally Superior Alternative from the Draft EIR, carefully balances flood control needs and reductions in impacts to habitat by restoring the required reservoir capacity while also minimizing the project footprint. Alternative 3 affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding

disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 229-4:**

See Response to Comments 229-1 and 229-3.

**Response to Comment 229-5:**

See Response to Comments 229-1 and 229-3.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs,

minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA USPS AND E-MAIL:  
[reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov)

January 21, 2014

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

## **Draft Environmental Impact Report (Draft EIR) for the Proposed Devil's Gate Reservoir Sediment Removal and Management Project (SCH #2011091084)**

Comment 230-1

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

Comment 230-2

The Lead Agency proposes to remove approximately 2.9 million cubic yards of sediment from the Devil's Gate Reservoir plus any additional sediment that accumulates during construction. Removal activities will include approximately 425 daily truck round trips during excavation with 25 percent of the truck haul trips transporting green waste debris to a local landfill with the remaining 75 percent of the truck trips hauling sediment to other sites. The project will take approximately five years to complete beginning in the summer of 2015. Reservoir management will then start after 2020 to reduce sediment buildup in the future and to reduce or eliminate the need of another large-scale removal activity.

Comment 230-3

On page 30 of the Air Quality Report, the Lead Agency cites a U.S. Environmental Protection Agency (EPA) conversion factor guideline for using EMFAC emission factors when estimating vehicle emissions for on-road trucks. This guideline discusses using a NOx conversion factor from grams per mile to grams per brake-horsepower per hour when estimating heavy-duty truck engine emissions. The SCAQMD staff notes that the conversion guideline document published by the U.S. Environmental Protection Agency (EPA) cited in Appendix B on page 30 in the Air Quality Report is outdated and does not apply to California. EMFAC2011 should be used instead in order to calculate emission benefits for cleaner trucks. In addition, the Lead Agency proposes to use EPA 2007 model year trucks during sediment removal activities as mitigation.<sup>1</sup> Since 2007 model year trucks are generally considered to have only PM controls but no NOx controls,<sup>2</sup> the Draft EIR should be revised omitting reference to reduced NOx emissions in the Final

<sup>1</sup>DEIR, Air Quality Report, page 31, Mitigation AQ-1

<sup>2</sup>California Air Resources Board: <http://www.arb.ca.gov/msprog/onrdiesel/regulation.htm>

Comment 230-3  
continued

EIR. If the Lead Agency will require only 2007 model year trucks during project activities, NOx reduction credit should not be taken in the air quality analysis. Finally, in order to determine the feasibility of the mitigation proposed starting on page 29 in Appendix B, the SCAQMD staff recommends that the proportion of 2007 and 2010 model year trucks during the applicable project years be reviewed using EMFAC2011 to determine if the measure is feasible in the Final EIR.

Comment 230-4

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:GM

LAC131105-01  
Control Number

**Response to Comment Letter #230 (SCAQMD)**

**Response to Comment 230-1:**

The comments by the South Coast Air Quality Management District's (SCAQMD) have been noted as guidance for Los Angeles County Flood Control District (LACFCD), as the Lead Agency.

**Response to Comment 230-2:**

LACFCD notes the details regarding the Proposed Project, including amount of removal, number of truck trips per day, and timing of sediment removal versus reservoir management.

**Response to Comment 230-3:**

The revisions have used EMFAC2011 for reduction analysis by comparing the aggregate fleet mix emission factors for 2015 to the specific emission factors for Model Year 2010 (MY2010). This revision used MY2010, since LACFCD can now ensure that all trucks used to transport sediment for the Proposed Project will meet the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions, which would equate to MY2010 levels.

**Response to Comment 230-4:**

Written responses will be provided to SCAQMD after completion of the Response to Comments document. These will be provided before the Final EIR is adopted, as the Response to Comments document will be finished as part of the Final Environmental Impact Report (EIR) process. LACFCD notes that Gordon Mize is the contact person regarding this comment letter.

**From:** [Susan Campisi](#)  
**To:** [reservoircleanouts](mailto:reservoircleanouts)  
**Cc:** [fifthdistrict@lacbos.org](mailto:fifthdistrict@lacbos.org); [evizcarra@lacbos.org](mailto:evizcarra@lacbos.org); [SNemer@lacbos.org](mailto:SNemer@lacbos.org)  
**Subject:** Fwd: Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 4:36:57 PM

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

Dear Ms. Farber,

Comment 231-1 | Below are my comments on the Draft Environmental Impact Report for the Devil's Gate Reservoir Sediment Removal Plan.

Comment 231-2 | California is in a severe drought. Water conservation and protection of our water resources need to be an integral part of any plan that impacts the Hahamongna Watershed Park and Devil's Gate Dam. The approach of dredging up a natural habitat, essentially creating a moon-like basin, is an old-school paradigm, one that belongs in the middle of the last century. We need a forward thinking, community-based, innovative design solution that works with natural forces and takes into account the larger ecology of the region. Why didn't the county consider true alternatives to each of these massively destructive options?

Comment 231-3 | This project is far too massive in scope and unjustifiably destructive. The DPW is looking at the problem of flood control in a myopic way, failing to look at the larger ecosystem. Did the county consider this plan's potential negative impacts on regional habitat restoration projects, such as the LA River revitalization project? Did the county take into consideration erosion of the shoreline and how this sediment removal plan might impact the shoreline? Did the county consider that sediment has value and that there could be a potential use for it (and potential monetary value associated with it)? Did the county look into the possibility of selling the sediment or donating it to beach restoration projects? Did the county consider doing anything with dredged-up sediment other than hauling it off in trucks to be dumped, essentially treating it as trash that will end up destroying another piece of land?

Comment 231-4 | How was flood risk assessment determined?  
 1. How did the county come up with 2.0 DDE and the need to remove 4 million cubic yards of sediment that forms the basis of this plan?  
 2. How did they assess risk of flood to justify removing this amount of sediment?  
 3. What's the risk assessment that underlies the need to remove 4 million cubic yards of sediment? And how did they determine that risk?  
 4. Why didn't the county consider removing less sediment over a longer period of time to avoid such an ecologically destructive plan?  
 5. A massive run-off of sediment occurred in the years following the Station Fire. Did the county take into account that the sediment coming down from the San Gabriel Mountains will be significantly reduced during any future big rainfalls? If no, why not?

Comment 231-5 | Time frame  
 1. What is the basis for a 5-year plan for sediment removal?  
 2. Why isn't the county considering a slower, longer term plan, one that is comprehensive, sustainable, and less environmentally destructive?

Comment 231-6 | Consider surrounding projects  
 Why didn't the county consider in their plan these other activities in and near the Arroyo?  
 1. The proposed flood control pipeline to run between Hahamongna and Eaton Canyon  
 2. Pasadena's West side project (Flint Canyon and the West trail)  
 3. Pasadena's Arroyo water intake project (up the Arroyo near the ranger station)  
 4. The reclamation of the JPL East Parking lot  
 5. The JPL parking garage – including restoration of West side trail by the JPL fence

Comment 231-7 | Trees and vegetation as flood control

Comment 231-7 continued  
1. Did the county consider that trees and natural vegetation aid in flood control?  
2. How does the county justify denuding the Hahamongna area of trees and vegetation as a plan for flood control?  
3. Why isn't the county considering a flood control plan that includes the natural ability of trees and vegetation to reduce flooding as part of that plan? Why not work with natural forces rather than against them?

Comment 231-8  
Water conservation  
Did the county consult with other agencies and organizations that deal with water conservation and watershed health? What about the LA River Restoration? Did the county consult with Pasadena Water & Power?

Comment 231-9  
Local residential communities  
Is the county planning on evacuating local communities during the massive dig-out?

Comment 231-10  
Other Dams and sediment removal projects  
Why is the county approaching each of the 16 sediment removal projects in this region as separate, isolated dig-outs instead of developing a comprehensive strategy that not only protects communities but also protects and restores habitat and conserves water? What does the county plan to do with all the sediment? Why can't the county look at all these dams collectively and come up with a more holistic, comprehensive, ecologically sound plan for the region? Has the county considered ways to use any sediment removed from all these dams? Has the county considered the possibility of selling sediment rather than create a dump site for it?

What is the county planning on doing with all this sediment? Why doesn't the county come up with a more visionary innovative solution that restores rather than destroys ecological balance?

The county is working from a paradigm of old-school thinking. The community is progressive and forward-thinking and environmentally conscious. Why can't the county work with the community to come up with a plan to protect the natural gifts of this region rather than destroy it?

Thank you for your time and consideration.

Sincerely,

Susan Campisi  
3349 Alicia Avenue  
Altadena, CA 91001

## Response to Comment Letter #231 (Susan Campisi)

### Response to Comment 231-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The comments are noted and have been responded to below.

### Response to Comment 231-2:

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” However, “[a]n EIR is not required to consider alternatives which are infeasible” (CEQA Guidelines Section 15126.6(a)) or “which could change the fundamental nature of the proposed project.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.* (1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the Environmental Impact Report (EIR) must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project’s significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

Los Angeles County Flood Control District (LACFCD) goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3 drastically reduces the project’s footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3, Configuration D, Option 2 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project. See Section 4.6 of the EIR for more information on Alternative 3.

### Response to Comment 231-3:

The Proposed Project will not decrease the current amount of sediment that flows downstream and therefore would not contribute to the erosion of beaches. Also as noted in the Sediment Management Strategic Plan (SMSP), “Without human intervention, most Southern California beaches would naturally be narrow and rocky. The wide beaches in Southern California were created and have been maintained by various agencies through artificial beach nourishment projects (also referred to as beach fill projects)

and the construction of protective coastal structures since the 1930s.” In addition, the SMSP states, “Since the Los Angeles River changed course in 1825, the largest waterway reaching this region of the coast is Ballona Creek, which has an estimated annual sediment yield of less than 50,000 cubic yards and delivers generally fine-grained sediment that is not appropriate for beach nourishment.” For general information on beach nourishment, please see Section 6.5.1 of LACFCD’s Sediment Management Strategic Plan Sediment Management Strategic Plan, which can be viewed here:

<http://dpw.lacounty.gov/lacfcd/sediment/files/FullDoc.pdf>

The sediment that came into Devil’s Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil’s Gate Reservoir will be transported to the existing placement sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at the LACFCD sites, please refer to Section 6.5 of LACFCD’s 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

**Response to Comment 231-4:**

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam’s lowest spillway was determined to be the standard acceptable level of risk at Devil’s Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil’s Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a Design Debris Event to occur.

**Response to Comment 231-5:**

See Response to Comment 231-4.

**Response to Comment 231-6:**

The Draft EIR contains a cumulative impact analysis within each of the subsections of Section 3.0 Environmental Analysis. The cumulative analysis contains projects determined by LACFCD and the surrounding cities and communities to have a potential cumulative effect due to overlapping time frames of the projects. The list of these projects is included in Section 2.9 Cumulative Scenario and includes the Jet Propulsion Laboratory (JPL) On-site Parking Structure, Devil's Gate Water Conservation Project, Arroyo Seco Canyon Project, and the Hahamongna Watershed Park Multi-Benefit/Multi-Use Project (which includes the Westside Perimeter Trail and reclamation of the eastside surface parking lot). Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130.

**Response to Comment 231-7:**

See Response to Comments 231-3 and 231-4. In order to remove the necessary amount of sediment from the reservoir some vegetation must be removed, as the vegetation sits atop many layers of accumulated sediment. While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed.

Sediment flows through the reservoir are not only desired but are a natural process of the Arroyo Seco. One of the project's objectives is to establish a reservoir configuration more suitable for routine maintenance activities, including reservoir management. Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main construction phase has been completed, as described in Section 2.5.2 of the Draft EIR, and will help sediment naturally flow through the system.

When sediment is trapped in the reservoir, it reduces the volume available to provide adequate flood protection. When volume in the reservoir is reduced, sediment then moves to the base of the dam and clogs the valves and gates, which is not desired. Once the large sediment buildup in the reservoir is removed, the risk of clogging the outlet works with sediment is greatly reduced. LACFCD is committed to providing adequate flood control protection which requires anticipating future, larger storms in addition to the drought-like conditions since the Station Fire. By completing a large-scale sediment removal project at Devil's Gate, LACFCD is restoring the reservoir's capacity to previously existing historic levels.

FASTing, a passive method of transporting sediment downstream, is currently used when possible and would be used during the Maintenance Phase of the Proposed Project; however, FASTing, even in combination with the Interim Measures Project (IMP), will not efficiently remove large amounts of sediment. As discussed under the No Project Alternative, Section 4.9, use of FASTing and IMP alone will not meet Proposed Project objectives. The removal of accumulated sediment on a yearly basis is the proposed management scheme after the original sediment removal is completed. The regular maintenance of the area will lower the potential need for a large-scale sediment removal operation in the future. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 231-8:**

Outside experts, especially those on the Stakeholder Task Force and from the City of Pasadena, were consulted during the formation of the Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

The goal of the Proposed Project is to maintain the flood control capacity of the reservoir; however, the Proposed Project is likely to improve groundwater recharge. The Proposed Project is designed to be a long-term plan with the reservoir management phase providing management for future sediment inflows. The yearly cleanout of sediment will reduce the possibility for the need of a future large-scale cleanout.

**Response to Comment 231-9:**

The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs and minimizing the duration of environmental and construction impacts to the surrounding communities. LACFCD is not planning on moving any residents during the Proposed Project implementation.

Given the current, limited capacity of the reservoir, however, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

**Response to Comment 231-10:**

See Response to Comment 231-3.

In recent years, LACFCD has identified new challenges in managing sediment. In particular, the wildfires occurring in 2007 and 2009 burned a large portion of the County and have led to an increased inflow of sediment and debris within LACFCD facilities. This has put pressure on the remaining capacity of existing sediment placement sites where LACFCD has traditionally placed sediment. As a result, LACFCD has

developed a 20-year Sediment Management Strategic Plan (Strategic Plan) for years 2012 through 2032 that pursues new alternatives which can reduce the environmental and social impacts of sediment management.

The Strategic Plan represents the results of a continuing dialogue about sediment management between the LACFCD and numerous stakeholders, including the United States (U.S.) Army Corps of Engineers (USACE), in the region. The Strategic Plan provides an overview of sediment management issues, evaluates various strategies to help identify optimal solutions for sediment management, and identifies general steps that should be pursued to meet the LACFCD's mission. The Strategic Plan is guided by the following key objectives:

- Maintaining flood risk management and water conservation
- Recognizing opportunities for increased environmental stewardship
- Reducing social impacts related to sediment management
- Identifying ways to use sediment as a resource
- Ensuring LACFCD is fiscally responsible in decision-making

The Strategic Plan is a living document that is open to other alternatives and may be revised in the future as conditions change. This Strategic Plan is intended to be an advisory document. Development of specific cleanout plans for the LACFCD's numerous facilities are guided by the Strategic Plan. During the development of these specific cleanout plans there will be opportunities for additional public input, including from the local communities affected by each cleanout. LACFCD is undertaking the Proposed Project to provide long-term sediment management for the area. LACFCD recognizes the many comments submitted by the public and agencies.

The disposal sites located to the east of the Proposed Project currently have sufficient capacity for the entire amount of sediment proposed to be removed. The disposal sites located to the west of the Proposed Project will provide additional capacity if needed. The available pits and disposal sites, as outlined in the Proposed Project Description, have enough capacity for the sediment that is planned to be removed.

Additionally, after the Proposed Project's main sediment removal has occurred FASTing is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually; however, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.



January 21, 2014

To: Los Angeles County Department of Public Works

Comment Letter #232

RE: Devil's Gate Dam Sediment Removal Proposed Project

Comment  
232-1

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

Comment  
232-2

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

Comment  
232-3

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

Comment  
232-4

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

Comment  
232-5

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

Thank you for the opportunity to comment on this DEIR.

Sincerely,



/s/ PETER M. WOHLGEMUTH

Hydrologist  
USDA Forest Service  
Pacific Southwest Research Station  
4955 Canyon Crest Drive  
Riverside, CA 92507

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**From:** Chavez, Deborah -FS

**Sent:** Friday, February 07, 2014 10:51:27 AM (UTC-08:00) Pacific Time (US & Canada)

**To:** reservoircleanouts

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

This is your official notice that the letter was not a USDA Forest Service response to the DEIR.

*Debbie*

Deborah J Chavez, PhD

USDA Forest Service

Pacific Southwest Research Station

Program Manager Urban Ecosystems & Social Dynamics Program

Acting Program Manager Fire & Fuels

tel 951-680-1558 / cell 951-315-3610

email [dchavez@fs.fed.us](mailto:dchavez@fs.fed.us)

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**Response to Comment Letter #232 (Peter Wohlgemuth)**

Note: Per Dr. Deborah J. Chavez, Program Manager Urban Ecosystems & Social Dynamics Program, USDA Forest Service, despite the letterhead this is not a USDA Forest Service response to the Draft EIR. See correspondence from Dr. Chavez above.

**Response to Comment 232-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 232-2:**

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of LACFCD's responsibilities to provide flood protection, LACFCD does not plan for "average" amounts of sediment and must be ready at all times for a Design Debris Event to occur.

**Response to Comment 232-3:**

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur

along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

**Response to Comment 232-4:**

See Response to Comments 232-2 and 232-3.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 232-5:**

Due to the nature of a dam and reservoir system, as the Arroyo Seco enters the reservoir, the slope naturally flattens and stabilizes within the reservoir. As a part of the sediment removal project, the cut plan mimics these historic slopes by incorporating 3:1 side slopes and varying but gradual bottom slopes, all of which are shallow and stable. In Alternative 3, the proposed cut at the northern end of the reservoir is approximately 25:1, a very shallow slope, which mimics the historic slopes in that area of the reservoir.

In addition, as stated in the Draft EIR Section 2.7, "To reduce potential impacts to erosion and water quality, the Proposed Project would be conducted in accordance with applicable standards and BMPs. The Proposed Project will also conform to the requirements in the latest edition of the LACDPW "Construction Site Best Management Practices Manual" (BMP Manual)." Implementation of adequate BMPs and Proposed Project activities occurring mostly during the dry season would avoid erosion of susceptible slopes along the borders of excavation and/or reservoir management areas.



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



In Reply Refer To:  
FWS-LA-14B0081-14TA0122

**JAN 21 2014**

County of Los Angeles Department of Public Works  
Water Resources Division  
P.O. Box 1460  
Alhambra, California 91802-1460

Attention: Reservoir Cleanouts Program

Subject: Draft Environmental Impact Report for the Devil's Gate Reservoir Sediment  
Removal and Management Project, City of Pasadena, Los Angeles County, California

To Whom It May Concern:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Environmental Impact Report (Draft EIR) for the Devil's Gate Reservoir Sediment Removal and Management Project in the City of Pasadena, Los Angeles County, California. The Los Angeles County Flood Control District (LACFCD) proposes to excavate of approximately 2.9 million cubic yards of sediment from the reservoir. The project will impact 120 acres of active floodplain within the Arroyo Seco watershed. Sediment removal will occur over a 5-year period beginning in the summer of 2015. Following completion of the project, vegetation will be removed annually to prevent it from re-establishing in the project footprint, and an average of 13,000 cubic yards of sediment will be removed annually to maintain capacity.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. Specifically, the Service administers the Endangered Species Act (Act) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) and provides support to other Federal agencies in accordance with the provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*). Section 7 of the Act requires Federal agencies to consult with the Service should it be determined that their actions may affect federally listed threatened or endangered species or their critical habitats. Section 9 of the Act prohibits the "take" (e.g., harm, harassment, pursuit, injury, kill) of federally listed wildlife. Take incidental to otherwise lawful activities can be permitted under the provisions of section 7 (Federal consultations) and section 10 of the Act.

Comment 233-1

Comment 233-2

The Service met with the LACFCD and the U. S. Army Corps of Engineers (Corps) on December 18, 2013, to discuss the proposed project and visit the project site. We appreciate the early coordination in preparation for a future potential section 7 consultation. Our primary concerns with respect to this project are the extent of impacts to the federally endangered least Bell's vireo (*Vireo bellii pusillus*, vireo) and its habitat, and to other sensitive habitat types and wildlife species. We recommend that additional alternatives, including reduced sediment removal and a smaller maintenance footprint, be evaluated to increase the extent of native habitats avoided, preserved, and restored within the project site. We offer the following specific comments and recommendations regarding project-associated biological impacts based on our review of the DEIR and our knowledge of declining habitat types and species within Los Angeles County. These comments are provided in keeping with our agency's mission to "work with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people."

**1. Project Purpose** – Clarify how removing 2.9 million cubic yards of sediment meets the target objectives and whether the objectives could be met while initially removing smaller volumes of sediment. We are concerned that the proposed level of capacity may have been derived to allow for water conservation operations within the reservoir, which is not the stated objective in the DEIR. We request the Final Environmental Impact Report provide the following additional information to clarify the need for this level of capacity:

- a. The current capacity of the basin relative to the original design capacity of 7,423,000 cubic yards.
- b. Any changes in dam operations associated with the proposed project.
- c. The relationship between the proposed capacity and the capacity restored in 1998. It is our understanding that the project completed in 1998 restored the dam and reservoir to its full operational capacity (DEIR, page 11), including capacity for water conservation, but water conservation is not listed as an objective of the project.
- d. The amount of sediment capacity required in absence of water conservation activities (i.e., water outflow matches inflow up to the downstream channel capacity).
- e. The proposed frequency of sediment removal and how the frequency of removal relates to the proposed capacity

**2. Environmentally Superior Alternative (Alternative 3)** – Alternative 3 reduces the extent of sediment removal from 2.9 to 2.4 million cubic yards and reduces the permanent maintenance footprint to approximately 51 acres. Although this alternative would result in a substantial reduction in impacts to sensitive habitats and species relative to the proposed project, given that the vast majority resources within the Los Angeles River Watershed have already been lost, we request the LACFCD to consider additional alternatives that may

further reduce the temporary and permanent impacts associated with the project. None of the alternatives considered evaluate potential changes in dam operations that may assist in reducing cumulative sediment (i.e., increasing release rates during smaller storm events to pass more sediment through the dam) or the potential to increase frequency of sediment maintenance to reduce the permanent impact footprint. In addition, it is not clear how the change in geomorphology and regular disturbance associated maintenance will affect the quality and extent of native riparian and scrub vegetation remaining outside the permanent maintenance footprint following completion of sediment removal.

We recommend evaluating the risks associated with a reduction in the initial quantity of sediment removed and reducing the maintenance footprint to a pilot channel with a smaller basin directly in front of the dam. The pilot channel would direct sediment into the basin where it can be removed annually from a smaller maintenance area. This should substantially reduce the long-term maintenance costs associated with the project and will prevent the distribution of sediment throughout the reservoir, except during very large storm events. A larger maintenance footprint may then only be required during the extremely rare 50-year storm event following a fire that burns the entire watershed.

**3. Impacts to the Active Floodplain** - The proposed project will impact 120 acres of active floodplain within the Arroyo Seco Watershed in an area that has remained largely undisturbed since at least 1994. A minimum of 91 acres within the project footprint are proposed to be cleared of all vegetation annually. The proposed mitigation measures (MM BIO 6-8) do not provide sufficient detail to determine if biological resources within the project area will be adequately mitigated (see below). In addition, no mitigation is provided for coastal sage scrub which is a sensitive vegetation community with potential to support the federally threatened coastal California gnatcatcher (*Polioptila californica californica*, gnatcatcher). Given the paucity of mitigation opportunities in the project vicinity, the feasibility of mitigating proposed impacts should be evaluated, and a conceptual restoration plan should be prepared for inclusion in the Final Environmental Impact Report. This plan should consider the following:

**a. Riversidean Alluvial Fan Sage Scrub** – The DEIR acknowledges the significance and rarity of this habitat; however, proposed mitigation includes restoring and/or enhancing the vegetation at a 1:1 ratio, for a total of 1.1 acres (MM BIO 6). The extent of Riversidean alluvial fan sage scrub was reduced, and the extent of area mapped as “scoured” was increased between 2010 and 2013. The change in extent of habitats was the result flow events during the winter 2010/2011 storm season and is expected in an active floodplain. Riversidean alluvial fan sage scrub depends on the dynamic natural processes of riverine systems, including scour and sediment deposition, for continued renewal of its habitat. Without the proposed project, we would expect Riversidean alluvial fan sage scrub to re-establish on top of sediment deposits with sufficient elevation to support the vegetation. The proposed project may permanently inhibit this process by reducing the elevation of streambed below what is necessary to support the



vegetation and/or removing the vegetation in conjunction with annual maintenance activities. Permanent impacts to the alluvial fan should be avoided. The restoration plan should include provisions for collecting native seed from the alluvial fan prior to the initiation of sediment removal to assist in the restoration of Riversidean alluvial fan sage scrub within the active floodplain, outside the maintenance area, following completion of sediment removal.

Comment 233-8 continued



**b. Coastal Sage Scrub** - The proposed project will impact 3.1 acres of coastal sage scrub, potential habitat for the gnatcatcher. Protocol surveys for the gnatcatcher should be conducted by a qualified biologist prior to initiating project activities. Regardless of whether gnatcatchers are observed, we recommend that coastal sage scrub impacts be mitigated by restoring existing degraded upland areas adjacent to the project area. Dispersal of gnatcatchers from the San Jose Hills and Puente Hills (southeast of the project site) to occupied habitat in the Santa Monica Mountains (northwest of the project site) is likely difficult and infrequent due to the paucity of available habitat between these areas. Remaining fragmented patches of coastal sage scrub along the foothills of the San Gabriel Mountains, such as the vegetation in the project footprint, provide important stepping stones for gnatcatcher population dispersal and genetic exchange.

Comment 233-9



**c. Riparian Vegetation and Wetland** – The proposed project will mitigate for impacts to trees within the project area at a 1:1 ratio (MM BIO – 7), and 101.13 acres of jurisdictional waters of the United States, including 62.5 acres of suitable habitat for the vireo, at a 1:1 ratio (MM BIO – 8). We do not believe that the proposed mitigation is adequate to offset impacts to the vireo; however, we anticipate that impacts to the vireo and its habitat can be addressed through the section 7 consultation process with the Corps. We are concerned that the current extent of vegetation under-represents the permanent impact to riparian vegetation in the project footprint. It appears many areas mapped as riparian vegetation in 2010 are mapped as “ruderal” or “scoured” in 2013 and that the extent of ruderal vegetation increased from 7.64 acres in 2010 to 22.8 acres in 2013. While ruderal areas are likely to develop into riparian vegetation in absence of the project, the proposed project will permanently prevent the development of riparian vegetation in the project area. Mitigation should be adequate to offset impacts to the entire extent of active floodplain where riparian vegetation will be precluded from developing.

Comment 233-10



Although the proposed mitigation measure (MM BIO-8) identifies the potential for onsite restoration of habitat, it appears there will be minimal opportunities for restoration of riparian vegetation in the project area, as only 1.2 acres of riparian vegetation was previously supported outside the proposed management area (Figure 3.6-5). The Corps is currently evaluating opportunities for restoration of portions of the Los Angeles River Watershed, including Arroyo Seco, as part of the Los Angeles River Ecosystem

Comment 233-11

Comment 233-11  
continued

Restoration Plan.<sup>1</sup> Underfunded portions of this plan may provide mitigation opportunities for the proposed project.

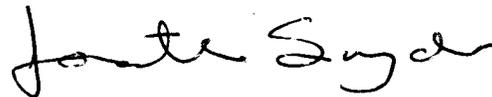
Comment 233-12

**d. Invasive Species** – Regular disturbance associated with annual maintenance of vegetation will result in an increase in the extent of invasive plant species within the project area. To ensure the proposed project does not result in spread of invasive plant species to adjacent undisturbed areas of native habitat, annual vegetation maintenance should include the requirement to remove invasive vegetation from all native habitat areas adjoining the project area.

Comment 233-13

We appreciate the opportunity to comment on the subject Draft EIR. If you have any questions regarding these comments, please contact Christine Medak of this office at 760-431-9440, extension 298.

Sincerely,



Karen A. Goebel  
Assistant Field Supervisor

cc:

Erinn Wilson, California Department of Fish and Wildlife  
Bonnie Rogers, U. S. Army Corps of Engineers

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<sup>1</sup> <http://www.spl.usace.army.mil/Portal/17/docs/publicnotices/DraftIntegratedReport.pdf>

## **Response to Comment Letter #233 (United States Fish and Wildlife Service)**

### **Response to Comment 233-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the comment addresses the details of the Proposed Project.

### **Response to Comment 233-2:**

LACFCD has been coordinating with the United States (U.S.) Fish and Wildlife Service (USFWS) regarding the Section 7 consultation for endangered species.

### **Response to Comment 233-3:**

LACFCD notes the meeting that USFWS had with LACFCD to discuss the Proposed Project and initiate coordination regarding the Section 7 consultation for least Bell's vireo.

USFWS recommends alternatives including reduced sediment removal and a smaller maintenance footprint. The Environmentally Superior Alternative, Alternative 3, Configuration D, most closely resembles these suggestions. Alternative 3, Configuration D drastically reduces the project's footprint and limits the maintenance area, allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, providing a greater distance between the western side and the excavation area. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

Specific comments and recommendations regarding project-associated biological impacts are responded to below.

### **Response to Comment 233-4:**

The Proposed Project, as stated in the Draft Environmental Impact Report (EIR), Section 2.4, Project Goals and Objectives is being undertaken to restore the flood control capacity of the reservoir. The Proposed Project does not involve changes to dam operations.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

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Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

The amount of sediment needing to be removed from the reservoir for flood control purposed is based on restoring the reservoir to the design capacity necessary for flood control storage or to safely contain future sediment inflow (volume for two DDEs below the spillway elevation of 1,040.5 feet) and protecting downstream communities from flooding. The amount is in no way related to other projects proposed in the area. The details listed in the Section 2.0, Project Description of the Draft EIR are the correct figures regarding the remaining capacity and the amount of sediment to be removed. The current remaining capacity in the reservoir is 1.3 million cy.

As stated in Section 2.2.1 of the Draft EIR, "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."

The 1998 rehabilitation project removed the DSOD restriction and restored use of the dam and reservoir to its full operational capacity. At that time, full reservoir capacity was not available; but the DSOD restriction on using full capacity was lifted. Clarification has been added to the Final EIR.

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, and a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Nevertheless, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 233-5:**

See Response to Comments 233-4. The Draft EIR analyzed a range of sediment removal amounts that would obtain the two Design Debris Events (DDEs). Removing less sediment would not provide the capacity necessary to achieve the Proposed Project objectives.

LACFCD determined that Alternative 3 would be the environmentally superior alternative, affecting the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives. Alternative 3, Configuration D, Option 1 would provide a buffer on the west side of the reservoir that

would allow for the movement of wildlife (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2 would avoid excavation of the western branch, providing a greater distance between the western side and the excavation area. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. Alternative 3 Option 2 reduces the project footprint from 120 acres for the Proposed Project down to 71 acres.

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, and a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Nevertheless, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

Due to the nature of a dam and reservoir system, as the Arroyo Seco enters the reservoir, the slope naturally flattens and stabilizes within the reservoir. As a part of the sediment removal project, the cut plan mimics these historic slopes by incorporating 3:1 side slopes and varying but gradual bottom slopes, all of which are shallow and stable. In Alternative 3, the proposed cut at the northern end of the reservoir is approximately 25:1, a very shallow slope, which mimics the historic slopes in that area of the reservoir.

In addition, as stated in the Draft EIR Section 2.7, "To reduce potential impacts to erosion and water quality, the Proposed Project would be conducted in accordance with applicable standards and BMPs. The Proposed Project will also conform to the requirements in the latest edition of the LACDPW "Construction Site Best Management Practices Manual" (BMP Manual)." Implementation of adequate BMPs and Proposed Project activities occurring mostly during the dry season would avoid erosion of susceptible slopes along the borders of excavation and/or reservoir management areas.

As such, no impacts to the stream or habitat are expected in the northern area of the reservoir, outside the project boundary, or outside the LACFCD easement. It should be noted that unconsolidated and recently deposited post fire sediment upstream is expected to continue to wash downstream during significant storm events and that this will occur regardless of the Proposed Project.

**Response to Comment 233-6:**

See Response to Comments 233-4 and 233-5.

**Response to Comment 233-7:**

Mitigation Measures MM BIO-1 through MM BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. These Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands

and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

As discussed in the Draft EIR, Section 3.6.6, Sensitive Wildlife, to avoid harm or take of any special status wildlife species, mitigation measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will be implemented. These include conducting preconstruction surveys, having a biological monitor onsite during construction, and implementing measures to avoid impacts to sensitive species. In addition, coastal California gnatcatchers surveys will be conducted in 2015. If coastal California gnatcatchers are identified on site, LACDPW will work with the agencies regarding additional mitigation measures through a formal consultation process. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant.

**Response to Comment 233-8:**

Due to the structure of the dam and basin, the amount of sediment entering the basin far exceeds the amount of sediment leaving the basin. Expansion or spreading of sediment does not occur in a relative horizontal direction but rather the accumulation of sediment occurs in a more vertical manner; and as much as 20 feet of sediment buildup has occurred in one rainy season, burying existing vegetation.

The sedimentation that has occurred as a result of the 2009 Station Fire, and is expected to continue to occur, has greatly reduced the size of this community and has inhibited its ability for succession.

Impacts to Riversidean Alluvial Fan Sage Scrub (RAFSS) would result in a significant impact requiring mitigation. To minimize impacts due to loss of RAFSS, Mitigation Measure MM BIO-6 has been provided. Removing the accumulated sediment and designing a system that will provide transport of sediment downstream will allow a more natural expansion of sediment that will benefit the alluvial fan sage scrub establishment. With implementation of this mitigation measure, impacts to RAFSS would be reduced to a level below significance.

As analyzed in the Draft EIR, Section 4.0, impacts to RAFSS during the sediment removal phase of Alternatives 1, 2, and 3 would be reduced in comparison to the Proposed Project. With all the Alternatives, impacts to RAFSS would be mitigated through restored and/or enhanced at a ratio of at least 1:1 ratio by acreage. This ratio will be finalized during the negotiations with the resource agencies, including CDFW, during the regulatory permitting process.

LACFCD has been and will continue to work closely with CDFW and USACE to determine a mitigation and restoration plan to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. With

implementation of this mitigation measure, impacts to Riversidean Alluvial Fan Sage Scrub would be reduced to a level below significance.

**Response to Comment 233-9:**

Protocol focused surveys for least Bell's vireo and coastal California gnatcatcher are being conducted in 2014. The LACFCD has been and will continue to work closely with the CDFW and USACE to determine a mitigation and restoration plan to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws.

**Response to Comment 233-10:**

Vegetation mapping is provided to capture changes in vegetation communities. With the dam and basin structure, the accumulation of as much as 20 feet of sediment buildup has occurred in one rainy season, burying existing vegetation and altering community composition. The LACFCD is working closely with CDFW and USACE regarding mitigation and restoration for the Proposed Project. This includes areas identified as scoured, which is considered under state and federal jurisdictions. Additional mitigation requirements will be provided in the CDFW and USACE permits.

**Response to Comment 233-11:**

The LACFCD is working closely with CDFW and USACE regarding mitigation and restoration for the Proposed Project. This will include onsite and offsite opportunities and will be discussed with the agencies and incorporated into the mitigation/restoration plan and Streambed Alteration Agreement and 404 permits. The County of Los Angeles Department of Public Works is a local sponsor of the USACE's *Arroyo Seco Watershed Ecosystem Restoration Study* and thus will continue to coordinate accordingly.

**Response to Comment 233-12:**

A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation and to satisfy permitting requirements. The plan will include and address invasive species management, monitoring, and success criteria.

**Response to Comment 233-13:**

LACFCD notes that Christine Medak is the contact person for USFWS regarding this comment letter.

**From:** [Darren Dowell](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 9:42:35 PM

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January 21, 2014

Comment 234-1 Thank you for addressing the following comments and concerns about the Devil's Gate Reservoir Sediment Removal and Management Project as described in the Draft Environmental Impact Report, dated October 2013.

Comment 234-2 1) Mitigation measures BIO-7 and -8 do not have sufficient detail in the report to be evaluated for credibility in achieving the claimed "less than significant" impact to riparian and sensitive habitats.

Comment 234-3 a) Given the size of the proposed project, there is an 'acreage problem' with implementing the mitigation on site. Since no information is given about off-site mitigation, it cannot be established if the mitigation provides equivalent biological value to what is proposed to be removed from Hahamongna.

Comment 234-4 b) The description of tree replacement as "up to 1:1 by acreage" in BIO-7 is problematic since, mathematically speaking, zero replacement is consistent with "up to 1:1". Mitigation at a level below 1:1 is clearly unacceptable.

Comment 234-5 2) The classification of habitat in the 2010 and 2013 surveys does not appear to be consistent or objective.

Comment 234-6 a) For example, p. 99 states that "In 2010, Coast Live Oak was present in the Riparian Woodland mostly at the southern end of the Proposed Project site (Chambers Group 2010a). In 2013, only four small patches were identified in the Project site, including one located east of the dam face (Chambers Group 2013b)." The wording implies that there has been a significant change to the content of Coast Live Oak in Hahamongna between 2010 and 2013. However, to my knowledge, this is not the case.

Comment 234-7 b) Page 95 states that "At the time of the 2010 survey (Chambers Group 2010a), the Proposed Project site was primarily composed of riparian and upland communities (see Figure 3.6-1: Devil's Gate Vegetation Communities (2010)). The Proposed Project site was resurveyed in 2013 (Chambers Group 2013) and is shown to be primarily composed of riparian and ruderal communities plus large scoured areas created as a consequence of the 2009 Station Fire". However, the impact of the scouring should have been readily apparent during the 2010 survey, due to the large rains and debris flow in January and February 2010 following the station fire in 2009.

Comment 234-8 c) Page 100 states that "much smaller patches of [the riversidean alluvial fan sage scrub] community remain 2013" in comparison to 2010. However, inspection of Figures 3.6-1 and 3.6-2 suggests that this change in acreage is merely an artifact of changing the survey boundary between the two years.

Comment 234-9 3) The statement on page 106 that the yellow warbler is not nesting within the proposed project site is factually incorrect and raises serious concerns about either the quality of the biological surveys or the fair presentation of the facts in the summaries.

Comment 234-10 4) The yellow-breasted chat is a California Bird Species of Special Concern which is present and likely nesting in Hahamongna, but is not listed in Table 3.6-3.

Contact: C. Darren Dowell, resident of Pasadena, CA

**Response to Comment Letter #234 (Darren Dowell)**

**Response to Comment 234-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The comments have been responded to below.

**Response to Comment 234-2:**

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

Mitigation Measures MM BIO-1 through MM BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. These Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures, including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. Los Angeles County Flood Control District (LACFCD) has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

**Response to Comment 234-3:**

See Response to Comment 234-2, above. Mitigation locations will comply with CDFW recommendations as follows: first onsite, offsite within the Arroyo Seco Creek, and offsite within the greater Los Angeles River watershed.

LACFCD determined that Alternative 3, Configuration D would be the Environmentally Superior Alternative, affecting the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives. Alternative 3, Configuration D, Option 1 would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife (see Section 4.6 of the Final EIR). Furthermore, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, providing a greater habitat buffer on the west

side. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and provide additional areas for wildlife movement.

**Response to Comment 234-4:**

See Response to Comment 234-2, above. As discussed in the Draft EIR, Section 3.6.6, Impacts and Mitigation, the Proposed Project would remove trees from the Proposed Project site. Implementation of Mitigation Measure MM BIO-7 will identify trees that will be removed or potentially affected, the appropriate level of tree replacement, and protection of the root zone of oak trees. Implementation of this mitigation measure will reduce impacts to a level below significance. LACFCD has been and will continue to work closely with CDFW to identify appropriate mitigation and replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW for review and approval prior to project implementation.

**Response to Comment 234-5:**

The 2010 vegetation survey was conducted before the Proposed Project was formulated, and the entire reservoir was mapped for established vegetation communities. Once the Proposed Project configuration was formulated, vegetation mapping was conducted again in 2013 in order to achieve a more conservative analysis of the potential impacts to biological resources from the Proposed Project.

**Response to Comment 234-6:**

The four small patches refers to the vegetation community Riparian Woodland mentioned in the preceding sentence. As discussed in that sentence, Coast Live Oak is part of that community. The discussion refers to a reduction in the Riparian Woodland community, not the number of Coast Live Oak. This has been clarified in the Final EIR.

**Response to Comment 234-7:**

Vegetation mapping is provided to capture changes in vegetation communities. With the dam and basin structure, the accumulation of as much as 20 feet of sediment buildup has occurred in one rainy season, burying existing vegetation and altering community composition. Within the storms following the Station Fire, 1.3 million cubic yards (cy) of sediment flowed into the reservoir, with each subsequent storm bringing the sediment closer to the dam face. Devil's Gate Dam and Reservoir is a dynamic system that is constantly changing. With the intermittent heavy flows that occur through the reservoir, sediment accumulates and washes throughout the basin. With this, the established vegetation communities are subjected to varying conditions and will continue to change throughout the life of the reservoir. During small rain events in the reservoir, flows typically rise to 6 and 8 cubic feet per second (cfs). Large rain events can take place several times per year where flows can rise from 2 cfs to over 300 cfs in the span of one hour; with extremely heavy rains producing flows of nearly of 1,350 cfs. The changes to vegetation composition, sediment buildup, and scouring due to these high flow events occurred over several years since the Station Fire and were captured during the 2013 mapping efforts.

**Response to Comment 234-8:**

There is a slight difference between the survey areas from the 2010 and 2013 surveys, and a portion of the Riversidean Alluvial Fan Sage Scrub community acreage in 2010 is not a part of the 2013 survey area. Further,

comparing the same area, the Riversidean Alluvial Fan Sage Scrub community was identified with more sediment composition within this community in 2013. This sedimentation that has occurred as a result of the 2009 Station Fire is expected to continue to occur if sediment removal is not implemented.

**Response to Comment 234-9:**

As discussed in the Draft EIR, Section 3.6, Wildlife, and in Appendix D, yellow warblers were identified within the basin and are considered to be present. Table 3.6-3 *Special Status Animal Species Occurring in Proposed Project Vicinity* has been corrected, and “but not nesting” has been removed from the table in the Final EIR. Locations of yellow warbler nest sites will vary from season to season. To remain in compliance with the Migratory Bird Treaty Act and CDFW Code Sections 3503 and 3503.5, a nesting bird survey will be conducted prior to ground-disturbing activities. LACFCD will continue to work closely with the CDFW and USACE regarding avoidance and protection measures outlined in the Streambed Alteration Agreement and 404 permits.

**Response to Comment 234-10:**

Yellow-breasted chats were observed during surveys for least Bell's vireo (see Appendix D of the Draft EIR). Table 3.6-3 has been updated in the Final EIR to include this species.

**From:** [John West](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project Draft EIR Comments  
**Date:** Wednesday, January 22, 2014 12:12:54 AM

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Gentlemen:

Please accept the following comments:

1) Justification for Sediment Removal: Before any plan for sediment removal is approved, the Department of Public Works, Water Resources Division, County of Los Angeles, should thoroughly review the justification for the original construction of the dam and the specifications to which it was constructed. Both the original justification and the dam's specifications were based on knowledge about storm probabilities and projected run-off in the region known almost 100 years ago. At that time, there was almost no climatological database from which to derive projections of the probability that storms of the magnitude that caused the flooding in the 1920's would happen nor to estimate the amount of the run-off. A lot has been learned since then. It may well be that that new knowledge may show a dam of the size and volume of the current dam is not needed or that a smaller or entirely different approach to manage the risk of flooding in the area is entirely acceptable. Given the cost and inconvenience to the public and impact to the environment of this project, proceeding with the project without such a review would be both financially irresponsible and disrespectful of the interests of the people the project is represented to serve.

2) Cooperation with Other Public Agencies to Reduce Project Impact to Affected Communities: Should the review called for in #1, Justification for Sediment Removal, be substantiated, before any work on sediment removal is initiated, the Department of Public Works, Water Resources Division, County of Los Angeles, should make every reasonable and prudent effort to examine how the public's interest may be best served by LADPW cooperation with any and all public agencies whose participation in the project could lessen the project's impact on the affected communities. Since impact on traffic to accommodate the number of trucks necessary to remove the sediment is one of the paramount and most broadly accepted negative impacts of the project, this means LADWP outreach to the public agencies with which responsibility for management of the principal roads on which the sediments will be transported rests. In particular, given the volume of sediment which will require transport to the east San Gabriel Valley, this means LADWP outreach to the agency responsible for the transition ramp from the eastbound 210 freeway to the eastbound 134 where the 210 freeway and eastbound 134 freeway meet at the uncompleted 210 freeway connection with the 710 south freeway. Already this is a major chokepoint. With the sediment removal project in place, and no relief in sight during the period of the sediment removal from completion of the 210-710 connection, it will only get worse. What is recommended for serious multi-public agency cooperation to address this longstanding bottleneck both in the interests of the public immediately affected by the sediment removal and the public affected every day by the bottleneck at this location is widening and redesign of the 210E-134E transition ramp. Were the 710 south never have been intended to be completed, this connection would never have been designed to permanently choke a four-lane freeway to one lane at such an important freeway connection point. This is an opportunity for multi-agency

Comment 235-2  
continued

↑  
cooperation to fix a longstanding issue with major positive impact to a broad section of the public.

## **Response to Comment Letter #235 (John West)**

### **Response to Comment 235-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

Devil's Gate Dam, built in 1920, was the first dam built by the Los Angeles County Flood Control District (LACFCD). The dam was built in response to the severe flooding of Los Angeles in the early 1900s and allowed for the channelization of and development along the Arroyo Seco. The Arroyo Seco normally carries low flows, but it is periodically inundated from severe floods flowing off its large, steep watershed that includes mountainous terrain. Prior to the construction of the dam, cities such as Pasadena, South Pasadena, and Los Angeles would experience flooding from the Arroyo Seco during storms. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway, also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam.

As stated in Section 2.2.1 of the Draft Environmental Impact Report (EIR), "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." The 1998 rehabilitation project removed the DSOD restriction and restored use of the dam and reservoir to its full operational capacity.

LACFCD has and continues to evaluate hydrologic, climate, and other environmental conditions as they relate to their facilities. In recent years, LACFCD has identified new challenges in managing sediment. In particular, the wildfires occurring in 2007 and 2009 burned a large portion of the County and have led to an increased inflow of sediment and debris within LACFCD facilities. This has put pressure on the remaining capacity of existing sediment placement sites where LACFCD has traditionally placed sediment. As a result, LACFCD has developed a 20-year Sediment Management Strategic Plan (Strategic Plan) for years 2012 through 2032 that pursues new alternatives which can reduce the environmental and social impacts of sediment management.

The Strategic Plan represents the results of a continuing dialogue about sediment management between the LACFCD and numerous stakeholders, including the United States (U.S.) Army Corps of Engineers (USACE), in the region. The Strategic Plan provides an overview of sediment management issues, evaluates various strategies to help identify optimal solutions for sediment management, and identifies general steps that should be pursued to meet the LACFCD's mission. The Strategic Plan is guided by the following key objectives:

- Maintaining flood risk management and water conservation
- Recognizing opportunities for increased environmental stewardship
- Reducing social impacts related to sediment management
- Identifying ways to use sediment as a resource
- Ensuring LACFCD is fiscally responsible in decision-making

The Strategic Plan is a living document that is open to other alternatives and may be revised in the future as conditions change. This Strategic Plan is intended to be an advisory document. Development of specific cleanout plans for the LACFCD's numerous facilities are guided by the Strategic Plan. During the development of these specific cleanout plans there will be opportunities for additional public input, including from the local communities affected by each cleanout.

LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two Design Debris Events (DDE) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 County of Los Angeles Department of Public Works Hydrology Manual and the March 2006 County of Los Angeles Department of Public Works Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million CY (two DDEs) below the spillway elevation of 1040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

**Response to Comment 235-2:**

LACFCD has been and will continue to coordinate with public agencies, including those listed in the Draft EIR Section 2.8 Required Permits and Approvals.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. Truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments along any of the haul routes. While the majority of the sediment disposal and associated truck traffic is expected to go to the disposal sites east of the Proposed Project, the Draft EIR also analyzed the use of disposal sites west of the Proposed Project. This will allow for flexibility in case one particular route is temporarily unusable.

In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, LACFCD will continue to work with local organizations, cities, and communities to minimize traffic impacts around the Proposed Project site.

**From:** [Donna Rodriguez](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 10:51:28 PM

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>

> The La Canada Flintridge Trails Council(LCFTC) is writing to you regarding our concerns with the Devils Gate Reservoir Sediment Removal and Management project. The LCFTC is a non-profit organization run by volunteers that watch over and protect the La Canada Flintridge trails since the mid nineteen seventies.

> The following are specific concerns:

> According to the Draft Environmental Impact Report(DEIR), for the following five years the Flint Canyon Trail will be closed for eight months each of those years. The street alternative, along Berkshire Place which has been used in the past will no longer be an alternative. The reason for this according to DEIR is that fifty trucks an hour will be using this street to access the freeway. Hence, the southern portion of the city will be cut off from the trails in Hahamongna.

> Also, all trail users coming north from Pasadena will be unable to access Hahamongna for eight months of the year. We would ask that every effort be made to keep the trails open as much as possible especially on weekends during construction. We strongly request that during the part of the year when construction is not taking place, the park should be left in a condition so that all trails in Hahamongna are open and accessible.

>

> Both the projects and alternatives, with the exception of the sluicing and the no project alternatives require that most of the trails in the park be closed since work is going on in their vicinity. We strongly suggest that the work be done in phases so that not all the trails need to be closed at one time.

>

> The DEIR trail map is misleading since it focuses upon specific designated trails. As a result of this emphasis many of the existing trails are not included in the report. The environmental impact of their removal is not considered nor is it at all mentioned. Clarification of the criteria used and who designated these trails is essential since some trails in this category were not represented in the DEIR. The DEIR is incorrect in stating that there are "trails adjacent to but not within the reservoir," noted on page 209 of the report. There is a network of existing trails which have been used for decades. We are curious to why these trails are not shown on the trails map in the DEIR and the environmental impact of their removal is not studied.

>

> The Perimeter Trail, the most important trail in the Hahamongna trail network, is also omitted in the DEIR. The LCFTC has worked very closely over the years with the Altadena Crest Trail Working Group that has been working to reconnect the Altadena Crest Trail portions of which need consistent maintenance. The trails of Hahamongna, and the Perimeter Trail in particular, are at the center of the regional trail network of Pasadena, South Pasadena, Altadena, La Canada- Flintridge and the Angeles Crest National Forest. Portions of the Perimeter Trail clearly appear to be within the footprint of the project. So the LCFTC emphasizes that the Perimeter Trail be represented and evaluated within the scope of the project.

>

> According to the DEIR, a small portion of the Altadena Crest Trail will be closed for the duration of the construction project. This will cut off trail users to and from Altadena. We would ask that efforts be made to keep this historic and important trail open.

>

> The DEIR is also deficient in not indicating where the access routes will be within the basin. The report only states that vehicular activity will be limited to established unpaved roads and unpaved parking lots, as noted on page 86. If the access routes within the park are not indicated, how can the public assess what the impact of these routes and parking lots will be upon he trails.

> We look forward to having you address our concerns,  
Donna Rodriguez  
LCFTC Vice President

**Response to Comment Letter #236 (Donna Rodriguez)**

**Response to Comment 236-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the details regarding the La Cañada Flintridge Trails Council.

**Response to Comment 236-2:**

Impacts to recreation were analyzed in the Draft Environmental Impact Report (EIR), Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 236-3:**

See Response to Comment 236-2.

**Response to Comment 236-4:**

Baseline recreation opportunities were described in the Draft EIR, Section 3.15, Recreation/Public Services. The trails were designated by the City of Pasadena, as shown on the City of Pasadena Department of Public Works' Arroyo Seco Trail Map. As seen on the Arroyo Seco Trail Map, the maintenance roads within the reservoir are not designated as trails by the City of Pasadena Department of Public Works. As noted in the Draft EIR, Section 3.15, maintenance roads within the basin are used by LACFCD, Southern California Edison (SCE), and the City of Pasadena, among others, for operations and maintenance of Devil's Gate Reservoir and other facilities in the area. The Draft EIR notes that these roads are used as unofficial trails when reservoir water levels and conditions permit. These maintenance roads are not designated as trails by the City of Pasadena or any other public agency. LACFCD encourages all recreational users of Devil's Gate Reservoir to use the designated trails.

**Response to Comment 236-5:**

See Response to Comment 236-4. Any impacts to the proposed Perimeter Trail were not included in the Draft EIR, as it is one of the improvements previously proposed under the Hahamongna Watershed Park Multi-Benefit/Multi-Use (MBMU) Project, not an existing trail at the site. No designated trails will be permanently closed due to implementation of the Proposed Project.

**Response to Comment 236-6:**

See Response to Comment 236-2.

**Response to Comment 236-7:**

As described in the Draft EIR, Section 2.5, Proposed Project Description, trucks will utilize two access roads (one existing and one upgraded) at the southern portion of the reservoir. The trucks will enter at one access road and exit at a separate access road to encourage circular flow. Within the work area, the truck path will vary depending on the location of the work. Please see Section 2.5.1 of the Draft EIR for further information on the access roads.

20 January 2014

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

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



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

Dear Ms. Farber and DPW Staff,

Comment 237-1 | Please enter my comments regarding the *Devil's Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report* (hereafter DEIR) into the official record. Regrettably, I find the massive DEIR unacceptable for so many reasons that it is difficult to prioritize my concerns. I intend to focus most on issues I believe others may not have emphasized, though this in no way reduces the importance of the criticisms submitted by others in their own areas of expertise or personal interest. I concur wholeheartedly with submissions by noted regional stakeholders, including *Friends of Hahamongna, Arroyo Seco Foundation, Pasadena Audubon, Santa Monica Mountains Conservancy, Friends of the Los Angeles River*, and individuals long devoted to protection of HWP, including its wildlife and water projects, Robert Staehle, Christle Balvin, Hugh Bowles and Marietta Kruells, plus arborist Rebecca Latta.

Comment 237-2 | I have enjoyed, and acted to protect, Hahamongna Watershed Park (HWP) for several decades. As a local Altadena resident, hiker, and wildlife biologist, I am particularly devoted to the park's flora and fauna, its trails that connect four regional trail systems, and support pastoral recreational activities that encourage exercise. This natural park... where ancient oak woodland meets seasonal ponds, wetlands, and streams; alluvial scrub; and arid chaparral... provides numerous benefits to local communities. I also value HWP's importance as a functional watershed, biodiverse habitat, and critical (if tenuous) wildlife corridor that connects the San Gabriel Mountains (Angeles National Forest) with the remnant natural stretches of the lower Arroyo Seco, with the San Raphael Hills and, from there, the Verdugo Mountains. HWP is the last viable connection between species in the San Gabriels and the Verdugo Mountains.

Comment 237-3 | While I recognize the multifaceted role of HWP as a popular recreational destination, wildlife habitat, and flood control structure (Devil's Gate Dam), and I respect the need to protect property below the dam from damage during high flood events, I adamantly oppose the assertion by the DPW that the current level of sediment constitutes an emergency that justifies the proposed obliteration of this incredible natural resource and beloved park. From the frisbee golfers and dog walkers, to horse riders and hikers, to birders, runners, and mountain bikers, and to its many other visitors and neighbors, HWP is irreplaceable. Yet the DPW has set itself on a course with this DEIR to destroy HWP as thoroughly, and with as little justification and regard, as it destroyed the ancient oaks in the Acradia Oak Woodland in January 2011 to create a Sediment Placement Site (SPS) for Santa Anita Dam sediments that the County has never used (see Concern VII).

Comment 237-4 | The DPW has failed from inception of its sediment removal approach (Project Goals and Objectives in the DEIR) to acknowledge the importance and sacredness of the park. It's first assumption *should have been* to respect and commit to protect the park, its habitat, and its visitors... then work from that premise to design a project which preserves those high values while achieving flood control goals. I, and many others, believe that such a conservative project plan is not only possible; it is imperative.

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

Comment 237-4  
continued

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

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

Comment 237-5

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

Comment 237-6

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

Comment 237-7

Why has the DPW failed to provide appropriate cost benefit and flood risk analysis for the proposed project and, instead of reducing the amount of sediment and acreage of habitat destroyed as required by the CRWQCB, significantly *increased* the amount of sediment removal from an unacceptable 1.6 million to a far greater 4 million cubic yards, involving the destruction of up to 120 acres of natural habitat?

Comment 237-8



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

Comment 237-9

acres of all natural terrain and vegetation in HWP basin, including establishment of a permanent maintenance facility, will "result in a less than significant impact to scenic vistas." This is demonstrably untrue, since scenic overlooks from the top of the dam, from the Oak Grove day use area, and from Sunset Ridge Overlook... indeed from vantage points all over the park that now look upon stands of willows,

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

The DEIR repeatedly characterizes obviously severe impacts as "less than significant." For example, under "Aesthetics," it is stated that large scale excavation and removal of hundreds of

Comment 237-9 continued sycamores, sage and red buckwheat shrubs, low contoured hills and open water... visitors would instead see a barren and lifeless wasteland if any alternative in the DEIR becomes a reality.

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

Comment 237-10 Why is there no detailed mitigation plan for this draconian project? The public and stakeholders cannot comment on important mitigation issues and options for HWP without a mitigation plan in the DEIR.

Comment 237-11 Questions like these are the tip of the iceberg for a DEIR that appears to be bulked out by the environmental consultant with boilerplate content and conflicting or inaccurate information. The alternatives offered in the DEIR are not authentic alternatives representing significant differences; instead, they are essentially identical repetitions of a theme involving permanent destruction of HWP basin utilizing polluting truck convoys that resort to outdated sediment dumping instead of exploring different sustainable sediment management options.

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

Comment 237-12 The DEIR asserts that the extensive obliteration of all trees and native vegetation, resulting in the death or displacement of resident wildlife, for the creation of a steeply sloped barren pit approximately 50 feet deep will result in a “less than significant impact” to biological resources. The proposed large crater will eliminate the heart of HWP, its expansive living basin, leaving only a “Friar Tuck” fringe of living trees around the perimeter of the park. I would certainly call that a “significant impact.”

Comment 237-13 The biological surveys conducted in HWP were incomplete and inaccurate. For example, in the Biological Resources section, the DEIR states that “most of the vegetation and trees in the Proposed Project area site were dead, washed out, or buried under sediment.” Photos in the DEIR were taken during natural dormancy for the deciduous willow trees, which were not dead, but simply losing their leaves for the season (see photo of willow leaves turning yellow). In fact, the willows, mulefat, California sycamores and other vegetation thrived in the fresh sediments and water that flowed through the park. The referenced statement and photos of “brown,” allegedly dead vegetation in the DEIR are either the result of shocking ignorance, or were deliberately intended to give a false, negative impression of HWP’s basin ecosystem.



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

Comment 237-14 Species present in HWP were not listed accurately, as present and/or breeding, such as the federally endangered Least Bell’s Vireo (*Vireo bellii pusillus*) in 2013. After damage caused by illicit SCE road grading near riparian areas in the park that spring, the vireos may have been driven away from nesting in the basin for a season; however, their presence has been well documented in the past. Yellow warblers (*Setophaga petechial*, formerly *Dendroica petechial*) have also been confirmed in HWP.

Comment 237-15 Several reptile species, including, for example, the San Diego nightsnake (*Hysiglena ochrorhyncha klauberi*) pictured on page 2, are present in the park. The rare coast patch-nosed snake (*Salvadora hexalepsis virgultea*) is listed in the DEIR, but it was not noted that this snake is a U.S. Fish & Wildlife Service and California Department of Fish & Wildlife “Species of Special Concern.” <http://www.californiaherps.com/snakes/pages/s.h.virgultea.html>

Comment 237-16 Worse, the DEIR lists both the western toad (*Bufo boreas*) and the California toad (*Anaxyrus boreas halophilus*), which are actually the same toad species. The genus Bufo is the former (older) name while the genus Anaxyrus is the current scientific name including sub-species: <http://www.californiaherps.com/frogs/pages/b.b.halophilus.html>

Comment 237-17



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

Comment 237-18

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

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

Comment 237-19

The list of native plants is insufficient, as well. For example, Plummer's (aka hairy) mariposa lily (*Calochortus plummerae*) is not listed as documented in HWP, though

several of these perennial bulbs grow in the margins of the basin among chaparral species. This beautiful and rare lily, formerly classified by the California Native Plant Society as a California Rare Plant Rank 1B, remains on the "watch list" (Rank 4) and its presence should be noted: <http://www.rareplants.cnps.org/detail/1599>

Comment 237-20

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

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

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



Comment 237-21

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

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

Comment  
237-21  
continued

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

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

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

Comment  
237-22



Predators and other species, including wood rats, mice, voles, ground squirrels, pocket gophers, moles, snakes, rabbits, skunks, raccoons, rattlesnakes and other snakes, lizards... along with larger species, such as mule deer, bears, and cougars displaced by the catastrophic loss of 50 to 120 acres of diverse habitat... will move into the territory of wildlife residing in surrounding neighborhoods and wild areas, causing stress and competition that will result in death of many individual animals and creating nuisance conflicts with surrounding homeowners, schools, and the JPL campus. With much of the Angeles National Forest above HWP burned and

not fully re-vegetated, and destruction of the basin commencing with trucks and rock crushers generating noise, dust and blocking movement across Flint Wash Bridge down into the Lower Arroyo Seco or up into the San Raphael Hills, displaced wildlife has few options for successful relocation.

Comment  
237-23

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

Comment  
237-24

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

Comment  
237-25

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

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

Comment  
237-25  
continued

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

Comment  
237-26

## II. Failure to Recognize Protective Designations and Jurisdictions over HWP

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

**Altadena Arroyos & Foothills Significant Ecological Area (SEA)** was reviewed and accepted by County staff and can be viewed in the current version of the General Plan at:

[http://planning.lacounty.gov/view/altadena\\_foothills\\_sea/](http://planning.lacounty.gov/view/altadena_foothills_sea/)

This SEA encompasses all of HWP.

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

Comment  
237-27

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

Comment  
237-28

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

HWP is a hub for four popular regional trail systems:

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

Comment  
237-29

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

Comment  
237-30

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

Comment  
237-31

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

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

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

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



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

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

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

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

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

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

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

### Health Impacts of Wildfires

November 2, 2012

Finlay SE, Moffat A, Gazzard R, Baker D, Murray V. PLOS Currents Disasters. Edition 1.

<http://currents.plos.org/disasters/article/health-impacts-of-wildfires/>

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

Comment  
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237-33

Comment  
237-34

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

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

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

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

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

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

#### **IV. Sediment Is a Resource Not Trash**

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

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

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

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

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

Comment  
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continued

Comment  
237-35

Comment  
237-36

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

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

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

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

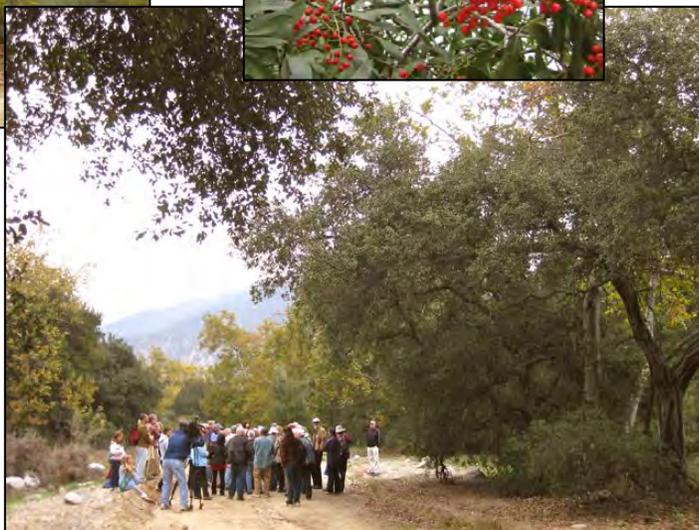
The mitigation plan for the Arcadia SPS, debuted in June 2013, is woefully inadequate and restoration of the site to authentic native habitat is, according to many experts, impossible. One wonders how the \$650,000.00 the Board of Supervisors provided for restoration in "compensation" for the loss of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

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

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

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

**BEFORE the Arcadia Oak Woodland was "removed."**



(Photos by Lori Paul unless otherwise credited)



Comment  
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continued

AFTER



Comment  
237-38  
continued

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



Comment  
237-39

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

Comment  
237-40

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

Comment  
237-41

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

Respectfully,



Lori L. Paul  
626.798.3235  
gaboon@sbcglobal.net  
153 Jaxine Drive  
Altadena, California 91001

CC:

Sussy Nemer, Field Deputy, Supervisor Antonovich  
Edel Vizcarra, Field Deputy, Supervisor Antonovich  
Bill Bogaard, Mayor of Pasadena  
Terry Tornek, Pasadena Councilperson  
Ann Wilson, for La Canada Flintridge

**Response to Comment Letter #237 (Lori Paul)**

**Response to Comment 237-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 237-2:**

Comment noted.

**Response to Comment 237-3:**

Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Alternative 3, Configuration D affects the least amount of reservoir area of all the action alternatives, while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer between the Oak Grove area of Hahamongna Watershed Park and the excavation area. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish. Alternative 3, Configuration D, Option 2 will also avoid all currently existing Oak Grove Disc Golf holes.

**Response to Comment 237-4:**

See Response to Comment 237-3. The amount of sediment needing to be removed from the reservoir is based on design capacity necessary to reduce flood risk to downstream communities. LACFCD goes to great lengths to lessen project impacts. The Draft EIR provides alternatives that avoid large areas of habitat in order to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities. As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

The Devil's Gate Dam was built in response to the severe flooding of Los Angeles in the early 1900s and allowed for the channelization of and development along the Arroyo Seco. The Arroyo Seco normally carries low flows, but it is periodically inundated from severe floods flowing off its large, steep watershed that includes mountainous terrain. Prior to the construction of the dam, cities such as Pasadena, South Pasadena, and Los Angeles would experience flooding from the Arroyo Seco during storms. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway, also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam. Removing the dam would remove the only flood attenuation mechanism that is in place along the Arroyo Seco. Areas downstream of the dam would be at high risk of flooding during storm events. Also, sediment would move downstream and accumulate within and adjacent to the channel as a result of removal of the dam. Sediment accumulation in the channel would reduce the capacity of the channel in those areas and would further increase the likelihood of flooding. As discussed in Section 4.10.3 of the Draft Environmental Impact Report (EIR), removal of the Devil's Gate Dam was considered but rejected due to its inconsistency with Proposed Project objectives, as well as the potential safety concerns. This alternative would fail to meet the Proposed Project objectives and would result in greater additional impacts than the Proposed Project (geology, hazards, hydrology, and public services). Also as discussed under the No Project Alternative, Section 4.9, use of FASTing, a passive method of transporting sediment downstream, even in combination with the Interim Measures Project (IMP) will not any of the meet Proposed Project objectives.

As discussed in Section 2.2.1 of the Draft EIR, LACFCD has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate

Reservoir after just two average water year storm seasons. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cy was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). This emergency project was not completed because, in March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan (Strategic Plan) and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

**Response to Comment 237-5:**

The California Regional Water Quality Control Board denied without prejudice a permit for the emergency project, with the understanding that the LACFCD would be initiating an EIR process for a project which would restore the required level of protection. As part of project approval, LACFCD will obtain the necessary permits from the California Regional Water Quality Control Board.

**Response to Comment 237-6:**

Per the CEQA, scoping comments are not required to be responded to in the EIR. Only comments received during the Draft EIR Public Review Period are required to be responded to, and these responses are included in this Response to Comments document. Outside experts in the community, especially those on the Stakeholder Task Force, were consulted during the formation of the Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

**Response to Comment 237-7:**

See Responses to Comments 237-3 and 237-4.

Under CEQA, the lead agency is not required to analyze an economic impact associated with a project in the EIR; as Section 15131(a) of the CEQA Guidelines states: "Economic or social effects of a project shall not be treated as significant effects on the environment." Moreover, CEQA allows economic analysis in the administrative record only if the basis for infeasibility, and thus rejection of a mitigation or alternative, is economic, as described in CEQA Guidelines Sections 15091(a)(3) and 15364.

**Response to Comment 237-8:**

See Responses to Comments 237-3 and 237-4.

The purpose of the Devil's Gate Dam and Reservoir is to provide downstream flood protection. If another flood control facility were placed downstream, sediment would accumulate there and would need to be excavated eventually. In this case, project impacts would not be avoided; they would simply be moved downstream.

Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cy of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. In order for the removal project to be efficient, and therefore reduce impacts and costs, the amount of sediment removed every year needs to exceed the amount of sediment deposited. Over 92 years, the average amount of sediment deposited each year is approximately 130,000 cy; however, Devil's Gate Reservoir is a dynamic system with constantly changing amounts of sediment deposited from year to year, depending on the frequency and intensity of storm events. If a 1 in 50 years storm were to occur, approximately 2.0 million cy (one DDE) of sediment could be expected to wash into the reservoir. Because of LACFCD's responsibilities to provide flood protection, LACFCD must be ready at all times for a design debris event to occur.

Given the current, limited capacity of the reservoir, a 50-year storm event that results in a DDE would result in storm flows with sediment flowing over the spillway. Flooding with mud/sediment would occur along the portions of the Arroyo Seco in the Cities of Pasadena, South Pasadena, and Los Angeles, impacting approximately 650 parcels and requiring closure of Interstate 110 from Orange Grove Avenue to Interstate 5. Additional information about the potential flood areas and analysis is shown in the Arroyo Seco Channel Hydraulic Analysis prepared by Bureau Veritas North America, Inc., available on the Project website. Please note that protocols are in place to monitor storms, reservoir conditions, and channel conditions and to communicate with emergency responders and the California Department of Transportation (Caltrans) to execute any necessary evacuations or freeway closures.

The Flood Hazard Warning and Contingency Plan (FHWCP) for Arroyo Seco Channel was prepared in an effort to coordinate with local and state agencies to minimize negative impacts in anticipated areas of flooding along the Arroyo Seco Channel, should those events occur. This effort is outside the scope of the Proposed Project and will not be included in the Final EIR. The potential flooding analyzed in the FHWCP is anticipated to occur during a Capital Flood Event (caused by a 50-year rainfall event) and under the current impacted reservoir condition of the Devils Gate Dam. The 50-Year Frequency Rainfall Bulked Flows and Superelevation Map in the FHWCP depicts the potential flooding risks along the Arroyo Seco downstream of Devil's Gate Dam.

During a single design-event-sized storm, the Rose Bowl is not expected to be impacted by flows from the dam; however, if sediment from each storm event is not removed from the downstream floodplain, each subsequent storm would increase the flood risk.

**Response to Comment 237-9:**

Although projects within the Hahamongna Watershed Park Master Plan are designed to take advantage of the scenic characteristics at the site, no City or County documents list the project site as a designated scenic resource. As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that

will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

The Draft EIR determined that visual impacts associated with reservoir management will be less than significant and, therefore, will not require mitigation. Reservoir management impacts to visual character under both of the Proposed Project's management options will result in a lower degree of contrast than seen during sediment removal. Due to the rapid growth of herbaceous plants, it is expected that during the majority of the year the Proposed Project site will appear vegetated. In addition, as with existing conditions, vegetation conditions on the Proposed Project site, including height and density, would change on a regular basis due to seasonal conditions, water flow/views, water storage, and sediment conditions.

**Response to Comment 237-10:**

See Response to Comment 237-3. Mitigation Measures MM BIO-1 through MM BIO-8 are enforceable and designed to reduce impacts through methods known to be feasible and effective. These Mitigation Measures are accepted by agencies that would be involved in consultation, negotiation, and final approval of Mitigation Measures including conceptual restoration plans. As with any project that involves California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) jurisdictional areas, the ultimate mitigation for impacts related to the wetlands and drainages under the jurisdiction of the resource agencies is negotiated with the resource agencies during the regulatory permitting process. LACFCD has been and will continue to work closely with CDFW and USACE to identify appropriate mitigation, replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation. Prior to commencement of the Proposed Project, LACFCD will have obtained all necessary permits for impacts to CDFW, USACE, and RWQCB jurisdictional areas including Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement. Clean Water Act Section 404 (b)(1) guidelines will be followed as a framework for compensatory mitigation. Through 404(b)(1) negotiations with USACE and negotiations with CDFW under Fish and Game Code Sections 1600-1616, a determination of the functions and values of impacted jurisdictional waters shall result in the coordination of appropriate Mitigation Measures for sediment removal.

**Response to Comment 237-11:**

Pursuant to Section 15126.6(a) of the CEQA Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, "[a]n EIR is not required to consider alternatives which are infeasible" (CEQA Guidelines Section 15126.6(a)) or "which could change the fundamental nature of the proposed project." (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.*(1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from

detailed analysis in an EIR if it fails to reduce or avoid the project's significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

**Response to Comment 237-12:**

See Response to Comment 237-3.

As discussed above, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. Wildlife species currently found in the Proposed Project area would be expected to either remain in the Proposed Project area or to reestablish once sediment removal activities have been completed.

Alternative 3, the Environmentally Superior Alternative, will restore the bottom elevation of Devil's Gate Reservoir to its design elevation of 986 feet, which coincides with the sill elevation of the lowest valve on Devil's Gate Dam, the sluice gate. The final elevations of the reservoir after the sediment removal phase is completed will not exceed historic elevations. Additionally, all side slopes will be excavated at a 3:1 ratio, or 3 feet horizontally for every 1 foot rise in elevation. The slope produced by this side cut is relatively shallow.

**Response to Comment 237-13:**

In Section 3.6.1, first paragraph, that statement was referring to the 2011 survey results, "As discussed above, in 2011 these resources were severely impacted by sediment deposition. Most of the vegetation and trees on the Proposed Project site were dead, washed out, or buried under sediment, reducing the amount and quality of vegetation communities and wildlife habitat." However, immediately following that statement, it continues, "Since publication of the NOP, some of the vegetation and trees have re-established, improving the amount and quality of vegetation communities and wildlife habitat of the Proposed Project site. In order to achieve a more conservative analysis of the potential impacts to biological resources from the Proposed Project, 2013 conditions were also taken into account." Therefore, the information presented is correct and does not warrant a change.

**Response to Comment 237-14:**

The biological resources of the Proposed Project site are described in Section 3.6 of the Draft EIR. The bird species recorded during surveys conducted specifically for the Proposed Project are presented in the Biological Technical Report (BTR) in Appendix D of the Draft EIR. Table 3.6-3 in the Draft EIR includes both least Bell's vireo and yellow warbler as present within the project site.

**Response to Comment 237-15:**

The species recorded during surveys specifically for the Proposed Project are presented in the BTR in Appendix D of the Draft EIR. The coast patch nosed snake was observed on site and the state and federal status has been included in the Draft EIR. As discussed in the Draft EIR, Section 3.6.6, Sensitive Wildlife, to avoid harm or take of any special status wildlife species, mitigation measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will be implemented. These include conducting preconstruction surveys, having a biological monitor onsite during construction, and implementing measures to avoid impacts to sensitive species. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant.

**Response to Comment 237-16:**

Species names used in the Draft EIR were consistent with the Master Watershed Plan for the Hahamongna Watershed by request of the City of Pasadena to maintain consistency with the Master Plan. Species names have been updated, and duplications of species have been eliminated in the Final EIR (see Section 3.6 of the Final EIR).

**Response to Comment 237-17:**

See Response to Comment 237-16.

**Response to Comment 237-18:**

The Draft EIR, BTR, and focused surveys provide rigorous existing conditions for biological resources (Draft EIR, Section 3.6; Appendix D, Biological Reports). These reports and related impact analyses were based on thorough field surveys conducted in 2010 and 2013, including general biological surveys, focused sensitive plant surveys, focused least Bell's vireo surveys, and federal and state jurisdictional waters surveys. Species with the potential to occur within the Proposed Project and species that were identified during surveys are presented in the biological survey reports in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records and species lists of occurrence were used as additional data; but since these are positive-sighting databases, this data was used only in support of the analysis from the previously identified factors. Based on the results of the BTR, additional protocol-level focused surveys were conducted for Proposed Project.

**Response to Comment 237-19:**

As discussed in the BTR (Appendix D of the Draft EIR), Chambers Group conducted the reconnaissance-level survey in the Survey Area on May 27, 2010. Focused surveys for special status plants that were floristic in nature (i.e., all plants observed were identified to the appropriate taxonomic level to determine rarity and/or special status) took place in June and August 2010, within the appropriate blooming periods. Because the sensitive plant species with potential to occur have two different flowering periods, two separate focused plant surveys were conducted. The first focused survey was conducted on June 28 through June 30, 2010. The second focused survey was conducted on August 24, 2010. As discussed in the BTR, Plummer's mariposa lily was surveyed for during the flowering period during focus plant surveys; it was not observed and, therefore, was determined absent from the site.

**Response to Comment 237-20:**

See Response to Comments 237-4 and 237-10.

As discussed in the Draft EIR, Section 3.6.6, Impacts and Mitigation, the Proposed Project would remove trees from the Proposed Project site. Implementation of Mitigation Measure MM BIO-7 will identify trees that will be removed or potentially affected, the appropriate level of tree replacement, and protection of the root zone of oak trees. Implementation of this mitigation measure will reduce impacts to a level below significance. LACFCD has been and will continue to work closely with CDFW to identify appropriate mitigation and replacement ratios, and sites for restoration and enhancement that will offset impacts and satisfy the requirements of all applicable laws. A detailed restoration plan will be prepared and provided to CDFW for review and approval prior to project implementation.

Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.

The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant.

**Response to Comment 237-21:**

The County of Los Angeles Agricultural Commissioner acknowledges that Polyphagous Shot Hole Borer (PSHB) infestations are already widespread in many areas of the County dating back to 2003 and that there is little that can be done to prevent PSHB infestations from occurring over a wider geographic area in the future. To this end, local infestations of PSHB are considered as part of the Project's 2010 existing conditions base line. In addition, all trees, branches, shrubs, and any other woody material that are cut and cleared from the debris basin would be chipped on-site and then loaded it into covered dump trucks to be hauled to the Scholl Canyon Landfill for final disposal; therefore, the Project would not result in significant impacts associated with infestations of PSHB at the Project Site or Scholl Canyon Landfill.

**Response to Comment 237-22:**

See Response to Comment 237-20. Although the western gray squirrel (*Sciurus griseus*) is not considered to be a sensitive or special status wildlife species, avoidance and minimization measures have been developed to protect wildlife. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

**Response to Comment 237-23:**

As discussed in the Draft EIR, Section 3.6.6, Sensitive Wildlife, to avoid harm or take of any special status wildlife species, Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 will be implemented. These include conducting preconstruction surveys, having a biological monitor onsite

during construction, and implementing measures to avoid impacts to sensitive species. Biological monitoring will include slowing down equipment to allow species to disperse from the area, and capture and relocation of species, if needed. With implementation of these mitigation measures, direct impacts to biological resources would be less than significant. LACFCD has been and will continue to work closely with the CDFW and USACE to identify appropriate mitigation and monitoring for the Proposed Project.

**Response to Comment 237-24:**

See Response to Comment 237-20. As discussed in the Draft EIR, Section 3.6.6, Sensitive Wildlife, Mitigation Measure MM BIO-4 will reduce any impacts associated with the Migratory Bird Treaty Act to less than significant.

**Response to Comment 237-25:**

LACFCD will continue to work closely with the CDFW and USACE regarding mitigation and restoration requirements for the Proposed Project. Weed abatement will be conducted in accordance with CDFW and USACE regulations, and the methods will be outlined in the project mitigation/restoration plan and Streambed Alteration Agreement and 404 permits.

**Response to Comment 237-26:**

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). As discussed in the Draft EIR, Subsection 3.12.3, Applicable Regulations, the HWPMP emphasizes protection of recreational and natural resources as well as the management of flood control for the downstream watershed. Key to determining the consistency of the project with the HWPMP is the conformance with the plan's Goals and Objectives. As identified in the Applicable Regulations portion of the Existing Conditions, Goal 2 and Goal 6 are the most crucial in determining conformance. These Goals focus on the basin being "managed to provide protection to the developed and natural downstream areas and providing a safe and secure park." The Proposed Project will manage the flood control basin for protection of the downstream areas by improving and maintaining the flood capacity behind Devil's Gate Dam. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

The Proposed Project is not located in a currently adopted Significant Ecological Area (SEA). The Los Angeles County Department of Regional Planning is currently in the process of updating the SEA Program. The Proposed Project is located within the Proposed Altadena Foothills and Arroyos SEA. Regional Planning's SEA updates, including the Proposed SEAs, have not been adopted nor are they covered under the current Hillside Management Area and SEA Ordinance.

The SEA does not change the land use designation or the zoning of a property. The intent of the proposed SEA regulations is not to preclude development but to allow limited, controlled development that does not jeopardize the unique biotic diversity within the County. Under the Ordinance for the Proposed SEA, safety activities and existing permitted uses are exempt.

As discussed in the Draft EIR, Section 3.12.6, Land Use and Planning, the Proposed Project will not have any significant impacts or conflict with the applicable land use plans, policies, or regulations of adopted plans.

The Spirit of the Sage Council Settlement pertains to City's implementation of the HWPMP. The Proposed Project is not one of the HWPMP projects.

**Response to Comment 237-27:**

See Response to Comment 237-26.

**Response to Comment 237-28:**

The National Park Service is conducting a "special resource study" of the area known as the "Rim of the Valley Corridor." This is the area that generally includes the mountains encircling the San Fernando, La Crescenta, Santa Clarita, Simi, and Conejo valleys of Los Angeles and Ventura counties in southern California. The purpose of this special resource study is to determine whether any portion of the Rim of the Valley Corridor study area is eligible to be designated as a unit of the national park system or added to an existing national park (NPS 2014).

This special resource study will provide recommendations to Congress but would not change current management without further action from Congress. Each of the alternatives considered in this study respects and retains the authorities of existing local, state, and federal agencies.

The area that Congress directed the NPS to study (study area) is not proposed for a national park. It is simply an area in which the NPS is asked to evaluate natural and cultural resources and opportunities for public use and resource preservation. It does not mean that all the land within the study area has nationally significant natural and cultural resources. Resources found to be nationally significant must also meet NPS criteria for suitability and feasibility to be considered for inclusion in the national park system.

As the NPS evaluates resources in the study area, often the focus of the study is narrowed. If significant resources are identified, the NPS will identify a range of options or alternatives to protect these resources and provide for public enjoyment.

The preliminary study findings of the Rim of the Valley Corridor Special Resource Study have not identified the Devil's Gate Reservoir or the Hahamongna Watershed Park as nationally significant natural and cultural resources. The nearest nationally significant resources identified in this study are the Jet Propulsion Laboratory (JPL) and the Rose Bowl. The Proposed Project does not involve either of these resources.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays) e. It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the

west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 237-29:**

As noted in the Draft EIR, Section 2.8 Required Permits and Approvals, a Section 404 Permit will be obtained from the USACE. LACFCD is currently coordinating with the USACE regarding the Section 404 Permit. In addition, LACFCD is a local sponsor of the USACE's *Los Angeles County's Arroyo Seco Watershed Ecosystem Restoration Study*, and the study was used in the preparation of the Draft EIR.

**Response to Comment 237-30:**

See Response to Comments 237-3 and 237-4.

**Response to Comment 237-31:**

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and non-cancer-related acute short-term and long-term impacts.

As part of the geotechnical study for the Proposed Project, a subsurface exploration was performed at four representative locations within the reservoir. Although a distinct ash layer was not observed, a "burn layer" within otherwise "clean" sediments was encountered at depth at three locations. Representative sampling of the burn layer was performed, and the samples were subjected to various environmental laboratory tests to evaluate the presence and concentrations of pertinent and regulated contaminants of concern. None of the contaminants that were detected in the sediment samples exceeded regulatory screening levels for this project, nor would they be characterized as hazardous.

The airborne transport of dust, including "micro ash," to offsite locations can be controlled through methods that are usually employed during earth removal operations, such as spraying the material with water. In addition, dust monitoring at the property boundaries will confirm the effectiveness of the water spraying. During offsite transport, the sediment will be covered in each truck to further reduce the potential for dust.

**Response to Comment 237-32:**

See Response to Comment 237-31.

**Response to Comment 237-33:**

See Response to Comment 237-31.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**Response to Comment 237-34:**

See Response to Comment 237-31.

**Response to Comment 237-35:**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As a result, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the reservoir will be transported to the placement sites listed in Section 2.0, Project Description in the Draft EIR.

For further information regarding beneficial uses for sediment at LACFCD sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx>.

**Response to Comment 237-36:**

See Response to Comments 237-11, 237-30, and 237-35.

The Draft EIR analyzes long-range maintenance of the reservoir under the Reservoir Maintenance phase of the Proposed Project and Alternatives. Outside experts in the community, especially those on the Stakeholder Task Force, were consulted during the formation of the Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

**Response to Comment 237-37:**

The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was

analyzed in the Draft EIR as a cumulative project, as described in Section 2.9. The Proposed Project does not involve construction of a pipeline.

**Response to Comment 237-38:**

A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation and to satisfy permitting requirements. The plan will include and address monitoring and success criteria.

**Response to Comment 237-39:**

See Response to Comment 237-7. LACFCD notes that the commenter disapproves of the October 2013 Draft EIR, and would like a revised analysis that includes a cost-benefit analysis.

**Response to Comment 237-40:**

See Response to Comment 237-36.

**Response to Comment 237-41:**

The commenter's contact information has been retained and added to the mailing list.

**From:** [dmdurham52@gmail.com](mailto:dmdurham52@gmail.com)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project comment from citizen  
**Date:** Tuesday, January 21, 2014 7:48:12 PM

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To Whom It May Concern:

These are my comment on the EIR for the [Devil's Gate Reservoir Sediment Removal and Management Project](#).

Comment 238-1

I believe there is inadequate measure of the environmental impact on residents, businesses, recreation areas and schools to the west of the Arroyo and assert that the proposed action would disproportionately impact economically disadvantaged populations, and that these effects would comprise a grave environmental injustice.

Comment 238-2

Why is the sediment removal transport focused on the west side? Is it because the voices of Altadena come from citizens with less political influence and wealth than their La Canada counterparts? the damage to the natural habitat, traffic, air pollution and noise pollution will be bad everywhere around the dam, but do you acknowledge the people of Altadena will suffer disproportionately compared to Pasadena and La Canada populations?

Comment 238-3

The proposed project is short-sighted and is a temporary bandage on a problems that are ongoing and actually caused by the dam. It also exacerbates long term environmental impacts to the larger environment, preventing the delivery of sand to the eroding coastline.

Comment 238-4

Did the county consider a 100-year plan that would involve acquisition of Arroyo properties that would be threatened in a flood?

Will the county consider an imminent domain campaign over the next century to take custody of potentially threatened homes and businesses so that these areas could be restored to their natural states and serve as a buffer against flood?

Comment 238-5

I have worked at JPL since 1980 and have seen it evolve from a gravel pit wasteland, raided by dozens of trucks daily, to a splendid' rich riparian environment and unique recreational area. I believe your current plan inadequately addresses the rarity of this environment and does not do enough to protect the birds and wildlife that now reside there. The habitat should remain intact.

Comment 238-6

Will you please consider a 20-year or longer plan to more gently remove the sediment that is necessary? Will you please devise a sluicing system to allow the sand of the San Gabriels to reach the beach to help mitigate the out-of-control erosion.

Please take the long view, allow the natural habitat of the Arroyo to thrive, and build a better plan with greater input from all stakeholders, which your current plan does not reflect.

Sincerely,  
 Mary Beth Murrill  
 3293 Alegre Lane

Altadena CA 91001

**Response to Comment Letter #238 (Mary Beth Murrill)**

**Response to Comment 238-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Draft Environmental Impact Report (EIR) adequately analyzes impacts to the environment and community.

**Response to Comment 238-2:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site, will have a potentially significant impact. This intersection is not located in Altadena but in La Cañada Flintridge. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. Los Angeles County Flood Control District (LACFCD) will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. This includes impacts to the surrounding areas of the Proposed Project site, including the Altadena area. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

**Response to Comment 238-3:**

Devil's Gate Dam, built in 1920, was the first dam built by LACFCD. The dam was built in response to the severe flooding of Los Angeles in the early 1900s and allowed for the channelization of and development along the Arroyo Seco. The Arroyo Seco normally carries low flows, but it is periodically inundated from severe floods flowing off its large, steep watershed that includes mountainous terrain. Prior to the construction of the dam, cities such as Pasadena, South Pasadena, and Los Angeles would experience flooding from the Arroyo Seco during storms. The Rose Bowl, built in 1922, and the Arroyo Seco Parkway, also known as State Route 110, completed in 1953, are two examples of downstream development made permissible by the construction of Devil's Gate Dam.

The scope of the project is to restore capacity for Devil's Gate Reservoir. The dam provides the only flood attenuation mechanism that is in place along the Arroyo Seco. Without the dam, areas downstream would be at high risk of flooding during storm events. Also, sediment would move

downstream and accumulate within and adjacent to the channel as a result of removal of the dam. Sediment accumulation in the channel would reduce the capacity of the channel in those areas and would further increase the likelihood of flooding.

The Proposed Project will not decrease the current amount of sediment that flows downstream and therefore would not contribute to the erosion of beaches. Also as noted in the Sediment Management Strategic Plan (SMSP), "Without human intervention, most Southern California beaches would naturally be narrow and rocky. The wide beaches in Southern California were created and have been maintained by various agencies through artificial beach nourishment projects (also referred to as beach fill projects) and the construction of protective coastal structures since the 1930s." In addition, the SMSP states, "Since the Los Angeles River changed course in 1825, the largest waterway reaching this region of the coast is Ballona Creek, which has an estimated annual sediment yield of less than 50,000 cubic yards and delivers generally fine-grained sediment that is not appropriate for beach nourishment." For general information on beach nourishment, please see Section 6.5.1 of LACFCD's Sediment Management Strategic Plan Sediment Management Strategic Plan, which can be viewed here:

<http://dpw.lacounty.gov/lacfcd/sediment/files/FullDoc.pdf>

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, and a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Nevertheless, it is estimated that approximately 13,000 cubic yards (cy) of sediment will be removed by excavation annually. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

**Response to Comment 238-4:**

See Response to Comment 238-3. Taking custody of downstream properties is outside the scope of this project.

**Response to Comment 238-5:**

See Response to Comment 238-2.

Alternative 3, Configuration D is considered the Environmentally Superior Alternative. Alternative 3 affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 238-6:**

See Response to Comment 238-2 and 238-3. LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. This alternative would involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system; this sediment would need to be mechanically removed and trucked out from numerous downstream locations potentially including the two soft-bottom portions of the channel. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

Outside experts in the community, especially those on the Stakeholder Task Force, were consulted during the formation of LACFCD's Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts, cities, and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. The proposed yearly cleanout of sediment after the completion of the Proposed Project will reduce the necessity for a future large-scale cleanout. Also, as mentioned in Response to Comment 238-5, the Proposed Project Alternatives provide options that would allow for habitat to reestablish outside the maintenance areas.

**From:** [Mary Fitzpatrick](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Comments on EIR & Hahamonga  
**Date:** Tuesday, January 21, 2014 8:38:48 PM

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I would like to voice my opposition to a drastic, "clear-cut" type of sediment removal and advocate for a more gradual and continual process, over many years, and in favor of protecting the trees, plants, and wildlife that make the Hahamonga Basin a special place.

Let's not do to Hahamonga what happened in Arcadia. There is no need for wholesale destruction. I value my oaks and gnatcatchers.

Mary Fitzpatrick  
wordfitz@aol.com

Comment 239-1

## Response to Comment Letter #239 (Mary Fitzpatrick)

### Response to Comment 239-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the commenter's opposition for the Proposed Project and support for a more gradual process that protect wildlife and vegetation.

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. For example, the Draft Environmental Impact Report (EIR) concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. Also, implementation of Mitigation Measure MM BIO-7 will identify trees that will be removed or potentially affected, the appropriate level of tree replacement, and protection of the root zone of oak trees. Implementation of this mitigation measure will reduce impacts to a level below significance.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**From:** [Pat Phillips](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Wednesday, January 22, 2014 8:08:26 AM

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To:  
 County of Los Angeles County  
 Department of Public Works  
 Water Resources Division  
 Attn: Reservoir Cleanouts Program  
 P.O. Box 1460

RE Devil's Gate Reservoir Sediment Removal and Management Project

I am a 25-year resident who owns horse property and a horse-boarding business in Altadena and live a half a block away from Devil's Gate dam. As an equestrian I specifically chose to purchase my property because it has stables and because it's so close to the mountain trails. I've enjoyed riding my horse, mountain biking, running and hiking in the Devil's Gate Dam, La Canada-Flintridge trails, and Brown Mountain trails which are all extremely close to my home. My family and I are active in the mountains on a daily basis. My three children have grown up enjoying the trails that we live by. In the 1980s I assisted with establishing trails along the dam and in the mountains and played a major part in the "share the trail" project where mountain bikes, hikers and equestrians have learned how to enjoy the trails together. Currently I'm a member of CORBA and have logged many hours assisting trail restoration in the mountains and along the dam so that others may enjoy the natural habitat that we're so fortunate to live by.

Comment 240-1

I am concerned about the sediment removal project because as a home owner my property value will go down. Should I desire to sell my property and relocate, it will be extremely difficult to sell the benefits of living so close to nature and the mountains to prospective buyers. Forget about selling to a family with small children. The health risks to small children and their respiratory systems is too great for a young family to find my home during the sediment removal project desirable. The location of my property has always been a selling point because my home is so close to the trails. I have stables in my backyard and have enjoyed a horse-boarding business for the last twenty years. The selling point for my stables is that I live a half a block away from the trails. This project puts my business at risk as well as the horses and riders. It puts my business at risk because my boarders will leave to another location because they can no longer enjoy riding in the trails so close to my home. Their health and wellbeing are put in jeopardy because it will no longer be safe to cross Windsor Ave. nor will it be safe to ride their horses around the dam or in the trails closeby. This project puts my livelihood at risk and then what happens when I can no longer afford my home, but I will be unable to receive the fair market value for my home because of your 5-year project which decreases the value of my property as well as its desirability.

Comment 240-2

If you're unfamiliar with horses they're extremely perceptive to their environment. For example, when the horses leave my house to go for a ride they exit my gate and walk a half a block to Windsor Ave. At the stop sign we wait to cross the street. The traffic currently is already busy with commuters. However, the inundation of traffic with semi-trucks and utility trucks will make the congestion on Windsor Ave. even more significant and dangerous. Horses spook easily with an unfamiliar stimulus and/or unexpected stimulus. Should one of my boarders, my

Comment 240-3

wife, my daughter or myself begins to cross the road during this proposed project and our horses becomes startled by the air breaks of the semi-truck the horse could potentially rear up in fear and land on the rider: which is often fatal occurrence. Or, it could run into the truck because it doesn't know where to go and can't beat the speed of the truck.

Comment 240-3  
continued

Will the drivers of the semi-trucks be sufficiently trained to ensure the safety of equestrians - inclusive of the rider and the horse? Will they be trained to respond safely so as not to spook the horse with unexpected movements or air-break sounds? If you've never seen a horse spook due to an unexpected sound or movement I can assure you it is a potentially dangerous experience - which can and does cause physical harm. Should this unfortunate occurrence happen and the equestrian is seriously injured or dies, then most certainly the County of Public Works Water Resource Division has been put on notice that you have been informed and have knowledge of the potential harm, risk and danger this project puts to equestrians and the public at large should God-forbid this happen during the project.

Recently, we've become aware of the County's project for Devil's Gate sediment removal and management and the availability of the draft environmental impact report (DEIR). In addition, we have been advised that the County is planning a pipeline to pull water from Devil's Gate to Eaton Wash at essentially the same time.

We know the recreational impact has been grossly underestimated and biased and that it's imperative that mitigation measures are considered and evaluated. We also know that the impact on traffic while considered an unavoidable and significant result of the proposal, the reports also do not accurately reflect the adverse effects and impacts on the surrounding communities, including Linda Vista and the Rose Bowl, especially as it pertains to the proposed pipeline. It's imperative that the environmental impact reports accurately reflect the adverse effects on the constituents who are both recreational users and residents of the the surrounding communities of Devil's Gate dam, including Pasadena, Altadena, Linda Vista, La Vina, La Canada-Flintridge, Montrose, La Crescenta. and Chevy Chase Canyon.

Notable concerns are the following:

Recreation - According to the DEIR, use of the park facilities may be less desirable due to construction-related emissions, noise, dust, visual, and traffic impacts associated with the sediment removal. It is stated in the DEIR that "recreational users may choose to visit other area parks, recreational facilities, or trails due to the temporary access restrictions or the indirect effects of construction-related activities during reservoir management activities." The DEIR fails to recognize that there are no other park options in the area that offer the unique features that Devil's Gate dam and its natural habitat offers. Recreational uses such as horse-back riding, disc golf, ornithological societies, and environmental enthusiasts have no alternatives within a 20 mile radius. These activities are endemic to Devil's Gate dam and is what brings people at large to the area as well as why myself and other homeowners have chosen to purchase real estate in this particular location. This project greatly adversely impacts my real estate value as well as the personal reasons I've chosen to reside in this particular area of Altadena.

The dirty little secret that is the report fails to refer to and none of the powers that be want to reveal is the permanent desecration of Devil's Gate dam natural habitat.

Traffic - The traffic impacts on the community as well as the Woodbury Corridor and New York Drive in Altadena as a result of this project and the related pipeline have not been accurately nor adequately addressed and no assurances provided to curb the negative impact. Nor have there been any preventatives presented to alleviate

Comment 240-6

Comment 240-7

Comment 240-7 continued  
the disruption of natural flow of traffic. Since the Windsor/Arroyo freeway entrances exits are extremely popular and heavily used, the report does not address this. Beyond the traffic impact is the human risk factor. On or about the year 2010 the City of Pasadena inadequately re-striped the northbound and southbound Windsor Ave. thereby eliminating the safety zone for cyclists riding on Windsor Ave. This inherently creates a potential litigation quagmire adverse to the City of Pasadena.

This safety zone is currently almost non-existent with everyday commuters and is most assuredly eliminated with heavy utility trucks and semi-trucks traveling northbound and southbound on Windsor Ave. This creation of this situation by the county of Los Angeles Department of Public Works Water Resources Division puts them, the City of Pasadena, and the private utility trucks and corporations and anyone else involved in the project culpable during litigation should an accident or multiple accidents arise from this removal event, especially since each of the governing bodies have been forewarned about the potential health risks and safety risks involved in this proposed project.

Comment 240-8  
Furthermore, there is extreme suspicion regarding the failure to mention or address the pipeline project described in the March 2013 Devil's Gate and Eaton Storm Water Flood Management Project Proposition 1-E grant funding request.

Comment 240-9  
And finally, due the extreme health hazards and high risk to the respiratory health of the children in the surrounding area as a result of this project there is a potential class action lawsuit in the coming years. The city of Los Angeles and the County of Los Angeles have been advised and forewarned of the extreme adverse health risks and effects on the children in the surrounding schools including the many early childhood schools and preschools as well as the high schools and elementary schools in the surrounding areas including: Crestview Preparatory School, Child Educational Center, Saint Francis High School, La Canada High School, Paradise Canyon, Flintridge Preparatory School, the magnet schools in Altadena, Muir High School and others. There is a huge population of youth and future constituents that each of the governing factions are putting at risk.

Sincerely,  
Patrick Phillips  
Altadena, CA 91001

**Response to Comment Letter #240 (Patrick Phillips)**

**Response to Comment 240-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

**Response to Comment 240-2:**

Air quality impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Section 3.5. Los Angeles County Flood Control District (LACFCD) has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant. As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

Potential effects to horses stalled near the Proposed Project site would be similar to the construction-related impacts from emissions associated with sediment removal to nearby residents and Hahamongna recreational users. It should be noted that construction activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays); so the maximum construction impacts would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project. Additionally, hauling traffic will not occur on Windsor Avenue north of Oak Grove Drive.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Comment regarding economic impacts to surrounding homeowners has been noted.

**Response to Comment 240-3:**

See Response to Comment 240-2. The Proposed Project is limited to excavation and transportation of sediment that has accumulated in Devil's Gate Reservoir and would not introduce any new uses that do not currently occur in and around the Reservoir. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant.

**Response to Comment 240-4:**

See Response to Comment 240-2.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

**Response to Comment 240-5:**

See Response to Comment 240-2.

**Response to Comment 240-6:**

As discussed in Section 3.6.6 of the Draft Environmental Impact Report (EIR), Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the

maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 240-7:**

As noted above, the Devil's Gate Water Conservation Project is a separate project from the Proposed Project, and those impacts will be analyzed in a separate environmental document. The Proposed Project does not involve construction of a pipeline. The traffic impacts associated with the Proposed Project were accurately analyzed as described in the Draft EIR, Section 3.16 Transportation and Traffic. The Draft EIR, Section 3.16 Transportation and Traffic, included the Devil's Gate Water Conservation Project in the cumulative analysis.

See Response to Comments 240-3 and 240-4.

**Response to Comment 240-8:**

The Draft EIR did mention the Devil's Gate Water Conservation Project in Section 2.9 Cumulative Scenario as one of the projects included in the cumulative analysis. See Response to Comment 240-4.

**Response to Comment 240-9:**

See Response to Comment 240-2.



# Rebecca Latta Arboricultural Consulting

359 North Westridge Avenue, Glendora, CA 91741 (626) 272-8444  
[rebecca@rebeccalattaconsulting.com](mailto:rebecca@rebeccalattaconsulting.com) ISA #4264A

January 21, 2014

County of Los Angeles  
 Department of Public Works, Water Resources Division  
 Attn: Reservoir Cleanouts Program  
 PO Box 1460  
 Alhambra, California 91802-1460

**Subject: Comments on Devil’s Gate Sediment Removal and Management Project Draft and Environmental Impact Report (DEIR), State Clearinghouse No. 2011091084, October 2013**

**Letter transmitted via e-mail to: [reservoircleanouts@dpw.lacounty.org](mailto:reservoircleanouts@dpw.lacounty.org)**

Dear Department of Public Works Personnel,

Comment 241-1

Please accept for the official record my comments and questions regarding the DEIR and the proposed project for reservoir cleanouts. In my opinion, the project was not adequately noticed to the public, it hypes the threat of downstream flooding and minimizes the potential for less damaging, slower sediment removal alternatives. The cumulative impacts of the proposed pipeline to carry water to Eaton Canyon in combination with the proposed project impacts have not been adequately considered.

Comment 241-2

The University of California Eskalen Laboratory has confirmed the presence of an invasive insect/fungal complex in the willows, sycamore, alders, castor bean and other plants in the basin. The Polyphagous shot hole borer carries and farms several fungus pathogens that can kill trees. Since it is a fairly new pest, the extent of potential damage is unknown. At this point, the insect/fungal disease complex has killed trees along the foothills from La Canada to Ontario. The DEIR does not discuss the insect and treatments required to prevent the spread of the insect. The insect is an ambrosia beetle, the same insect responsible for the mortality of woodlands in Florida, Northern California and San Diego Counties.

Comment 241-3

I have concerns about the proposed project and believe that none of the proposed alternatives are acceptable. In my opinion, the County needs to revisit the project and find an alternative that removed sediment in a slower, steadier fashion allowing the vegetation to recover between events. The area is an alluvial fan and the vegetation is used to disturbance. However, the County’s plans to denude the area of vegetation are shortsighted and unnecessary. Growing up in Altadena, I watched Jim, the gravel and

Comment 241-3  
continued

rock operator remove sediment and gravel slowly and move around the basin. The vegetation would be destroyed in an area and then regrow between removal events.

Comment 241-4

The project notification failed. As a regular user of Hahamongna Watershed Park and the Arroyo Seco Trails, I did not see notification at the beginning of the trails at the parking lot corner of Ventura and Windsor in Altadena where many people start walking/running/biking. When I asked visitors if they knew about the project, they did not.

Comment 241-5

Some of my clients in Altadena live adjacent to spreading basins where wood was stored after the 2010 Windstorm. These clients have infestations of PSHB (Polyphagous shot hole borer) that may be directly linked to the wood storage activities. I am concerned that if the County does not properly handle the wood from the tree removal operations, the insect could be spread to currently uninfested areas and cause property damage (loss of trees = loss of property value).

Questions:

Comment 241-6

1. Will the County seriously consider the slower sediment removal alternatives?

Comment 241-7

2. Did the County consider the impact of the PSHB insect/fungus? Were they in contact with County Agriculture (Gevork Arkalian) and UC Riverside (Akif Eskalen) to discuss the spread and extent of the insect?

Comment 241-8

3. How will the County adjust their operations to prevent the spread of the insect/fungal complex?

Comment 241-9

4. How will the County contain the dust that will be generated from the operations and protect the trees from the impacts? Dust on the leaves prevents the trees from photosynthesizing.

Comment 241-10

5. How will the County protect the nearby schools (LCHS, Flintridge prep, St. Francis) from dust and noise?

Comment 241-11

6. Removal of trees impacts carbon sequestration, storm water interception and pollution filtration. Will the County quantify these impacts and mitigate?

Sincerely,



**Rebecca Latta**

Consulting Arborist, Horticulturalist

ISA Certified Arborist WE4264A, Certified Tree Risk Assessor #1217  
Member, American Society of Consulting Arborists  
Board Member, Inland Urban Forest Council  
Member California Native Plant Society

## Response to Comment Letter #241 (Rebecca Latta)

### Response to Comment 241-1:

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. These comments are included in the Response to Comments document for the Final Environmental Impact Report (EIR) and have been responded to below.

The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

### Response to Comment 241-2:

The County of Los Angeles Agricultural Commissioner acknowledges that Polyphagous Shot Hole Borer (PSHB) infestations are already widespread in many areas of the County dating back to 2003 and that there is little that can be done to prevent PSHB infestations from occurring over a wider geographic area in the future. To this end, local infestations of PSHB are considered as part of the Project's 2010 existing conditions base line. In addition, all trees, branches, shrubs, and any other woody material that are cut and cleared from the debris basin would be chipped on-site and then loaded it into covered dump trucks to be hauled to the Scholl Canyon Landfill for final disposal; therefore, the Project would not result in significant impacts associated with infestations of PSHB at the Project Site or Scholl Canyon Landfill.

### Response to Comment 241-3:

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-6, MM BIO-7, and MM BIO-8 provide mitigation to restore and enhance riparian and sensitive habitats.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, "[a]n EIR is not required to consider alternatives which are infeasible" (CEQA Guidelines Section 15126.6(a)) or "which could change the fundamental nature of the proposed project." (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.*(1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 16126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project's

significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

The Draft EIR, Section 4, fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

**Response to Comment 241-4:**

Per CEQA Guidelines Section 21902 (b)(3), notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:

- publication in a newspaper of general circulation in the area affected by the Proposed Project
- posting of notice by the lead agency on and off site in the area where the Proposed Project is to be located
- direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll

The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the Los Angeles County Department of Public Works (LACDPW) website

Therefore, notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

**Response to Comment 241-5:**

See Response to Comment 241-2.

**Response to Comment 241-6:**

See Response to Comment 241-3.

**Response to Comment 241-7:**

See Response to Comment 241-2.

**Response to Comment 241-8:**

See Response to Comment 241-5.

**Response to Comment 241-9:**

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices (BMPs) and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

**Response to Comment 241-10:**

See Response to Comment 241-9.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. Impact analyses took in to account the location of nearby schools. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

**Response to Comment 241-11:**

The Draft EIR, Section 3.9 Greenhouse Gas Emissions analyzes greenhouse gases and associated impacts from the Proposed Project. As noted in the Draft EIR, impacts to greenhouse gas emissions would be less than significant.

The Draft EIR, Section 3.11 Hydrology and Water Quality analyzes Proposed Project impacts on hydrology within the reservoir. As noted in the Draft EIR, Section 3.11 Hydrology and Water Quality, "The Proposed Project will remove accumulated sediment deposits within the reservoir. This means the percolation characteristics of the reservoir will stay the same, if not improve; and the reservoir will still permit penetration of rainfall and percolation of local runoff to replenish the groundwater basin. Additionally, sediment removal will restore Devil's Gate Reservoir to its current design standard of the ability to contain two DDEs. As a result, the reservoir will have the ability to contain more of the local

runoff, which in turn could result in more runoff penetrating into the ground in the project area and subsequently recharging the groundwater basin. In addition, by keeping the reservoir clear of future sediment deposits, the Proposed Project will reduce the potential for accumulated sediments to impact the percolation rate." As stated in the Draft EIR, Section 3.11, the Proposed Project activities involving construction equipment will be temporary and involve the limited transport, use, disposal, and storage of fuel and lubricating oil, which are regulated by various agencies. Adequate BMPs will be utilized; and adherence to the regulations set forth by the County, State, and federal agencies will reduce the potential for impacts to water quality to a less than significant level. With adherence to regulations and permit requirements and implementation of project-specific BMPs, impacts related to otherwise substantially degrading water quality would be less than significant.

**ROBERT L. STAEHLE  
153 JAXINE DRIVE  
ALTADENA, CALIFORNIA 91001**

2014 January 21

County of Los Angeles  
Department of Public Works  
Water Resources Division  
Attn: Reservoir Cleanouts Program  
P.O. Box 1460  
Alhambra, California 91802-1460  
[reservoircleanouts@dpw.lacounty.org](mailto:reservoircleanouts@dpw.lacounty.org)

Re: Comments on *Devil’s Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report (DEIR)*, State Clearinghouse No. 2011091084, October 2013.

Dear Department of Public Works Personnel,

Please accept for the official record my comments and questions as follows regarding the subject report and the proposed Project it describes. In general, I find the proposed Project dramatically over-scoped beyond what is necessary for safety. The DEIR manifests an insularity on the part of the Department through its promotion of a long-used but unsustainable method of trucking sediment at great expense from one place to another. At the same time other County budgets are being sought to restore sand to beaches that are eroding, and exposing coastal structures to their own set of hazards, precisely because an early 20<sup>th</sup>-Century “solution” to what was then a much smaller sediment removal problem is being offered in the 21<sup>st</sup> Century in answer to a scale of problem never envisaged when the trucking practice was begun. Further, contrary to CEQA requirements, the subject DEIR does not cover the entire scope of relevant actions, because the proposed pipeline to carry water from the Arroyo Seco drainage to the Rubio Canyon drainage is not considered in sufficient detail, even though the depth of excavation proposed, and the volume of sediment to be removed, appears to be driven in part by the latter action, which itself is poorly considered.

Comment 242-1

Therefore I conclude that the proposed Project as described is seriously flawed, and I conclude that the DEIR as a document describing the proposed Project is also seriously flawed. Many other commentors have taken up these issues and more. My detailed comments and questions concern the following three topics, of which I have some personal knowledge:

1. Lack of notice to park users.
2. Trail closure and home value impact.
3. Assessment of impact at sediment destinations, and points in between.

Comment 242-2

1. Lack of Adequate Notice to Park Users.

An informal survey was conducted by Lori Paul and Robert Staehle visiting the proposed Project area within Hahamongna Watershed Park (hereafter “HWP” or “Park”) on a number of days

Comment 242-3

↑ during 2013 November and December, and 2014 January, entirely within the period during which comments on the draft EIR were solicited from the affected public. Park users who were encountered at random were asked if they had heard of the proposed sediment removal project. Of >120 people encountered and asked, all were surprised at mention of the project, and zero were aware of the proposed project before being asked if they knew about it. These results included my most recent excursions in the Park on January 10, and January 20, both after the DEIR comment period was extended, and the latter being one day before the extended comment due date. (These results are cited for days exclusive of the December 14 “Hands Across the Dam” event sponsored by Save Hahamongna.org. By definition, anyone coming to that event knew about the proposed project, and most, if not all, were there to protest its anticipated scope and/or impact.)

Under CEQA, users of the Park and the land proposed for sediment removal are considered an impacted group, so it is surprising to find so few (in fact none) of those surveyed aware of the project described in the DEIR. Why might this be?

A survey of some of the more popular park entrances and traverse routes conducted on January 10 and 20 offers at least a partial explanation. There was no signage at the following entrances, features, and trail intersections making any mention of the proposed Project (see photos on pages 5 – 14 below keyed to these location numbers):

1. West end of Altadena Drive trailhead.
2. Intersection of the trail that descends from the west end of Altadena Drive with the paved service road above the JPL east parking lot (identified in Google Maps and other places as both the Gabrielino Trail and N. Arroyo Blvd).
3. Intersections of the trail that crosses the JPL east parking lot with the entering-JPL traffic lane on the east side of the parking lot, and the exiting-JPL traffic lane on the west side of the parking lot.
4. The trail where it leaves the public road to enter the Park from between JPL’s south and west corner and the Los Angeles County Fire Department Camp 2 Air Attack installation.
5. The above trail, where it enters the open area of the Park from between the fence on one side delineating NASA/JPL property and the fence on the other side of this trail delineating the area used by Rose Bowl Riders.
6. The parking area on the east side of the Park located along N Windsor Avenue between W. Mountain View Street and Ventura Street.
7. The top of the trail that descends from the middle of the west edge of the same parking area down toward the middle of the Park.
8. The Gabrielino trailhead, which serves also as a Park trail entrance, just north of the parking area noted above.
9. The Park’s “Sunset Overlook” a few hundred feet north on the footpath west of and parallel to the paved “N Arroyo Blvd/Gabrielino Trail”.

Most of the above locations had general signage when visited. There was reasonably elaborate signage about the Park at locations 6, 8 and 9 above, but nothing at all about the proposed Project described in the DEIR, or even mention of the DEIR comment period, etc. Zero. The accompanying photographs of these locations document the signage there on January 10 or 20, depending on location.

Exactly two signs with a single notice on one sheet of 8.5 X 11 inch paper under scratched plexiglass facing were found in the Park that made mention of the DEIR, but did not describe the scope of the project. One was near the east end of Devil’s Gate Dam, and the second at the

↓

Comment 242-3  
continued

↑ intersection of a north-south and east/west trail near the middle of the Park (see Photos #10 on pages 15-16). A third was said to have been posted in a January 2 email from Edel Vizcarra to Lori Paul and Robert Staehle, but was not found in the Park (it may have been present, as not every possible signage location was examined). While some of those Park users who were encountered and asked if they were aware of the proposed Project appeared to have passed by one or the other of these signs, apparently none of those people had taken any notice. Others, many of whom expressed themselves to be frequent Park users, could have entered and left the Park repeatedly without ever encountering one of the signs mentioning the proposed Project.

Comment 242-3  
continued

The sign mentioned above near the middle of the Park (see photo) does not actually even hint at the scope of the proposed project, and is only a notice of the extension of the deadline to receive comments for an additional 15 days, to January 21.

A sign near the bottom of the trail that leads down from the Windsor/Ventura parking area, photographed on 2013 November 16 (see “Devil’s Gate Dam Interim Measures 2013” sign in photo on next page), refers to a project in which “Public Works will remove up to 5,000 cubic yards of sediment...to again be temporarily placed at Johnson Field,” (which is within the Park) and where “The green waste will be hauled to Scholl Canyon Landfill at a rate of no more than 10 trucks per day to avoid impacts to the neighborhood along the haul route on Windsor Avenue.” Therefore, this sign clearly does not refer to the proposed Project described in the DEIR to which this set of comments is addressed. On November 16, well into the comment period, there was no sign nearby describing or giving notice of said Project or DEIR.

Questions:

Comment 242-4

By what quantitative measure and methods can DPW assure that an adequate number of Park users were notified about the proposed Project?

Comment 242-5

When did signs advising of the proposed Project first appear, where, and by what measure were they of adequate format and size, type size, graphic design, and descriptive content to draw adequate attention of Park users? How long did each of these signs remain in place?

Comment 242-6

Were any of the signs placed in locations accessible to disabled persons? (The sign in photos #10 was hundreds of feet from any wheelchair-accessible location.) With which provisions of the Americans with Disabilities Act were these signs, their locations, and accessibility not compliant?

Comment 242-7

How can it be explained that out of >120 Park users encountered at random over three months during the comment period, not one of them was aware of the proposed Project, DEIR, or comment period?

Comment 242-8

Why were prominent signs not placed at sites of other signs frequently seen by Park visitors describing the proposed Project scope, DEIR, and opportunity to comment, for the duration of the comment period? Poor as it was, the “Devil’s Gate Dam Interim Measures 2013” sign photographed 2013/11/16 near the bottom of the trail that leads down from the Windsor/Ventura parking area provided a map and summary description of an earlier project to remove only 5,000 cubic yards of sediment and green waste. Why was it possible to place a sign describing such a small project, with a map included, and yet a descriptive sign could not be placed at the same location, and elsewhere, for the entire comment period, for this Project proposed to be as much as 800 times larger in terms of the volume of sediment removed?



## DEVIL'S GATE DAM INTERIM MEASURES 2013



The County of Los Angeles Department of Public-Works (Public Works) is in the process of planning the Devil's Gate Reservoir Sediment Removal and Management Project which will remove sediment from behind Devil's Gate Dam to enhance its flood protection capabilities.



The draft Environmental Impact Report (EIR) for the project is expected to be completed in October 2013. Project construction is expected to start in the summer of 2015 and finish in the fall of 2019.

While this EIR process is underway, Public Works is continuing to implement interim measures similar to the previous project that was completed in the summer/fall of 2012. The goal is to reduce the potential impact of debris on flood control operations during the upcoming storm seasons until the major sediment removal project is implemented.

This year, work on the interim measures will begin as early as September 15, 2013 and is expected to be completed within one month. The project work area is highlighted in red. Public riding and hiking trails within the reservoir will remain open, except for brief closures to move equipment and materials along the roadway.

Public Works will remove up to 5,000 cubic yards of sediment. The City of Pasadena is allowing sediment to again be temporarily placed at Johnson Field. Green waste (dead tree branches and other vegetative matter) will also be removed from the area immediately in front of the dam. The green waste will be hauled to Scholl Canyon Landfill at a rate of no more than 10 trucks per day to avoid impacts to the neighborhood along the haul route on Windor Avenue.

Public Works has obtained all of the necessary permits and has received clearance from our biologist, who will be onsite during the interim measures to oversee work activities. No live trees will be removed during this operation.

For continuing updates on the status of these projects, please visit [www.LASedimentManagement.com/DevilsGate](http://www.LASedimentManagement.com/DevilsGate) or contact Steve Sheridan, of Public Works' Flood Maintenance Division – East Area Office at (626) 445-7630.

Above: Prior project sign from 2013 November 16 (Lori Paul photo.)

1. a, b, & c: West end of Altadena Drive trailhead. No Project or DEIR sign. 2014 January  
10



2. a, b, & c: Intersection of the trail that descends from the west end of Altadena Drive with the paved service road above the JPL east parking lot (identified in Google Maps and other places as both the Gabrielino Trail and N. Arroyo Blvd). No Project or DEIR sign. 2014 January 10



3. a, b, c, d, e, f, g, h, i, j, k, l, m, n: Descent (a, b, c, d) from east to intersection of the trail that crosses the center of the JPL east parking lot with the entering-JPL traffic lane on the east side of the parking lot (e, f, g), and the exiting-JPL traffic lane on the west side of the parking lot (h, i, j, k, l) and ~100 feet west of there (m, n). No Project or DEIR sign. 2014 January 10

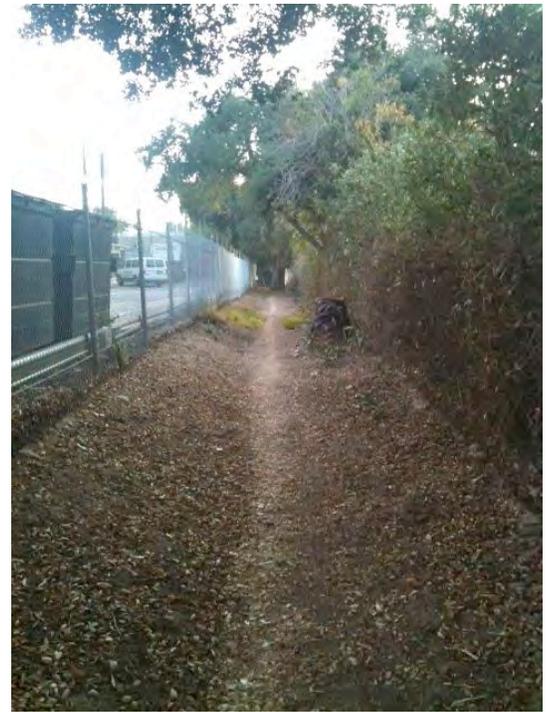






4. a, b, c, d, e, f: The trail near JPL's South Gate, where it leaves the public road to enter the Park from between JPL's south and west corner and the Los Angeles County Fire Department Camp 2 Air Attack installation. No Project or DEIR sign. 2014 January 10





5. a, b, c, d: The above trail, where it enters the open area of the Park from between the fence on one side delineating NASA/JPL property and the fence on the other side of this trail delineating the area used by Rose Bowl Riders. No Project or DEIR sign. 2014 January 10





6. a, b: The parking area on the east side of the Park located along N Windsor Avenue between W. Mountain View Street and Ventura Street. No Project or DEIR sign. 2014 January 20



7. a, b, c: The top of the trail that descends from the middle of the west edge of the same parking area down toward the middle of the Park. No Project or DEIR sign. 2014 January 20



8. a: The Gabrielino trailhead, which serves also as a Park trail entrance, just north of the parking area noted above. No Project or DEIR sign. 2014 January 20



9. a, b: HWP's "Sunset Overlook" a few hundred feet north on the footpath west of and parallel to the paved "N Arroyo Blvd/Gabrielino Trail". No Project or DEIR sign. 2014 January 20



10. a, b, c, d: Finally, near the intersection of a north-south and east-west trail near the middle of the Park, is a small sign missed by most who pass it, noting the new due date for comments, but omitting any hint of the proposed Project scope. 2014 January 10



## Devil's Gate Reservoir Sediment Removal and Management Project



### *Devil's Gate Reservoir Sediment Removal and Management Project Draft EIR Comments To Be Accepted Through January 21, 2014*

Due to the high volume of content in the Devil's Gate Reservoir Sediment Removal and Management Project Draft EIR and requests for additional time to review the document, we will now be accepting comments for an additional 15 days, 90 days in total, through **Tuesday, January 21, 2014**.

If you have not done so already, comments emailed to [reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov), mailed, or faxed to LA County Public Works will be included in the official Response to Comments Log that will be attached to the Final EIR.

Please check out the project website at <http://www.LASedimentManagement.com/DevilsGate>

Mail	Email	Fax
County of Los Angeles Department of Public Works Water Resources Division Attn: Reservoir Cleanouts Program P.O. Box 1460 Alhambra, CA 91802-1460	<a href="mailto:reservoircleanouts@dpw.lacounty.gov">reservoircleanouts@dpw.lacounty.gov</a>	(626) 979-5436

## 2. Trail Closure and Home Value Impact

In addition to its natural values described by a number of other commentors, Hahamongna Watershed Park is host to a large number of trail users. Such trail use centers on recreation, physical fitness maintenance and training, commuting to and from NASA's Jet Propulsion Laboratory (the region's largest employer), educational field trips by local student and adult groups, bird watching, dog walking, mountain biking, and equestrian use by probably a few thousand users of all ages. Local parking areas are often full on weekends, with many cars coming and going during a single hour of a popular day with good weather. On January 20, for example, at the Windsor/Ventura parking area, there were approximately 40 cars parked in the lot and nearby when I visited in the early afternoon. During a single 15 minute period, approximately 5 cars departed and 5 entered and parked, with some carrying as many as four people. Nearly all the parked cars were empty, indicating that their occupants were almost certainly using trails in the Park. Clearly other Park users simply walked, ran, or rode their bikes from their residences to use the Park, and could be missed in a parking survey.

As Chair of the Steering Committee of the County-chartered Altadena Crest Trail Restoration Working Group (ACTRWG), which holds monthly public meetings at the Altadena Community Center approximately 9 times per year, I can indicate that the topic of connecting the Altadena Crest Trail (ACT) and other Altadena trails with three neighboring trail systems is a priority for many of the trail users who attend ACTRWG meetings, and has been adopted as a goal by the group as a whole, and endorsed by vote on more than one occasion without any opposition. Said connection is precisely within and across Hahamongna Watershed Park, to the La Canada Flintridge trail system to the west, to the Gabrielino Trail into Angeles National Forest to the north, and to trails south down the Arroyo Seco into Pasadena. This multi-system connection increases the value of the trail experience to users of all these trail systems, and increases property values of all nearby residential properties.

The proposed Project would sever this four-way connection and/or make it hazardous during many parts of the year and part or all of many days when intensive digging and trucking operations are going on with attendant traffic hazard, dust, toxic pollutant, and noise impacts. A considerably smaller operation than the favored alternative could be fashioned to reduce these impacts to a level that does not necessitate severing the connection among the four trail systems, while still removing an adequate volume of sediment.

Questions:

What quantitative measures of trail use have been made, using what methodologies, against which the impact of the proposed Project on trail use can be assessed?

What alternatives can be put forward that enable unbroken, or infrequently broken (as perhaps required during flood or fire emergencies) connection among a) the Altadena Crest Trail (ACT) and other Altadena trails with three neighboring trail systems b) to the La Canada Flintridge trail system to the west, c) to the Gabrielino Trail into Angeles National Forest to the north, and d) to trails south down the Arroyo Seco into Pasadena? One would think that the ACT-to-Gabrielino Trail linkage need never be severed by the proposed Project, but what about Altadena-to-La Canada, Altadena to South Arroyo Seco, and La Canada-to-Gabrielino Trail connections? How many trail users does the proposed Project impact, and what activities are curtailed or eliminated?

How many birds of how many species will be left to watch, and how does this compare with past Audubon-sponsored bird counts made by qualified observers? What will be the impact to physical fitness in the community, increased emergency room visits from cardiovascular and pulmonary disease, allergies, and other ailments that result from direct impact of the project, and

Comment 242-13 continued ↑ indirect loss of health because of reduced physical fitness resulting from reduced trail use? What increased medical expenses will result that must be borne by taxpayers and insurance plan members?

Comment 242-14 | What fraction of trail users will divert to other trail areas less convenient, and what will be the impact to those locations in terms of parking, habitat disturbance, and crowding?

Comment 242-15 | How many people use the trails and Park today to walk and bike to and from work at JPL and other employers? What will be the impact on their habits, and on JPL's compliance with average vehicle ridership targets and other parameters set by the South Coast Air Quality Management District (AQMD)? I personally rode my mountain bike between my home in Altadena and JPL, crossing the Arroyo through the Park, and using the west end of the Altadena Crest Trail from the west end of Altadena Drive, 42 times in 2013, starting February 25. I have used this commuting method on many days in most prior years back into the 1990s. This year, I started earlier, on January 9, and expect to ride to/from work ~60 times. I will definitely curtail my riding any time the safe link is severed, e.g., by frequent truck traffic, diesel smoke, dust, toxic ash, and other Project-related hazards or route closures. What will be the impact of the reduction in lowest-impact commuting (e.g., by walking and bicycles) that results from the proposed Project, and how were these quantities measured, estimated, and/or derived? I am clearly not the only commuter using this method near or across the proposed Project Area, but I am unaware of any reliable surveys estimating this population, automobile emissions saved, and other environmentally relevant parameters. What surveys has DWP used in and around HWP, and why should they be considered reliable?

Comment 242-16 | There is significant literature linking public trail proximity, quality and usage to home values, with examples in different parts of the country. Likewise, similar literature exists concerning the impact on home sale prices of nearby large construction projects. For houses sold during the duration of the proposed Project, what is the expected aggregate value lost to sellers as compared to if these houses had been sold during a period without the proposed Project in progress? Clearly such an estimate can only be made on a statistical comparison basis, so what historical records were used, what assumptions applied, and what range of answers emerged? (For example, if 1,000 homes within earshot, downwind dust and traffic impact are estimated to be sold during the proposed period leading up to and during the proposed work, and the average home value is impacted negatively by \$10,000, then the total impact to home sellers would be \$10 million, with some error bars.)

### 3. Assessment of Impact at Sediment Destinations, and Points In Between.

#### Questions:

Comment 242-17 | The bulk of the DEIR is focused on impacts in and around the "Project Location" where sediment is to be removed. How thorough and accurate are the assessments of impact where the proposed huge volume of sediment is to be deposited? For example, none of the maps in the DEIR Section E.S.2 Project Summary show the haul routes or destination beyond the immediate areas of Hahamongna Watershed Park. Do not the residents and commuters along those routes and near those destinations deserve some focused attention in the Executive Summary? Surely similar threats exist concerning diesel exhaust, traffic interruption, sediment dust, its toxic components, pulmonary effects on downwind residents and schools, etc.

Comment 242-18 ↓ Has comment been sought in an effective manner from commuters on the 210 Freeway who will be slowed by the ponderous chain of trucks carrying sediment, and their slightly less ponderous

Comment 242-18  
continued

return journey to pick up more? What fraction of these commuters have any idea that this Project is proposed and will directly affect their lives every day that sediment is being hauled? One can expect all the Los Angeles traffic reporters to be prominently noting the slowing effects of a new truck every 70 seconds on traffic flow, especially during “rush hours” in the morning and afternoon. Is another lane needed on the freeway to offset these effects, who will pay for that, and when will its construction start, with what environmental impacts? What is the estimated impact of greater fossil fuel burn, commuter car maintenance expense, increased costly child care hours, and lost work time from the inevitable traffic snarls that will result? What methods were used in making such quantitative assessments, and how can we be sure they are accurate? What are the error bars on these impact quantity estimates, and what error budget and/or statistical analysis backs them up?

Comment 242-19

Thank you for your consideration of these matters and answers to the questions posed. They are clearly relevant to any complete assessment of the environmental impact of the proposed Project.

Sincerely,

/s/

Robert L. Staehle

Note: all photos by Robert Staehle, except as noted. Permission hereby granted for unlimited reproduction for non-commercial use.

## **Response to Comment Letter #242 (Robert Staehle)**

### **Response to Comment 242-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, and a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Nevertheless, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

The Proposed Project will not decrease the current amount of sediment that flows downstream and therefore would not contribute to the erosion of beaches. Also as noted in the Sediment Management Strategic Plan (SMSP), "Without human intervention, most Southern California beaches would naturally be narrow and rocky. The wide beaches in Southern California were created and have been maintained by various agencies through artificial beach nourishment projects (also referred to as beach fill projects) and the construction of protective coastal structures since the 1930s." In addition, the SMSP states, "Since the Los Angeles River changed course in 1825, the largest waterway reaching this region of the coast is Ballona Creek, which has an estimated annual sediment yield of less than 50,000 cubic yards and delivers generally fine-grained sediment that is not appropriate for beach nourishment."

For general information on beach nourishment, please see Section 6.5.1 of LACFCD's Sediment Management Strategic Plan, which can be viewed here:

<http://dpw.lacounty.gov/lacfcd/sediment/files/FullDoc.pdf>

The Proposed Project does not require the implementation of the Devil's Gate Water Conservation Project in order to achieve the Proposed Project's objective to satisfactorily reduce flood risk, create a configuration suitable for routine operations and maintenance, and reduce the possibility of plugging at the face of the dam. The Devil's Gate Water Conservation Project does not require the implementation of the Proposed Project to be carried out. Neither project is a foreseeable consequence of or a future expansion of the other project; therefore, these projects are separate projects per CEQA.

The Devil's Gate Water Conservation Project is a separate project that is not part of the Proposed Project or alternatives. The Devil's Gate Water Conservation Project is still in a conceptual design phase, and no environmental report is available for public review at this time; however, this project was analyzed in the Draft EIR as a cumulative project.

**Response to Comment 242-2:**

LACFCD notes the commenter's concerns and the commenter's opinion that the Proposed Project is flawed. The specific comments have been responded to below.

**Response to Comment 242-3:**

Per California Environmental Quality Act (CEQA) Guidelines Section 21902 (b)(3), notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:

- publication in a newspaper of general circulation in the area affected by the Proposed Project
- posting of notice by the lead agency on and off site in the area where the Proposed Project is to be located
- direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll

The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse

- posted at eight local libraries
- posted on the LACDPW website

Therefore, notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

**Response to Comment 242-4:**

See Response to Comment 242-3.

**Response to Comment 242-5:**

See Response to Comment 242-3. Notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

Notices placed onsite were placed at both the east and west entrances to the dam, as well as along a trail on the upper east side of the reservoir. These notices were placed at the start of the public review period, on October 23, 2013. They defined the Proposed Project, the timeline for the public review period, location and dates of the community meetings, and the extension of the public review period. The notices remained in place until after the public review period closed on January 21, 2014.

**Response to Comment 242-6:**

See Response to Comment 242-3.

**Response to Comment 242-7:**

See Response to Comment 242-3.

**Response to Comment 242-8:**

See Response to Comment 242-3 and 242-5.

As stated above, notices placed onsite were placed at both the east and west entrances to the dam, as well as along a trail on the northeastern side of the reservoir. Notices were placed at all three locations, including the location shown in the commenter's letter, at the start of the public review period, on October 23, 2013 and remained in place until after the public review period closed on January 21, 2014.

**Response to Comment 242-9:**

LACFCD notes, as described in Section 3.15 of the Draft EIR, the many recreational opportunities in the reservoir including hiking, passive recreation, and bird watching.

**Response to Comment 242-10:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna

Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. Also as discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to traffic conditions by the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

See Response to Comment 242-1. Alternative 3, Configuration D, is the Environmentally Superior Alternative. Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding

disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement. A footprint any smaller would decrease the volume removed and the ultimate capacity of the reservoir, which would fail to meet Proposed Project objectives.

**Response to Comment 242-11:**

Methodology for determining impacts to recreation is found in the Draft EIR, Section 3.15.5. The City of Pasadena General Plan and the Hahamongna Watershed Park Master Plan were utilized to aid in the development of this analysis. Interviews with several individuals associated with various recreational activities that take place in and around the Proposed Project site also provided information for this analysis. Additionally, site visits were conducted, and aerial and topographic maps were examined to determine existing recreational uses. Locations of existing designated recreational facilities in and near the Hahamongna Watershed Park were mapped with the Proposed Project boundaries.

See Response to Comment 242-10.

**Response to Comment 242-12:**

See Response to Comment 242-10.

**Response to Comment 242-13:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

See Response to Comment 242-10.

**Response to Comment 242-14:**

The Draft EIR, Section 3.15 Recreation analyzes impacts to other recreational facilities due to relocation of some uses. As noted in the Draft EIR, "due to the number of other recreational facilities and trails in the vicinity, it is anticipated that these visitors will be dispersed throughout the area and that no single park or facility will experience a substantial increase in use. Therefore, the Proposed Project will not increase use of other existing parks or recreation facilities such that substantial physical deterioration of these facilities will occur or be accelerated."

**Response to Comment 242-15:**

See Responses to Comments 242-10 and 242-11.

**Response to Comment 242-16:**

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule.

Comment regarding economic impacts to surrounding homeowners has been noted.

Under CEQA, the lead agency is not required to analyze an economic impact associated with a project in the EIR; as Section 15131(a) of the CEQA Guidelines states: "Economic or social effects of a project shall not be treated as significant effects on the environment." Moreover, CEQA allows economic analysis in the administrative record only if the basis for infeasibility, and thus rejection of a mitigation or alternative, is economic, as described in CEQA Guidelines Sections 15091(a)(3) and 15364. Economic and social factors can be considered by a lead agency when reaching a decision on a project; however, such an evaluation is separate from the process of preparing and certifying an EIR, which is concerned with evaluating the significant environmental effects of a project. See also *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App. 4th 1184.

**Response to Comment 242-17:**

The Draft EIR analyzes impacts at the Proposed Project site and along the haul routes. Figures 2.5-2 through 2.5-4 depict the location of the haul routes to the sediment disposal sites and the Scholl Canyon Landfill. Analysis of air quality, noise, and traffic along the haul routes is included in the Draft EIR including in Sections 3.5 Air Quality, 3.14 Noise and Vibration, and 3.16 Transportation and Traffic. Additional information on the haul routes to the disposal sites can be found in the Traffic Report in Appendix J.

**Response to Comment 242-18:**

See Response to Comment 242-4 regarding public noticing. The traffic impacts were analyzed in the Draft EIR Section 3.16 Transportation and Traffic. As noted in the analysis, no mainline freeway segments will be significantly impacted by the Proposed Project. Therefore, no new lanes are needed on the freeways. Both the Air Quality and Greenhouse Gas Emissions sections of the Draft EIR, Sections 3.5 and 3.9 respectively analyze air quality impacts including the addition of traffic to the roadways.

**Response to Comment 242-19:**

Comment noted. The comments have been responded to above.

**From:** [Sophia Hansen](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Wednesday, January 22, 2014 7:18:55 AM

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To:  
County of Los Angeles County  
Department of Public Works  
Water Resources Division  
Attn: Reservoir Cleanouts Program  
P.O. Box 1460

RE Devil's Gate Reservoir Sediment Removal and Management Project

I am a 33-year resident of the La Crescenta-La Canada-Altadena area and currently live a half a block away from Devil's Gate dam. I run on a daily basis around the dam as well as take my 6-year old son bike riding around the dam as well. My husband, daughter and eldest son are avid mountain bike riders who ride around the dam weekly. My fondest times running around the dam is when I see the wild life habit in action. I recall one afternoon while running I witnessed a red-tailed hawk pick up a snake and fly across the air with it...this was nature at it's finest. Another memorable moment was when I witnessed a flock of 19 snowy egrets land on the tree near the pond nearest to the oak tree that grows next to the main gated road. Yes, I literally counted each bird because I was so awestruck at the magnificence and volume of snowy egrets flying together and landing together. This moment stopped me dead in my tracks from running just so I could watch them in wonder.

The other memorable moment that I've enjoyed the dam was when the space shuttle flew by. We've enjoyed stabilizing the trails so we can ride our horses around the dam and up the trails. My son and I have spent many days walking around the dam and he even learned how to ride his bike around the dam when he was 2 and a half. Needless to say our mountains and Devil's Gate Dam have provided me and my family so many priceless and enjoyable moments in our lives and it's a tragedy that a conglomerate corporation that is five times removed from the beauty and bounty of this natural habitat and finds it acceptable to destroy one of the few remaining natural habitats in the name of the All Mighty Dollar.

Concerns:

Recently, we've become aware of the County's project for Devil's Gate sediment removal and management and the availability of the draft environmental impact report (DEIR). In addition, we have been advised that the County is planning a pipeline to pull water from Devil's Gate to Eaton Wash at essentially the same time. We know the recreational impact has been grossly underestimated and biased and that it's imperative that mitigation measures are considered and evaluated. We also know that the impact on traffic while considered an unavoidable and significant result of the proposal, the reports also do not accurately reflect the adverse effects and impacts on the surrounding communities, including Linda Vista and the Rose Bowl, especially as it pertains to the proposed pipeline. It's imperative that the environmental impact reports accurately reflect the adverse effects on the constituents who are both recreational users and residents of the the surrounding communities of Devil's Gate dam, including Pasadena, Altadena, Linda Vista, La Vina, La Canada-Flintridge, Montrose, La Crescenta. and Chevy Chase Canyon.

Comment 243-1

Comment 243-2

Notable concerns are the following:

Recreation - According to the DEIR, use of the park facilities may be less desirable due to construction-related emissions, noise, dust, visual, and traffic impacts associated with the sediment removal. It is stated in the DEIR that "recreational users may choose to visit other area parks, recreational facilities, or trails due to the temporary access restrictions or the indirect effects of construction-related activities during reservoir management activities." The DEIR fails to recognize that there are no other park options in the area that offer the unique features that Devil's Gate dam and its natural habitat offers. Recreational uses such as horse-back riding, disc golf, ornithological societies, and environmental enthusiasts have no alternatives within a 20 mile radius. These activities are endemic to Devil's Gate dam and is what brings people at large to the area as well as why myself and other homeowners have chosen to purchase real estate in this particular location. This project greatly adversely impacts my real estate value as well as the personal reasons I've chosen to reside in this particular area of Altadena.

The dirty little secret that is the report fails to refer to and none of the powers that be want to reveal is the permanent desecration of Devil's Gate dam natural habitat.

Traffic - The traffic impacts on the community as well as the Woodbury Corridor and New York Drive in Altadena as a result of this project and the related pipeline have not been accurately nor adequately addressed and no assurances provided to curb the negative impact. Nor have there been any preventatives presented to alleviate the disruption of natural flow of traffic. Since the Windsor/Arroyo freeway entrances/exits are extremely popular and heavily used, the report does not address this.

Beyond the traffic impact is the human risk factor. On or about the year 2010 the City of Pasadena inadequately re-striped the northbound and southbound Windsor Ave. thereby eliminating the safety zone for cyclists riding on Windsor Ave. This inherently creates a potential litigation quagmire adverse to the City of Pasadena. This safety zone is currently almost non-existent with everyday commuters and is most assuredly eliminated with heavy utility trucks and semi-trucks traveling northbound and southbound on Windsor Ave. This creation of this situation by the county of Los Angeles Department of Public Works Water Resources Division puts them, the City of Pasadena, and the private utility trucks and corporations and anyone else involved in the project culpable during litigation should an accident or multiple accidents arise from this removal event, especially since each of the governing bodies have been forewarned about the potential health risks and safety risks involved in this proposed project.

Furthermore, there is extreme suspicion regarding the failure to mention or address the pipeline project described in the March 2013 Devil's Gate and Eaton Storm Water Flood Management Project Proposition 1-E grant funding request.

And finally, due to the extreme health hazards and high risk to the respiratory health of the children in the surrounding area as a result of this project there is a potential class action lawsuit in the coming years. The city of Los Angeles and the County of Los Angeles have been advised and forewarned of the extreme adverse health risks and effects on the children in the surrounding schools including the many early childhood schools and preschools as well as the high schools and elementary schools in the surrounding areas including: Crestview Preparatory School, Child Educational Center, Saint Francis High School, La Canada High School, Paradise Canyon,

Comment 243-8  
continued

↑  
Flintridge Preparatory School, the magnet schools in Altadena, Muir High School and others. There is a huge population of youth and future constituents that each of the governing factions are putting at risk.

Sincerely,

Sophia Hansen  
Altadena, CA 91001

**Response to Comment Letter #243 (Sophia Hansen)**

**Response to Comment 243-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) recognizes that the area is an important area for recreation, as outlined in Section 3.15, Recreation/Public Services. LACFCD notes, as described in the Draft Environmental Impact Report (EIR), the many recreational opportunities in the reservoir including hiking, passive recreation, and bird watching.

**Response to Comment 243-2:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

The Devil's Gate Water Conservation Project is a separate project from the Proposed Project, and those impacts will be analyzed in a separate environmental document. The Proposed Project does not involve construction of a pipeline. The traffic impacts associated with the Proposed Project were accurately analyzed as described in the Draft EIR, Section 3.16 Transportation and Traffic, including impacts to surrounding communities. The Draft EIR, Section 3.16 Transportation and Traffic, included the Devil's Gate Water Conservation Project in the cumulative analysis.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Project Site will have a potentially significant impact. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site. Additionally, hauling traffic will not occur on Windsor Avenue north of Oak Grove Drive.

**Response to Comment 243-3:**

See Response to Comment 242-2.

Comment regarding economic impacts to surrounding homeowners has been noted.

**Response to Comment 243-4:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

The Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 243-5:**

See Response to Comment 242-2.

**Response to Comment 243-6:**

As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to traffic conditions by the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant. Additionally, hauling traffic will not occur on Windsor Avenue north of Oak Grove Drive.

**Response to Comment 243-7:**

See Response to Comment 242-2.

**Response to Comment 243-8:**

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation

Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

**From:** [Susan Rudnicki](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Fwd: Comments on Devil's Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2011091084  
**Date:** Wednesday, January 22, 2014 11:37:10 AM

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Department of Public Works---I have just received a reject message for my comments. It appears, on checking, that the address was not formatted properly, as I addressed it to ".org" and not ".gov" Why it took over 24 hours to advise me the note was undeliverable is strange..... Please advise if this is going to render my carefully crafted letter of remarks on the Hahamonga Watershed Park proposed "project" invalid for coming in under the deadline. It is time stamped in the original message Date: Tue, Jan 21, 2014 at 9:44 AM so this would seem to verify compliance for submission I await your response

Susan Rudnicki

----- Forwarded message -----

**From:** **Susan Rudnicki** <[susanrudnicki@gmail.com](mailto:susanrudnicki@gmail.com)>  
**Date:** Tue, Jan 21, 2014 at 9:44 AM  
**Subject:** Comments on Devil's Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2011091084  
**To:** [reservoircleanouts@dpw.lacounty.org](mailto:reservoircleanouts@dpw.lacounty.org)

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

Department of Public Works---

As a member of the impacted public citizenry, I am submitting comments for the record regarding the DEIR report and the proposed project it "describes".

Do NOT make the assumption, based on my address in the beach area, that I am not acquainted fully with this issue, the nature of the operations of DWP and alleged transparency, or the vastly destructive scope of this project. The geologic processes that convey sediments to our beaches begin in the foothills (and higher) and these beaches have been rapidly eroding since the advent of increased sediment "management" by DPW---erosion which is now being exacerbated by Climate Change. Yet, DPW continues to operate in its "plumbing mindset", as if in the last 80 years no advancement in ecological, biological, and geological knowledge has accrued. As a homeowner in the LA Basin who has friends I visit in Altadena, Pasadena, and Sierra Madre, I am a frequent visitor to the trails of the area under scope for this egregious project.

There are significant impacts the DPW analysis completely ignores in its rush to

denude and destroy a thriving wildlife habitat and a recreational outlet zone for beleaguered urban citizens. The methods employed to supposedly make the area "safe" harken to a last century human-devised "bulldoze and bury" model that makes NO long-term sense in geologic terms, environmental impact terms, or financial terms.

The DEIR is seriously deficient, non-compliant with CEQA requirements, and ultimately flawed as a template for work in Hahamonga watershed park.

Below are particularly grating deficiencies noted in my visits to hike at the Hahamonga Park trails.

The supposed "public announcement" notices posted at various points in the park are pathetically poor advisement to users. Under CEQA, users of the Park and the land proposed for sediment removal are considered an "impacted group". One has the clear impression the city was exercising the absolute lowest possible meeting of the requirement to "advise". I saw only TWO notices, posted on letter-head, under scratched Plexi-glass, in areas divorced from the larger, general information signs which give rules and regulations about all manner of behavior allowed in the park and other information. My asking many trail users, over the course of some weeks, if they had seen these low-profile signs or knew ANYTHING about the proposed project or its scope as laid out by DPW, was that NONE of them knew about it. It was clear to me the subversion of public opinion by DPW to avoid outcry and push back by impacted users could not have been more successful. Though an informal data collection of the numbers of trail riders, walkers, bird watchers, and cars coming/going from the parking areas would indicate a great interest in the opportunities afforded at Hahamonga, the DPW appears to have made no quantitative or qualitative analysis of these usages. How can this document purport to be a complete analysis of the issues when the thousands of users and adjacent homeowners know nothing about it or what they will lose if the City turns this area into a lifeless, denuded "flood control" channel?

I am appalled and dismayed by the arrogance and lack of transparency continually employed by the DPW, using citizen's monies, to advance a ecosystem destruction program that has no relevance to modern education or understanding of immutable Nature. The dust, noise, diesel fumes, traffic impacts to surrounding roads and freeways goes far beyond the site just around the proposed project---and DPW ignores these issues, as well.

We, in the Los Angeles Basin, are learning that government agencies often act in renegade fashion, writing self-serving documents, and loathe the participation of impacted citizens on these "projects" As was amply seen in the destructive bulldozing of the Sepulveda Basin Wildlife Refuge by the Army Corps of Engineers over the Christmas holidays in 2012, we have learned that no amount of data gathering, documentation of existent features, lifeforms, and public rest spaces (as compiled in a 500 page examination by Tetra-Tech Inc.) will stop the summary and capricious destruction of irreplaceable wildlife and recreational resources when the "State" tries to justify a "emergency"

Thus, I reject the Devil's Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report--for all the reasons noted above and many more that I have not detailed.

Susan Rudnicki  
804 Fifth St  
Manhattan Beach, CA 90266

**Response to Comment Letter #244 (Susan Rudnicki)**

**Response to Comment 244-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The comment letter has been recorded and included in this Response to Comments document.

**Response to Comment 244-2:**

The specific comments are responded to below.

**Response to Comment 244-3:**

Los Angeles County Flood Control District (LACFCD) notes that the commenter is a frequent visitor to the trails in the area of the Proposed Project. LACFCD also notes that the commenter disapproves of the Proposed Project methods.

The Proposed Project will not decrease the current amount of sediment that flows downstream and therefore would not contribute to the erosion of beaches. Also as noted in the Sediment Management Strategic Plan (SMSP), "Without human intervention, most Southern California beaches would naturally be narrow and rocky. The wide beaches in Southern California were created and have been maintained by various agencies through artificial beach nourishment projects (also referred to as beach fill projects) and the construction of protective coastal structures since the 1930s." In addition, the SMSP states, "Since the Los Angeles River changed course in 1825, the largest waterway reaching this region of the coast is Ballona Creek, which has an estimated annual sediment yield of less than 50,000 cubic yards and delivers generally fine-grained sediment that is not appropriate for beach nourishment." For general information on beach nourishment, please see Section 6.5.1 of LACFCD's Sediment Management Strategic Plan Sediment Management Strategic Plan, which can be viewed here:

<http://dpw.lacounty.gov/lacfcd/sediment/files/FullDoc.pdf>

**Response to Comment 244-4:**

The Draft Environmental Impact Report (EIR) is adequate and compliant with California Environmental Quality Act (CEQA) regulations.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of

the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 244-5:**

Specific comments have been responded to below.

**Response to Comment 244-6:**

Per CEQA Guidelines Section 21902 (b)(3), notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall also be given by at least one of the following procedures:

- publication in a newspaper of general circulation in the area affected by the Proposed Project
- posting of notice by the lead agency on and off site in the area where the Proposed Project is to be located
- direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll

The notices for the Proposed Project, the Notice of Preparation (NOP), and the Notice of Availability/Notice of Completion (NOA/NOC) were:

- sent to agencies, organizations, and individuals who have previously requested notices, in addition to other area agencies and organizations
- published in local newspapers, the *San Gabriel Valley Tribune* and the *Pasadena Star News*
- posted on and off site
- mailed to over 1,100 owners and occupants of contiguous property shown on the latest equalized assessment roll
- filed with the County Clerk and the State Clearinghouse
- posted at eight local libraries
- posted on the LACDPW website

Therefore, notice for the Proposed Project was adequate, as the notice efforts went beyond the CEQA Guidelines requirements.

See Response to Comment 244-4.

As part of the outreach effort, the Los Angeles County Department of Public Works (LACDPW) has reached out to recreational users, including the Pasadena Audubon Society, Rose Bowl Riders, Tom Sawyer Camps, Oak Grove Disc Golf Club, and MACH-1.

**Response to Comment 244-7:**

See Response to Comment 244-6. LACFCD was transparent throughout the EIR process in meeting with stakeholders, elected officials, and organizations, as well as holding multiple community meetings to discuss the Draft EIR. LACFCD held three community meetings to inform the public of the Proposed Project, Alternatives, and the results of the Draft EIR. The meetings included a presentation, workshops where the public could ask specific questions about the project and potential impacts and had the opportunity to submit formal comments. Members of the public were able to ask questions or pose comments either in a group setting after the presentation or at the individual workshop stations.

The Draft EIR did analyze impacts to air quality, noise, and traffic on the surrounding roads and freeways, as well as at the project site. The analysis is included in the Draft EIR in Sections 3.5 Air Quality, 3.9 Noise and Vibration, and 3.16 Transportation and Traffic.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, truck traffic associated with the Proposed Project will not cause any major traffic impacts at the studied freeway segments along any of the Haul Routes. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 244-8:**

See Response to Comments 244-6 and 244-7.

**Response to Comment 244-9:**

LACFCD notes that the commenter does not support the Draft EIR in its current form.

**From:** [Tim Martinez](#)  
**To:** [reservoircleanouts](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal and Management Project  
**Date:** Tuesday, January 21, 2014 9:14:43 PM

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Comment 245-1 | I am writing to submit my comments for the Devil's Gate Reservoir Sediment Removal and Management Project DEIR. I do not believe any of the proposed alternatives for sediment removal behind Devil's Gate Dam are acceptable, and request that the final EIR consider the following:

### Habitat Destruction

Comment 245-2 | • Study the effects of an increase in herbicide application that would become necessary by permanently clearing the Hahamongna basin of it's habitat on a yearly basis.

Comment 245-3 | • Study the impact of destroying trail networks and the vast open space of Hahamongna, behind Devil's Gate Dam on the recreational users of Hahamongna Watershed Park, along with local high school cross-country teams who utilize the park.

Comment 245-4 | • Study the impact that permanently scraping the basin would have on local wildlife corridors. The alternatives as presented in the DEIR would all destroy a vital habitat corridor connecting the Arroyo Seco and Angeles National Forest with the San Rafael Hills and Arroyo Seco habitat further south at Debs Park in Los Angeles. Bears, mule deer, coyotes and a recently discovered bobcat at Debs Park in Los Angeles are all known to utilize this irreplaceable habitat corridor which is threatened with destruction under the current alternatives.

Comment 245-5 | • This area is a superfund cleanup site. Would any toxic materials become exposed through the sediment removal process?

Comment 245-6 | • Study the impacts on the health of the surrounding community that would result from exposing buried ash deposited in the sediment behind Devil's Gate Dam during the sediment removal process.

Comment 245-7 | • Study the inevitable increase in invasive plant species which is sure to occur with a permanent removal of native habitat behind the dam, along with the increased fire risk which such dried, invasive mustards and grasses will present.

### Traffic

Comment 245-8 | • Any route chosen for County trucks to carry away loads of removed sediment from the dam will be heavily used by hundreds of new drivers from the surrounding local high schools. Flintridge Sacred Heart Academy, Hillside Academy, La Canada High School, Flintridge Preparatory School, and Saint Francis High School students will all be on the road with County trucks, and many of these students are sixteen-year-old new drivers and especially prone to car accidents. 425 truck trips digging out sediment five or six days a week on these roads is an accident waiting to happen.

Comment 245-9 | • The above listed schools, along with the surrounding community and

Comment 245-9  
continued



surrounding elementary schools will be more prone to asthma, cancer, and other diseases due to so many truck trips. Is it really necessary to destroy so much habitat and to conduct this sediment removal in so short a timespan as five years?

Conclusion

Ultimately, you should change this plan from a five-year clean-out of the dam (following years of neglect) to a more sustainable model of sediment management which would remove the accumulation of debris behind Devil's Gate Dam on a yearly basis, and on a much smaller scale. I support the Arroyo Seco Foundation's plan for sustainable sediment removal, and urge you to adopt it.

- Adopt a 20 year program for sediment removal. Rather than removing 4 MCY in five years, remove an initial 160,000 cubic yards, and then maintain a much smaller area, closer to the Dam, on a yearly basis.
- Use the natural stream flow to move sediment down the Arroyo Seco naturally.

This plan would save the precious riparian habitat behind the dam, reduce pollution and traffic in the area considerably, save money, and keep downstream communities safe, while sustainably and more regularly removing sediment buildup behind Devil's Gate Dam. Please join members of the community in La Canada Flintridge, Pasadena, Altadena, environmental and neighborhood organizations in support of this plan.

Thank you.

Tim Martinez

Comment 245-10

**Response to Comment Letter #245 (Tim Martinez)**

**Response to Comment 245-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter opposes the alternatives considered in the Draft EIR. The specific comments have been responded to below.

**Response to Comment 245-2:**

LACFCD will continue to work closely with California Department of Fish and Wildlife (CDFW) and United States (U.S.) Army Corps of Engineers (USACE) regarding mitigation and restoration requirements for the Proposed Project. Weed abatement will be conducted in accordance with CDFW and USACE regulations, and the methods will be outlined in the Project mitigation/restoration plan and Streambed Alteration Agreement and 404 permits.

**Response to Comment 245-3:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. Impacts to recreation would be less than significant. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 245-4:**

Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

The protective Mitigation Measures MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would avoid and minimize any impacts associated with Proposed Project activities. Therefore, the potential impacts to wildlife movement and corridors are anticipated to be less than significant.

**Response to Comment 245-5:**

As discussed in the Draft EIR, Section 3.10, the U.S. Environmental Protection Agency (EPA) included Hahamongna Watershed Park area on the National Priorities Superfund List due to the presence of detected volatile organic compounds (VOCs) and perchlorate in groundwater originating from the Jet Propulsion Laboratory (JPL) property. The impacted groundwater is at 200 feet below ground surface (bgs); and, as with the Proposed Project, the concentrations of VOCs, organochlorine pesticides, petroleum hydrocarbons (diesel and hydraulic/motor oil range and aromatics), and semi-volatile organic compounds (SVOCs) detected in samples that were collected from Devil's Gate Reservoir are below regulatory thresholds. No perchlorates, the substance of concern from JPL, were found in the soil sample analysis. The JPL Groundwater Cleanup Project is an ongoing project and considered to be part of existing conditions. As discussed in the Draft EIR, Section 3.10, no significant impacts associated with the Proposed Project due to the inclusion of the Hahamongna Watershed Park area on the JPL Superfund List are expected, as the contamination is found in the local groundwater table, not in the sediment. Therefore, the listing of the watershed on the Superfund List does not present a significant hazard to the public or the environment; and no significant impacts associated with the Proposed Project or Alternatives are expected.

**Response to Comment 245-6:**

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

As part of the geotechnical study for the Proposed Project, a subsurface exploration was performed at four representative locations within the reservoir. Although a distinct ash layer was not observed, a "burn layer" within otherwise "clean" sediments was encountered at depth at three locations. Representative sampling of the burn layer was performed, and the samples were subjected to various environmental laboratory tests to evaluate the presence and concentrations of pertinent and regulated contaminants of concern. None of the contaminants that were detected in the sediment samples exceeded regulatory screening levels for this project and would not be characterized as hazardous.

The airborne transport of dust, including "micro ash," to offsite locations will be controlled during earth removal operations through the Proposed Project's use of best management practices, such as spraying the material with water. In addition, dust monitoring at the property boundaries will confirm the effectiveness of the water spraying. During offsite transport, the sediment will be covered in each truck to further reduce the potential for dust.

**Response to Comment 245-7:**

A detailed restoration plan will be prepared and provided to CDFW and USACE for review and approval prior to project implementation and to satisfy permitting requirements. The plan will include and address invasive species management, monitoring, and success criteria. Management of these invasive species will reduce the risk of fire danger.

**Response to Comment 245-8:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Project Site will have a potentially significant impact. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the project site.

As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to traffic conditions by the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant.

**Response to Comment 245-9:**

See Response to Comments 245-4 and 245-6.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the EPA's 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 245-10:**

LACFCD goes to great lengths to lessen project impacts and maximize efficiencies. As such, many of the points in the Arroyo Seco Foundation's four-point "Slow Program" are compatible with the LACFCD Proposed Project.

For example, the Draft EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3, Configuration D, Option 2 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD strives to achieve an efficient, low-cost sediment removal project. Sediment removal rates and trucking operations, now utilizing all low-emissions trucks, as explained in Section 3.5 of the Draft EIR, have been carefully planned for economies of scale to realize maximum efficiencies without major delays in project schedule, thus greatly reducing operating costs. Furthermore, LACFCD has applied for

and received an approximately \$28 million grant through the State's Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E) program. A portion of this grant will be used to help offset the Proposed Project's costs.

While sluicing is not a viable project alternative, as explained in Section 4.7 of the Draft EIR, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

For a more detailed response to the Arroyo Seco Foundation's four-point "Slow Program", please see the response to the Arroyo Seco Foundation's comment letter (Comment Letter #216, Response to Comment 216-16).



January 17, 2014  
 Patty Sue Jones  
 311 N. Ave. 66  
 LA, CA 90042

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

Comment Letter #246

RE: Comments: Draft Environmental Impact Report for Devil's Gate Reservoir Sediment Removal and Management Project

Comment  
246-1

I've ridden my horse and walked my dogs in the Hahamongna Watershed Park, daily since 1984. I am a witness to the ecological changes in the terrain of this robust wild area. I've forged swirling waters from the west to the east banks and watched the waters flow diligently through Devil's Gate Dam. It functions just fine, the sediment flows through with the water.

The Hahamongna Watershed Park is alive with water; trees, native plants, deer, coyote, bobcats, snakes, birds, rabbits, squirrels, ducks, toads, snowy white egrets, and blue herons. I've seen a fox and a mountain lion.

Comment  
246-2

The Recreational Uses of the Hahamongna that I view daily include: family picnics under live oak trees, bird watchers, scout troops learning nature lessons, Pasadena Police Dept. K9 training, softball and soccer games on the field, dog walkers, equestrians on horses, frisbee disc golfers, mountain bikers, school field trips, guided native plant tours, runners from local schools, parents pushing baby strollers, TSC children campers learning how to trail ride horses, JPL employees walking on their lunch hours, running marathons from the Rose Bowl, Search and Rescue Team training, LA County Fire Dept. firemen running and training, and artists painting landscapes of the Hahamongna.

Comment  
246-3

I have witnessed sediment removal several times. A convoy of trucks drove the east side from the dam through the Hahamongna past JPL parking, up the hill and onto Windsor Ave. to the 210 Fwy. East. I have also seen trucks dump sediment from the dam area onto Johnson's field, east side

You have not employed an annual sediment removal program in decades, only occasional removal. Your sediment removal proposals will exterminate a rich native habitat of animals and vegetation along with the happiness folks feel when they exercise recreational pleasures in the Hahamongna Watershed Park.

Comment  
246-4

If the LA County Dept. of Public Works moves forward with this proposed sediment removal project in the Devil's Gate Dam area of the Hahamongna Watershed Park, I ask that you address in the final EIR the loss of habitat and recreational uses that I have specified in this letter and witness daily in the Hahamongna.

Comment  
246-5

I am opposed to your proposal of turning the Hahamongna into a barren wasteland devoid of animals, plants and humans. Happy Trails, *Patty Sue Jones*

Patty Sue Jones 311 No. Ave. 66 Los Angeles, CA. 90042 323-255-8641

**Response to Comment Letter #246 (Patty Sue Jones)**

**Response to Comment 246-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration.

After the Station Fire in 2009, the following two storm seasons brought 1.3 million cy of sediment into the reservoir, raising the ground elevations over 18 feet in some locations within the reservoir and burying most of the established vegetation. The sediment removal efforts aim to restore the historic elevations within the reservoir to the conditions existing prior to the impacts caused by the Station Fire. If the reservoir is left in its current state, the flood risk to downstream communities would be left at an unacceptable level.

**Response to Comment 246-2:**

Los Angeles County Flood Control District (LACFCD) notes, as described in the Draft Environmental Impact Report (EIR), Section 3.15 the many recreational opportunities in the reservoir including hiking, passive recreation, and bird watching. Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 246-3:**

As noted in the Draft EIR in Section 2.2.1, LACFCD History, sediment removal efforts have previously taken place at the reservoir in order to ensure correct functioning of the outlet works and/or to maintain reservoir capacity. Historically, large amounts of sediment have been deposited in the reservoir in short time periods. Between 1935 and 1938 over 1.6 million cubic yards (cy) of sediment, between 1938 and 1943 over 1.95 million cy of sediment, between 1959 and 1966 over 1.75 million cy of sediment, and between 2010 and 2012 over 1.3 million cy of sediment was deposited in the reservoir. Since the 1920 dam construction and prior to the Station Fire in 2009, approximately 10.7 million cy of sediment accumulated in the reservoir; and approximately 8.0 million cy was removed by LACFCD.

LACFCD has executed several sediment removal projects at Devil's Gate Reservoir in the past, with the last major effort being in 1994. Smaller amounts of sediment were removed in 2006, 2009, and as a part of the Interim Measures Project in 2011, 2012, and 2013. Following the 2009 Station Fire, approximately 1.3 million cy of sediment flowed into Devil's Gate Reservoir after just two average water year storm

seasons. In 2010, LACFCD proposed an emergency sediment removal project in response to the large inflow of sediment resulting from the Station Fire.

The Proposed Project is designed to be a long-term plan. Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. A maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

See Response to Comment 246-2.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 246-4:**

See Response to Comments 246-2 and 246-3. The Draft EIR addresses impacts to biological resources and recreation in Sections 3.6 and 3.15, respectively.

**Response to Comment 246-5:**

See Response to Comments 246-2 and 246-3.



# Rose Bowl Riders, Inc.

Mailing Address: P.O. Box 533, Pasadena, CA 91102

January 17, 2014

County of Los Angeles  
 Department of Public Works  
 Water Resources Division  
 ATTN: Reservoir Cleanouts Program  
 PO Box 1460  
 Alhambra CA 91802-1460  
[reservoircleanouts@dpw.lacounty.gov](mailto:reservoircleanouts@dpw.lacounty.gov)

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

Department of Public Works, Water Resource Division;

Rose Bowl Riders (RBR) is a not-for profit, volunteer-operated horse facility and social club in Pasadena, CA with 200 memberships – mostly families. RBR was founded in 1946 and moved to 12 acres in the Hahamongna Watershed Park in the early 1950s. We are located immediately south of JPL. The property consists of horse boarding facilities, riding arenas, turn out pens, a clubhouse, a wrangler residence, and is home to our club, Tom Sawyer Camps and MACH 1.

Comment  
247-1

Many of our members have attended the meetings on the Draft Environmental Impact Report for Devil's Gate Reservoir Sediment Removal and Management Project. (DEIR). While we understand the need for removal of the sediment for proper flood control, RBR members have grave concerns about the plan.

Comment  
247-2

1. The RBR property is used every day, year round by members and the community. There are three lesson programs going six days a week, morning to evening. Members ride every day in the arenas and on the trails. The fugitive dust generated from the removal process will adversely affect these riders, both children and adults.

Comment  
247-3

2. RBR is home to 70 horses year-round and up to 100 during the summer months. Daily exposure to fugitive dust will impact the animals evenly more severely than the humans.

Comment  
247-4

3. Proposed closure of trails and access to trails will mean limited ability to utilize our park.

Comment  
247-5

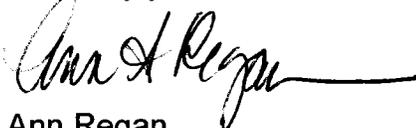
4. The removal of sediment in the willow forest and alluvial scrub areas will leave the area void of native vegetation, destroy needed wildlife habitat, and forever change the beauty of the arroyo.

Comment  
247-6

Comment  
247-7

We trust you will consider the negative impacts a project of this magnitude will have on all the users of the Hahamongna Watershed Park and especially your friends at RBR who utilize this wonderful area every day of the year. There must be a way to minimize the negative impact on all of us who use the park and still accomplish the task of protecting our community from flooding.

Sincerely yours,



Ann Regan  
President  
Rose Bowl Riders, Inc

[annregan@sbcglobal.net](mailto:annregan@sbcglobal.net)

**Response to Comment Letter #247 (Rose Bowl Riders)**

**Response to Comment 247-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the information regarding the Rose Bowl Riders organization.

**Response to Comment 247-2:**

LACFCD notes the Rose Bowl Riders' concerns. The specific comments have been responded to below.

**Response to Comment 247-3:**

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft Environmental Impact Report (EIR), Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

**Response to Comment 247-4:**

Potential effects to horses near the Proposed Project site would be similar to the construction-related impacts from emissions to nearby residents and Hahamongna recreational users. See Response to Comment 247-3. It should be noted that construction activities would be temporary, and construction would occur throughout the reservoir in phases, so the maximum impacts to the horse riding facilities would be much shorter than the five-year duration of the sediment removal phase of the Proposed Project.

**Response to Comment 247-5:**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the

west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 247-6:**

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

As noted in the Draft EIR, Section 3.4, Aesthetics and Figures 3.4-1 through 3.4-3, the visual aspects of the Proposed Project site are constantly changing. The Draft EIR does note that the Proposed Project will have significant temporary impacts to aesthetics; however, after the sediment removal phase of the Proposed Project is complete, a habitat restoration plan will be implemented that will allow native plant communities to reestablish outside the reservoir management area. Riparian Herbaceous vegetation is expected to continue to populate and/or reestablish in the management area of the Proposed Project site between maintenance activities.

Alternative 3, Configuration D affects the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). This alternative would provide a buffer on the west side of the reservoir that would allow for the movement of wildlife. Alternative 3, Configuration D, Option 1 provides a more natural configuration for the reservoir by having two branches to carry water and sediment toward the face of the dam, avoiding disturbing a significant portion of existing vegetation. To further reduce the Proposed Project's footprint, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and providing additional areas for wildlife movement.

**Response to Comment 247-7:**

The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while minimizing the duration of environmental and construction impacts to the surrounding communities. LACFCD is going to great lengths to keep impacts to a minimum. The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities. Alternative 3 was determined to be the Environmentally Superior Alternative that reduces impacts while still meeting Proposed Project objectives.

# ZANJA MADRE

1355 Lincoln Ave. · Pasadena CA 91103 · info@zanjamadre.org

Elizabeth Brennan  
Mary Ferguson  
Veronica Franco  
Rishi Kumar  
Michelle Matthews  
Elizabeth Tang  
Ilesha Wadala

January 21, 2014

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

Comment Letter #248

Re: Zanja Madre Comments on Draft Environmental Impact Report for Devil's Gate Reservoir Sediment Removal and Management Project

Dear County of Los Angeles,

Board members of Zanja Madre, a nonprofit located in Pasadena, have attended public hearings, reviewed the Draft Environmental Impact Report (DEIR) for the Devil's Gate Reservoir Sediment Removal and Management Project, and the January 16th, 2014 letter from the City of Pasadena regarding the DEIR.

Comment  
248-1

Zanja Madre concurs with the concerns as outlined by the City of Pasadena, particularly regarding the need for a long-term approach to sediment removal behind Devil's Gate Dam. While there may seem like a need to remove the sediment build up behind the dam, the process should be slowed down, and supplemented with alternative sustainable methods to mitigate several environmentally degrading impacts of sediment removal, including poor air quality, destruction of riparian habitat and loss of recreational space.

Comment  
248-2

The Project Description section of the DEIR states that there would be, "an estimated maximum of 425 truck round trips per day during excavation activities." This aspect alone impacts residents and sensitive receptors in the area, including nearby schools and residential communities, with an overwhelming amount of noise, air pollution and traffic. As the City of Pasadena advises, a full evaluation should be done on NOx emissions and other pollutants to mitigate any risks to sensitive receptors in the area.

Comment  
248-3

The Devil's Gate Reservoir requires a long-term plan for regular maintenance to avoid numerous negative impacts associated with a quick and large-scale plan, such as the alternatives laid out in the DEIR. The issues that have arisen from the Devil's Gate Dam and the Hahamogna watershed, are numerous and fall outside the scope of a singular agency, the Los Angeles County Public Works. Ideally a coalition made up of a broad cross-section of partners including Los Angeles Public Works, surrounding cities, engineers, scientists, activists and laborers, would provide the opportunity to create a long-term comprehensive plan for this ongoing issue of sediment removal.

The Board of Directors

## **Response to Comment Letter #248 (Zanja Madre)**

### **Response to Comment 248-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes Zanja Madre's concerns and that the organization concurs with the City of Pasadena's concerns.

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final Environmental Impact Report (EIR), Section 2.3, Project Need.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays).

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

**Response to Comment 248-2:**

See Response to Comment 248-1. As discussed in the Draft EIR, Section 3.5, Air Quality, the air quality analysis takes into account the existing air quality environmental conditions and the location of nearby populations considered sensitive to air pollution and discusses the consequences to air quality related to implementation of all Proposed Project activities. Also, as discussed in Section 3.5, SCAQMD air quality standards were set to protect the health of sensitive individuals (i.e., elderly, children, and the sick). With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with nitrous oxide (NO<sub>x</sub>) emissions, will be reduced to less than significant.

As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant and would not be anticipated to disturb sensitive uses, including schools.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

**Response to Comment 248-3:**

The Draft EIR analyzes long- range maintenance of the reservoir under the Reservoir Maintenance phase of the Proposed Project and Alternatives. Outside experts, especially those on the Stakeholder Task Force, were consulted during the formation of the Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts and agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

After the sediment removal phase has occurred, Flow Assisted Sediment Transport, or FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, and a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Nevertheless, it is estimated that typically 13,000 cy of sediment will be removed by excavation annually. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.



EV  
SN  
MDA

January 17, 2014

Supervisor Michael D. Antonovich  
Los Angeles County Fifth District  
500 West Temple Street, Rm. 869  
Los Angeles, CA 90012

Dear Mr. Antonovich,

Comment  
249-1

I know you have probably heard from many people about the flood control project in Hahamongna Watershed Park (HWP) but since I am the Director of The Hillside School and Learning Center, located across the street from the project, I thought I should weigh in on the subject since, we are located directly across from the current planned exit for the trucks.

Comment  
249-2

First of all, we agree there needs to be a systematic removal of sediment from the basin. Our concern is the removal estimate shows 400 plus truck-loads exiting from the basin daily in front of our school on Oak Grove Drive. Even the perception of this amount is slowing down the rate of student applications for our school. The noise, pollution, dust, and dirt create other issues for our students. We currently use the park for physical education and parents are already talking about the health hazards associated with this project.

Comment  
249-3

Is there any way to re-direct truck traffic through a different route or limit hours of the project to non-school hours or work at night? What about extending the project over a longer period of time?

Comment  
249-4

We appreciate all you do for our district and if there is any way of mitigating this situation we would be extremely grateful.

Sincerely,

Robert A. Frank  
Executive Director  
The Hillside School and Learning Center

## **Response to Comment Letter #249 (Hillside School and Learning Center)**

### **Response to Comment 249-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes the location of the school, as described in the Proposed Project Description, Section 2.1.6 Surrounding Land Uses. The specific comments made by the Hillside School and Learning Center have been responded to below.

### **Response to Comment 249-2:**

Air quality and noise impacts associated with truck traffic were analyzed in the Draft Environmental Impact Report (EIR) in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the project's use of best management practices and would be in full compliance with South Coast Air Quality Management District's (SCAQMD's) fugitive dust regulations.

As discussed in the Draft EIR, Section 3.5, the Health Risk Assessment (HRA) analyzed both the cancer-related and noncancer-related acute (short-term) and chronic (long-term) impacts from project-related emissions. The HRA analysis found the Proposed Project would result in less than significant impacts for both the cancer-related and noncancer-related acute short-term and long-term impacts.

### **Response to Comment 249-3:**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. The Draft EIR outlines a 12-hour trucking schedule, with trucking operations on Saturdays as well. This schedule is used to model the most intensive construction operation, which may not be applicable at the site for the duration of the Proposed Project. Typical trucking schedules are estimated to be 8 hours per day on weekdays. In practice, hauling rates and routes may be adjusted to help reduce impacts depending on operational need. In addition, potential use of Alternative 5, Haul Route Alternative, Site Access Option 1, would allow trucks to avoid passing by the Hillside School and Learning Center (See Figure 4.8-1 of the Draft EIR). LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 249-4:**

LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize impacts around the Proposed Project site.

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0043  
(916) 319-2043  
FAX (916) 319-2143

DISTRICT OFFICE  
300 EAST MAGNOLIA BOULEVARD  
SUITE 504  
BURBANK, CA 91502  
(818) 558-3043  
FAX (818) 558-3042

# Assembly California Legislature



**MIKE GATTO**  
ASSEMBLYMEMBER, FORTY-THIRD DISTRICT

COMMITTEES  
APPROPRIATIONS  
ARTS, ENTERTAINMENT, SPORTS,  
TOURISM AND INTERNET MEDIA  
BANKING AND FINANCE  
GOVERNMENTAL ORGANIZATION  
WATER, PARKS AND WILDLIFE

Comment Letter #250

January 13, 2014

Mr. Christopher Stone  
P.E., Assistant Deputy Director  
Water Resources Division  
County of Los Angeles Department of Public Works  
Attn: Reservoir Cleanouts Program  
P.O. Box 1460  
Alhambra, CA 91802-1460

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

Dear Mr. Stone,

I am writing to urge the Los Angeles Department of Public Works to conduct a more extensive analysis of environmental impacts and options associated with the proposed Devil's Gate Reservoir Sediment Removal and Management Project. The proposals released by the Department of Public Works as part of the draft Environmental Impact Report do not fully appreciate the ecosystem which the Hahamongna Watershed Park has become since the Devil's Gate Dam was built in 1920, nor does it fully account for the impact of the proposed project on local schools and residents. While it is imperative that our communities be kept safe from catastrophic events, especially as global climate change contributes to the frequency of extreme weather events, it is also critical that we take a strong stance in favor of protecting our valuable environmental resources from destruction.

Comment  
250-1

Proponents of the Sediment Removal Project argue that the Devil's Gate Dam was originally constructed as flood-protection and water-conservation infrastructure, protecting the residents of Pasadena and Los Angeles from dangerous flood waters coursing through the Arroyo Seco watershed. However, over the years sediment buildup behind the dam has transformed this flood-protection infrastructure into a diverse habitat that fosters native plant growth and houses several species of birds and mammals. Like the Salton Sea, this man-made ecosystem now plays a vital role for local wildlife, as well as migratory birds. Additionally, the Hahamongna Watershed Park itself is frequented by bird watchers, hikers, joggers, and families seeking to escape the fast pace of urban life in Los Angeles for the peace of the outdoors. The current proposals, which recommends hauling between 2.4 and 4 million cubic yards of dirt and debris from Hahamongna Watershed Park, threatens to disrupt not only the local ecosystem but also local opportunities for recreation. The draft EIR should be amended to balance the traditional goals of flood protection and water conservation with the new ecological and recreational attributes of the area.

Comment  
250-2

The proposed alternatives in the draft EIR also represent an aggressive approach to solving the sediment problem, as oppose to a balanced approach that seeks to minimize impacts on the local

Comment  
250-3



Comment  
250-3  
continued

community. The project site abuts several schools, churches, sports facilities, businesses, and private residences, all of which would be affected by the traffic, noise, and air quality problems associated with the project. The Department of Public Works should seriously consider extending the project length to allow for reduced daily truck trips and allow for flexible work hours to prevent working during peak commuting times for local schools and businesses. The Department should also consider changing truck routes to minimize traffic impacts for local residents and commuters and maximizing the use of low-emissions trucks to minimize local air-quality impacts.

Comment  
250-4

For these reasons, I encourage the Los Angeles Department of Public Works to reevaluate the project proposals put forth in the draft EIR for the Devil's Gate Reservoir Sediment Removal and Management Project and to develop additional options that better balance the flood-protection needs of the community with the health of local residents and of the local environment. Thank you for your consideration. If you have further questions, please feel free to contact Katrina Robinson in my office at (916) 319-2043.

Very truly yours,



Mike Gatto  
Chair, Assembly Committee on Appropriations  
Assemblyman, 43rd District

## **Response to Comment Letter #250 (Assembly Member Mike Gatto)**

### **Response to Comment 250-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. The Draft Environmental Impact Report (EIR) analyzes impacts to biological resources and the community.

### **Response to Comment 250-2:**

The Los Angeles County Flood Control District (LACFCD) was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1,040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. In addition, sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary, are expected to occur only in the drier months (April to December, excluding holidays). It is expected that these activities will often not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the

reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained; and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on nonworking days.

The goal of LACFCD is to restore reservoir flood capacity as soon as feasible while reducing costs, minimizing the duration of environmental and construction impacts to the surrounding communities, and configuring the reservoir to allow for sustainable future maintenance. LACFCD is going to great lengths to keep impacts to a minimum. The Draft EIR analyzed a range of sediment removal amounts and configurations aimed at addressing the diverse concerns of stakeholders. The alternatives presented in the Draft EIR represent the best options available to respond to stakeholders' concerns while adequately reducing flood risk to downstream communities. For example, the EIR concluded that Alternative 3 is the Environmentally Superior Alternative. Alternative 3, Configuration D drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3, Configuration D, Option 2 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

LACFCD is committed to *Public Service that Works*; and by combining almost 100 years of technical expertise and invaluable input from the community, less invasive flood protection will continue to be a reality.

**Response to Comment 250-3:**

See Response to Comment 250-2.

Pursuant to Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, "[a]n EIR is not required to consider alternatives which are infeasible" (CEQA Guidelines Section 15126.6(a)) or "which could change the fundamental nature of the proposed project." (*Al Larson Boat Shop, Inc. v. Board of Harbor Comm.* (1993) 18 Cal.App.4th 729, 745.) The alternatives discussed in the EIR must be reasonable alternatives, selected to foster informed decision-making and public participation (CEQA Guidelines 15126.6(a)). An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative because unrealistic alternatives do not contribute to a useful analysis (CEQA Guidelines 15126.6(f)(3)). Additionally, an alternative may be rejected from detailed analysis in an EIR if it fails to reduce or avoid the project's significant environmental effects, does not implement the basic project objectives, is not potentially feasible, or is facially unreasonable. 14 C.C.R. §15126.6(c); *Id.*, see also *Mann v. Community Redevelopment Agency* (1991) 233 Cal. App. 3d 1143; *Del Mar Terrace Conservancy, Inc. v. City Council* (1991) 10 Cal. App. 4th 712.

Section 4 of the Draft EIR fully analyzed six alternatives, including the No Project Alternative. These alternatives substantially lessen one or more significant effects of the Proposed Project and, with the exception of the mandatory No Project Alternative, would feasibly attain most of the basic objectives of

the Proposed Project. These alternatives include options for different amounts of removal, different methods of removal, and a different haul route.

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site will have a potentially significant impact. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

Air quality and noise impacts associated with truck traffic were analyzed in the Draft EIR in Sections 3.5 and 3.14, respectively. As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant. LACFCD has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the United States (U.S.) Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality, including those associated with health effects, will be reduced to less than significant.

LACFCD proposed a project duration of five years to reduce accumulated sediment in a timely fashion. Extending the project would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

**Response to Comment 250-4:**

See Response to Comment 250-3.

**From:** [Bob Musselman](#)  
**To:** [reservoircleanouts](#)  
**Cc:** [bbogaard@cityofpasadena.net](#); [smadison@cityofpasadena.net](#)  
**Subject:** Devil's Gate Reservoir Sediment Removal Project  
**Date:** Wednesday, October 23, 2013 6:36:08 PM

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Comment  
251-1

I relatively new to the area and just started to study this project. Frankly I can't believe the amount of wasted time and effort has gone into accommodating interests that are minor in comparison to the critical function of the dam and reservoir to protect lives and property.

This is a debris basin, not a park or a nature preserve. It serves to protect an incredible wealth of life and property downstream and that should be the overriding concern.

Comment  
251-2

Currently the dam has a capacity of less than one DDE (50 year storm effect 4 years after a major fire). The proposed alternative will result (in five years!) of a capacity of well under 2 DDEs.

If you think 1 or 2 DDEs is sufficient you are kidding yourselves. Most respected meteorologists and climatologists suggest a megastorm such as occurred in 1861-1862 every 100 to 200 years:

Scientific American: [California Megaflood: Lessons from a Forgotten Catastrophe](#)

Several peer reviewed studies have estimated the probability adjusted cost of this almost-certain future event to be far in excess of a similarly certain major earthquake.

Comment  
251-3

You get opinions from everyone for sure. This one is mine. Forget the garter snakes and turtles and return the basin to its original function as a debris basin to protect Pasadena and the Arroyo Seco.

Respectfully,

Robert Musselman  
3935 Chapman Court  
Altadena, CA 91001  
612-325-9638 (cell)  
626-421-6411 (home)  
[bob@mobiuseenergy.com](mailto:bob@mobiuseenergy.com)  
Skype: musselmanrp  
[www.linkedin.com/in/rpmusselman/](http://www.linkedin.com/in/rpmusselman/)

**Response to Comment Letter #251 (Robert Musselman)**

**Response to Comment 251-1:**

Thank you for your input. These comments have been noted and will be provided to the County of Los Angeles Board of Supervisors for their consideration. Los Angeles County Flood Control District (LACFCD) notes that the commenter believes downstream protection is more important than the potential impacts of the Proposed Project. As noted in the comment, the primary purpose of the reservoir is as a flood control facility.

**Response to Comment 251-2:**

As noted in the comment, the current capacity of the dam is less than one design debris event (DDE). A reservoir storage design capacity of two design debris events (DDEs below the dam's lowest spillway) was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The alternatives in the Draft EIR analyzed a range of sediment removal amounts (2,425,000 cy to 4,000,000 cy), obtaining or close to obtaining two DDEs.

Reference and the commenter's suggestion for designing for megastorms are noted.

**Response to Comment 251-3:**

LACFCD notes the commenter's opinion that the reservoir should be returned to its original function as a flood control facility to protect areas and property downstream.

## **Comment Letter #252 Devil's Gate Community Meetings Comment Summaries**

### **OUTREACH AND COMMUNICATION**

Los Angeles County Department of Public Works (LACDPW) on behalf of the Los Angeles County Flood Control District (LACFCD) held three community meetings to inform stakeholders about the Project and the Draft Environmental Impact Report (EIR). The meetings were held on:

- 1) Wednesday, November 6, 2013 from 6:00 p.m. – 8:00 p.m. at Rose Bowl Stadium, Visitor's Locker Room, 1001 Rose Bowl Drive, Pasadena, CA 91103. Seventy-two (72) stakeholders signed-in.
- 2) Thursday, November 14, 2013 from 6:30 p.m. – 8:30 p.m. at Jackson Elementary School Auditorium, 593 West Woodbury Road, Altadena, CA 91001. Fifty-seven (57) stakeholders signed-in.
- 3) Saturday, November 16, 2013 from 2:00 p.m. – 4:00 p.m. at the Community Center of La Cañada Flintridge, 4469 Chevy Chase Drive, La Cañada Flintridge, CA 91011. Fifty-seven (57) stakeholders signed in.

At each meeting, LACFCD presented information about the Proposed Project and the various alternatives, the environmental process, the conclusions reached in the Draft EIR and the procedure for submitting formal written public comments. Team members were available to discuss various aspects of the Project and to answer stakeholder questions. Formal written public comments were accepted at the meetings. Formal oral public comments were not taken at these meetings; however, a summary of topics and a response to these topics discussed are presented below.

### **SUMMARY OF TOPIC DISCUSSIONS AND RESPONSES**

#### **Comments on Proposed Project, Objectives, Purpose and Need**

##### **Flooding Risk Justification**

The LACFCD was mandated by the State Legislature to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 LACDPW Hydrology Manual and the March 2006 LACDPW Sedimentation Manual. For Devil's Gate Dam and Reservoir, the required reservoir capacity is 4.0 million cubic yards (cy) (two DDEs) below the spillway elevation of 1040.50 feet.

The Hydrology Manual (January 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf)

The Sedimentation Manual (March 2006) can be viewed here:

[http://dpw.lacounty.gov/wrd/publication/engineering/2006\\_sedimentation\\_manual/Sedimentation%20Manual-Second%20Edition.pdf](http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf)

Additional information concerning DDE calculation methods has been added to the Final EIR, Section 2.3, Project Need.

### **Why Was There an Increase in the Amount of Sediment Removal?**

In 2010, in response to the Station Fire, an emergency project to remove only 1.67 million cy was proposed. The volume of 1.67 million cy is the previously published DDE, and this amount was considered justifiable as an emergency exemption to the California Environmental Quality Act (CEQA). In March 2011, the County of Los Angeles Board of Supervisors motioned LACFCD to complete an EIR for a comprehensive sediment removal project at Devil's Gate. LACFCD then initiated project development in accordance with the required level of protection of two DDEs. At that time, LACFCD also began receiving feedback on the concurrent Sediment Management Strategic Plan and the interest to look at more sustainable sediment and reservoir management. As a result of the feedback and recommendations during the development of the Strategic Plan, LACFCD began evaluating ways to create a more sustainable long-term way to manage its sediment and habitat. To emphasize the goals of the project, the Proposed Project was given the name Devil's Gate Sediment Removal and Management Project.

### **Reuse of Sediment / Sediment Disposal Sites**

The sediment that came into Devil's Gate Reservoir following the Station Fire has a very fine gradation or consistency. As such, the majority of this material is not readily reusable on a commercial scale and will most likely not be sold; however, sediment placed at sediment placement sites would be available for potential reuse for other projects or sediment reuse opportunities. The sediment removed from the Devil's Gate Reservoir will be transported to the existing placement sites listed in the Draft EIR in Section 2.0, Project Description.

For further information regarding beneficial uses for sediment at LACFCD sites, please refer to Section 6.5 of LACFCD's 2012 Sediment Management Strategic Plan which can be found at: <http://dpw.lacounty.gov/lacfd/sediment/stplan.aspx>.

### **Length of Project**

Although the sediment removal phase of the Proposed Project will occur over a five-year period, the removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays), as described in the Draft EIR, Section 2.5.1, Sediment Removal Phase, Project Schedule. This approach supports dam safety to remove 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. Prolonged periods of high sediment levels in the reservoir increase the potential risk for downstream flooding. With sediment removal operations moving efficiently, it is reasonable to assume a project duration of no more than five years. Extending the project any further would prolong the flood risk to downstream communities and increase the construction impacts to the surrounding communities.

### **Gathering Community Concerns**

Outside experts in the community, especially those on the Stakeholder Task Force, were consulted during the formation of the LACFCD's Sediment Management Strategic Plan. Information from that consultation was used in the formulation of the Proposed Project and Alternatives. In addition, the purpose of the scoping process was to gather input from outside experts, cities, and

agencies as well as the public on what the environmental analysis should consider and what alternatives should be analyzed. Information gathered from the scoping process was used in the formulation of the Proposed Project and Alternatives and preparation of the Draft EIR.

LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the Hahamongna Watershed Park Master Plan (HWPMP). LACFCD goes to great lengths to lessen project impacts and maximize efficiencies.

### **Impacts to Air Quality Impacts**

Lower emission trucks were considered for the Proposed Project; however, the availability of these trucks could not be guaranteed at the time the Draft EIR was written. Air quality impacts associated with truck traffic were analyzed in the Draft EIR in Section 3.5. Los Angeles County Flood Control District has conducted an availability study and can now ensure that all trucks used to transport sediment for the Proposed Project will meet or exceed the U.S. Environmental Protection Agency's (EPA's) 2007 standards for emissions. Therefore, in order to further reduce emissions, Mitigation Measure MM AQ-1 has been revised; and the contractor will be required to use only sediment removal dump trucks that meet or exceed EPA's 2007 emission standards. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts to air quality will be reduced to less than significant.

As discussed in the Draft EIR, Section 3.10.6, Impacts and Mitigation, HAZARDS-1, Sediment Removal/Reservoir Management, no hazardous levels of the contaminants were detected in the sediment. Dust impacts from the Proposed Project were carefully evaluated, as discussed in the Draft EIR, Section 3.5.6, Impacts and Mitigation, AIR QUALITY-2, Sediment Removal. The Proposed Project's activities, including excavation, grading, material loading, and hauling, would result in less than significant dust emissions due to the Proposed Project's use of best management practices and would be in full compliance with SCAQMD's fugitive dust regulations.

### **Impacts to Biological Resources**

The biological resources of the Proposed Project site are described in Section 3.6 of the Draft EIR. The bird species recorded during surveys conducted specifically for the Proposed Project are presented in the Biological Technical Report (BTR) in Appendix D of the Draft EIR. Factors used to determine the potential for occurrence included the quality of habitat, elevation, and the results of the reconnaissance survey. The locations of prior database records of occurrence were used as additional data; but since the California Natural Diversity Database (CNDDDB) is a positive-sighting database, this data was used only in support of the analysis from the previously identified factors.

As discussed in Section 3.6.6 of the Draft EIR, Mitigation Measures MM BIO-1 through MM BIO-8 provide mitigation to protect and avoid impacts to sensitive species and to restore and enhance riparian and sensitive habitats. These measures will also serve to protect and reduce any impacts to all other wildlife, including coyotes, bobcats, heron, egrets, and bear. Sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with night time wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area. Wildlife species currently found in the Proposed Project area would be expected to either remain in the undisturbed areas of the

reservoir outside the Proposed Project area or to reestablish once sediment removal activities have been completed.

### **Impacts to Cultural Resources**

A cultural resources literature review and records search was conducted for the Proposed Project at the South Central Coastal Information Center (SCCIC) located at California State University in Fullerton. The results of the records search are discussed in the Draft Environmental Impact Report (EIR), Section 3.7.5 and in the Cultural Resources Report (Appendix E of the Draft EIR). As discussed in the Draft EIR, Section 3.7 and in the Cultural Resources Report, Chambers Group conducted an archaeological survey of Devil's Gate Reservoir for the LACFCD. The survey was conducted pursuant to Section 15064.5 of the *CEQA Guidelines*, with respect to the identification and preservation of historic resources, and also in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470f and 470h-2), and its implementing regulations (36 CFR 800.4), as well as the 2004 Programmatic Agreement (PA) among the Federal Highway Administration, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer (SHPO), regarding compliance with Section 106 of the PA. The Draft EIR and Cultural Resources Report discuss the findings of the records search and field survey. In addition, the Draft EIR provides Mitigation Measures to reduce potentially significant impacts to less than significant.

### **Effect on Hydrology/Groundwater Recharge**

Accumulated sediment does not contribute to groundwater recharge of stormwater. As stated in the Draft EIR, the Proposed Project will remove accumulated sediment deposits within the reservoir. This means the percolation characteristics of the reservoir will return to pre-Station Fire conditions if not improve, and the reservoir will still permit penetration of rainfall and percolation of local runoff to replenish the groundwater basin. Sediment removal will restore Devil's Gate Reservoir to its current design standard. As such, the reservoir will have the ability to contain more of the local runoff, which in turn could result in more runoff penetrating into the ground in the Proposed Project area and subsequently recharging the groundwater basin. In addition, by keeping the reservoir clear of future sediment deposits, the Proposed Project will reduce the potential for accumulated sediments to negatively impact the percolation rate.

### **Noise Impacts**

The Draft EIR, Section 3.14.6, Sediment Removal/Reservoir Management, Offsite Vehicular Noise, analyzed the noise impacts from the haul trucks. The analysis found that the maximum noise increase on the roads in the immediate vicinity of the Devil's Gate Dam and Reservoir area would be a 1-decibel (dB) increase on Berkshire Place east of the Interstate 210 (I-210) northbound ramps. A 1-dB increase is well below the 3-dB increase threshold of perception and would therefore not be anticipated to disturb the learning environment. The roadway noise impact analysis provided in the Draft EIR found that the Proposed Project would result in less than significant impacts for all analyzed alternatives.

As discussed in the Draft EIR, Section 3.14, with implementation of Mitigation Measure MM N-1, noise impacts would be reduced to a level of less than significant.

### **Impacts to Traffic Impacts**

Potential impacts due to the Proposed Project's truck trips were analyzed in the Draft EIR, Section 3.16, Transportation and Traffic. As listed in that section, a single intersection in the immediate vicinity of the Proposed Project site, Berkshire Place and I-210 Eastbound ramps intersection during the AM peak period, will have a potentially significant impact. Therefore, impacts would not be significant all day, and significant impacts would occur only at the intersection and on-ramp/off-ramp listed above. In practice, hauling rates and routes may be adjusted to help reduce impacts, depending on operational need. In addition, construction activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays). As discussed in the Draft EIR, Section 3.16, Transportation and Traffic, TRANSPORTATION-3, modifications to roadway conditions by the Proposed Project will consist of roadway restriping. These changes would not alter existing roadway use or substantially increase hazards. Thus, impacts related to traffic hazards would be less than significant. LACFCD will continue to work with local organizations, the Cities of Pasadena and La Cañada Flintridge, and the community of Altadena to minimize traffic impacts around the Proposed Project site.

### **Impacts to Recreation**

Impacts to recreation were analyzed in the Draft EIR, Section 3.15. The Proposed Project will not limit the use of the Oak Grove area of Hahamongna Watershed Park. Sediment removal activities would be temporary and are expected to occur only in the drier months (April to December, excluding holidays), and often will not be adjacent to the Oak Grove area of Hahamongna Watershed Park. The Proposed Project would result in temporary limitations on the recreational use of the Proposed Project site and some of the adjacent trails. Most of these areas would be reopened seasonally or intermittently throughout the sediment removal process. In addition, temporary impacts to designated recreational facilities and trails will be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project. Furthermore, an east-west trail crossing will continue to provide access at the north end of the reservoir. At the south end of the reservoir, after the reservoir ingress and egress ramps have been fully constructed, access to the upper east side Arroyo Seco Trail from La Cañada Verdugo Road will be maintained and the linkage from the west side Arroyo Seco Trail and the Flint Wash Trail to the upper east side Arroyo Seco Trail (crossing Devil's Gate Dam and also continuing south to the Rose Bowl) will be available after construction activities have ended each day and on non-working days.

No official disc golf course holes located in the Oak Grove area of Hahamongna Watershed Park will be removed by the Proposed Project. As noted in the Draft EIR, Section 3.15, LACFCD recognizes the importance of the area to those who take advantage of the recreational opportunities offered, including the Oak Grove Disc Golf Course. Where possible, LACFCD will avoid any disc golf course holes located outside the Oak Grove area of Hahamongna Watershed Park. When avoidance is not possible, LACFCD will coordinate with the Oak Grove Disc Golf Club for removal of the disc golf hole equipment. In addition, Alternative 3, Configuration D, Option 2 will also avoid all currently existing Oak Grove Disc Golf Club holes.

### **Cumulative Projects and Impacts**

The Draft EIR contained a cumulative impact analysis within each of the subsections of Section 3.0 Environmental Analysis. The cumulative analysis contains projects as determined by LACFCD and

the surrounding cities and communities to have a potential cumulative effect due to overlapping time frames of the projects. Potential projects that were determined to be outside the area of influence, sediment-removal phase of the project schedule, or lacking sufficient project detail, were not considered to be reasonable foreseeable probable future projects, as set forth in the CEQA Guidelines Section 15130.

### **Comments on Alternatives**

The Draft EIR, Section 4.0 Alternatives Analysis considers six alternatives, including the No Project Alternative. LACFCD determined that Alternative 3, Configuration D was the environmentally superior alternative that reduced impacts while still meeting the Proposed Project objectives.

Alternative 3, Configuration D closely resembles the natural contours within the reservoir, affecting the least amount of habitat of all the action alternatives while still achieving Proposed Project objectives (see Section 4.6 of the Final EIR). Alternative 3, Configuration D, Option 1 provides a more natural configuration to the reservoir with two branches to carry water and sediment toward the face of the dam, and it avoids disturbing a significant portion of the existing vegetation. In addition, LACFCD has added an optional configuration for this Alternative. Alternative 3, Configuration D, Option 2, which drastically reduces the project's footprint of 120 acres down to 71 acres, would avoid excavation of the western branch, thereby providing a greater habitat buffer on the west side of the reservoir. In addition, the maintenance areas would be smaller than the original sediment removal footprint, allowing for habitat to reestablish and provide additional areas for wildlife movement.

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's HWPMP. LACFCD has met and will continue to meet with the City of Pasadena regularly to coordinate and ensure resolution of concerns regarding Devil's Gate Reservoir and the HWPMP.

Sluicing was analyzed as part of the Draft EIR in the Alternatives Analysis, Section 4.7, Alternative 4 Sluicing Method. The sluicing alternative would potentially have additional significant impacts in comparison to the Proposed Project. Many of these impacts would be associated with the likelihood that large amounts of sediment would not be fully transported through the flood control system to the ocean; this sediment would need to be mechanically removed and trucked out from numerous downstream locations. This alternative would also involve use of construction equipment and the removal of trees and vegetation over the same footprint as the Proposed Project. Please see Section 4.7 and Appendix K of the Draft EIR for further analysis.

While sluicing is not a viable project alternative, as discussed above, Flow Assisted Sediment Transport, or FASTing, will be used for maintenance after the project's main sediment removal phase has been completed, as described in Section 2.5.2 of the Draft EIR.

The Proposed Project is designed to be a long-term plan, with the reservoir management phase providing management for future sediment inflows. After the sediment removal phase has occurred, FASTing, is proposed to be an integral part of the annual maintenance at Devil's Gate. Annual FASTing operations will be implemented to reduce future buildups of sediment in the reservoir and to reduce the need for mechanical removal of sediment from the reservoir. Although FASTing is expected to be an effective means of keeping sediment levels low in the reservoir, it is estimated that typically 13,000 cy of sediment will be removed by excavation

annually. However, a maintenance regime that relies on FASTing greatly reduces the need for and extends the life of future and existing sediment placement sites and improves the future sustainability of the reservoir. Please see Section 2.5.2 of the Draft EIR for more information on future maintenance.