

ATTACHMENT D

Comparison Working Group Final Recommendation with City Comments to DEIR, Proposed Project (Alternative 1, Configuration A), & Environmentally Superior Alternative
(Alternative 3, Configuration C)

Item	DEIR - Proposed Project (Alternative 1, Configuration A)	DEIR – Environmentally Superior Alternative (Alternative 3, Configuration D)	City Comments on DEIR	Working Group – Pasadena “Alternative”
Flood control volume	4,153,000 cy (ES-19)	3,588,000 cy (ES-19)	<p>Project scope should be appropriately scaled to provide adequate flood protection in most environmentally responsible & respectful manner possible resulting in as little impact to HWP as possible. (C-5)</p> <p>HWPMP establishes a minimum flood control capacity of 2.3 mcy & includes a conceptual grading plan that would create a flood management/conservation pool of 3 mcy. (C-2)</p>	2,500,000 cy (WG-2)
Flood protection	2 DDEs (ES-19)	Up to 2 DDEs (ES-19)	<p>While DEIR mentions potential Arroyo Seco Channel overtopping areas (flooding) including locations in Pasadena, Los Angeles, South Pasadena, & 110 Fwy, impacts are not discussed in depth. Notably, flooding/damage risks to critical Pasadena infrastructure & natural resources, including historic Rose Bowl, HWP, Arroyo Seco Golf Course, & Central & Lower Arroyo Seco are not clear. Without knowing the magnitude of flood risk, City will take any & all steps necessary to identify least impactful Project, one</p>	Greater than 1 DDE (WG-2)

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			that balances City's priorities of protecting its public investments, infrastructure & natural resources of HWP. (C-4)	
Total removal volume	2,946,000 cy (ES-19)	2,425,000 cy (ES-19)	Scope should be appropriately scaled to provide adequate flood protection in most environmentally responsible & respectful manner possible resulting in as little impact to HWP as possible. (C-5) At time of HWPMP preparation (2003), sediment removal required was approximately 800,000 cy. (C-2)	1,100,000 cy (WG-2)
Reservoir footprint	120.42 ac (ES-19)	75.99 ac (ES-19)	Project should conform to limitations & responsibilities of Easement & is only as impactful as necessary to preserve & maintain Reservoir for water conservation & flood control purposes. (C-6) HWPMP envisioned basin with 69-acre surface area. (C-2)	Less than 75.99 ac; majority of excavation taking place north of dam & on natural stream channel along east side of Arroyo as far north as Johnson Field; there should be no excavation in west side stream channel beyond where 2 channels merge; & irregular shaped seasonal conservation pool should be constructed near dam (WG-2)
Project duration	5 years (ES-19)	5 years (ES-19)	Appropriately scaled project. (C-5)	5 years (WG-1)
Maximum annual removal until target achieved	589,200 cy (calculated)	485,000 (calculated)	Project only as impactful as necessary to preserve & maintain Reservoir for water conservation & flood control purposes. (C-6)	220,000 cy/year (WG-1)
Contingency removal if heavy inflow during initial 5 years	---	---	Appropriately scaled project. (C-5)	100,000 cy/year (during first five years) (WG-1)
Sediment management plan	FAST during rain events. Vegetation	FAST during rain events. Vegetation	DEIR fails to specify County's	Maintain 2.5 mcy storage capacity

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	maintenance for 3 weeks, sediment excavation for 2 weeks annually during dry weather (ES-19)	maintenance for 3 weeks, sediment excavation for 2 weeks annually during dry weather (ES-19)	commitment to an ongoing sediment management program. Document describes an estimated 13,000 cy annual removal with periodic removal of approximately 170,000 cy should heavy rainfall year occur. City objects to this broad latitude, as it would allow County not to perform removals some years & initiate larger, periodic removal projects when desired. City requests that County commit to a specified maintenance program that defines a minimum & maximum amount of work that County will perform annually. Annual minimum & maximum should conform to limitations & responsibilities of Easement & be only as impactful as necessary to preserve & maintain Reservoir for water conservation & flood control purposes. (C-5) City requests inclusion of Central & Lower Arroyo Seco downstream areas in a further modeling & sediment transport analysis be conducted since sediment removed from reservoir by FAST method will move through this area. (C-3)	with schedule of sediment removal acceptable to city & with regular topographic surveys to evaluate sediment storage especially after heavy rainfalls bring large amounts of sediment into basin (WG-1)
Traffic/Trucking route	Trucks enter reservoir at east side of reservoir & exit reservoir on west	Trucks enter reservoir at east side of reservoir & exit reservoir on west	DEIR has determined there will be significant & unavoidable traffic	Construct lane off Oak Grove Drive onto paved area east of dam for

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	<p>side. Trucks will enter reservoir directly from Oak Grove Dr as opposed to using La Canada Verdugo Rd. Loaded trucks will exit reservoir by turning right onto n/b Oak Grove Dr, then left onto w/b Berkshire Pl, & then to 210 Fwy e/b to disposal sites in Azusa & Irwindale or w/b to disposal sites in Sun Valley. (ES-6)</p>	<p>side. Trucks will enter reservoir directly from Oak Grove Dr as opposed to using La Canada Verdugo Rd. Loaded trucks will exit reservoir by turning right onto n/b Oak Grove Dr, then left onto w/b Berkshire Pl, & then to 210 Fwy e/b to disposal sites in Azusa & Irwindale or w/b to disposal sites in Sun Valley. (ES-6)</p>	<p>impacts caused by project. To fullest extent, County of Los Angeles must independently mitigate these impacts without relying on local agencies. Proposed schedule of 11 to 12-hour work days during week & 9 hour work days on Saturdays, involving a maximum of 425 truck round trips per day during excavation activities will increase traffic on haul routes & generate burdens to residential & other streets throughout Pasadena & neighboring communities that are not mentioned in DEIR. Such local burdens, as well as impacts to 134 & 210 Freeways & area schools must be identified & mitigated before a final project is approved. (C-5) It is imperative that County coordinate sediment removal & transport activities with Rose Bowl special events, which involve substantial traffic on 134 & 210 Fwys. (C-6)</p>	<p>incoming trucks to enter reservoir while avoiding La Canada Verdugo Rd neighborhood. Loaded trucks will depart using west side reservoir access road, turn right on Oak Grove Dr, then left on Berkshire to 210 Fwy. Flaggers are essential to allow for smooth traffic flow & ensure all non-essential traffic for project site is re-routed. No staging of trucks on city streets. Onsite storage of trucks & construction equipment shall be minimized; if storage takes place onsite, trucks & equipment shall be stored when not in use away from recreation, wildlife corridors & habitat. (WG-2)</p>
Schedule	Excavation & associated activities within reservoir expected to take place from April to December, Monday through Saturday (except on holidays). During dry years, work could start earlier &/or continue	Excavation & associated activities within reservoir expected to take place from April to December, Monday through Saturday (except on holidays). During dry years, work could start earlier &/or continue	City recommends no work on Saturdays/Sundays/holidays. This will reduce or eliminate Rose Bowl & other scheduled event conflicts & preserve greatest amount of recreation enjoyment for park users.	April 15 to October 15; no work on weekends, federal holidays (Memorial Day, Fourth of July, Labor Day, Columbus Day), & during Rose Bowl displacement events. Truck activity limited to 8:45 a.m. to

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	<p>later. Onsite excavation activities will take place Monday through Friday between 7:00 a.m. & 6:00 p.m. Standard Time & between 7:00 a.m. & 7:00 p.m. Daylight Savings Time & on Saturday between 8:00 a.m. & 5:00 p.m. Removal of sediment offsite expected to take place during these hours. (ES-6) Sediment removal will require an average of 50 truck round trips per hour & 425 truck round trips per day. (ES-4)</p>	<p>later. Onsite excavation activities will take place Monday through Friday between 7:00 a.m. & 6:00 p.m. Standard Time & between 7:00 a.m. & 7:00 p.m. Daylight Savings Time & on Saturday between 8:00 a.m. & 5:00 p.m. Removal of sediment offsite expected to take place during these hours. (ES-6) Sediment removal will require an average of 50 truck round trips per hour & 425 truck round trips per day. (ES-4)</p>	(C-18)	<p>2:45 p.m. Site arrival & set up at 8:00 a.m. & site closure at 4:00 p.m. Limit of 120 trucks per day; quantity may be adjusted after heavy rainfalls that bring large amounts of sediment into basin. (WG-3)</p>
Air quality	Air quality is an unmitigatable significant impact. (ES-11)	Air quality is an unmitigatable significant impact. (ES-11)	Short & long term health effects due to silica dust, fugitive dust clouds, diesel fumes, carbon monoxide, NOx emissions & other pollutants should be fully evaluated to determine health risk assessment to adjacent neighborhoods & sensitive receptors. Greater use of alternative fuel vehicles for hauling is critical & must be required as a mitigation measure. (C-4)	<p>Construction activities should be suspended during high winds, when air quality is poor, on Red Flag Days, & during local wildfires Project should use best management practices to mitigate fugitive dust (wheel washer, water trucks, tarps, etc.) To reduce NOx emissions:</p> <ul style="list-style-type: none"> - Use low emission vehicles that adhere to highest federal & state standards including AQMD standards - Use of electricity from power poles rather than temporary diesel or gasoline power generators

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				<ul style="list-style-type: none"> – Contractors should apply for SCAQMD “SOON” funds (reduction of NOx emissions) (WG-3)
Wildlife	Impacts to biological resources could be mitigated to a level of less than significant. (ES-11 to ES-14)	Impacts to biological resources could be mitigated to a level of less than significant. (ES-11 to ES-14)	Proposed Project & Project Alternatives would destroy regionally significant willow & mule fat riparian forest. Forest provides critical habitat for a variety of animals & birds, including nesting Yellow Warbler, which is a species of Special Concern in CA. In 2012, 'Least' Bell's Vireo, which is a federally endangered species, nested here for first time. Other animals found here include mountain lion, bobcat, mule deer, gray fox, gopher snake, pacific tree frog, & other reptiles and mammals. Other types of habitat, including freshwater marsh, alluvial scrub, and chaparral would be destroyed. (C-3)	Preserve wildlife corridors at least 100 feet wide to allow wildlife to move back and forth from the foothills southward under the roadways to places such as Cottonwood & other points farther south of the dam in Arroyo Seco Watershed (WG-3)
Habitat Mitigation	Impacts to biological resources could be mitigated to a level of less than significant. (ES-11 to ES-14)	Impacts to biological resources could be mitigated to a level of less than significant. (ES-11 to ES-14)	Proposed Project & Project Alternatives are inconsistent with HWPMP goal to preserve, restore & enhance native habitats. City expects County to prepare a final Project design more closely resembling configuration, aesthetics, habitat restoration &	Riparian & alluvial habitat should be replaced at ratio of 5:1; mitigation should take place primarily within Arroyo Seco Watershed or within City of Pasadena (WG-4)

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			<p>vegetation management described in HWPMP. (C-2) Project offers no habitat mitigation plan. Because lost habitat is riparian, it should be replaced at highest ratio possible & as much of mitigation as possible should occur within Hahamongna basin. County should collaborate with City to determine the most suitable restoration areas. (C-3)</p>	
On-site project manager	---	---	---	<p>Name & cell phone number of the onsite Project Manager shall be given to Working Group, Pasadena neighborhood associations adjacent to Hahamongna & Central Arroyo, Pasadena Public Works & City of La Canada-Flintridge to facilitate prompt resolution to project issues or impacts that require immediate, responsive attention Contact information should be updated regularly throughout project (WG-4)</p>

Note – DDE for Devil’s Gate Reservoir is approximately 2 million cubic yards (mcy)