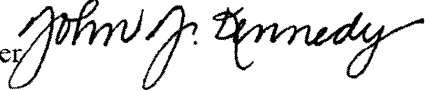


CITY COUNCIL  
JOHN J. KENNEDY  
COUNCILMEMBER  
DISTRICT 3

## MEMORANDUM

**Date:** 7 December 2013

**To:** William J. Bogaard, Mayor and Members of the Pasadena City Council

**From:** John J. Kennedy, Councilmember 

**Subject:** Devil's Gate Sediment Removal and Management Project Draft  
Environmental Impact Report

On October 23, 2013, the Los Angeles County ("County") Flood Control District ("the LACFCD") issued the Devil's Gate Reservoir Sediment Removal and Management Project ("Project") Draft Environmental Impact Report ("DEIR").<sup>1</sup> The DEIR presents several options for different levels and approaches to flood management and sediment removal at Pasadena's Hahamongna Watershed Park ("Park").

Council will meet on December 16 to provide guidance on the City's comments to the County, due by January 6, 2014.

### Dates and elements

- The County briefed the Municipal Services Committee on the DEIR on November 12.
- Council will receive a similar briefing on December 9.
- Council expects to receive advisory memos from the Hahamongna Watershed Park Advisory Commission, the Environmental Advisory Commission, and perhaps from other commissions.
- Council expects to receive the City Manager's recommendations and analysis prior to our December 16 meeting.
- The December 16 meeting will be the last opportunity for the full Council to provide guidance on the DEIR in advance of the City's comments to be filed to meet the January 6 deadline. At that meeting Council will provide policy direction to the administration regarding our comments to the County.

<sup>1</sup> <http://dpw.lacounty.gov/lacfcd/sediment/prj.aspx?prj=1>

**Purpose of this memorandum**

Recognizing the likely time constraints at the December 16 meeting, I have prepared this memo to focus our attention on what I believe are important points of interest and to better manage our time at the meeting.

**Communication and coordination between the City and the County**

I anticipate that the City Attorney will provide the details on the City's grant to the County of an easement at the Park for the purpose of flood control. Our owner-easement partnership with the County is of key significance. To further the best possible set of outcomes for the City and for the wider region, I urge my colleagues to make decision on December 16 that embarks us on a path that leads to a process of informed and engaged City communication and interaction with the County.

**The December 16 meeting**

At our December 16 meeting I will urge the City to exercise the maximum requisite commitment of time and resources to ensure that the Council's policy positions are effectively communicated to the County. I advocate that the City's comments on the DEIR must be fully representative of the views of councilmembers. I provide below some initial policy directions for inclusion in the City's comments.

Additionally, I urge that we press for an inclusive, thoughtful, and constructive dialogue with the Los Angeles County Board of Supervisors and their executive staff. I suggest that City representatives meet in January with Supervisor Michael Antonovich to secure a commitment from the County's Department of Public Works that they open an inclusive role for the City as they prepare the final environmental impact report.

**Some initial policy directions for inclusion in the City's comments.**

- 1) Flood management is the reason for sediment removal. An open question remains whether the DEIR focused sufficient effort to quantify flood risks, and how the County settled on their Two Design Debris Event criteria. This is a key matter, as the City needs to fully understand the flood risks in order to evaluate the efficacy of proposed mitigation measures, i.e. sediment removal at the park. My concern is that even the environmentally superior alternative (Alternative 3) described in the DEIR should be deemed as unacceptable until the City learns much more about the extent of the flood risk.
- 2) I am not aware that there is a point of view that suggests that sediment management at the park is not needed. I am of the opinion that sediment removal behind the Devil's Gate dam is required. However, the proposed timing, scale, scope, economic and environmental costs of the options have not been satisfactorily analyzed. The opportunity to remedy this omission is in the hands of the County as they prepare the final environmental impact report.

- 3) For the City to serve as an example on this matter, we must be good neighbors. To do so, the City must work with the County to find a balance that mitigates flood risk, preserves the natural environment, respects the neighbors and institutions in close proximity to the Park, and does not unnecessarily add to the often stressed traffic on the 210 Freeway. I hope our objective is to see a path forward that harmonizes flood management requirements while minimizing economic and environmental costs.
- 4) Only after the County establishes a convincing set of rationales based on flood risks can the key questions of timing, scope, scale, cost, habitat destruction, maintenance, traffic, air, and noise issues be thoroughly evaluated.
- 5) Let us be concerned about the County's suggestion that intense sediment removal take place over a three to five year period. Admittedly, a better approach may be outlined in a Pasadena-Star News editorial, dated November 20, 2013, entitled "Go Slow on Removing Devil's Gate Detritus."<sup>2</sup>
- 6) Lastly, we are the voice to ensure that the eventual Project is a sustained economic benefit to the Pasadena economy via possible apprenticeship programs; local hire and contracting opportunities; the development of unique educational curricula in public as well as private schools; and environmental research.

I thank you, my respected colleagues, for your consideration and attention on this most important matter.

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<sup>2</sup> <http://www.sgvtribune.com/opinion/20131120/go-slow-on-removing-devils-gate-detritus-editorial>

## Jomsky, Mark

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**From:** Timothy Wendler <timwendler85@yahoo.com>  
**Sent:** Sunday, December 08, 2013 9:20 PM  
**To:** Bogaard, Bill  
**Cc:** Robinson, Jacque; McAustin, Margaret; jkennedy@cityofpasadena.net; Masuda, Gene; Gordo, Victor; Madison, Steve; Tornek, Terry; Jomsky, Mark  
**Subject:** Devil's Gate Sediment Removal and Management Project,

Mayor and Members of the City Council –

As you consider the County's proposal on the Devil's Gate Sediment Removal and Management Project, as a former member and chair of the Hahamongna Watershed Advisory Committee, I would urge that you consider the following to preserve one of our region's most precious open spaces:

- 1) **Seek the minimum sediment removal that is truly necessary to achieve the goal of flood control, thus minimizing environmental impacts and costs.** The alternatives in the Draft EIR call for the removal of 2.4 to 4 million cubic yards. However, historical sediment buildup over 90 years (see County's Sediment Management Strategic Plan 2012-2032 Table 8-12) suggest more sediment could safely remain in the basin (since we have likely already seen the bulk of the Station Fire related runoff). Additionally, County Flood Control's grant application for \$28M from CA State Water Resources suggested that 2M cubic yards required removal, not 2.4-4M.
- 2) **Seek a more moderate time frame to complete the removal, again minimizing environmental impacts.** A 20-year program rather than a 5-year program could become a more routine sediment maintenance project rather than the proposed dramatic reshaping of Hahamongna.
- 3) **Require significant mitigation of whatever project is ultimately implemented.** Use this as an opportunity to implement other natural restoration projects planned in the Hahamongna Master Plan that could improve habitats in other areas to balance any damage done by the sediment management project. Particularly appropriate would be efforts to restore erosion-resistant native species such as mature chapparal in the upper watershed, thus reducing new sediment influx into the basin.

Thanks for your consideration of these comments.

-Tim Wendler  
951 N Hudson Ave, Pasadena CA 91104  
(626) 794-6389, [timwendler85@yahoo.com](mailto:timwendler85@yahoo.com)

12/09/2013  
Item 18

**Jomsky, Mark**

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**From:** meb787@aol.com  
**Sent:** Monday, December 09, 2013 11:41 AM  
**To:** Bogaard, Bill  
**Cc:** Robinson, Jacque; McAustin, Margaret; jkennedy@cityofpasadena.net; Masuda, Gene; Gordo, Victor; Madison, Steve; ttornek@gmail.com; Jomsky, Mark  
**Subject:** Devil's Gate Sediment Removal and Management Project

Mayor Bogaard and City Council:

There are many reasons the Pasadena City Council might ask County Flood Control to go back to the drawing board and come up with new smaller alternatives than those in the Devil's Gate Reservoir Sediment Removal and Management Project currently out for environmental review. Chief among these are:

- The County's numbers simply do not add up
- The public has been given confusing, misleading information
- There may possibly be another project driving the size and scope of the sediment project as proposed in the DEIR

**The key questions are why has the project more than doubled in size from when it was first proposed? Can the goals of the project, especially downstream flood protection, be accomplished with the removal of less sediment and/or the extension of the project over a longer period of time? The advantage, of course, would be greatly reduced environmental impacts particularly to air quality, traffic, noise, habitat, and aesthetics.**

#### **COUNTY NUMBERS DON'T ADD UP**

In November 2010 the Hahamongna Advisory Committee was informed that the sediment removal project would remove 1.67M cubic yards and scour 50 acres with only 15 of those to remain permanently bare. Now the DEIR project and alternatives would scour up to 120 acres and remove from 2.4 to 4M cubic yards of sediment. No credible answer has been given to account for this huge increase in the scale of the project.

According to the County's Sediment Management Strategic Plan 2012 - 2032 Flood Control has historically taken far less sediment out of the basin than they want to now and still been able to keep the downstream safe:

Strategic Plan Table 8-12 Devil's Gate Reservoir Historical Sediment Accumulation and Removal, shows that since 1938 the sediment stored in the basin has averaged 3.24 million cubic yards. In the late 1960s and 70s the amount of sediment in the basin was more than 4 million cubic yards. At no time during this 90 year period was more than 750,000 cubic yards removed during each cleanout operation. The 750,000 cubic yards was removed in 1977 when the sediment in storage was 4.14 million cubic yards, more than the amount that is in the reservoir now (which is 3.89 million cubic yards). **Why is it necessary to remove from 2.4 million up to 4 million cubic yards of sediment for**

**safety reasons when this was not necessary in the past? This is three to almost six times as much sediment as was ever removed at one time in the past.**

**Table 2-1, p.2-3 in the same document shows that in March 2011 the storage capacity of the basin was 47% or 3.7 million cubic yards.** In November 2010 Pasadena's Hahamongna Advisory Committee was shown a presentation by County Flood Control which stated that the storage capacity in the basin was only 17% or 1.242 million cubic yards. **This major discrepancy needs to be resolved.**

County Flood Control recently received a grant for \$28 million from CA State Water Resources for the Devil's Gate and Eaton Stormwater Flood Management Project, a component of which is the removal of sediment from behind Devils Gate dam, described in the application as follows:

**"To restore reservoir capacity to address the post-Station Fire sediment impacts at Devils Gate Dam, the Devil's Gate Reservoir Sediment Removal and Management Project will remove an estimated 2,000,000 cubic yards of sediment from the reservoir."**

When this grant application went before the Board of Supervisors for their approval, this is how Gail Farber's letter describes the project **"modifying Devil's Gate Reservoir by removing up to 2,000,000 cubic yards of sediment... to enhance flood protection to the downstream communities"** (Los Angeles County Board of Supervisors, Statement of Proceedings, March 19, 2013)

If the state is being told the removal of 2,000,000 cubic yards of sediment is sufficient to protect the downstream communities, **then why in the DEIR is the project, and all the alternatives studied, with the exception of the No Project, for removal of more than 2,000,000 cubic yards???** Why are the proposals studied by Flood Control in the DEIR more extensive than that for which the grant funds were obtained?

### **CONFUSING, MISLEADING INFORMATION**

As recently as October 2013, the Los Angeles Times was reporting that the Rose Bowl would be flooded in the event of a capital, or 50-year, storm. The grant application, however, includes an exhibit which shows that flooding in Pasadena would be minimal and none of it near the Rose Bowl (Exhibit A.1 in Workplan 2of2). Unfortunately, the public has been allowed to confuse the overtopping of the dam in a capital storm with the catastrophic failure of the dam, an event the County deems "highly unlikely." KCAL News presented an inflammatory and inaccurate report on the Devil's Gate situation in November 2013. The strategy seems to be to frighten the public so much that they will go along with the County's massive DEIR plan without question.

### **What is really driving the size of this project?**

The grant application states that the sediment removal is one component of a project, another component of which is the Devil's Gate Water Conservation project which would

store water behind the dam. A pipeline would be built to carry the water to the Eaton spreading grounds. The sediment removal project and the water conservation project are both in the same location with the same lead agency being done at the same time.

Despite this, **they are segmented and studied in two separate environmental documents.** Since the environmental documents for the water conservation project will not be available until February or March 2014, the public is not able to assess how the massive increase in the size of the sediment removal project may be related to the other project. That there is a relationship between the two is suggested by the following:

“There is a need to remove sediment from the Devil’s Gate Reservoir in order to increase Reservoir capacity and reduce the flood damage risk to the communities along the Arroyo Seco Channel. The resulting new reservoir configuration will result in the ability to impound stormwater to be conveyed via the new pipeline to Eaton Wash spreading Grounds for conservation” (p.7-3 Grant Application, Technical Justification 1of2)

Maximizing our local water resources is a laudable goal but if it requires the denuding of almost half of Hahamongna Watershed Park, the public might say let’s take a long and careful look at this, the opportunity it seems we are being denied at the moment. There would certainly be questions about how do we arrive at a compromise which increases water supply while still retaining the habitat, recreation, and aesthetic values of the park – not to mention the lessened impacts upon air quality, traffic, noise, etc. which a smaller project would have.

Why also in the Integrated Regional Water Management Plan data base is the City of Pasadena mentioned as a partner of County Flood Control in the Devil’s Gate Water Conservation Project for possible IRWMP grants? The 2010 Pasadena Urban Water Management Plan states that Pasadena Water and Power plans to participate in the project funding and receive credit for a portion of the water recharged. If there has been a precommitment to the water conservation project which would affect the design and implementation of the sediment removal project, the staff of both the City and the County should inform the City Council and the public. The relationship between the two projects must be disclosed in the sediment removal EIR so that the public and the decision makers can understand the full impacts of the two projects upon one another.

I urge the City Council to get to the bottom of all this because Hahamongna is too important to just allow this DEIR to move forward unchallenged.

Thank you for reading.  
Mary E. Barrie  
Friends of Hahamongna

Citations:

County Flood Control Original Presentation to the Hahamongna Watershed Park Advisory Committee, November 2010

[www.arroyoseco.org](http://www.arroyoseco.org)

Click on Devil's Gate EIR Toolkit

Click on County Environmental and Planning Documents

Click on Original Presentation November 2010

Los Angeles County Sediment Management Strategic Plan

[www.dpw.lacounty.gov/lacfd/sediment/stplan.aspx](http://www.dpw.lacounty.gov/lacfd/sediment/stplan.aspx)

Devil's Gate And Eaton Stormwater Flood Management Project

I had trouble getting to the grant application directly - I kept getting broken link messages. You can google the title but the sections come up separately so it's confusing. The following is how I got there:

From Water Resources home page [www.water.ca.gov](http://www.water.ca.gov), click on these tabs:

Issues

Funding

Grants and Loans

IRWM (Prop 50, 84, and 1E)

Archives

Prop 1E Round 2 Stormwater Flood Management Applications

Los Angeles County Flood Control District



DATE: December 9, 2013

TO: Mayor Bogaard and members of the Pasadena City Council

FROM: Thom Mrozek and Rita Moreno  
Members, Recreation and Parks Commission

SUBJECT: DISSENTING LETTER REGARDING THE DEVIL'S GATE SEDIMENT  
REMOVAL AND MANAGEMENT PROJECT DRAFT ENVIRONMENTAL IMPACT  
REPORT

We want to express some significant concerns with a letter approved by a majority of our colleagues on the Hahamongna Watershed Park Advisory Committee (HWPAC), in relation to the Devil's Gate Sediment Removal and Management Project Draft Environmental Impact Report (DEIR), and sent recently to the City Council.

As we expressed to our colleagues at a special meeting of the HWPAC last week, we believe the letter from the Committee fails to address the DEIR in any meaningful way and; therefore, fails in its attempt to provide advice to the City Council on matters pertaining to Hahamongna Watershed Park.

While the impacts of this project are obviously of great concern to HWPAC, Pasadena residents and users of the park, we believe that the County has correctly concluded that a significant sediment removal project is needed to ensure the viability of Devil's Gate Dam. Our colleagues on the HWPAC essentially have suggested that you should not consider what they view as a deeply flawed DEIR because it "does not provide a full analysis of what is quantitatively needed for flood control in the region."

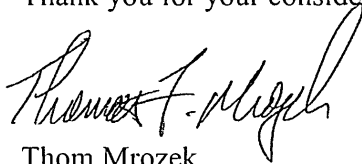
The issue before us is a DEIR that looks at the impacts related to a project at one specific dam – not the overall system of flood control across the front range of the San Gabriel Mountains. The primary objective of the DEIR is not, nor should it be, to examine the county's flood control practices and overall strategies. Devil's Gate Dam is part of a well-established strategy to protect lives and property by controlling flood waters that come out of the San Gabriel Mountains. If this flood control strategy is flawed, which appears to be the conclusion of our colleagues, we wonder why they don't take the next obvious step and propose that the County demolish Devil's Gate Dam? After all, there apparently are alternatives to the County's current dam-based flood control strategy. And, wouldn't destruction of the dam return the area to the "natural" state that is advocated by some?

We have concluded that Devil's Gate Dam is part of an important system designed by engineers and other professionals to protect people and their homes. It is also our conclusion that the

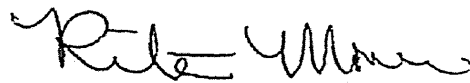
engineers correctly tell us that without the removal of the sediment, the dam will not function properly in times of emergency. For these reasons – which have been clearly explained by people with a much deeper understanding of the issues than we will ever have – we conclude that the Committee failed in its mission to provide meaningful advice to the Council.

While the claims in the letter from our colleagues that the DEIR fails to adequately address the environmental impacts of the project to the Park and to the surrounding communities may be true, that assertion is of little value to the Council because the Committee's "advice" to the Council fails to address these purported shortcomings. The DEIR may be imperfect, incomplete or subject to other criticisms, but the letter fails to address the pertinent issues in any meaningful way. We urged our colleagues to avoid sending this letter to the Council, and now that they have done so, we wanted to express our deep concerns with such a flawed communication.

Thank you for your consideration.



Thom Mrozek



Rita Moreno

# Memorandum

**To:** Pasadena City Council  
**CC:** Pasadena City Manager  
**From:** Environmental Advisory Commission  
**Date:** 12/9/2013  
**Re:** Los Angeles County Department of Public Works Sediment Removal in Hahamongna Watershed Park—Draft Environmental Impact Report

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## **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

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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

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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

December 9, 2013

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.

*December 9, 2013*

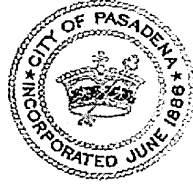
**Keep Costs Low:** This \$100 million project can cost a lot less if the County uses the SLOW method. By sluicing more sediment through the dam and working with nature instead of against it, the costs of this project can be greatly reduced. If the County removed more of the sediment with sluicing, that 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.





## Hahamongna Watershed Park Advisory Committee

Comprised of  
Recreation and Parks Commission ♦ Northwest Commission Members ♦ Environmental Advisory  
Commission Members

December 6, 2013

Dear Mayor Bogaard and Pasadena City Council Members,

Pasadena's Hahamongna Watershed Park Advisory Committee ("HWPAC") has reviewed the proposed Los Angeles County Devil's Gate Reservoir Sediment Removal and Management Project (the "project") Draft Environmental Impact Report (DEIR) issued by the Los Angeles County Flood Control District ("the LACFCD") on October 23, 2013.

There is a fundamental issue as to whether the project proposed is even necessary and whether it truly is the proper type and scope of work to address the problems that have been identified. There should be strong consideration given by the Los Angeles County Board of Supervisors to adopt and analyze an integrated and comprehensive means for managing flood control concerns within Pasadena and within the surrounding region.

This Project is of key concern to residents of the impacted neighborhoods, the City of Pasadena, and the region as a whole. It is the opinion of the HWPAC that the proposed project and the alternatives set forth in the DEIR do not adequately address potential and unacceptable impacts to Hahamongna Park, the surrounding communities, and the entire ecosystem, of which Hahamongna is a part.

Devil's Gate Dam is one of many contributors of concern regarding flooding within the purview of the LACFD. Other mountain ranges in the region as well as storm drains empty into the Los Angeles River, which can also create flooding hazards in the region with or without any watershed from our mountain range or water released from Devil's Gate Dam.

The DEIR does not provide a full analysis of what is quantitatively needed for flood control in the region. The DEIR does not mention other viable and less intrusive methods to address sediment in the Hahamongna Watershed. Furthermore, the proposed project alternatives do not adequately mitigate noise, traffic, air pollution, aesthetic, and habitat degradation in the Hahamongna Park and surrounding communities.

We ask that the City Council urge the Los Angeles County Board of Supervisors and the LACFCD to take into appropriate consideration the overwhelming response of citizens heard during the outreach process as they addressed myriad issues and concerns. We ask that the City Council convey to the Board of Supervisors and the LACFCD that the DEIR should include alternatives that do not focus merely on sediment removal as a means to address

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flood control issues. We further ask that the City Council urge the Board of Supervisors and the LACFCD to craft and carefully analyze options for a project that will protect the Hahamongna Watershed Park environment and ecosystem, that will preserve Hahamongna for recreational uses, and that will minimize the impacts on the surrounding community.

Thank you for your consideration of our advice on this matter.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Annette Perry". The signature is written in black ink and is positioned above the typed name.

Annette Nicole Perry, Chair

*Hahamongna Watershed Park Advisory Committee*