

# Devil's Gate Reservoir Sediment Removal and Management Project



## LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS

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

#### **Alison Snow**

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

#### **Allen and Mignonne Decker**

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

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

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

#### **Arroyo Seco Foundation – Tim Brick, Managing Director**

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

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

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

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

**Asif Ahmed**

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

**Betsy Bour, Friends of Hahamongna**

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

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

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

#### **Carla Bollinger**

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

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

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

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

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

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

**Claudette E. Buddie**

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

**Constance Brines**

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

**Cosmo Bua**

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

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

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

**Dana Kennedy**

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

**Darren Dowell – on behalf of Pasadena Audubon Society**

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

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

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

**Dianne Patrizzi**

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

**Don Bremner, Chair, Hahamongna Watershed Park Advisory Committee**

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

**Doris L. Stewart**

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

**Gabrieleno Band of Mission Indians – Christina Swindall Martinez, Secretary**

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

**Grace Wong**

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

### **Gregg Oelker**

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

### **H. Guido Meindl**

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

### **Hill Penfold**

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

### **Hugh Bowles – Hahamongna Watchdog Group**

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

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

#### **Jack Lindblad**

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

#### **Jaime Parker**

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

#### **Jake Robbins – Advocacy for Pacoima Canyon**

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

#### **Jill Boddie**

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

**Laurel Beck**

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

**Laurie Barlow**

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

**Madeline Schleimer**

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

**Mark Hunter**

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

**Markus Klemm**

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

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

#### **Marnie Gaete – Fund for Wild Nature**

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

#### **Mary E. Barrie**

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

#### **Metropolitan Water District of Southern California**

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

#### **Michael Long**

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

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

#### **Mitzi Shpak**

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

#### **Native American Heritage Commission**

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

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

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

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

#### **Neal Turner**

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

#### **Ninarose Mayer**

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

#### **Pamela Folgert**

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

#### **Pasadena Audubon Society – Laura Garrett, Conservation Chair**

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

#### **R. Rhoads Stephenson**

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

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

**Raymond Basin Management Board – Anthony Zampello, Executive Officer**

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

**Roger Klemm**

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

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

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

**Sierra Club, Pasadena Group – David Czamanske, Vice Chair**

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

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

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

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

**Steven S. Lamb**

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

**Sylvia Stachura**

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

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

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

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

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

**Thomas Holaday**

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

**Unknown**

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

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

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