ARROYO SECO
FOUNDATION

January 21, 2014

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

Re: Devil's Gate Reservoir Sediment Removal and Management Project

Dear Ms. Farber:

We at the Arroyo Seco Foundation (ASF) have reviewed the Draft Environmental Impact Report (DEIR) for the Devil's Gate Dam Sediment Removal and Management Project and find it inadequate for numerous reasons:

- The DEIR fails to provide genuine alternatives to the project;
- The DEIR fails to consider steps that could be taken to mitigate the negative impacts of the project;
- The DEIR is not responsive to numerous scoping comments offered by ASF and other stakeholders;
- The DEIR fails to incorporate an integrated approach to the management of the Devil's Gate Basin, but focuses narrowly on a massive sediment trucking operation;
- The DEIR fails to consider and protect the rare environmental values found in the Hahamongna basin;
- The DEIR fails to identify and quantify the downstream flood threat as well as steps that could be taken to reduce that threat;
- The project, as outlined in the DEIR, does not take into account the fact that the project site rests squarely in the middle of Hahamongna Watershed Park and that it would abuse the property rights of the City of Pasadena and overburden Los Angeles County Flood Control District's (LACFCD) easement;
- The DEIR fails to appropriately measure the impacts on hydrology, water quality, and recreation; the subsequent dismissal of these impacts as less than significant is gratuitous;

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

- The DEIR fails to provide a plan to mitigate the impacts on noise, land use and planning to levels of less than significant;
- The DEIR fails to present a biological mitigation program for the project and offers a completely inadequate 1:1 standard for the replacement or enhancement of invaluable riparian and alluvial canyon habitat.

The Arroyo Seco Foundation has worked with the LACFCD for more than twenty years to encourage an integrated watershed-based approach to the management of Devil's Gate Dam and the Arroyo Seco River. As vice-president of the Devil's Gate Multi-Use Project Joint Powers Authority and the Executive Director of Pasadena's Hahamongna Operating Company, ASF's Managing Director Tim Brick played an important role in the rehabilitation of Devil's Gate Dam in 1996-95 as well as in shaping Pasadena's Arroyo Seco Master Plan and the Arroyo Seco Watershed Restoration Feasibility Study, which emphasized the importance of an ongoing sediment management program for the Devil's Gate/Hahamongna Basin. More recently Mr. Brick served on the County of Los Angeles' task force to develop the Sediment Management Strategic Plan for the Los Angeles County Flood Control District.

ASF is very concerned that the program outlined in the Devil's Gate Dam Sediment Removal and Management Project (project) DEIR fails to incorporate the important principles of watershed management and integrated water resources planning that have been the focus of these previous efforts extending over more than twenty years.

The most fundamental failure of the DEIR is the omission of a detailed evaluation of the potential flood threat that may be a direct result of the accumulation of sediment behind Devil's Gate Reservoir (reservoir) and of a clearly defined plan to reduce that threat. The project description lacks the detail necessary to sufficiently evaluate the impacts of the project, and thus, severely hinders our ability and that of concerned agencies, organizations and citizens to make meaningful comments on the document.

This project will have extraordinarily negative environmental impacts on the habitat in the Hahamongna basin behind the dam, the neighborhoods surrounding the reservoir and around the freeways along the route, the Arroyo Seco downstream of the dam and the Los Angeles River, air quality throughout the region, the safety of surrounding schools and the financial resources of taxpayers in Los Angeles County and throughout California. While this project may temporarily increase the storage capacity of the reservoir, it will not solve the sediment problem and does not represent even an attempt to sustainably manage the natural resources of the region in an integrated fashion.

There is a sensible, sustainable way to manage sediment in Devil's Gate Reservoir, which the Arroyo Seco Foundation has developed with stakeholders and the communities affected. We call it the Slow Program. This solution would maintain flood protection for downstream communities, reduce negative impacts on the surrounding neighborhoods, and take advantage of the Arroyo Seco's natural ability to transport sediment. It would also protect the rich habitat and

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

recreational opportunities in Hahamongna Watershed Park. This plan involves four key elements: timing, transfer method, the permanent footprint and the neighborhood impacts of sediment removal:

> **Go Slow**. LACFCD has not provided any direct evidence of an immediate flood threat to the Arroyo Seco downstream of the dam. The Sediment Management Strategic Plan, issued by the LACFCD in 2012, reveals that the dam has stored greater amounts of sediment in the past and currently still has about 47% capacity. With very low probability of a sediment flow similar to the two years after the Station Fire, there is no need to remove 4 MCY in five years. A 20-year project will minimize the negative environmental impacts. Instead of removing as much as a million cubic yards each year, LACFCD should remove 160,000 cubic yards. After a suitable storage capacity is restored, sediment removal should be an ongoing maintenance task based on the amount that flows into the basin annually.
>
> **Go With the Flow**. LACFCD should use natural stream flows through the dam to remove sediment from the reservoir to the greatest extent possible. Large quantities of sediment have been removed in the past using this method. Using hydrology and hydraulics will very substantially reduce the need for heavy, noisy, air-polluting diesel trucks on our already overcrowded streets and freeways.
>
> **Let the Habitat Grow**. LACFCD proposes to leave a permanently denuded maintenance area of up to 120 acres after their removal program, but the alluvial Hahamongna basin is now home to some of the richest riparian and woodland habitat in Los Angeles County. The Slow Program will not necessitate this permanent scar, creating only small areas of temporary biological disturbance.
>
> **Keep Costs and Neighborhood Impacts Low**. The Slow Program can reduce the cataclysmic impacts of the project, which will be hard on everyone in this region but especially on residents of Pasadena, Altadena and La Cañada Flintridge. The Slow Program will reduce harmful air pollution levels, noise, dust and traffic impacts that the DEIR describes as unmitigable.

There is no dispute that something needs to be done to restore storage capacity at Devil's Gate Dam, but the solution needs to be ongoing and sustainable, while reducing neighborhood impacts. The purpose should be clearly defined as flood protection in the context of a comprehensive watershed management and restoration program. The sediment in Devil's Gate Dam should be evaluated as a component and product of LACFCD's flood protection program including the ten miles of concrete flood channel downstream of the dam.

We urge the Los Angeles County Flood Control District to go back to the drawing boards and work with the Arroyo Seco Foundation, the cities of the watershed and other stakeholders to develop a true alternative to be evaluated as part of the Final EIR. This alternative should be

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

ARROYO SECO
FOUNDATION

designed in a way that integrates water resources, water quality, habitat conservation and restoration, and recreation with the flood protection goals. Such a program, we believe, would be far superior to the one-dimensional sediment-trucking program contained in the current DEIR.

The Devil's Gate project should be the first of a new generation of sustainable flood management for Southern California. The Slow Program will ensure that it is.

Sincerely yours,

Tim Brick
Managing Director

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

ID	Topic	Page	Comment
1	Introduction - Flood protection	ES-1	What is the "intended level of flood protection"? The DEIR fails to state this clearly. Please define this and specify a reservoir capacity requirement based on this number. This key planning assumption is critical to evaluate both the short-term sediment removal program and the long-term ongoing sediment maintenance program.
2	Project Goals and Objectives	ES-3	The DEIR fails to document the basis for a key planning assumption that it is necessary to restore the design capacity volume for two Design Debris Events (DDE) below the spillway elevation of 1,040.5 feet. What design capacity does this refer to? What is the basis for a standard of two design debris events? Why is the spillway elevation of 1,040.5 feet chosen rather than the historic pre-rehab capacity level of 1054 feel? Is it LACFCD's position that the Devil's Gate Dam rehabilitation that occurred in the 1990's necessitates additional storage capacity in the reservoir? By what process was LACFCD's new standard of two DDEs developed and approved? The project description and objectives should consider the dam and sediment buildup as part of the flood control system and thoroughly evaluate downstream flood threats and facilities as well as other means that can be used to diminish the flood threat.
3	Project Need	ES-3, 11,	The expansion of the spillway for Devil's Gate Dam accomplished by the dam rehabilitation project in 1996-97 was intended to lower the capacity needed in the reservoir. Please evaluate the post-rehab spillway and how that changes the need for the magnitude of sediment removal discussed in the DEIR.
4	Proposed Project Description	ES-4	The project description is insufficient because it only describes the sediment removal and maintenance elements of the County's flood protection program. The description is that of a sediment-trucking project without considering the broader implications and impacts of the project.
5	Air Quality	ES-11, 68, 73, 74, 80, 85, 87, 91-93	The DEIR is inadequate because it fails to adequately address air pollution problems that will be associated with the project and to adopt equipment and procedures that would mitigate them. The DEIR identifies that sensitive populations and the structures that house them (sensitive receptors) are adjacent to and within ½ mile of the proposed project area on pp 73-74, and must be considered in the AIR QUALITY-4 Significance Criteria (p 80). In the analysis of this criterion on pp 91-93, the CO and carcinogenic analyses are only performed for impacts on surface streets. Without a clear description of the staging area for vehicles, or potential backups for departing vehicles,

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

			this analysis is incomplete. Trucks on-site may have significant queuing and idling times, and may create significant impacts on sensitive receptors adjacent to the proposed project area. These impacts should be examined in the DEIR. The DEIR states ""Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NOx emissions; however, the actual vehicles/equipment used may not reach the levels required to reduce the NOX emissions to a level of less than significant for the sediment removal phase. . . . Full implementation of these mitigations could be unachievable. Therefore, impact remains significant." Given the severe health impacts of diesel pollution, LACFCD should use state-of-the-art low-emission vehicles for sediment removal and not rely on the use of vehicles that only meet EPA air quality standards when "feasible."
6	Biological Mitigation	ES-11-13	The DEIR fails to identify a biological mitigation program. Instead it lists a series of guidelines that may be observed, such as a 1:1 replacement of critical habitat. MM BIO-6 lists only Riversidean Alluvial Fan Sage Scrub habitat as a habitat to be restored and/or enhanced. What scientific basis was used to list only this habitat type as appropriate for restoration or enhancement? Will other types of habitat be restored and/or enhanced if destroyed or damaged by this project? Why is the value of this habitat as a significant part of a wildlife corridor not considered? What steps will be taken to preserve the value and function of the wildlife corridor in the project area? Additionally, a 1:1 replacement of habitat is insufficient because it fails to replace the biological value of well-established habitat. What is the basis of this low replacement ratio? 1:1 replacement does not meet the standard of mitigation for areas of environmental sensitivity, where the level of 3:1 to 5:1 is more standard and appropriate. This project should implement habitat restoration at a ratio greater than 3 acres of restoration for each acre of habitat destruction. MM BIO-7 indicates that a biologist will conduct a tree survey prior to ground disturbing activities. Several species in the area to be disturbed could be classified as either shrubs or trees. What will be used as a guideline for determination of tree status? Will all willows and other species with significant representation on site be counted as trees? A seedling does not replace a tree, making a 1:1 replacement ratio for trees removed inadequate restoration. MM BIO-8 lists mitigation measures including habitat restoration, enhancement, and invasive removal as the measures LACFCD will undertake to conduct the proposed 1:1 mitigation. Which of these activities will be prioritized? How will invasive species removal prioritize different species, and will it prioritize removal on site? Will restoration and enhancement include activities beyond use of willow cuttings? Single species plantings are not sufficient to recreate or restore habitat. What

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

			additional measures will be taken, and will LACFCD take on these measures themselves or work with restoration specialists? The activities are also proposed at a 1:1 rate only for 'impacted sensitive habitat and jurisdictional waters.' What measurement will be used to determine what habitat within the impacted area will meet these guidelines? Will any weight be given to habitat composing the wildlife corridor connection in the project area? The DEIR states that attempts will be made to conduct habitat mitigation on-site, but even at the inadequate level of 1:1, it will not be possible for LACFCD to do so because the area of destruction considered in the various alternatives is so great. The DEIR is inadequate because it does not detail a complete habitat restoration program, considering both on-site and off-site components.
7	Land Use and Planning	ES-14	The DEIR identifies that the impacts to recreational uses of the project site will be significant. The mitigation measure MM LAN-1 of communication to users and redirection to nearby facilities does not make this a less than significant impact unless there are equable facilities within reasonable distance for existing users. What are the expected costs to users to relocate their activities to nearby facilities? What is the communication plan for making closures and alternatives known to the public? Several long-term programs serving children use the current facilities, including the Tom Sawyer Camp and MACH One program, and would be significantly burdened by the loss of these facilities. Neighborhoods surrounding the facility will also be significantly impacted, as there are no equivalent facilities within walking distance and public transit in the area is limited. LACFCD's communication and outreach, as demonstrated by the release of this DEIR and related communications, have not proven to be effective. A clear plan for the communication of trail and other facility closures should be outlined, and the cost of impacts to these community users should be clearly demonstrated.
8	Project Location	7	The description of the Arroyo Seco Watershed is misleading and incorrect. The watershed begins in the San Gabriel Mountains in the Angeles National Forest, and extends approximately 24 miles to the confluence with the Los Angeles River. The Arroyo Seco is a main tributary to the Los Angeles River Watershed.
9	Flood Protection	11	Please define the Probable Maximum Flood for the Arroyo Seco. What stream discharge is this flood associated with and what are the potential hazards from this flood? What reservoir discharge level will aggravate flood hazards? What flood hazards will be unaffected by potential reservoir discharges?

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

			The DEIR also fails to adequately describe the downstream flood threat and alternative steps that could be taken to enhance flood protection there. The description of the project area is incorrect because it fails to consider the downstream impacts of the program.
10	Sediment Accumulation	11	Many inconsistencies exist between this DEIR and the LACFCD's Long Term Sediment Management Strategic Plan (March, 2013), such as the sediment yield post-Station Fire, average annual sediment yield and the capacity of Devil's Gate reservoir. These inconsistencies mislead the public about the gravity of the problem the project attempts to address. Please address these inconsistencies and clarify them for the final EIR.
11	Reservoir Capacity	11	The DEIR states that the storage capacity in the reservoir after the Station Fire and subsequent storms is below one DDE. The Sediment Management Strategic Plan (pp. 8-42 to 8-43) gives different data. Using the County's historic method of calculating reservoir capacity, it indicates that as of the March 2011, there are two DDEs and 3.73 MCY of storage capacity in the basin. Please explain these discrepancies and estimate the current capacity behind the reservoir in terms of percentage and volume. Please also indicate why the historic method of calculating DDEs and storage capacity is not appropriate and why a new standard of two DDEs is required.
12	Flood Risk	12	The DEIR states that emergency steps have been taken "to minimize the level of flood risk to downstream communities along the Arroyo Seco." What level of flood risk exists with the current sediment accumulation, and what level of flood risk and reservoir capacity is desirable? What are the specific neighborhoods at risk of flood damage with and without the project and what steps are being taken to reduce potential damage? The key planning assumptions regarding the flood threat from sediment buildup at Devil's Gate Dam should be subject to a technically sound risk analysis. LACFCD's assertions that a flood threat is imminent or that it is necessary to have capacity in the dam basin for two Design Debris Events (DDEs) needs to be carefully scrutinized. Pasadena resident Charles ("Charley") Kohlhase worked for forty years at NASA/JPL leading the design of many deep-space missions during his extended career, including Mariner, Viking, Voyager, and Cassini missions. For his sustained robotic exploration contributions over the last 40 years of the 20th century and solid success record, he received the NASA Distinguished Service Medal. Mr. Kohlhase analyzed the flood threat related to sediment in the Devi's Gate basins and concludes that the probability of a catastrophic event is

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

			very remote. He points out that the likelihood a 50 year storm in a ten year period of time is 20%. He states: "If a 50-year event has a probability of 100% of occurring, then the probability for each year would be 2% or 0.02 or 1/50. As independent probability events are multiplied to determine the likelihood of two 50-yr events occurring in the same year, that probability would be 1 chance in 2500 ... not at all very likely. Even assessed over a 10-yr period, the likelihood would only be 10 x (1/2500) or 1/250 ... still very unlikely. And if a second 50-yr event were to occur closely after the first 50-yr event, there would not likely be additional fire debris to raise the sediment level as much as for the first 50-yr event, so the threat level would have been over-estimated. So you really do not need to lower the existing sediment levels unless you are being extremely conservative in avoiding an overflow of the Devils Gate dam. And given the station fire, why not just wait until the next 50-yr event before taking any action to truck out sediment?" Question: How has LACFCD calculated the risk involved and why has it chosen such an expensive and conservative metric?
13	Supporting Sustainability	12	A long-term plan for reservoir management would support sustainability but is not sufficient for sustainability on its own. Addressing some maintenance difficulties should be part of a overall strategy of reducing the need for maintenance by improving the function of the flood control system as a part of an Integrated Watershed Management Program, including considerations of water quality, the water basin, groundwater resources, stream health, recreational opportunities, and economic strategies for the watershed. What is the LACFCD's plan for improving overall sustainability of the reservoir and the flood control system? How does this proposed project fit into such a plan?
14	Project Access and Staging	16	Please clarify the statement that "empty trucks will be staged within the Proposed Project site." Does this mean that they will be staged there overnight? How many trucks at one time will be allowed in the staging area or on adjoining roads? What other equipment besides trucks will be used to process and transfer the sediment? How big will the staging area for those trucks be, and will the staging area move as the location of sediment removal changes?
15	Reservoir Management	21	"It is estimated that an average of 13,000 cy of sediment will potentially be deposited in the reservoir annually after completion of the Proposed Project." Please explain how this number was estimated. According to the Flood Control District's Sediment Management Strategic Plan, the average annual sediment deposition is over 100,000 cy. Such a dramatic underestimate of the average sediment loading of the Devil's Gate basin is misleading and deceptive.

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

16	Project Area	21	The downstream Arroyo Seco River flood control channel is a critical component of the Devil's Gate Dam flood system and should be evaluated as such. Please include the downstream channel in the project area and include the impacts of flooding and the sediment removal program there.
17	Cumulative Projects	28	The DEIR is inadequate because it fails to consider a number of closely related projects, including: • The NASA/Jet Propulsion Laboratory water contamination well now being planned, • The JPL parking structure, • The Arroyo Seco Canyon Project, • Pasadena's Berkshire Creek Program, and • The cross-town pipeline from the Devil's Gate area to Eaton Canyon proposed by LACFCD; and • The US Army Corps of Engineers (USACE) Arroyo Seco Ecosystem Restoration Study. The proposed project, when combined with these planned projects, could have a significant net effect on the hydrological functioning of the Arroyo Seco, which must be explored. Since the proposed project to divert water from the Devil's Gate Reservoir to the Eaton Canyon Watershed is a project of LACFCD and was included as part of a successful grant application to the CA Department of Water Resources for flood funding, the pipeline across Pasadena should be fully evaluated in this DEIR. The Feasibility Scoping Meeting Documentation Final Report for the USACE Arroyo Seco Ecosystem Restoration Program, prepared in August 2011, contains a remarkably different description as well as conflicting recommendations for the Devil's Gate/Hahamongna basin. On page 2-3 that document states: "Alteration of the riparian conditions has resulted in fragmented, diminished or eradicated fish and wildlife habitat, and has resulted in water quality impacts that have diminished ecosystem function. For example, in the Hahamongna Watershed Park (HWP), the stream spreads over the floodplain in a braided pattern, as would be expected in a bedload-dominated alluvial system, but current land use does not provide a riparian vegetation border along the braided stream margin. Thus, the water is exposed to direct sunlight and is subject to heating, thereby reducing aquatic habitat quality for native species and contributing to harmful algal blooms." We note that LACFCD is the lead local sponsor of the USACE Arroyo Seco Watershed Ecosystem Restoration study and has expressed support for completing and implementing that program for many years, but the DEIR does not incorporate the principles of integrated watershed and ecosystem management that characterize that program. ASF believes that the USACE program offers the basis for a sediment removal and management program that will be truly sustainable and respect the rare

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

			ecosystem values found in the Hahamongna basin. Why was the USACE program not included in the DEIR analysis? Will its findings and recommendations be incorporated into LACFCD's final EIR and sediment management program?
18	Regional Water Quality Control Board	26	Please explain in detail the permit denial from the Regional Water Quality Control Board in March 2011 for the 1.67 million cubic yard project proposed by LACFCD for the Hahamongna basin. What measures have been taken to meet the directives of the Regional Board's letter?
19	Native Soils	141	Please provide information regarding depths to "native soils" in the basin. What is being used a reference? Will there be any monitoring on site to determine that the data is accurate? This is not only important for evaluating archaeological resources as herein, but also for contamination and management purposes.
20	Alternatives Analysis	274-626	The DEIR is inadequate because it fails to analyze true alternatives to the proposed project. Aside from the "no project" alternative, there is no alternative that is significantly smaller in scale or in environmental impacts than the proposed project. Alternatives 1, 2 and 3 are all sediment trucking programs and not true alternatives, simply variations of the proposed project with different footprints and amounts of sediment to be excavated. Dig a hole here; dig a hole there. Dig two bigger holes there. The scope of all three is significantly larger than the November 2010 original project description (1.67 MCY) despite the Regional Water Quality Control Boards directive from March 2011 to consider more modest alternatives that would have less environmental impact. Why does LACFCD fail to abide by this directive? Alternative 4 (Sluicing Method) gives a narrow definition to sluicing and flow-assisted sediment transport and posits the ridiculous premise that all sediment transport would be accomplished through a passive sediment program that would take forever. Clearly this is a dismissive pseudo-analysis and not a true alternative to the sediment-trucking program outlined by LACFCD. Alternative 5 (Haul Route Alternative) describes a different route for trucks to leave the Devil's Gate basin and travel to the 210 Freeway, using the Arroyo/Windsor on-ramp primarily instead of the Windsor on-ramp. This is not a true alternative to the project itself, but simply a variation that could be used for the project or any of the three pseudo-alternatives (1-3).
21	Sluicing Alternative	469	Alternative 4, the Sluicing Alternative, is poorly conceived and set up to be easily dismissed. ASF has long advocated using the flow of the Arroyo Seco River to transport sediment out of the reservoir, but it is very obvious that, because of long-deferred maintenance, this method cannot transport the entire volume of sediment necessary at this time.

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

			Alternative 4 suggests that sluicing be used as the only method of sediment removal from the basin, which is clearly infeasible. This alternative should consider maximizing the amount of sediment sluiced given projected future weather conditions. It is specious to assert that since sluicing cannot meet the entire removal need, it is not a viable option or methodology that could significantly reduce negative impacts of sediment removal. Appendix K shows that during a historically "typical" year of stream flow, sluicing 20,000 cubic yards is possible. This result does not justify dismissing sluicing as an alternative. Even in years of typical rainfall levels, sluicing should be maximized to transport about 20,000 cubic yards from the reservoir. During periods of low rainfall levels, no sluicing will be possible, but in years of high rainfall, the potential for flow assisted sediment transport is much greater, and should be exploited. The definition of the historically typical year for the sluicing analysis uses only a narrow and unrepresentative sample of recent years rather than considering the historical variations in hydrology and rainfall and the potential impacts of climate change. Question: Please justify your selection of the "historically typical year." According to Table 8-12 in the LACFCD Sediment Management Strategic Plan, in 1942 over one million cubic yards of sediment were sluiced from the Devil's Gate Reservoir. This magnitude of sluicing will very rarely be possible and should not be depended on, but it does demonstrate the possibility for maximizing sluicing as a removal method. In 1952, 410,000 cubic yards were sluiced from Devil's Gate Reservoir, and in 1979 an additional 250,000 cubic yards were sluiced. The DEIR uses sluicing as a red herring to dismiss alternative removal methods. Sluicing should be considered a viable removal method that can be optimized as a major component of a sediment removal and management program.
22	Haul Route Alternative	521	The Haul Route "alternative" is simply a variation on truck routes and not an alternative to the project. This 'alternative' does not demonstrate a reduction in overall air quality or traffic impacts. Instead of evaluating this minor route difference as an alternative, the LACFCD should evaluate an adaptive route alternative based on the hourly/daily/weekly/monthly haul route on seasons, events, burden, school times, work times, rush hour, and even unforeseeable circumstances.
23	CEQA Process	Appendix A	Stakeholder comments on the Scope of the EIR are presented in Appendix A, but the County provides no responses to those comments. Please address each comment individually and how they were incorporated into the DEIR. At this point it seems that the comments were ignored.

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org

24	CEQA Process	Appendix A	LACFCD has not undertaken a sufficient outreach program to stakeholders about the project and its impacts. Most stakeholders and neighbors of Hahamongna Watershed Park who will be affected by the project remain unaware of it. The three community meetings held did not meet the requirements of CEQA. They were styled to limit public input and exchange on the project, and the meeting facilitators filtered participant input in a prejudicial way. The format of the meeting did not give sufficient opportunity to get answers to key questions that were necessary to understand in order to make effective comments on the DEIR. This DEIR is a massive document that is extremely difficult to review in electronic form, yet few hard copies were made available to the public and only at local libraries where they are difficult to review due to limited hours and availability. Question: Why did LACFCD not provide full and complete hard copies of the DEIR, including appendices, to key agencies and stakeholder organizations?

570 W. Avenue 26 #450, Los Angeles, CA 90065
PO Box 91622, Pasadena, CA 91109-1622 (323) 405-7326 www.arroyoseco.org