ATTACHMENT 'D'

Timeline of the History of Devil's Gate Reservoir and Hahamongna Watershed Park

- 1919 The area north of what was commonly known as Devil's Gate was annexed to the City of Pasadena by popular vote. The City of Pasadena grants an easement to the Los Angeles County Flood Control District (LACFCD) for the purposes of flood control and water conservation. 1920 The County of Los Angeles completed construction of Devil's Gate Dam. 1965 Easement agreement is modified to expand the included area. 1978 The California Division of Safe Operation of Dams (DSOD) imposed an operational restriction on Devil's Gate Dam and officially declared the dam seismically unsafe. These actions were taken in part due to the 1971 Sylmar earthquake. 1986 The City of Pasadena received a grant from the Santa Monica Mountains Conservancy for a study of the use of the Devil's Gate basin. A formal progress report for the Devil's Gate Multi-Use Project (DGMUP) was presented to the Pasadena City Council in March of 1988. 1986-91 The Devil's Gate Multi-Use Project Plan is developed. The Devil's Gate Project was propelled by Pasadena's Strategic Planning Process, which identified it as one the most promising projects necessary to make Pasadena a great city in the year 2000 and beyond. 1992 The Preliminary Park Plan was received and conceptually approved by the Pasadena City Council. 1993 The area was named Hahamongna Watershed Park 1994 Last major sediment removal project performed by LACFCD in which 190,000 cubic yards were removed. 1994 Mining operations in the Hahamongna Watershed Park basin cease. As many as eight mining operations had been in the basin and had been licensed to mine sand and gravel.
- 1995-98 Devil's Gate Dam rehabilitated by the LACFCD.
- The "Park Elements" that reflected consensus towards the development of the 1997 Park's Master Plan were presented to the City Council for review.

- 1998 Planning and design efforts begin to develop the final Master Plan for Hahamongna Watershed Park.
- 2003 City Council adopts Hahamongna Watershed Park Master Plan (HWPMP). Includes detailed descriptions of basin operation for water conservation and flood control, long-term sediment management plan includes haul routes, and conceptual grading plan, prepared in collaboration with Los Angeles County.
- 2009 Station Fire burns nearly 100% of the undeveloped watershed tributary area to the basin.
- 2009-10 Heavy winter rains transport 1.3M yards of debris and sediment into the basin.
- 2011 County starts draft EIR process City submits comments within the scoping period.



OFFICE OF THE CITY MANAGER

November 10, 2011

Los Angeles County Department of Public Works Keith A. Lilley Senior Civil Engineer Water Resources Division Water Resources Division – Reservoir Cleanouts P.O. Box 1460 Alhambra, CA 91802-9974

Re: City of Pasadena Comments on the Notice of Preparation and Initial Study for the Devil's Gate Reservoir Sediment Removal and Management Project

Dear Mr. Lilley:

Thank you for forwarding a copy of the Notice of Preparation (NOP) and Initial Study (IS) for the Devil's Gate Reservoir Sediment Removal and Management Project. The project as described would remove up to 4.0 million cubic yards of sediment from the reservoir behind Devil's Gate Dam to restore it to its current design standard, and establish a reservoir configuration more suitable for routine maintenance activities including sediment management. Although approximately 2.6 million cubic yards of sediment is the current excess amount of sediment in the reservoir, additional sediment accumulation is anticipated during the upcoming storm seasons due to the burned condition of the watershed that will have to be removed. The ultimate reservoir configuration and volume of sediment to be removed will be determined based on locations of access roads; areas for preservation or restoration of native vegetation; and the amount and location of sediment inflow that occur during the upcoming storm seasons. In order to remove the sediment from the reservoir, vegetation growing within excavation areas will require removal. We understand the sediment and organic materials are planned to be trucked off-site and then taken to sites that are already prepared and designated to accept such material without additional construction or vegetation and habitat removal. We also understand the primary goal of this project is to return adequate flood control capacity to the facility and establish a reservoir configuration more suitable to Los Angeles County Department of Public Works' (LACDPW) routine maintenance activities. Based on our review of the NOP and IS we believe that the project's primary potential impacts to the City of Pasadena are related to Air Quality, Noise and Traffic and Transportation.

The City is a responsible agency pursuant to CEQA, and looks forward to consultation with LACDPW throughout the CEQA process. The following comments from the Department of Public

Works, Department of Transportation and Water and Power Department are provided based on review of the Notice of Preparation and Initial Study:

- 1. The adopted Hahamongna Watershed Park Master Plan must be considered in the project's design as well as in all alternatives. LACDPW may recall the discussions and collaboration between our two agencies in developing a strategy and conceptual grading plan, which is part of the adopted HWPMP, for sediment removal in the basin that helped achieve the best possible balance between all the other competing issues in the basin including water resources, habitat, recreation, flood & sediment management and cultural resources. We provide the following link to the HWPMP and can provide hard copies upon request. http://www.cityofpasadena.net/PublicWorks/arroyo_plans_and_projects/
- 2. Page 18 5.1.1d Light and glare: The City disagrees; there will need to be an evaluation of the impacts to wildlife if lights are used during the dark hours.
- 3. Page 25 5.7.1 Greenhouse Gases The City's Green Action Plan, Action #3, identifies goals to reduce greenhouse gases which should be considered and evaluated. http://www.ci.pasadena.ca.us/GreenCity/Green_Team/
- 4. Page 26 5.8.1h Fire: The City disagrees; the area is designated a high fire zone by LA County Fire and the Pasadena Fire Department; work during the summer months in Hahamongna and the project's impact to fire needs to be evaluated.
- 5. Page 34 5.14.1 Security protection: The City disagrees with IS; since it is anticipated that the construction contractor will retain a presence on site during non-construction times, the City feels there is a need to address the project's impacts to the security issues of the site during non-construction times.
- 6. Page 37 5.17.1 Green Waste to Landfill This is not consistent with Action 4 of the City's Green Action Plan to reduce waste. Alternatives to green waste going to the landfill should be considered.
- 7. Coordination between LACDPW, The City of Pasadena and the Rose Bowl Operating Company will be necessary to ensure there are no or minimal impacts to planned Rose Bowl events.
- 8. There must be coordination between the County and the City regarding the details on the project's truck haul routes and overall traffic/staging plan to ensure the neighborhoods are protected and to minimize and traffic conflicts.
- 9. The City is supportive of sustainable sediment management proposals for Hahamongna and the Central and Lower Arroyos.

- 10. The City asks that the County consider and analyze any secondary impacts downstream of Devil's Gate Dam.
- 11. In anticipation of the need to replace lost habitat, the City is supportive of the County considering the habitat projects identified in the HWPMP as appropriate mitigation.
- 12. In anticipation of the need to remove sediment from the basin, the City would like to make LACDPW aware of several approved projects on-site that have anticipated the County's sediment project and that may help reduce impacts through collaborative construction efforts with the City.
- 13. The HWPMP and the Master EIR are well known documents in the community. The City suggest that the EIR/bio studies to be prepared for the project are consistent with the studies of the Arroyo Seco MEIR and the HWPMP, specifically in their reference to plant communities/biological terminology, for the benefit of the public's understanding.
- 14. LACDPW must protect the infrastructure for Pasadena's Tunnel Water in the southeast quadrant of the basin, near the dam.
- 15. There are several related projects that the County needs to be aware of for purposes of evaluating cumulative impacts. These projects include: a) JPL's proposed parking structure; and b) the newly funded Prop. 84 IRWMP projects in both the basin and in the upper Arroyo Seco.
- 16. Tree protection: Any potential impacts to the adjacent oak woodland in the Oak Grove area of HWP needs to be evaluated. This project will be subject to review by the City's Urban Forestry Advisory Committee.

The City of Pasadena is pleased to coordinate with Los Angeles County Department of Public Works those topics of particular interest and impact to Pasadena residents pursuant to State CEQA Guidelines Section 15086. Pasadena looks forward to further participation in the comment and review period for the EIR, and continued cooperation and consultation with the County/Flood Control District. At this time Pasadena is commenting as a responsible agency since discretionary approval is required by Pasadena per the lease agreement between our two agencies. Pasadena requests to receive future CEQA notices for the project. The City of Pasadena appreciates the opportunity to comment on the referenced documents. Should you have any questions regarding this letter, please do not hesitate to contact me at (626)744-7371.

Respectfully submitted,

Julie A. Gutierrez

Assistant City Manager City of Pasadena City of Pasadena Comments to Devil's Gate Reservoir Sediment Removal and Management Project Page 4 of 4

cc: Siobhan Foster, Director, Department of Public Works (PW)

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