

Attachment F

DRAFT Staff Comments – Devil’s Gate Reservoir Sediment Removal and Management Project Draft EIR

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|-----|------|-------------------------|-----------|-------|---|
| 1 | 7 | 2 - Project Description | 2.1.1 | PW | Please 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. |
| 2 | 10 | 2 - Project Description | 2.1.6 | PL | Surrounding Land Uses: The discussion of recreational facilities in the Hahamongna Watershed Park focuses on the Oak Grove area on the west side of the Hahamongna Basin. In addition to such facilities, Hahamongna Watershed Park includes recreational improvements on the east side of the Basin, including trails, a park restroom and picnic areas. In addition, Pasadena Water & Power (PWP) maintains multiple water infrastructure improvements in this area including spreading basins. |
| 3 | 10 | 2 - Project Description | 2.1.6 | PW | Rose Bowl Riders also submits to the Move A Child Higher (MACH1) therapeutic horsemanship organization. |
| 4 | 12 | 2 - Project Description | 2.3 | FIRE | The Fire Dept. understands the need for the project and asks for adequate notification, should any obstacles/obstructions occur during the implementation of the project. |
| 5 | 12 | 2 - Project Description | 2.4.0 | PWP | LACFCD is currently using Johnson Field with storing sediment. 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. |
| 6 | 12 | 2 - Project Description | 2.5.1 | PL | 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. Please provide this level of detail to allow proper consideration of impacts related to biological resources, aesthetics, air quality, greenhouse gas emissions, noise, and traffic. |

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| 7 | 14 | 2 - Project Description | 2.5.1 | PL | <p>Sediment Disposal: This section states, "The trucks are anticipated to haul an estimated 7,650 cubic yards (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. With the level of detail provided it is not possible to discern the maximum hourly or average daily impacts, nor can the reasonableness of the stated level of operations be considered (e.g., assuming an 8-hour work day, 50 truck trips per hour results in 400 trips, 25 less than the estimated 425 daily trips).</p> |
| 8 | 14 | 2 - Project Description | 2.5.1 | PW | <p>The City's Berkshire Creek Restoration project will likely need fill material as a part of the implementation. It is anticipated that this work will take place while the sediment removal efforts are underway. The City requests coordination with LACFCD to utilize sediment for this fill material that would otherwise be removed from the site, should the material be deemed suitable for this use.</p> |
| 9 | 15 | 2 - Project Description | 2.5.1 | PW | <p>The proposed access improvements on the east and west sides of the dam are not well-defined. Please provide additional information regarding the width, steepness, proposed materials, and any specific treatments proposed where recreational trails cross these access points.</p> |
| 10 | 15 | 2 - Project Description | 2.5.1 | PW | <p>County should provide street repair at Oak Grove, Arroyo, Windsor, etc.</p> |
| 11 | 17 | 2 - Project Description | 2.5.1 | PW | <p>Fig. 2.5-1 Map shows access improvements to be outside the project boundary but improvements to the road are described.</p> |
| 12 | 21 | 2 - Project Description | 2.5.2 | PL | <p>Reservoir Management Phase, Vegetation Removal: This section states that vegetation will be removed annually. However, no details are provided regarding the extent of this vegetation removal. Would the entire County easement area be mowed or grubbed every year? What are the extents of this long-term loss of habitat and/or annual destruction</p> |

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| 13 | 21 | 2 - Project Description | 2.5.2 | PL | <p>of habitat?</p> <p>Reservoir Management Phase, Option 1, Vegetation Removal: Similar to the 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. Please provide this level of detail to allow proper consideration of impacts related to biological resources, aesthetics, and air quality.</p> |
| 14 | 21 | 2 - Project Description | 2.5.2 | PL | <p>Reservoir Management Phase, Option 1, Vegetation Removal: Similar to the Sediment Removal Phase, this section does not identify a re-vegetation plan for the land disturbance area. How will the disturbed land be re-vegetated? 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 City of Pasadena requests that 1) a re-vegetation plan be developed by a qualified restoration ecologist; 2) that only native species be planted; and 3) that re-vegetation occur concurrently with sediment removal, such that the minimum amount of denuded land necessary to conduct sediment removal activities exist at any given time.</p> |
| 15 | 21 | 2 - Project Description | 2.5.2 | PW | <p>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 downstream City improvements.</p> |
| 16 | 21 | 2 - Project Description | 2.5.2 | PW | <p>The FAST method requires the use of the Arroyo Seco Channel but does not include the channel within the project boundary or detailed analysis. Please revise the DEIR project boundary to include these downstream areas. Please provide a detailed analysis of these downstream effects of FAST including projected sediment accumulation and potential flooding.</p> |

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| 17 | 22 | 2 - Project Description | 2.5.2 | PL | <p>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." Please clarify these estimates, 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, please identify the equipment fleet that would be utilized for this annual operation.</p> |
| 18 | 22 | 2 - Project Description | 2.5.2 | PL | <p>Reservoir Management Phase, Option 1, 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." Please 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.</p> |
| 19 | 22 | 2 - Project Description | 2.5.2 | PL | <p>Reservoir Management Phase, 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. Please provide this level of detail to allow proper consideration of impacts related to biological resources, aesthetics, and air quality.</p> |

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| 20 | 22 | 2 - Project Description | 2.5.2 | PL | <p>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 City of Pasadena requests that 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.</p> |
| 21 | 28 | 2 - Project Description | 2.9 | PWP | <p>Recommend adding the proposed MHTS optimization projects (new well and Behner) to the list of other projects evaluated as part of Cumulative Impacts (see Table 2.9-1 starting on page 28).</p> |
| 22 | 27 | 2 - Project Description | 2.9.0 | PL | <p>Cumulative Scenario: WHO WILL REVIEW THE CUMULATIVE PROJECTS LIST?</p> |
| 23 | 28 | 2 - Project Description | 2.9.0 | PL | <p>Cumulative Scenario: I'm not sure what the criteria are for related projects or if the Lincoln Avenue Specific Plan should be considered as a related project, but it is relatively close to the project site and envisions additional development on Lincoln Avenue. The EIR can be found at this link: http://cityofpasadena.net/Lincoln_Avenue_Specific_Plan.aspx</p> |
| 24 | 28 | 2 - Project Description | 2.9.0 | PWP | <p>Table 2.9.1 lists projects that may have cumulative impacts with the Proposed Project. Pasadena Water and Power's 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.</p> |

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| 25 | 16 | 2 - Project Description | 2.5.1 | PD | It is evident this will be a long-term undertaking requiring a high volume of trucks impacting traffic along the 210 freeway corridor. From a Pasadena perspective, the impact will likely occur at the Berkshire and Arroyo Blvd freeway ramps and cause slowdowns for drivers passing through Pasadena as well as for local residents using the freeway system. More so, the Berkshire ramp is a primary exit for those who attend La Canada High School creating a potential for traffic-jams in the mornings and afternoons. |
| 26 | 21 | 2 - Project Description | 2.5.1 | PD | The PD is also concerned with major events at the Rose Bowl during the operational phase; however, the concerns are likely offset since most of the engagements occur on the weekend when sediment removal should be minimized or stopped. In 2014, Pasadena will host the UCLA football season between September and December as well as a planned concert and other sporting events. In that regard, we would encourage future discussions to plan and organize the sediment removal around Rose Bowl events so that potential traffic problems are mitigated prior to the start date. |
| 27 | 39 | 3.4 - Aesthetics | 3.4.2 | PL | Scenic Vistas: This 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). |
| 28 | 39 | 3.4 - Aesthetics | 3.4.2 | PW | The City does not agree that scenic vistas are not identified in the Hahamongna Watershed Park Master Plan (HWMP) (DEIR page 39). The terms "scenic vista" or "scenic resource" are not used; however descriptions of both "Sunrise Overlook" in section 3.5 and "Sunset Overlook" in section 3.6 include mention of views of the basin from these |

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| 29 | 42 | 3.4 - Aesthetics | 3.4.2 | PW | View images are misleading and should reflect a more panoramic view experience typical of what a viewer's eyes provide. An example of this can be found at the City's recently implemented Sunset Overlook project. An interpretive sign panel containing a panoramic image of this vista (included herein as reference) was placed at this location. |
| 30 | 43 | 3.4 - Aesthetics | 3.4.2 | PW | Table 3.4-1 Views. Trail use at viewpoint 5 may be more like 5,000 visitors per month. Is there a set threshold value to establish potential impact and the ratings contained within this table? |
| 31 | 48 | 3.4 - Aesthetics | 3.4.3 | PL | 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 generic General Plan. |

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| 32 | 48 | 3.4 - Aesthetics | 3.4.3 | PL | <p>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/ These citations could include: <i>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. 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) 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. 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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| 33 | 51 | 3.4 - Aesthetics | 3.4.5 | PL | Visual Sensitivity: This section states, "As discussed above, while the Proposed Project site is not designated as a scenic resource, it is considered to be an important scenic area and does receive a high degree of use (City of Pasadena 2002)." It is unclear what the County considers a designated scenic resource. The Hahamongna basin is a visual focal point of several view trails and scenic overlooks identified in the Hahamongna Watershed Park Master Plan. |
| 34 | 51 | 3.4 - Aesthetics | 3.4.5 | PW | Regarding viewer sensitivity. What are the standards and thresholds to define Viewer Exposure, Duration of Views, etc.? |
| 35 | 53 | 3.4 - Aesthetics | 3.4.6 | PL | 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 re-vegetation plan that occurs simultaneously with sediment removal. |
| 36 | 68 | 3.5 - Air Quality | 3.5.0 | PW | The City strongly encourages LACFCD to aggressively pursue the reduction of air quality impacts through the requirement of the lowest-emission and alternative-fuel vehicles available for this project. |
| 37 | 73 | 3.5 - Air Quality | 3.5.2 | PW | Sensitive Receptors. Check with MACH1 as to their dust management requirements. |
| 38 | 85 | 3.5 - Air Quality | 3.5.6 | PL | 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. Please explain or revise accordingly. |
| 39 | 96 | 3.6 - Biological Resources | 3.6.2 | PW | Fig. 3.6-1 Bio. Need to compare this map with our master plan map for consistency. It may not be critical however due to non-overlapping footprints. |

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| 40 | 121 | 3.6 - Biological Resources | 3.6.3 | PL | Applicable Regulations, Local: The 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> ” |
| 41 | 124 | 3.6 - Biological Resources | 3.6.6 | PL | 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. Please justify the use of these studies to support 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 seem warranted. |
| 42 | 124 | 3.6 - Biological Resources | 3.6.6 | PL | <p>Impacts and Mitigation, BIOLOGY-1: [FLAG FOR DISCUSSION. THE PROJECT WOULD SUBSTANTIALLY REDUCE HABITAT FOR THE SPECIES LISTED BELOW, BUT IMPACT IDENTIFIED AS NOT SIGNIFICANT:</p> <ul style="list-style-type: none"> • least Bell’s vireo is a federal and state listed endangered species – observed onsite (attempting to breed but not successful); habitat eliminated from management area • yellow warbler, an SSC – observed onsite; habitat eliminated from management area • southwestern pond turtle, coast range newt, and two-striped garter snake are all SSC – snake observed onsite; habitat for all 3 impacted but not eliminated] |
| 43 | 128 | 3.6 - Biological Resources | 3.6.6 | PL | <p>BIOLOGY-2: [FLAG FOR DISCUSSION. 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: • 1.1 acres of Riversidean Alluvial Fan Sage Scrub • 51.4 acres of Riparian Woodland • 9.3 acres of Mule Fat Scrub]</p> |

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| 44 | 137 | 3.7 - Cultural Resources | 3.7.3 | PL | 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. |
| 45 | 141 | 3.7 - Cultural Resources | 3.7.6 | PL | 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 or will grading crews be trained to recognize "native sediments" when they are encountered. The City recommends that the EIR provide the estimated depth/contours at which "native sediments" would be encountered and consideration of whether excavation below such depths/contours is necessary. |
| 46 | 148 | 3.8 - Geology and Soils | 3.9.2 | PL | Local GHG Inventory: This 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. The staff report and Inventory can be found at this link: http://ww2.cityofpasadena.net/councilagendas/2013%20agendas/Nov_18_13/agendarecap.asp |
| 47 | 159 | 3 - Environmental Analysis | 3.10.2 | PWP | Also correct the reference #44 on page 631. 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. |
| 48 | 129 | 3 - Environmental Analysis | 3.6.6 | PW | The City requests that LACFCD coordinate with the City to prioritize habitat mitigation efforts in some or all of the recommended '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. |

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| 49 | 129 | 3 - Environmental Analysis | 3.6.6 | PW | The City requests to see the final Habitat Restoration Plan for the project prior to its finalization and to be able to offer commentary on the County's plan. The City also requests to participate in any consultations between the 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 and basin in addition to the project. The City finally recommends the consideration of the criteria in the Habitat Restoration Plan section of the HWP Master Plan. |
| 50 | 177 | 3.11 - Hydrology and Water Quality | 3.11.6 | PW | The text suggests FAST sediment is transported to ocean where local evidence suggest first sediments drop out under bridges within city area. |
| 51 | 186 | 3.13 - Mineral Resources | 3.12.3 | PL | Applicable Regulations, City of Pasadena General Plan: see comments for page 48 above. |
| 52 | 185 | 3.12 - Land Use and Planning | 3.12.6 | PW | The mitigation measure is dismissive of recreational use. It is not sufficient to simply purpose redirecting recreational use. HWP is a unique setting and destination for recreational users. Similar facilities are not within a close distance. City requests to collaborate with LACFCD to develop public information and redirection plans related to recreation. |
| 53 | 186 | 3.13 - Mineral Resources | 3.13.2 | PW | Conditions. Document states that Arroyo Stone is not as likely to be found due to sediment although project describes sediment removal in excess of post station fire deposit. Arroyo Stone is useful to the City for various purposes and routinely acquired and stored at HWP. City requests the option to receive Arroyo Stone should it be excavated. |
| 54 | 187 | 3.13 - Mineral Resources | 3.13.6 | PW | 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 (4ft. In diam. and larger) for various projects in HWP. At the time of sediment removal in the northwestern quadrant of the project area, the city would like to coordinate with the County and its contractor on the preservation and relocation of these valuable mineral resources. |

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| 55 | 195 | 3.14 - Noise and Vibration | 3.14.3 | PW | Figure 3.14.1, The exhibit shows a clear threshold for "unacceptable" noise levels in a neighborhood park but is vague for Riding Stables. Since only a portion of HWP contains stables and traditional park elements are contained within the park and adjacent to the project site, the City requests that this study be revised to use neighborhood park standards for Hahamongna Watershed Park. |
| 56 | 195 | 3.14 - Noise and Vibration | 3.14.3 | PW | Table 3.14-5 lists Hahamongna Watershed Park as a sensitive receptor for noise, but table 3.14-11 does not for vibration. The City requests that HWP be included as a sensitive receptor for vibration including potential effects on horses and domestic animals boarded and visiting the park. |
| 57 | 197 | 3.14 - Noise and Vibration | 3.14.3 | PL | 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. http://cityofpasadena.net/Planning/CommunityPlanning/General_Plan_Noise_Element/ References on page 631 should also include the Noise Element of the General Plan. |
| 58 | 198 | 3.14 - Noise and Vibration | 3.14.3 | PL | Regulatory Framework, City of Pasadena Municipal Code: [FLAG FOR DISCUSSION: 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 not construction, but rather long-term maintenance and operation. Should the project, thus, be evaluated against the balance of the Noise Ordinance, including 9.36.050 General noise sources?] |
| 59 | 209 | 3.15 - Recreation/Public Services | 3.15.2 | PW | Existing condition. Can the basin be separated from recreational use as they seem to do here? The project site is a portion of the park and not some space that exists separately from it. Description describes adjacent trails that are outside project footprint but will later call for periodic closure of these trails. In the second paragraph, the park is described as 300 acres. This value includes the basin which contradicts the earlier statement that the area is unofficially recreational. |
| 60 | 211 | 3.15 - Recreation/Public | 3.15.2 | PW | MACH1 is not mentioned in the description. |

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| 61 | 212 | 3.15 - Recreation/Public Services | 3.15.2 | HSR | Use of the park has increased since data was provided. (Supporting data pending.) Statistics provided address only those users visiting the park as part of a permit or reservation-based 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. |
| 62 | 217 | 3.15 - Recreation/Public Services | 3.15.2 | PW | Figure 3.15.1 The exhibit is misleading in the way it shows HWP and other nearby parks as a single point sitting outside the project boundary. The City requests this exhibit be revised to show the defined boundaries of HWP and other parks. |
| 63 | 219 | 3.15 - Recreation/Public Services | 3.15.3 | PL | Applicable Regulations, City of Pasadena General Plan: see comments for page 48 above. |
| 64 | 221 | 3.15 - Recreation/Public Services | 3.15.6 | HSR | The Department of Human Services and Recreation (HS&R) requests to review all final information and plans, so as to be able to redirect recreation use from Hahamongna, if necessary, during any time during the scope of the project. |
| 65 | 221 | 3.15 - Recreation/Public Services | 3.15.6 | HSR | HS&R, as the Recreation Manager, will need to coordinate with LACFCD when the need to relocate a 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 notified of the likelihood of such an occurrence with ample time (no less than 30 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. |
| 66 | 221 | 3.15 - Recreation/Public Services | 3.15.6 | HSR | HS&R foresees challenges on the west side of HWP, during the life of the project regarding regularly permitted recreational activities. Regular and timely coordination between LACFCD and the City of Pasadena HS&R Dept. is necessary. |

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| 67 | 221 | 3.15 - Recreation/Public Services | 3.15.6 | PW | The City requests staff-level involvement with LACFCD during the precise design and engineering efforts to establish limits of grading to protect existing and future recreational resources. |
| 68 | 222 | 3.15 - Recreation/Public Services | 3.15.6 | PW | The Oak grove Disc Golf 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. |
| 69 | 222 | 3.15 - Recreation/Public Services | 3.15.6 | PW | The City does not agree that the Altadena crest trail must be closed. The City requests the County provide a temporary re-route of the trail segment and way finding signs to maintain the availability of this trail for public use. |
| 70 | 221 | 3.15 - Recreation/Public Services | 3.15.16 | PW | There are potential impacts to Rose Bowl Riders, Tom Sawyer Camps and Move a Child Higher operations. The City request coordination with LACFCD to minimize operational impacts to these organizations and their associated City services. |
| 71 | 227 | 3.16 - Transportation | 3.16.0 | PW | Afternoon rush hour is more critical due to staggered schedule of La Canada High School and JPL (morning rush is more or less all in the same time frame) Suggest sliding haul hours forward (IE: 7a-330p) to reduce afternoon impacts. |
| 72 | 227 | 3.16 - Transportation | 3.16.0 | PW | Metro Gold Line extension is schedule to open at end of 2015. County could delay project start to allow commuters the opportunity to use Metro instead of driving. |
| 73 | 227 | 3.16 - Transportation | 3.16.1 | PW | Recommend no work on Sat/Sun/Holidays. This will reduce/eliminate Bowl and other event conflicts, and preserve greatest amount of recreational enjoyment for park users. |

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| 74 | 227 | 3.16 - Transportation | 3.16.2 | DOT | <p>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. - What is the truck turning radius? The trucks turning into Oak Grove Drive may encroach onto the adjacent traffic lane before entering the site.- 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.</p> |
| 75 | 246 | 3.16 - Transportation | 3.16.6 | DOT | <p>Impacts and Mitigation: Devil’s Gate Reservoir to/from I-210</p> <p>- 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 of the City of Pasadena.”</p> <p>- Please provide a schematic showing the proposed striping plan and indicate how many cars may be accommodated inside the TWLTL.</p> <p>- 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.</p> |

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| 76 | 246 | 3.16 - Transportation | 3.16.6 | DOT | Impacts and Mitigation: Table 3.16 LOS for Devil’s Gate Reservoir to/from I-210- 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 (http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821).- Intersection 3: Oak Grove Drive at Berkshire Place is jointly owned by Pasadena and La Canada Flintridge, but maintained by Pasadena. Intersections 6 and 7: Windsor Ave/Arroyo Blvd and I-210 Freeway Ramps are jointly owned by the State and Pasadena, but maintained by the State.- Please have the Level of Service impact thresholds for City of Pasadena intersections reflected in your report to determine whether the project’s impacts exceed the significance thresholds based on the City’s criteria. |
| 77 | 270 | 3.17 - Utilities | 3.17.1 | PW | Coordinate with SCE, SoCal Gas, PWP, etc. Are they all reviewing this document? |
| 78 | 270 | 3.17 - Utilities | 3.17.2 | PWP | 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 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. |
| 79 | 208 | 3 - Environmental Analysis | 3.14.6 | PH | Send out flyers to or posting in all nearby residents, schools and businesses notifying them about the proposed noises stemming from this project that will be starting 2014 and ending 2019 and the hours of operation (Don’t know if they are doing that) in addition to the public hearing. |

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| 80 | 275 | 4 - Alternatives Analysis | 4.3.0 | PWP | <p>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 pumps 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. 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 my belief that the volume of water lost during this process is far made up 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 fines are carried as close to the dam face as possible to maximize removal during the FAST process.</p> |
| 81 | 290 | 4 - Alternatives Analysis | 4.4.0 | PW | <p>The City requests notification for all FAST operations under the project or any selected Alternative with a 72-hour minimum advance notice prior to the beginning a FAST Operation.</p> |

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| 82 | 290 | 4 - Alternatives Analysis | 4.4.0 | PW | The City requests a separate agreement between the City and LACDPW be developed to insure protection to the downstream soft-bottom sections of the Arroyo Seco in Pasadena to ensure sediment management in those areas. Sediment management in the Devil's gate reservoir should not become a problem for downstream natural areas. |

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| 83 | 321 | 4 - Alternatives Analysis | 4.4.3 | PWP | <p>The DEIR was not clear as to the depth of material that is to be removed for the Proposed Project. The proposed finish grade elevation at the face of the dam following sediment removal and reservoir management is 985 and rising to 1,070 (depending on the configuration) at 4,977 feet north of the dam. Given these levels, LACFCD will be removing 40 to 80 feet of sediment near the face of the dam, and less further north. At these depths, I do not foresee perchlorate in soil being encountered since it is easily dissolvable. Perchlorate is a component of solid rocket propellant that was introduced into the ground and groundwater from the Jet Propulsion Laboratory (JPL) when the agency was disposing of these chemicals in open pits prior to the 1960s. Over these years perchlorate had ample time to dissolve into the groundwater. Volatile Organic Compounds were also disposed in pits by JPL. In 1992, JPL was designated a superfund site and since then NASA has performed and continued extensive groundwater monitoring and remediation. Based on NASA’s results, chemicals of concerns introduced into unlined pits over 50 years ago have since migrated from the soil into the groundwater hundreds of feet below ground surface (bgs). LACFCD geotechnical consultant collected soil samples for initial testing of both VOCs and perchlorate among other chemicals. Section 3.10 “Hazards and Hazardous Materials” of the DEIR references subsurface sampling at four boring locations. The geotechnical consultant attempted nine boring locations but five of the nine were not executed due to logistic issues. Appendix D, Table D3, in the geotechnical report (Appendix F of the DEIR) lists detectable traces of VOCs and SVOCs at the four boring locations. In general, Benzene was detected in shallower levels (5 feet bgs) with the exception at boring 9 (25 feet bgs). The shallower levels to me indicate the likely source was introduced in surface run-off from storm drains serving local communities. All the levels detected are above the California drinking water requirement of 1 ug/L or 1 ppb. The highest level shows .00085 mg/kg or 8.5 ppb. However the samples collected were from the soil and not groundwater. In Section 3.10 of the DEIR, LACFCD does not intend to monitor these chemicals of concerns during</p> |

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| | | | | | <p>the Proposed Project. As a mitigation measure it may serve useful for the agency to collect grab samples of represented batches for testing to ensure that state and federal guidelines are met. I did make contact with NASA’s technical consultant for input (Mr. Keith Fields at Tidewater) on these matters of contaminants. I will forward his comments when received.</p> |

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| 84 | J-1 | J - Traffic Report | Ch. 1 | DOT | 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 through 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. |
| 85 | J-31 | J - Traffic Report | Ch. 2 | DOT | 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 (http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821). Intersection 3: Oak Grove Drive at Berkshire Place is jointly owned by Pasadena and La Canada Flintridge, but maintained by Pasadena. Intersection 6 and 7: Windsor Ave/Arroyo Blvd and I-210 Freeway Ramps are jointly owned by the State and Pasadena, but maintained by the State. Please have the Level of Service impact thresholds for City of Pasadena intersections reflected in your report to determine whether the project’s impacts exceed the significance thresholds based on the City’s criteria. |
| 86 | J-91 | J - Traffic Report | Ch. 3 | DOT | Existing plus Project Traffic Analysis: The traffic study does not evaluate street segment impacts based on the City’s traffic impact study guidelines. Please include the street segment analysis in your report. |
| 87 | J-92 | J - Traffic Report | Ch. 4 | DOT | Project Trip Generation: As stated in a July 6, 2012 email, please justify your methodology for arriving at a PCE of 2.5 for inbound trucks, and 3.0 for outbound trucks. |

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| 88 | J-118 | J - Traffic Report | Ch. 5 | DOT | <p>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.</p> |
| 89 | J-B | J - Traffic Report | X.B | DOT | <p>Flow rate applied in the analysis calculations is 1900 vphpl. City of Pasadena uses 1700 vphpl for intersections connected to the TMC. Please reflect this value in your analysis calculations.</p> |