

Memorandum

To: Pasadena City Council
CC: Pasadena City Manager
From: Environmental Advisory Commission
Date: 12/6/2013
Re: Los Angeles County Department of Public Works Sediment Removal in Hahamongna Watershed Park—Draft Environmental Impact Report

Executive Summary

The Los Angeles County Department of Public Works is planning a massive five-year sediment removal project at Hahamongna Watershed Park that will cause enormous impacts to the City of Pasadena. As detailed later, the scope of these impacts is so severe that the Environmental Advisory Commission is compelled to urge the Pasadena City Council to review the Draft Environmental Impact Report issued by the County on October 23, 2013, and to work with the County and stakeholders to develop a responsible sustainable method of sediment removal. This document provides background on Hahamongna Watershed Park, the serious impacts to the City of Pasadena that would occur if the project proceeds, problems with the draft EIR issued by the County, and a recommendation for an alternative solution that the City of Pasadena should pursue.

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.

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Background on Sediment Management in Hahamongna Watershed Park

Devil's Gate Dam has been collecting sediment ever since it was built on the Arroyo Seco in 1920. In 2009, the Station Fire burned most of the undeveloped watershed of the Arroyo Seco. The loss of vegetation caused the winter storms in January 2010 and 2011 to deposit 1.2 million cubic yards of sediment behind the dam. Now the Los Angeles County Department of Public Works is planning a massive five-year sediment removal project which will cause enormous impacts to the City of Pasadena. Because the scope of these impacts is so severe, the Environmental Advisory Commission is compelled to urge the Pasadena City Council to review the Draft Environmental Impact Report issued by the County on October 23, 2013, and to work with the County and stakeholders to develop a responsible sustainable method of flood control, including a reasonable method of sediment removal. Clearly, this problem is not a new one, and it requires new thinking in order to prevent the permanent destruction of much of one of Pasadena's most beloved parks and open spaces.

Problems with the Project

The EAC 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 the City of Pasadena; 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, 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, increase risk for asthma, reduction 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 City.

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 East are already quite 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.

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.

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.

Problems with the Draft Environmental Impact Report

The EAC has identified the following problems with the draft EIR issued by the County of Los Angeles.

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, they never make the case for the need to remove it within five years.

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, and therefore negates much of the Hahamongna section of the Arroyo Seco Master Plan.

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.” This section of the DEIR needs to be redone because of its inadequate response to these concerns.

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 city.

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.

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. 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, 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. These flaws cause us to doubt the credibility of the biological information as it is presented in the DEIR.

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 they 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.

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 that they need to remove sediment because of the Station Fire, and while we do not dispute that some sediment needs to be removed, 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.

The EAC urges the Pasadena City Council to ask 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 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.

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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 find ways to reduce this cost permanently.

Conclusion

Pasadena has a responsibility as a steward of the environment and natural resources to protect Hahamongna and to promote and utilize sustainable programs for resource management. As the owner of the land involved and the operator of Hahamongna Watershed Park, Pasadena has great leverage to insist on a more environmentally sensitive program.

The Environmental Advisory Commission urges the Pasadena City Council to meet with the County and get satisfactory answers to these concerns. Ideally, we would like to find a way to remove a reasonably measured amount of sediment in a sustainably responsible way, without destroying one of Pasadena's most beloved parks, and without the extreme level of pollution and congestion. Pasadena rightfully prides itself on being a "green" city, with a commitment to open space and clean air, and we ask that Council continue that effort with the Hahamongna Watershed Park.



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Pasadena Group

December 11, 2013

To: Mayor Bogaard and Members of Pasadena City Council

Pasadena City Manager

From: Pasadena Sierra Club

Draft Environmental Impact Report for Sediment Removal in Hahamongna Watershed Park, by Los Angeles County Flood Control District

We have reviewed the DEIR alternatives for the proposed sediment removal behind Devil's Gate Dam. We are greatly concerned that the scope and timing of sediment removal would cause much greater environmental impacts than necessary to habitat, wildlife, recreation, air quality and transportation in Hahamongna Watershed Park and surrounding areas.

Hahamongna is a prize ecological area, its riparian habitat home to many species of plants and animals. Pasadena has recognized its value as a place for nature study, hiking, cycling, horseback riding, athletics and other activities. It also supplies much of Pasadena's water.

The proposed project is huge – to remove somewhere between 2.4 million and 4 million cubic yards of sediment and debris. The smallest amount -- 2.4 million cubic yards – would fill the Rose Bowl six times. At 20 cubic yards per truck load, that's at least 120,000 truck trips -- or 30,000 a year over four dry seasons. There would be an estimated maximum of 425 truck round trips a day, or one every minute or minute and a half

Recreation would be disrupted for much of four years as hikers, bicyclists and equestrians are blocked by truck movements. Activities such as Tom Sawyer Camp, MACH 1 and Rose Bowl Riders would be seriously affected. The inevitable, diesel fumes, dust, noise and congestion could pose a health threat to those near the site.

Under any of the plans, about 50 acres of riparian habitat would be cleared – and kept cleared every year – a permanent ecological loss not only for nature but those who might enjoy and learn from the plants and animals there.

Flood control is, of course, essential for public safety, and Pasadena has granted Los Angeles County an easement to build and operate Devil's Gate Dam. But the City of Pasadena owns the land, and must use its close partnership with the County and the City's permitting powers to ensure that sediment removal cause as little environmental impact as possible. This means weighing the environmental benefits of less aggressive sediment projects against their degree of risk.

The County's DEIR understandably is focused primarily on flood control. But what is the County's rationale for the project's size and timing? It is based on the premise that enough sediment must be removed to prepare for two Design Debris Events. A Design Debris Event – or DDE – is defined by the County as the volume that could flow into the reservoir after the Arroyo Seco's undeveloped watershed in the San Gabriel Mountains is completely burned, and a 50-year design storm event occurs after four years of watershed recovery. A DDE for Devil's Gate Dam and Hahamongna is calculated to be 2 million cubic yards. Allowing for approximately 1.25 million cubic yard capacity in the reservoir now, the goal is to remove from 2.4 to 4 million cubic yards of sediment and debris over several years.

The watershed in the mountains did burn completely in the 2009 Station Fire – and it will take many years for the hillsides to grow enough chaparral and other plants to fuel another devastating fire over the whole watershed. 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.

What is the likelihood of two 50-year storms within a relatively short period, before the County could remove sediment resulting from one storm and clear room for more? How did the County arrive at two DDEs as the event for which it must be ready? Could a less aggressive sediment removal program adequately protect public safety?

We urge the City of Pasadena to engage with the County in analyzing alternatives for smaller yearly removals of sediment, spread over more years, before any plan is adopted. Instead of taking out 600,000 or more cubic yards a year for four or five years, remove perhaps 150,000 or 200,000 cubic yards a year for 12 or 15 years. What risk of serious flooding downstream would that approach bring? At what cost?

These are answers that the public and decision-makers deserve before undertaking a project in such an environmentally sensitive area as Hahamongna.

Thank you for considering our comments.



Don Bremner, Conservation Chair
Pasadena Group, Angeles Chapter-Sierra Club