

ATTACHMENT A



OFFICE OF THE MAYOR

January 16, 2014

County of Los Angeles
Department of Public Works
Water Resources Division
Attn: Reservoir Cleanouts Program
P.O. Box 1460
Alhambra, CA 91802-1460

Re: City of Pasadena Comments on Draft Environmental Impact Report for Devil's Gate Reservoir Sediment Removal and Management Project

Dear County of Los Angeles:

On behalf of the City of Pasadena, I convey our thanks to the County of Los Angeles for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Devil's Gate Sediment Removal and Management Project (Project). The City's comments on the DEIR are set forth in this letter and in the attached statement of comments. We ask that both this letter and the statement of comments be reflected in the record of comments received as the DEIR comments of the City of Pasadena.

As specifically reflected in the statement of comments, Pasadena City staff have extensively reviewed the DEIR as the basis for the comments provided. Moreover, the City Council reviewed the Project on December 9 and December 16 of last year. The Council's evaluation was preceded by review by the Council's Municipal Services Committee on November 12, as well as by the City's Hahamongna Watershed Park Advisory Committee (HWPAC) on November 13 and the Environmental Advisory Committee (EAC) on November 19.

The City's Next Steps

The City is taking steps to identify a responsible Project design and sediment management program that reflects the configuration, aesthetics, habitat restoration, and vegetation management described in the Hahamongna Watershed Park Master Plan (HWPMP) adopted by the Pasadena City Council in 2003. The City's Project review seeks to answer key questions including the following:

- Is the scope of the Proposed Project and Project Alternatives too large?
- Does the County have to play catch up for its failure to maintain the Reservoir over the years at the expense of the City and other impacted communities and will the County specify and adhere to a specific maintenance program?

- Can a more gradual project approach be effective?
- What is the true downstream flood risk?
- How frequently have storms associated with a design debris event (DDE) occurred? What is the likelihood of two concurrent DDE occurring?

The City's efforts include an independent review of the Sediment Removal and Management Project and solicitation of input from key community members with relevant expertise. The City will update the County on its progress at the annual City Council meeting with Supervisor Antonovich on March 19, 2014.

We look forward to continuing the cooperation and consultation that have occurred so far in this extremely important project. In that regard, it will perhaps be helpful for us to provide certain background information about matters the City considers critical to a sediment removal and ongoing management project that will be consistent with the best interests of our community.

Hahamongna Watershed Park (HWP)

Hahamongna Watershed Park (HWP) is a unique environmental resource, unparalleled in Southern California for its biological and water resources. For decades, the Pasadena community has diligently protected and enhanced the natural character of this alluvial canyon and its rich riparian and stream zone habitat through major community-based planning efforts and City has adopted numerous policy documents relevant to HWP, such as the Hahamongna Watershed Park Master Plan (2003), Arroyo Seco Master Plans and Design Guidelines (2003), United Nations Urban Accords (2006), Green City Action Plan (2006), Hahamongna Watershed Park Master Plan Addendum for the Hahamongna Annex (2010), and Open Space & Conservation Element of the General Plan (2012.)

These efforts commit the City of Pasadena to protect native habitats, conserve and protect the water resources of the Arroyo Seco, reduce greenhouse gases, and provide diverse recreation opportunities for the Pasadena community among other goals. Over the last ten years, between 2003 and 2013, the City has invested \$2.7 million in HWP projects. Millions of dollars' worth of projects have been also completed downstream in the Central and Lower Arroyo Seco in furtherance of the City's commitment to preservation of the Arroyo Seco.

The adoption in 2003 of the Hahamongna Watershed Park Master Plan (HWPMP) was the culmination of a five-year community planning process with extensive County participation. The HWPMP is the central guiding document for how the City moves forward in planning for this area. There are several goals which would be greatly impacted by the Project as proposed and they are outlined below.

Hahamongna Watershed Park Master Plan (HWPMP) – Goal 1 – Preserve, restore & enhance the native habitats

Due to the size of the basin areas and corresponding maintenance plans, the Proposed Project and Project Alternatives are inconsistent with this HWPMP goal. The City expects the County to prepare a final Project design more closely resembling the configuration, aesthetics, habitat restoration and vegetation management described in the HWPMP. The HWPMP establishes a minimum flood control capacity of 2.3 million CY and includes a conceptual grading plan that would create a flood management/conservation pool of 3 million CY. At the time of HWPMP preparation

(2003), the sediment removal required was approximately 800,000 CY. When completed, the basin would have a 69-acre surface area. The Proposed Project would remove 2.95 million CY over a 120-acre area to create a flood control capacity of 4.15 million CY. The Project Alternatives would remove between 2.4 and 4.0 million CY with an affected area of 76 to 120 acres.

The larger footprints of the Proposed Project and Project Alternatives would have a greater initial and ongoing impact to native vegetation and habitat than envisioned in the HWPMP. The HWPMP describes a habitat restoration plan and distinct vegetation types that would occur at various elevations within the basin. Corresponding with the water level of the conservation pool, vegetation below elevation 1030 feet would be periodically removed as a part of regular maintenance, over an approximately 54-acre area. For elevations above 1030 feet, including the side slopes of the basin, the HWPMP describes a habitat restoration plan including periodic replanting due to future sediment removal efforts. The Proposed Project would periodically remove vegetation from the entire basin as a part of regular maintenance, resulting in significantly less habitat than described in the HWPMP. The Project Alternatives describe similar maintenance over areas ranging from 47 to 120 acres.

The Proposed Project and Project Alternatives would destroy regionally significant willow and mule fat riparian forest. The forest 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. Other types of habitat, including freshwater marsh, alluvial scrub, and chaparral would be destroyed.

Further, the Project offers no habitat mitigation plan. Because the lost habitat is riparian, it should be replaced at the highest ratio possible and as much of the mitigation as possible should occur within the Hahamongna basin. I request the County collaborate with the City of Pasadena to determine the most suitable restoration areas.

Hahamongna Watershed Park Master Plan (HWPMP) – Goal 2 – The Devil's Gate Flood Control basin will be managed to provide protection to the developed and natural downstream area

The Proposed Project and Project Alternatives may be consistent with the flood control objectives of this HWPMP goal, but the objectives related to a lower-impact and comprehensive approach to sediment removal and management are either not met or not included in the Proposed Project or Project Alternatives. Accordingly, these reaches of the Arroyo Seco stream could be impacted under the Proposed Project or any of the Project Alternatives and should be included within the Project area. The City requests that the inclusion of the Central and Lower Arroyo Seco downstream areas in a further modeling and sediment transport analysis be conducted since sediment removed from the reservoir by the Flow-Assisted Sediment Transport (FAST) method will move through this area.

Possible impacts of sediment drops in the soft-bottom areas under the 134 Freeway and Colorado Street Bridge include adverse impacts to adjacent lands and downstream City improvements. The County should recognize responsibility for ongoing maintenance of these areas to ensure protection of the soft-bottom sections of the Arroyo Seco and downstream improvements in Pasadena.

Hahamongna Watershed Park Master Plan (HWPMP) – Goal 4 – Provide diverse recreation opportunities for Pasadena community

Due to the proposed sizes and Project impacts, the Proposed Project and Project Alternatives could adversely affect the City of Pasadena's ability to meet this goal. Passive recreation within the vegetated areas would be harmed and the presence of a large, industrial operation in the Hahamongna basin, causing significant dust and noise impacts, will harm present and potential park users, notably hikers, equestrians, and bird watchers.

Other DEIR Concerns

Aesthetics

The DEIR determined that there will be significant impacts to the appearance of the Reservoir, but identified no feasible mitigation measures. It states that the preservation of existing visual conditions is not required for Reservoir management. The City of Pasadena respectfully disagrees and requests the County prepare a final Project design more closely resembling the configuration, aesthetics, habitat restoration and vegetation management described in the HWPMP, which only allows impacts necessary for Reservoir management.

Air Quality

The DEIR determined that there are significant and unavoidable impacts to air quality even after mitigation requiring equipment to meet EPA 2007 standards. This is due to the nature of the debris removal by heavy construction equipment that generates excessive daily NOx emissions.

The Proposed Project anticipates the hauling of 7,650 CY of sediment per day using double dump trucks which have an estimated capacity of 16 to 20 CY. 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. The trucks will drive through local neighborhoods and the 134 and 210 Freeways. The diesel trucks will operate for an estimated nine months per year, six days per week.

Short and long term health effects due to silica dust, fugitive dust clouds, diesel fumes, carbon monoxide, NOx emissions and other pollutants should be fully evaluated to determine the health risk assessment to the adjacent neighborhoods and sensitive receptors. Greater use of alternative fuel vehicles for hauling is critical and must be required as a mitigation measure.

Downstream Impacts

While the DEIR mentions potential Arroyo Seco Channel overtopping areas (flooding) including locations in Pasadena, Los Angeles, South Pasadena, and the 110 Freeway, impacts are not discussed in depth. Notably, flooding/damage risks to critical Pasadena infrastructure and natural resources, including the historic Rose Bowl, Hahamongna Watershed Park (HWP), Arroyo Seco Golf Course, and the Central and Lower Arroyo Seco are not clear. Without knowing the magnitude of the flood risk, the City of Pasadena will take any and all steps necessary to identify the least

impactful Project, one that balances the City's priorities of protecting its public investments, infrastructure and the natural resources of HWP.

Noise

Loud construction noise may be mitigated by restriction on operation of off-road construction equipment with a 200+ horsepower engine within 180 feet of residences. Other equipment should be limited to using access roads only.

Further analysis should be made of haul vehicle noise generated on haul routes. There also should be limitations on the use of warning alarms on construction vehicles over certain decibels when used in the reservoir.

Project Scope

The DEIR does not present scientific rationale for the need to remove between 2.43 to 4.0 million CY of sediment from the Reservoir within 5 years. When Los Angeles County initiated project planning for a large-scale project to remove sediment from the Reservoir in 2010, the project scope approved by the County Board of Supervisors in March 2011 envisioned a 1.67 million CY sediment removal project. As the City of Pasadena bears a significant burden from the Sediment Removal and Management Project, it is imperative that the Project scope be appropriately scaled to provide adequate flood protection in the most environmentally responsible and respectful manner possible resulting in as little impact to HWP as possible.

Sediment Management Phase

Regular maintenance of the Hahamongna basin by the County is essential to lessening the need for future large-scale sediment removal projects. The DEIR fails to specify the County's commitment to an ongoing sediment management program. The document describes an estimated 13,000 CY of annual removal with a periodic removal of approximately 170,000 CY should a heavy rainfall year occur. The City objects to this broad latitude, as it would allow the County to not perform removals some years and initiate larger, periodic removal projects when desired. The City requests that the County commit to a specified maintenance program that defines a minimum and maximum amount of work that the County will perform annually. The annual minimum and maximum should conform to the limitations and responsibilities of the Easement and be only as impactful as necessary to preserve and maintain the Reservoir for water conservation and flood control purposes.

Traffic

The DEIR has determined there will be significant and unavoidable traffic impacts caused by the project. To the fullest extent, the County of Los Angeles must independently mitigate these impacts without relying on local agencies.

The proposed schedule of eleven to twelve-hour work days during the week and nine hour work days on Saturdays, involving a maximum of 425 truck round trips per day during excavation activities will increase traffic on haul routes and generate burdens to residential and other streets throughout Pasadena and neighboring communities that are not mentioned in the DEIR. Such local

burdens, as well as impacts to the 134 and 210 Freeways and area schools must be identified and mitigated before a final project is approved.

Rose Bowl and Brookside Golf Course

Our statement of background information the City considers critical to a reasonable and responsible sediment removal and management project would not be complete without reference to the Rose Bowl and Brookside Golf Course.

The historic Rose Bowl and Brookside Golf Course are major attractions that provide significant economic benefits to Pasadena. In 2011, the City of Pasadena embarked on the \$182 million renovation of the Rose Bowl, prominently located downstream of the Reservoir in the Central Arroyo Seco. The primary project objectives are to improve public safety, enhance fan experience, maintain the Bowl's National Historic Landmark status, develop revenue sources to fund long-term improvements at the stadium, and enhance facility operations. The renovations, which will preserve the Rose Bowl as a Pasadena icon and enable the facility to stay competitive within the industry, will be completed in FY 2015. The City recognizes the needs to protect both the Rose Bowl and golf course from any potential future flood damages, but this needs to be balanced with a Project that is respectful of the Central Arroyo Master Plan and the expectations of the community. It is imperative that the County coordinate sediment removal and transport activities with Rose Bowl special events, which involve substantial traffic on the 134 and 210 Freeways.

Concluding Comments

The City of Pasadena has identified the foregoing Pasadena-specific concerns with the Sediment Removal and Management Project, beginning with impacts to Hahamongna Watershed Park (HWP), followed by concerns with topics studied in the DEIR. Any one of these items is sufficient to warrant review by the County of the impact of this Project on Pasadena. Collectively, the items offer a compelling argument that the Project as proposed is not reasonable or responsible for Pasadena.

While the City acknowledges the need for a responsible sediment removal project and ongoing sediment management program at the Devil's Gate Reservoir, it is strongly committed to protect the vast public assets in the vicinity of the Devil's Gate Reservoir and to preserve the quality of life in adjacent neighborhoods.

The Sediment Removal and Management Project as proposed in the DEIR differs from the Los Angeles County Board of Supervisors March 2011 action which authorized the Los Angeles County Department of Public Works to remove 1.67 million CY of sediment from the Reservoir. The DEIR fails to explain this critical difference.

We expect the County to carry out this project within the confines of the Easement which the City granted to the County. The City intends to assure the Easement is not overburdened by an aggressive Project that unnecessarily destroys habitat and denudes vegetation. We request the County to collaborate with Pasadena to design and implement a Project that conforms to the limitations and responsibilities of the Easement and is only as impactful as necessary to preserve and maintain the Reservoir for water conservation and flood control purposes.

The DEIR does not identify the City as a potential responsible agency pursuant to the California Environmental Quality Act (CEQA.) The City may have discretionary authority over approvals required to implement the Project. As discussed above, the Project must conform to the limitations and responsibilities of the Easement; otherwise the County will have to seek City authority to go beyond those limits. Further, the City may have discretionary permitting authority required to implement the Project or any alternative thereto. The City's analysis of its responsible agency status is ongoing and will require close cooperation between the City and County to ensure that all City permitting requirements are met and that the EIR is adequate for the City's use as a responsible agency.

The City requests that the County of Los Angeles include the City's Department of Public Works staff in the ongoing precise design and engineering tasks related to the Project.

Conclusion

The City of Pasadena looks forward to continued cooperation and consultation with the County of Los Angeles on this critical initiative. We wish to express sincere appreciation to County staff members, especially Keith Lilley, for their willingness to present the Project in various settings and their responsiveness during the public comment period. The City is also appreciative of the County's affirmative response to our community members' request for an extension of the public comment period.

If you have any questions regarding this letter, please do not hesitate to contact Julie A. Gutierrez, Assistant City Manager, at (626) 744-7371 or jgutierrez@cityofpasadena.net, or me at (626) 744-4311 or bbogaard@cityofpasadena.net.

Respectfully submitted,



BILL BOGAARD
Mayor

Attachments:

1. Hahamongna Watershed Park Master Plan (HWPMP) Goals & Objectives
2. City of Pasadena Comments on Draft Environmental Impact Report (DEIR) for Devil's Gate Reservoir Sediment Removal and Management Project

Copy: Michael D. Antonovich, Los Angeles County Board of Supervisors, District 5
Keith A. Lilley, Senior Civil Engineer, Los Angeles County Department of Public Works
Michael J. Beck, City Manager, City of Pasadena
Julie A. Gutierrez, Assistant City Manager, City of Pasadena
Siobhan Foster, Director of Public Works, City of Pasadena
Brad Fuller, Assistant City Attorney, City of Pasadena

The City of Pasadena offers the following comments on Los Angeles County Flood Control District's Draft Environmental Impact Report (October 2013, State Clearinghouse No. 2011091084) for the Devil's Gate Reservoir Sediment Removal and Management Project. As reflected below, the comments are provided by the following City departments: Fire, Human Services, Water and Power, Planning, Police, Public Health, Public Works, and Transportation.

Unless otherwise specified, these comments are applicable to the project as well as the alternatives.

Section	Paragraph	Comment
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The Pasadena Fire Department provides the following comments:

2 - Project Description	2.3	The Fire Dept. understands the need for the project and requires adequate notification, should any obstacles/obstructions occur during the implementation of the project.
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The Pasadena Human Services and Recreation Department provides the following comments:

3.15 – Recreation / Public Services	3.15.2	Use of the park is under-reported and has increased since data was provided. Statistics provided address only those users visiting the park as part of a permit or reservation-based activity, or as part of club or organization 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 and represents a significant percentage of overall recreational use within HWP.
3.15 – Recreation / Public Services	3.15.6	<p>The Department of Human Services and Recreation (HS&R), as the Recreation Manager, must have the opportunity to review all final information and plans, so as to be able to redirect recreation use from Hahamongna, if possible and necessary, during any time during the scope of the project.</p> <p>LACFD must coordinate with HS&R when the need to relocate any 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 provided with a project schedule 6 months in advance and notified of the likelihood of HWP facility closure or impact with ample time (no less than 30</p>

Section	Paragraph	Comment
3.15 – Recreation / Public Services	3.15.6	<p>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.</p> <p>HS&R foresees temporary impacts to regularly permitted recreational activities on the west side of HWP, during the life of the project. Regular and timely coordination between LACDPW and the City of Pasadena HS&R Dept. is necessary.</p>

The Pasadena Water and Power Department provides the following comments:

2 - Project Description	2.4	<p>LACFCD is currently using Johnson Field with storing sediment and green waste. 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. Condition #9 of the City permit PW-49-13 (September 3, 2013) states, "County agrees that upon commencement of large-scale sediment removal activity, removal of sediment from Johnson Field and its rehabilitation as a basin will be prioritized."</p>
2 - Project Description	2.9	<p>Table 2.9.1 lists projects that may have cumulative impacts with the Proposed Project. Pasadena Water and Power's (PWP) 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. The proposed Monk Hill Treatment System optimization projects (new well and re-purposing of the Behner Water Treatment Plant) should also be added to the list of other projects evaluated as part of Cumulative Impacts.</p>
3 - Environmental Analysis	3.10.2	<p>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.</p>
3.17 - Utilities	3.17.2	<p>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</p>

Section	Paragraph	Comment
3.17 – Utilities	3.17.2	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.
4 – Alternatives Analysis	4.3.0	<p data-bbox="570 506 1482 936">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 pumpers 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.</p> <p data-bbox="570 978 1482 1635">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 PWP's belief that the volume of water released or discharged during this process will be outweighed by the benefit gained 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 sediment fines are carried as close to the dam face as possible to maximize removal during the FAST process.</p>

Section	Paragraph	Comment
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The Pasadena Planning Department provides the following comments:

2 - Project Description	2.1.6	The EIR doesn't properly characterize Hahamongna Watershed Park (HWP) or the nature of the surrounding land. The discussion of recreational facilities in the Hahamongna Watershed Park focuses on the Oak Grove area on the west side of the Hahamongna Basin and implies this area is separate from HWP. The Oak Grove area is contained within HWP. In addition to the facilities described in the DEIR, Hahamongna Watershed Park includes recreational improvements on the east side of the Basin, including trails and picnic areas. In addition, Pasadena Water & Power (PWP) maintains multiple water infrastructure improvements in this area including a series of spreading basins.
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2 - Project Description	2.5.1	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. As a result, the EIR does not allow proper consideration of impacts related to biological resources, aesthetics, air quality, greenhouse gas emissions, noise, and traffic.
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Sediment Disposal: The EIR does not provide enough detail to discern the maximum hourly or average daily impacts, nor can the reasonableness of the stated level of operations be considered. This section states, "The trucks are anticipated to haul an estimated 7,650 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 and therefore not adequately studied. Construction equipment is described as "including but not limited to approximately four front loaders with 4-cubic-yard buckets, two bulldozers, one excavator, one grader, one water truck, and two tender trucks..." The quantity of equipment listed seems inadequate to acquire the sediment, place 16-20 yards into a truck every 72 seconds, and maintain suitable access for the trucks throughout each day. The EIR

Section	Paragraph	Comment
2 - Project Description	2.5.1	seems to agree by acknowledging there may be more equipment. A more realistic equipment estimate is required to adequately study their impacts.
2 - Project Description	2.5.2	Reservoir Management Phase, Vegetation Removal: This section states that vegetation will be removed annually by mowing or grubbing, but does not specify how that determination will be made and the amount of area subject to each method. The EIR does not specify the maximum or average size of the site that would be subject to maintenance activities at any given time. This level of detail must be provided to allow proper consideration of impacts related to biological resources, aesthetics, and air quality. This comment applies to all alternatives as well.
2 - Project Description	2.5.2	Reservoir Management Phase, Vegetation Removal: Similar to the Sediment Removal Phase, this section does not identify a revegetation plan for the land disturbance area. How will the disturbed land be revegetated? The EIR must describe: 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 revegetated areas function ecologically with the existing natural communities in the Hahamongna area? As previously noted, the City of Pasadena requests that 1) a revegetation plan be developed by a qualified restoration ecologist; 2) that only native species be planted; and 3) that revegetation occur concurrently with sediment removal, such that the minimum amount of denuded land necessary to conduct sediment removal activities exist at any given time.
2 - Project Description	2.5.2	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." These estimates must be clarified, 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, the equipment fleet that would be utilized for this annual operation must be identified, so that the impacts can properly be analyzed.

Section	Paragraph	Comment
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2 - Project Description	2.5.2	<p>Reservoir Management Phase, 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." The EIR must 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. Regarding 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. This level of detail must be provided to allow proper consideration of impacts related to biological resources, aesthetics, and air quality.</p>
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2 - Project Description	2.5.2	<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 EIR must include 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>
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2 - Project Description	2.9	<p>It is not clear what the criteria are for related projects. The Lincoln Avenue Specific Plan should be considered as a related project as it is relatively close to the project site and envisions additional development on Lincoln Avenue. The EIR can be found at this link:</p>
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<http://cityofpasadena.net/Lincoln Avenue Specific Plan.aspx>

Section	Paragraph	Comment
3.4 - Aesthetics	3.4.2	<p>Scenic Vistas: The City does not agree that scenic vistas are not identified in the Hahamongna Watershed Park Master Plan. This EIR 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).</p>
3.4 - Aesthetics	3.4.3	<p>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 the generic General Plan.</p> <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:</p> <p>http://cityofpasadena.net/Planning/CommunityPlanning/Green_Space_Element_and_Master_Plan/</p> <p>At a minimum, these citations must include:</p> <p><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.</i></p> <p>OBJECTIVE 2 – PRESERVATION AND PROTECTION OF THE ARROYO SECO AND ADJACENT OPEN SPACE AREAS: <i>Recognize the importance to Pasadena of the history, cultural resources, and unique character of the Arroyo Seco, and conserve and enhance these assets.</i></p>

Section	Paragraph	Comment
3.4 - Aesthetics	3.4.3	<p><i>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)</i></p> <p><i>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.</i></p> <p><i>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>
3.4 - Aesthetics	3.4.6	<p>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 revegetation plan that occurs simultaneously with sediment removal.</p> <p>Furthermore, PM10 emissions identified in Table 3.5-6 are unrealistically low. Given that the project's primary purpose is to move soil, daily excavating, grading, scraping, loading, and hauling activities would be of the most intense variety; and thus would presumably generate dust emissions well in excess of the SCAQMD thresholds of significance (150 lbs/day), not just a mere fraction thereof. As previously noted the DEIR fails to provide adequate detail about the peak daily grading activities (e.g., maximum daily acreage of ground disturbance, maximum daily hauling activities, etc.) and thus fails to provide the reader with the information necessary to adequately consider the air pollution impacts of the project.</p>
3.5 - Air Quality	3.5.6	<p>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. This must be explained and the study revised as necessary.</p>

Section	Paragraph	Comment
3.6 - Biological Resources	3.6.3	Applicable Regulations, Local: The City's 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> The study must be revised to correctly cite the 2010 Tree Protection Ordinance and its revised findings.
3.6 - Biological Resources	3.6.6	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. It is unclear how the use of these studies supports 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 are warranted.
3.6 - Biological Resources	3.6.6	Impacts and Mitigation, BIOLOGY-1: The City does not agree with the EIR findings. The project would substantially reduce habitat for Least Bell's Vireo, a State and fed listed endangered species and four Species of Special Concern. The City views this loss of habitat as a significant impact in contradiction to the County's conclusion.
3.6 - Biological Resources	3.6.6	BIOLOGY-2: The City disagrees with the EIR. 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: <ul style="list-style-type: none"> • 1.1 acres of Riversidean Alluvial Fan Sage Scrub • 51.4 acres of Riparian Woodland • 9.3 acres of Mule Fat Scrub <p>The loss of sensitive habitat and 1:1 replacement ratio is not sufficient to deem the impact less than significant.</p>
3.7 - Cultural Resources	3.7.3	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.

Section	Paragraph	Comment
3.7 - Cultural Resources	3.7.6	<p>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? The EIR must provide the estimated depth/contours at which "native sediments" would be encountered and consideration of whether excavation below such depths/contours is necessary.</p>
3.8 - Geology and Soils	3.9.2	<p>Local GHG Inventory: This DEIR 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, therefore, the DEIR does not provide adequate analysis. The staff report and Inventory can be found at this link:</p> <p>http://ww2.cityofpasadena.net/councilagendas/2013%20agendas/Nov_18_13/agendarecap.asp</p> <p>Also correct the reference #44 on page 631.</p>
3.13 - Mineral Resources	3.12.3	<p>Applicable Regulations, City of Pasadena General Plan: Clarify which elements of the Pasadena General Plan were reviewed.</p>
3.14 - Noise and Vibration	3.14.3	<p>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.</p> <p>http://cityofpasadena.net/Planning/CommunityPlanning/GeneralPlan_Noise_Element/</p> <p>References on page 631 should also include the Noise Element of the General Plan.</p>

Section	Paragraph	Comment
3.14 - Noise and Vibration	3.14.3	Regulatory Framework, City of Pasadena Municipal Code: 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 both long-term construction and ongoing annual maintenance and operation. Thus, the project should be evaluated against the entire City Noise Ordinance, including 9.36.050 General noise sources.
3.15 – Recreation / Public Services	3.15.3	City of Pasadena General Plan: The reference to Objective 9 and related policies are in the Land Use Element of the General Plan, not the generic General Plan.

The Pasadena Police Department provides the following comments:

2 - Project Description	2.5.1	<p>In review of the Environmental Impact Report and the Traffic Impact Analysis, the research data did not adequately provide a clear analysis regarding a coordinated traffic plan along the 210 freeway corridor ramps. It is the assessment of the Pasadena Police Department (PD) that the impact will likely occur at the Berkshire Avenue and Arroyo Blvd on/off ramps in the City of La Canada and may cause moderate slowdowns for local Pasadena residents using the freeway system for exits such as Windsor Avenue and Arroyo Blvd. Moreover, the Berkshire Avenue ramp is a primary exit for those who attend La Canada High School, creating significant traffic impacts in the mornings and afternoons. It is recommended that the report reflect an inclusive analysis of the impact at specific on/off ramps such as the Berkshire Avenue exit in coordination with the City of Pasadena and the Pasadena Police Department.</p> <p>The Traffic Impact Analysis did not sufficiently provide calculation data of the potential impact to traffic flows during major events at the Rose Bowl. In 2014, Pasadena will host the UCLA football season between September and December as well as concerts and other special at the Rose Bowl and other Pasadena venues. In review of the report, the PD is concerned with traffic impacts during major events for the duration of the sediment removal</p>
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Section	Paragraph	Comment
2 - Project Description	2.5.1	phase which is planned to occur on Saturdays between 8am-5pm. Therefore, it is recommended that the EI report reflect a specific traffic plan regarding the sediment removal with consideration for Rose Bowl and other significant events. This recommendation should assist in the design of a traffic strategy to mitigate potential problems prior to the project start date.

The Pasadena Public Health Department provides the following comments:

3.14 - Noise and Vibration	3.14.6	<p>Possible health impacts of dust: Due to the potential risk of soil-endemic pathogens particularly Coccidioidomycosis, LAC or AQMD, or the like, should reduce the risk of exposure by wetting the soil before excavation. This will also help prevent exacerbation of respiratory symptoms of high-risk residents who may be exposed.</p> <p>Noise considerations: Require that any construction equipment comply with the noise ordinance restrictions outlined in the City of Pasadena Municipal Code and all workers must comply with OSHA guidelines for employee safety. In addition, residents, schools and businesses in the impacted area must be notified that the noise levels may be affected beginning 2014 and ending 2019. Require noise monitoring be included as part of the requirement and be funded to ensure that there are no long-term effects.</p> <p>Recommend that an Environmental Impact Assessment be completed to look at all other environmental impacts.</p>
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The Pasadena Public Works Department provides the following comments:

2 - Project Description	2.1.1	The EIR provides a brief mention of the project's location within the Arroyo Seco watershed but does not include a graphic representation. 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.
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Section	Paragraph	Comment
2 - Project Description	2.1.6	Rose Bowl Riders also sublets to Move A Child Higher (MACH1), an organization that provides equine assisted activities to riders with disabilities.
2 - Project Description	2.5.1	The City's Berkshire Creek Restoration project will likely require fill material as a part of the implementation. It is anticipated that this work will take place while the County's sediment removal efforts are underway. Coordination between LACFCD and the City of Pasadena to utilize sediment for this fill material, should the material be deemed suitable for this use, that would otherwise be removed from the site will contribute to reductions to traffic and air quality impacts.
2 - Project Description	2.5.1	Fig. 2.5-1 shows portions of the access roads to be outside the project boundary but improvements to the road are described in the project description. This discrepancy is confusing and affects a reviewer's ability to fully understand the proposed access road implementation. These access roads must be described in greater detail. The DEIR does not describe or study potential impacts of modifications to the existing paved trail on the west side to protect trail users during sediment removal or maintenance operations or whether the trail surface in this area be strengthened to accommodate truck and equipment traffic. For the east access drive, how will the existing trail be accommodated as a part of this design? Figure 2.5-6 appears to include the approach to the east side trail undercrossing within the proposed access road, but this is not a suitable vehicular route. If there is a specific reason why this area is shown as part of the access road, it must be described in detail in the EIR.
2 - Project Description	2.5.1	The City will require street repair for City streets including, but not limited to, Oak Grove Drive, Arroyo Blvd., and Windsor Avenue as deemed necessary to repair damage caused by sediment hauling.
2 - Project Description	2.5.2	The EIR does not correctly describe the project footprint related to the reservoir management phase. Section 2.5.2 describes the effects of the Flow-Assisted Sediment Transport (FAST) method as finer grained sediment being transported down the Arroyo Seco Channel. The effects of this process are not studied in the EIR though. The EIR states "the majority of these FAST operations will be similar to historic FAST operations and that finer sediment discharged during FAST operations will be

Section	Paragraph	Comment
2 - Project Description	2.5.2	transported to the Pacific Ocean via Arroyo Seco Channel..." 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 adjacent lands and downstream City improvements. The EIR must include a detailed analysis of these downstream effects of FAST including projected sediment accumulation and potential flooding. Additionally, LACFCD must include active sediment removal from these downstream areas as part of the sediment management phase and not rely solely on discharge to move deposited sediment further downstream.
2 - Project Description	2.5.2	The County must provide 72 hours minimum notification to the City Public Works (PW) Department in advance of beginning a FAST Operation for all FAST operations described for the project and alternatives.
2 - Project Description	2.5.2	Due to sediment accumulation in the Arroyo Seco Channel as a result of FAST operations, a separate sediment management MOU between the City and LACDPW will need to be developed to insure protection to the soft-bottom sections of the Arroyo Seco and downstream improvements in Pasadena.
3.4 - Aesthetics	3.4.2	The viewpoint #5 image is misleading and should reflect a more panoramic view, typical of what a viewer's eyes provide. Additionally, a more important viewpoint is found just north at the City's recently implemented Sunset Overlook project. An interpretive sign panel containing a panoramic image of this vista (below) was placed at this location because of the inclusive view of the Park.



Section	Paragraph	Comment
3.4 - Aesthetics	3.4.6	Impacts and Mitigation, Visual Change: The EIR uses "view blockage" as one factor in determining the overall visual change of an area. It is improper and misleading to include this as a measure of project impact. The nature of the project is not to construct something that will block a view; rather it removes something that as a result, affects a view. Including view blockage as a measure and ranking it as "none" for each view results in skewing the overall visual change rankings downward.
3.5 - Air Quality	3.5	The City strongly encourages LACDPW to aggressively pursue the reduction of air quality impacts through the requirement of the lowest-emission and alternative-fuel vehicles available for this project. Within the anticipated timeframe of this project, the County will be required to have completed the conversion of heavy trucks to alternative fuel or clean diesel. The County could study the feasibility of imposing such requirements onto the contractor who will perform this work and/or commit to using some or all of their own fleet for hauling.
3.5 - Air Quality	3.5.2	The MACH1 organization is a certified Premier Accredited Center (PAC) as determined by the Professional Association of Therapeutic Horsemanship International (PATH). This certification is required for MACH1's professional good-standing and by the City to establish MACH1 as the most qualified provider of their services. Condition F34 of PATH's accreditation standards require MACH1 to have system in place to minimize exposure to dust for both humans and animals. MACH1 does have this system in place, but fugitive dust created by sediment removal and sediment management activities may overwhelm MACH1's efforts and potentially jeopardize their PAC status. The County must: ensure that all best management practices related to fugitive dust control are utilized to their fullest, notify the City and MACH1 in advance of upcoming activities in the vicinity of the MACH1 facility, and coordinate work activities with the City and MACH1 to schedule activities in the vicinity of MACH1 during MACH1's non-operational times.
3 - Environmental Analysis	3.6.6	The City has identified areas where habitat mitigation efforts can be prioritized. Refer to '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.

Section	Paragraph	Comment
3 - Environmental Analysis	3.6.6	The City has established a thorough habitat restoration plan as part of the Hahamongna Watershed Park master plan. The City will review the final Habitat Restoration Plan for the project prior to its finalization. The City also requests being a part of any consultations between 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.
3.12 - Land Use and Planning	3.12.6	Mitigation Measures, MM LAN-1: The mitigation measure oversimplifies the recreational uses in HWP. It is not sufficient to simply purpose redirecting recreational use to another facility as HWP is a unique setting and similar facilities are not within a close distance. The mitigation measure must be revised to include provisions that the City must review and approve suggested public information and redirection plans related to recreation.
3.13 - Mineral Resources	3.13.2	The EIR states that sediment removal is not expected to involve arroyo stone, however, the City's observations indicate 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 for various projects in HWP. For Arroyo stone that may be produced by the sediment removal effort, the City requests coordination with the County and its contractor on the preservation and relocation of these valuable mineral resources.
3.14 - Noise and Vibration	3.14.3	The EIR identifies HWP as the most impacted sensitive receptor for noise, but dismisses this due to County and City noise exemptions for public works projects. Park tenants and other recreational users must be made reasonably aware in advance when noise impacts are likely to be greater in areas of the park. The City requests the County provide anticipated work schedules and locations in advance and provide timely notification to the City and HWP tenants of expected work. In the event of HWP tenant events, the County should make every effort to direct work efforts away from these scheduled events.

Section	Paragraph	Comment
3.14 - Noise and Vibration	3.14.3	Table 3.14-5 lists Hahamongna Watershed Park as a sensitive receptor for noise, but table 3.14-11 does not for vibration. HWP must be included as a sensitive receptor for vibration due to potential effects on horses and domestic animals boarded and visiting the park. Panic reactions by animals due to vibration could become a public safety issue and should be adequately studied in the EIR.
3.15 – Recreation / Public Services	3.15.2	Existing Conditions: The City disagrees that recreational use of the basin or any other portion of Hahamongna Watershed Park is "unofficial". The park area within the project footprint is a specific recreational draw within the City that is not duplicated elsewhere.
3.15 – Recreation / Public Services	3.15.2	Recreation Uses: As stated earlier, the MACH1 organization is not included in the list of recreational users.
3.15 – Recreation / Public Services	3.15.2	Area Recreational Facilities. The discussion of Area Recreational Facilities is too broad. Many of the facilities described do not provide similar recreational features, are a considerable distance away, and in 3 cases, are private facilities. This list and discussion must be revised to suggest reasonable recreational alternatives to HWP. Figure 3.15.1 Exhibit is misleading in the way it shows HWP a sitting outside the project boundary. Revise this exhibit to show actual boundaries of HWP and other nearby parks.
3.15 – Recreation / Public Services	3.15.6	City staff must coordinate with LACDPW staff and consultants during the precise design and engineering efforts to help establish limits of grading to protect existing and future recreational resources.
3.15 – Recreation / Public Services	3.15.6	The EIR improperly states that sediment removal activities will not limit the use Oak Grove Disc Golf Course. The 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.
3.15 – Recreation / Public Services	3.15.6	The City does not agree that the Altadena crest trail must be closed during the sediment removal phase. The County must provide a temporary re-route of the trail segment and way finding signs to maintain the availability of this trail for public use.

Section	Paragraph	Comment
3.15 – Recreation / Public Services	3.15.16	There are potential significant, periodic impacts to Rose Bowl Riders, Tom Sawyer Camps and MACH1 operations. The County must coordinate with the City and these tenants to minimize operational impacts to these organizations and their associated City services.
3.16 - Transportation	3.16.0	The Metro Gold Line extension is scheduled to open at end of 2015. The County could adjust their anticipated project start to allow commuters the opportunity to use Metro instead of driving.
3.16 - Transportation	3.16.1	The City recommends no work on Sat/Sun/Holidays. This will reduce or eliminate Rose Bowl and other scheduled event conflicts, and preserve greatest amount of recreational enjoyment for park users.

The Pasadena Transportation Department provides the following comments:

3.16 -
Transportation

3.16.2

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, especially during start and end times for La Canada High School or during Rose Bowl events. This may adversely impact emergency service vehicles entering or existing the Bowl. County needs to evaluate potential impacts and include appropriate mitigation.
- Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines:

(<http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821>)

The County must meet with the City to determine the street segments for analysis and appropriate mitigation included.

- What is the truck turning radius? The trucks turning into Oak Grove Drive may encroach onto the adjacent traffic lane before entering the site. Please provide a schematic drawing for further evaluation of potential impacts.
- 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 or during Rose Bowl events. Please evaluate potential impacts and include appropriate mitigation.

Section	Paragraph	Comment
3.16 - Transportation	3.16.6	<p data-bbox="570 289 1409 319">Impacts and Mitigation: Devil's Gate Reservoir to/from I-210:</p> <ul style="list-style-type: none"> <li data-bbox="570 365 1479 579"> <p data-bbox="570 365 1479 506">• Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines: (http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821)</p> <p data-bbox="613 583 1435 653">The County shall meet with the City to determine the street segments for analysis of potential impacts.</p> <li data-bbox="570 657 1479 1056"> <p data-bbox="570 657 1479 1056">• 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 from the City of Pasadena."</p> <li data-bbox="570 1060 1479 1167"> <p data-bbox="570 1060 1479 1167">• Provide a schematic showing the proposed striping plan and indicate how many cars may be accommodated inside the TWLTL.</p> <li data-bbox="570 1171 1479 1499"> <p data-bbox="570 1171 1479 1499">• 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. Please evaluate potential impacts and include appropriate mitigation.</p>

Section	Paragraph	Comment
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3.16 - Transportation	3.16.6	<p>Impacts and Mitigation: Table 3.16 LOS for Devil's Gate Reservoir to/from I-210:</p> <ul style="list-style-type: none"> Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines: (http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821) The County shall meet with the City to determine the street segments for analysis and appropriate mitigation included.
J - Traffic Report	Ch. 1	<p>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 thru 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. Please evaluate potential impacts and include appropriate mitigation.</p>
J - Traffic Report	Ch. 2	<p>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.</p> <p>Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines: (http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821)</p> <p>The County must meet with the City to determine the street segments for analysis and appropriate mitigation included.</p>

Section	Paragraph	Comment
J - Traffic Report	Ch. 3	<p data-bbox="570 289 1081 321">Existing plus Project Traffic Analysis:</p> <p data-bbox="570 359 1463 506">Given that the County does not have methodology in place for analyzing street segment levels of significance, the study should include segment analysis based on the City of Pasadena guidelines:</p> <p data-bbox="570 543 1463 615">http://www.cityofpasadena.net/WorkArea/DownloadAsset.aspx?id=6442458821</p>
J - Traffic Report	Ch. 4	<p data-bbox="570 653 1390 724">The County must meet with the City to determine the street segments for analysis and appropriate mitigation included.</p> <p data-bbox="570 751 1451 888">Project Trip Generation: As stated in a July 6, 2012 email, justify your methodology (and include in the report) for arriving at a PCE of 2.5 for inbound trucks, and 3.0 for outbound trucks.</p>
J - Traffic Report	Ch. 5	<p data-bbox="570 909 1403 980">Route Summary and Mitigations/Potential Impact Reduction Measures:</p> <p data-bbox="570 984 1487 1457">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>