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From: Friends of Hahamongna - Elizabeth Bour, Mary Barrie, Nina Chomsky
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RE: Comments: Draft Environmental Impact Report for Devil's Gate Reservoir Sediment Removal and Management Project

DATE: January 19, 2014

I. Introduction

Friends of Hahamongna hereby submits its comments on the Los Angeles County Department of Public Works (LACDPW) Devil's Gate Reservoir Sediment Removal Project at Hahamongna Watershed Park. We have reviewed the Draft Environmental Impact Report (DEIR) and related official documents about this proposed project and related projects. One or more of us has attended all of the County presentations.

The proposed project will permanently alter the environment, eliminating the possibility of implementing projects that would meet the goals of the Hahamongna Watershed Park Master Plan (HWPMP) (www.ci.pasadena.ca.us/PublicWorks/HWPMP)

We believe that this project would result in serious environmental impacts to the surrounding communities, especially Pasadena, La Canada Flintridge, and Altadena as well as the negative environmental impacts to the park. We would like to address these impacts as well as inaccuracies and inadequacies with the DEIR.

II. Issues with the Project Description:

The project description is legally inadequate in that it is inaccurate, inconsistent and incomplete.

A. Inconsistent statements regarding the necessary project scope

There are inconsistent statements in several official LACDPW documents regarding the amount of sediment that will be removed and the remaining capacity for sediment placement behind the dam. It is apparent that the justification for the project, the quantity of sediment to be removed and the excavation acreage are in dispute. Some of the official statements made are:

1. Stated Dam Capacity and Removal Quantity:

- A LACDPW presentation to the Pasadena's Hahamongna Watershed Park Advisory Committee (HWPAC) on 11/30/2010 described the original sediment quantity to be removed as 1.67 million cubic yards (mcy) (Exhibit 1). The remaining capacity for sediment placement was stated as 1.242mcy (17%) (Exhibit 2). Finally, in the same presentation, it was stated that this project would regain necessary flood protection (Exhibit 3). (http://www.savehahamongna.org/pdf/HWPAC_Presentation.pdf)

- The LACDPW report to the Los Angeles County Board of Supervisors on March 1, 2011 stated that one Design Debris Event (DDE) for Devil's Gate Dam was 1.67 mcy, the amount of sediment which LACDPW was originally proposing to remove from behind the dam. (Los Angeles County Board of Supervisors Statement of Proceedings, March 1, 2011, Item 60-C, , Item 60-C, Motion 11-1056, (http://bos.co.la.ca.us/Services/RecordsSearch.aspx).

- According to LACDPW Sediment Management Strategic Plan 2012-2032 (http://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx), Table 2-1 Reservoirs in the Flood Control District (Exhibit 4), the remaining capacity is 3.7 mcy (47%), almost 2 Design Debris Events (DDEs). In addition, the Strategic Plan Figure 8-27, Graph of

Historical Sediment Storage at Devil's Gate Reservoir, illustrates that just over two DDEs of storage capacity remained in the basin as of 2010 (Exhibit 5). The DEIR, however, states that available flood control capacity is currently less than one DDE (p.ES-3). This is a critical discrepancy which must be resolved since the size of the project depends directly upon the capacity remaining in the basin.

- A grant application submitted by LACDPW to the CA Water Resources Board (March 2013) for the Devil's Gate and Eaton Stormwater Flood Management Project, (http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted_Applications/P1E_Round2_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20(201243210009)/Attachment%203%20-%20Att3_SWF_WorkPlan_1of2.pdf) indicated that Phase V of the project would remove an estimated 2mcy of sediment from the reservoir. The discrepancy between the grant application and the DEIR is that, with the exception of the No Project Alternative, the proposed project and the alternatives all remove more than 2 mcy of sediment. The grant application states that "the Devil's Gate Reservoir Sediment Removal and Management Program will remove an estimated 2,000,000 cubic yards of sediment from the reservoir. This will reduce the level of flood risk to the downstream communities along the Arroyo Seco." When the grant application went before the Board of Supervisors for approval, the amount of sediment removed was described as "up to 2,000,000 cubic yards" and the Chief Engineer or her designee was authorized only "to make minor changes in project scope." (Los Angeles County Board of Supervisors, Statement of Proceedings, March 19, 2013, Agenda Item 13).

- The DEIR Appendix D, Biological Technical Report dated November 2010 was done before the scope of the project was changed. The text states "the proposed project will remove 1,671,000 cy of sediment debris from Devil's Gate Reservoir." (p.1). Figure 3 of the Biological Resources map in the same Appendix shows an excavation footprint which appears to correspond with that of the project as originally proposed to the HWP Advisory Committee and the Los Angeles County Board of Supervisors. Thus, there is evidence within the DEIR itself that the removal of

1.67mcy of sediment was the scope of the project since that is the amount of sediment removal anticipated when the biological reports were done.

The final EIR must answer the following questions:

? What is the correct percentage of sediment storage capacity remaining in the reservoir?

? How many DDEs of storage capacity remain?

? What is the actual minimum amount of sediment removal necessary for downstream flood protection?

? Why was no project studied in the DEIR, with the exception of the No Project alternative, within the scope of work for which the grant was obtained from the State of California?

? Even Alternative 3, Configuration D, the smallest alternative, is 400,000 cy larger than the project described in the grant. Does the California Department of Water Resources consider this “a minor change in project scope?”

? Why was the State of California told that the removal of one DDE of sediment would provide safety to the downstream communities when the decision makers and the public are now being told otherwise?

? Why were the biological technical reports not redone more recently? The report attached to the DEIR is now over three years old.

? Why and when was the project scope of work changed to the removal of from 2.4 to 4mcy of sediment?

2. Excavation Acreage:

- The excavation acreage presented to HWPAC in 2010 by LACDPW was 50 acres (only 15 acres of willows to be permanently removed) and would only occur in the area immediately behind the dam. According to this presentation, removal of 1.67 mcy of sediment and excavation of 50 acres would result in “regaining necessary flood protection” (Exhibit 14).

- According to the DEIR, the excavation acreage in the proposed project is 120 acres.

The final EIR must answer the following questions:

? Why is there such a significant increase in the acreage for the excavation area between the 2010 project description and this project and the alternatives presented in the DEIR?

? Why is flood protection no longer achieved with the removal of one DDE and the excavation of a much smaller area? What has changed?

B. <u>Incomplete project description, justification and insufficient risk assessment</u>

The project description does not quantify the current actual risk of flooding and what event(s) would be necessary to create that risk. No case is made for the removal of up to 4 million cubic yards of sediment or the need to do so within 5 years. Language from the DEIR (ES-3) related to downstream risk and the likelihood of a Design Debris Event (DDE) event is :

The DDE is the estimated amount of sediment that could flow into the reservoir after the undeveloped portion of the tributary watershed is completely burned and a 50-year design storm event occurs after four years of watershed recovery. The 50-year design storm and the DDE are defined by the Los Angeles County Department of Public Works Hydrology and Sedimentation Manuals, respectively. The DDE for Devil's Gate Reservoir is approximately 2 million cubic yards (cy).

The definition of a DDE of 2 million cubic yards (mcy) is an LACDPW internal standard that has, somehow, increased since 2011 from 1.67 mcy. The County Sedimentation Manual was last updated in 2006 so, presumably, the standard has not changed since 2006. In Section 4.2 of the DEIR, Project Objectives (page 275) the following statement is made:

The LACFCD must remove sediment that has accumulated behind the dam to minimize the level of flood risk to downstream communities along the Arroyo Seco. In its current condition, the reservoir no longer has the capacity to safely contain another major debris event".

Again, there is no specific statement of the actual risk to the downstream communities, what event scenario would put these communities at risk and how much this project would reduce that risk. The final EIR should express risk assessment in terms of a scenario-based probability statement such as "there a ___ % chance of _____ event happening and the downstream consequences / cost would be _____". Multiple scenarios should be discussed.

There is a **Flood Hazard Warning and Contingency Plan for the Arroyo Seco Channel** and the map of potentially impacted parcels (Exhibit 6) that is included in the grant application but is not included in the DEIR. In addition, the **Arroyo Seco Channel 50-Year Frequency Rainfall Bulked Flows and Superelevation Map** (Exhibit 7) was included in a report to the Board of Supervisors on March 1, 2011 (Los Angeles County Board of Supervisors Statement of Proceedings, March 1, 2011, Item 60C) but is not included in the DEIR. Both these maps show no danger of the Rose Bowl being impacted by flooding. However, information being circulated to the press as recently as October 2013 included: "Officials say locations downstream from the dam along the Arroyo Seco that could be in danger of flooding include the Rose Bowl…" ("County presents options for Devil's Gate Dam sediment removal," Los Angeles Times, October 26, 2013). The final EIR must include these two maps, explain the difference between them, and explain the downstream flood risk in an understandable narrative format.

The final EIR must answer the following questions:

? What is the risk, in terms of a percentage, of downstream flooding and under what conditions?

? What is an acceptable amount of risk and what is the minimum amount of sediment that would need to be removed to reduce that risk to an acceptable level?

? What documentation exists that justifies the change in the amount of a DDE?

? How many DDEs are needed to achieve flood control storage capacity in order to assure public safety?

? Why is it necessary to remove enough sediment to return the reservoir to pre-1938 levels when this would cause severe environmental damage which cannot be mitigated to a level of less than significance? (Exhibit 8, Sediment Management Strategic Plan, Devil's Gate Reservoir Historical Sediment Accumulation and Removal, Table 8-12)

? How has it been possible to keep the areas south of the dam safe for over 75 years while still retaining between 2.62 mcy and 4.40 mcy in storage behind the dam (Exhibit 8, Sediment Management Strategic Plan, Devil's Gate Reservoir Historical Sediment Accumulation and Removal, Table 8-12)?

? If downstream communities were, in fact, safe during all those years, what is now driving the need to remove most of the sediment in storage behind the dam?

? Why are two important inundation maps which address flood risk downstream not included in the DEIR? Why was the public, including City Officials, misled in presentations and publications relating to flood risk at the Rose Bowl?

C. <u>Inadequate and incomplete description of this project's relationship to other regional projects that are not discussed in the DEIR or evaluated for cumulative impacts.</u>
There are several related projects in and around Devil's Gate Dam that have been announced and are partially funded but are inadequately addressed or not mentioned at all in the DEIR and not properly considered for cumulative impacts.

1. A Prop 1-E funds grant application was submitted by the LACDPW (March 2013) for a project titled <u>Devil's Gate and Eaton Storm Water Flood Management Project</u> (http://www.water.ca.gov/irwm/grants/docs/Archives/Prop1E/Submitted_Applications/P1E_Round2_SWFM/Los%20Angeles%20County%20Flood%20Control%20District%20(201243210009)/Attachment%203%20-%20Att3_SWF_WorkPlan_1of2.pdf). The Los Angeles County Flood Control District (LACFCD) received $28 million from the California Department of Water Resources toward the total projected project cost of $80 million The five phases of this project are:

   - Eaton Wash spreading grounds improvements

- Eaton Wash dam rehabilitation project
- Eaton Wash spreading grounds intake improvement and basin enlargement
- Devil's Gate Water Conservation Project (Phase IV)
    - Installing a pump to the upstream face of Devil's Gate Dam
    - Installing 27,000 feet of 30-inch reinforced concrete pipe from Devil's Gate Dam to Eaton Wash
    - Installing an outlet structure at Eaton Wash
- Devil's Gate Reservoir Sediment Removal and Management Project(Phase V)
    - Removing 2 million cubic yards of sediment
    - Establishing a reservoir configuration more suitable for routine maintenance

The Devil's Gate Water Conservation component will have significant impacts both upon Hahamongna and the surrounding region. According to the DEIR, *"Impacts to biological resources associated with the Arroyo Seco Canyon Project and the Devil's Gate Water Conservation Project are also not known at this time*". The Water Conservation project, although partially funded, is still in the conceptual design phase. The final EIR must include a detailed project description and environmental documents for the Water Conservation project in order to properly evaluate cumulative impacts of the whole of the project.

It is also unclear whether the massive increase in the size of the current sediment removal project is related to the plan to store water behind the dam to be pumped to Eaton Canyon. According to the Technical Justification section of the Prop 1-E grant application, "*The resulting new reservoir configuration will result in the ability to impound stormwater to be conveyed via the new pipeline to Eaton Wash Spreading Grounds for conservation*". This clearly ties these two projects together and it is clear that the completion of the pipeline project depends upon the completion of the sediment removal

project. The project in the DEIR appears to be designed to facilitate and/or accommodate this pipeline to Eaton Wash but the pipeline project is not defined or evaluated for cumulative impacts in the DEIR. Since these two projects are described in the grant application as integrated elements of one project, both projects will have the same lead agency and/or responsible agencies, both projects are in the same area, and both are scheduled to be implemented during roughly the same time frame, the project description in the final EIR must include both phases in order to evaluate the impacts of the "whole of the project". The final EIR must answer the following questions:

- ? Are there any of the alternatives studied in the DEIR that are not compatible with the Water Conservation Project?
- ? Were the proposed project and the alternatives included in the DEIR designed to support the water conservation project?
- ? Is this why the proposed project and the alternatives are all larger than the project originally proposed to the Los Angeles County Board of Supervisors and the CA Department of Water Resources?

2. In March 2013, the Foothill Municipal Water District (FMWD) submitted a grant as part of a Greater Los Angeles County application containing numerous projects for consideration in the California Department of Water Resources (DWR) Integrated Regional Water Management (IRWM) Proposition 84 grant program funds. [Los Angeles County Flood Control District, Prop 84 IRWM Grant Program Implementation Grant, Round 2, 2013] The grant was awarded and the FMWD component of this large grant request is titled Foothill Municipal Water District Recycled Water Project. (http://www.ladpw.org/wmd/irwmp/docs/Prop84Round2ImplGrantApp/Attachment%201%20Eligibility%20Documents%201%20of%201.pdf)

The County was aware of this component project at the time it was completing this DEIR. As stated in the project description, *"The proposed locations for the MBR* [Membrane Bioreactor Plant] *facility integrate the FMWD Recycled Water Project into the Arroyo Seco Watershed as a key feature supporting a sustainable, local and reliable*

supply within the Raymond Groundwater Basin. As the MBR facility will be neighboring the La Cañada United Methodist Church, La Cañada High School, and Hahamongna Watershed Park … FMWD is currently investigating three discharge methods for the recycled water produced from the MBR facility. All methods operate via indirect potable reuse and demonstrate potential methods of groundwater replenishment for the Raymond Groundwater Basin. These scenarios are outlined below:

- *La Cañada United Methodist Church MBR location:*
    - *Option 1: La Cañada High School Infiltration Galleries*
    - *Option 1a: Devil's Gate Dam Spreading*
    - *Option 1b: Flint Canyon Creek Live Stream*

? *La Cañada High School MBR location:*

- *Option 1: La Cañada High School Infiltration Galleries*
- *Option 1a: Devil's Gate Dam Spreading*
- *Option 1b: Flint Canyon Creek Live Stream"*

The Foothill Municipal Water District project is included in the suite of Greater Los Angeles Integrated Regional Water Management projects which were 100% funded in the amount of $23,433,962 as of September 25, 2013. Foothill's portion of this amount was $1,499,500 [Los Angeles County Board of Supervisors Statement of Proceedings, March 19, 2013, Item 35, Board Letter]

As of September 4, 2013, Foothill Municipal announced that the Recycled Water Demonstration Project had been suspended. However, since the project has been suspended rather than cancelled and since it now has grant funding available, it may be undertaken at a later date or by another agency. Thus, the cumulative effects of this project must be studied in the final EIR. The final EIR must answer the following questions:

? Since two of the three infiltration methods would impact the quality of the water held behind the dam, why is this project not evaluated in the DEIR?

? Since this FMWD project has components in Hahamongna/Devil's Gate Dam area, is an anticipated project and, although suspended, is partially funded through County managed IRWMP funds, why is there no mention of this project or consideration of cumulative impacts in this DEIR?

? Are there any of the alternatives studied in the DEIR that are not compatible with the Foothill Municipal Water District Recycled Water Project?

3. Another possible project conflict for the immediate area is the NFL Temporary Use of the Rose Bowl. The projected duration of this project is five years and it is possible, indeed likely, that the timeline for these two projects would be the same. The EIR for the NFL use of the Rose Bowl identified several CEQA categories with likely significant impacts, some unavoidable, including recreation, traffic, air quality and noise. (http://cityofpasadena.net/Rose_Bowl_EIR)

   Although the assertion is made in this DEIR that *"The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."*, the DEIR must analyze the possible cumulative impacts in detail so that the decision makers can fully assess the costs of the project relative to the benefits. For example, traffic impacts and the level of service at intersections in and around Pasadena, especially during weekday NFL events need to be discussed in detail.

   The DEIR does not evaluate the impact to recreation as significant and unavoidable and suggests all activities can be relocated. In the proposed project for the NFL's use of the Rose Bowl, one of the mitigations suggested for displaced recreation was to relocate that recreation to neighboring parks, including Hahamongna Watershed Park. However, recreational opportunities in Hahamongna Watershed Park will not be possible during this project and possibly well beyond. The recreational opportunities for

hikers and equestrians at both the Rose Bowl and Hahamongna Watershed Park will be displaced with limited or no relocation opportunities. The equestrian trails cannot be relocated. The final EIR must answer the following questions:

? Since the NFL project is anticipated, why is there no detailed analysis of the cumulative traffic impacts?

? How will the County address the proposed relocation of recreational activities into Hahamongna if the NFL project moves forward?

D. Inadequate project description in that there is apparent segmentation and pre-commitment to other projects

Per CEQA Guideline 15126 "All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation". To properly avoid segmentation, an EIR's project description must include foreseeable related projects, specifically for complete and adequate evaluation of cumulative impacts. The County has announced, defined, and requested grant money for the Devil's Gate Water Conservation project and is in partnership with FMWD for the Foothill Municipal Water District Recycled Water project. These projects must be included in this DEIR project description and evaluated for cumulative impacts. In the DEIR, the Devil's Gate Water Conservation Project is mentioned only once in Table 2.9-1 (p.29), and is described as a project which is still in the conceptual design phase. Even though these two projects are components of the same larger project, there are two separate environmental reviews planned. The Devil's Gate Sediment Removal EIR comment period closes January 21, 2014. The grant application states that the environmental work for the Water Conservation Project component will be done at the same time. However, representatives for the LACDPW have stated during recent public meetings that the Initial Study or Mitigated Negative Declaration for the Water Conservation component will not be available for public review until February or March 2014.

Further, environmental reviews of the Devil's Gate Water Conservation and FMWD Recycled Water projects are not scheduled until after the date by which public comments

must be submitted for the sediment removal phase of this project. Consequently, the public and the decision makers are deprived of the opportunity to review and comment on the cumulative environmental impacts of these three very large and costly projects. Not only does this omission appear to be illegal segmentation, but it also raises the question whether there was a pre-commitment to the pipeline and recycled water projects that may have influenced the decision on the preferred/proposed sediment removal project, may have limited alternatives presented, or may have limited the level of environmental review performed on these alternatives. The final EIR must answer the following questions:

? Since the pipeline and recycled water projects are anticipated and even partially funded, why is there no project description for two of the projects or evaluation of the cumulative impacts of these three related projects?

? Why are the three projects that are in the same location and that are being constructed at the same time not being evaluated in one environmental process?

? Given that the amount of sediment proposed to be removed from the basin is much greater than was originally proposed in November of 2010, is this increase in sediment removal necessary to support the Water Conservation component or the Foothill Municipal Water District Recycled Water project?

? How much sediment removal is necessary to support the Water Conservation component and in what areas will the basin be cleared to support this project?

E. <u>Inadequate and potentially inaccurate description of the County easement rights and responsible agencies</u>

The LACDPW has clearly taken over full management of the proposed project, and is using the easement as a justification for control of this project and the entire park from the sediment removal phase through to the foreseeable future. There is a question as to LACDPW's legal right to do so and whether this project exceeds its rights under the easement between the City of Pasadena and the County. Because permits will be required from Pasadena, Pasadena is a Responsible Agency and the final EIR must directly identify Pasadena as a Responsible Agency. As the land owner and a Responsible Agency,

Pasadena must oversee all aspects of this project including all mitigation measures and the relationship between this project and projects planned as a result of the Hahamongna Watershed Park Master Plan.

In addition, another Responsible Agency, the California Regional Water Quality Board, rejected the County's earlier project proposal. In a March 2011 letter, the California Regional Water Quality Control Board denied the Los Angeles County Flood Control District (LACFCD) water quality certification for the original, much smaller, 1,600,000 cy project which would have cleared only 50 acres: (http://www.waterboards.ca.gov/losangeles/water_issues/programs/401_water_quality_certification/final_letters/Documents/2011/10-170DenialWQC.pdf).

The Board was informed that the removal of 1,600,000 cy of sediment would provide a "total cleanout" which would bring the reservoir "back to its original design contours which were developed when the reservoir was constructed." The objections raised by the Board are very similar to those which the public has raised throughout the environmental review process. According to the Board, LACFCD would be required to "demonstrate that appropriate alternatives, in terms of the amount of material to be removed and in terms of the timing or phasing of the removal of materials were considered." These alternatives were to include "cleanout alternatives sufficient to protect public safety other than 'return to design capacity.' LACDPW was directed to "identify the immediate, public safety, capacity need which allows proper function of the flood control system and the corresponding sediment removal need. With this basis, LACFCD shall then develop an alternative(s) for this amount of sediment removal." They were to "identify cleanout alternatives which would minimize the 50-acre impact and identify alternatives for phasing the project to minimize impacts over time." The Board stated that the "final analysis should include the rationale for the determination that the proposed project is the most appropriate design for this project which meets project needs and that there are not other, more appropriate, project designs which avoid or minimize impacts to waterways while also meeting project needs". It is clear from this language that the California Regional Water Board had concerns and

was not willing to certify a much smaller project. The final EIR must answer the following questions:

? Do the project boundaries exceed the easement boundaries? This will require a Survey.

? Does the extent of the proposed project exceed the legal rights granted in the easement or legal rights under applicable California law?

? Does the easement allow for the County to construct the infrastructure/ equipment necessary to pump water held behind the dam into the Eaton dam pipeline?

? What will the City of Pasadena's role be for implementation and management rights over all adopted EIR mitigations?

? What permits from the City will be required and how will Pasadena be engaged to enforce its permitting authority and application review? There must be strict enforcement over all County future operations in Hahamongna arising out of this project and/or related projects.

? Why doesn't the DEIR state that the Pasadena Tree Protection Ordinance protects native trees and all public trees, native and non-native, within the City including those in Hahamongna Watershed Park? Why doesn't the DEIR discuss the jurisdiction of Pasadena's Urban Forestry Advisory Committee over tree removal in Hahamongna? The DEIR only states that the Pasadena Tree Protection Ordinance applies to trees "in certain parts of the City" (p.121).

? Who will all the other Responsible Agencies be and what permits will be required from each?

? How can the necessary certification from the California Regional Water Board for this project be expected when the Board rejected a much smaller Devil's Gate sediment removal project in March 2011? Why was the Water Quality Board informed that one DDE would bring the reservoir back to its original design contours when the public was subsequently told that the removal of two DDEs would be necessary? Why did LACDPW ignore the Board's directive to develop an alternative which minimized the 50

acre impact and, instead, defined the project and all the alternatives as much larger projects?

F. Inadequate Alternatives

1. The DEIR is deficient in that it fails to propose and evaluate alternatives in a legally adequate manner. The extremely confusing alternatives section is dense and impenetrable. Each alternative is considered separately and its environmental impacts are divided into issue areas. The method of presentation is very difficult to follow as this example shows:

   - Alternative 1, Configuration B is considered environmentally superior to the Proposed Project.
   - Alternative 1, Configuration B will also be environmentally superior to Alternative 2, Configuration C; Alternative 4, Sluicing; and Alternative 5, Haul Route Alternative.
   - Alternative 1, Configuration B will be environmentally inferior to Alternative 3, Configuration D
   - Alternative 1, Configuration B will be environmentally superior to Alternative 6, No Project Alternative

2. Despite the 350 page length of the Alternatives section, there was no simple, straightforward narrative discussion which compares in plain English the pluses and minuses of the alternatives so that the public and the decision makers can make an informed decision as to which alternative would be best. The alternative described as the Environmentally Superior Alternative gets two short paragraphs and no discussion whatsoever as to why it was not chosen by the County as the Preferred Project. In the final EIR, all alternatives must be presented in a format which allows the reader to easily compare the environmental impacts of the alternatives.

3. The DEIR failed to consider possible less impactful alternatives. Los Angeles County's own documents and their historical removal of sediment in the basin prove that a slower, more environmentally sensitive approach can keep the downstream areas safe.

LACDPW has never removed more than 750,000 cy of sediment at one time from behind Devil's Gate Dam and yet the downstream communities have been safe for 75 years. In 1977, the year that 750,000 cy of sediment was removed, the amount of sediment in storage was 3.9 mcy or about the same amount in storage now (Exhibit 8). Based on the historical record, a sediment removal alternative should have been developed and considered for the removal of a maximum of 750,000 cy of sediment. Removing this amount of sediment along with increased sluicing and extending the timeframe would meet the stated project goals while reducing the level of impacts and would conform to the goals and objectives stated in the HWPMP. This alternative should also provide for a slow, ongoing process of sediment removal which would avoid the kind of massive, environmentally destructive project now proposed.

The second possible, although less desirable, alternative would be for LACDPW to return to its initial proposal to remove 1,670,000 cy of sediment which would scour only 50 acres and keep permanently cleared only 15 acres (Exhibit 14). There is ample evidence in the record that Flood Control believed this plan to be sufficient to provide flood protection to the downstream communities despite the far more damaging alternatives now proposed in the DEIR.

The least objectionable of the alternatives proposed in the DEIR is, however, Alternative 3 (Configuration D), referred to in the DEIR as the environmentally superior alternative. In light of the considerable evidence in the record, however, it is clear that there are far more superior alternatives meeting the project objectives which should be considered in the final EIR.

The final EIR must answer the following questions:

? Why was a document as important as the Sediment Management Strategic Plan 2012-2032, which has so much critical information about sediment removal behind Devil's Gate Dam, not discussed in the DEIR?

? Does Alternative 2, Configuration 3 also allow for the restoration of previously existing recreational opportunities?

? Why will it still take only five years to complete Alternative 2 when it would remove over 1 mcy more sediment than the Proposed Project?

III. Issues with the DEIR:

A. Aesthetics

In both this section and in the Biological Resources section, there is a statement that "[m]ost of the vegetation and trees on the Proposed Project site were dead, washed out, or buried under sediment…" Most of the trees in the excavation area are willows which were not only alive but thriving after the influx of sediment. This assertion must be removed in the final EIR.

The San Gabriel Mountains are the dominant feature in the scenic vista throughout Hahamongna Watershed Park which is why the City of Pasadena's Master Plan calls for both a Sunset Overlook and a Sunrise Overlook. The recently built pedestrian bridge also has a small park seating area which overlooks both the basin and the mountains.

The DEIR states that Management Option 1, the permanent clearing of vegetation from 120 acres of the basin, will "result in a less than significant impact to scenic vistas" and that for most of the year the Proposed Project site will appear vegetated. The Reservoir Management Visual Change Table, p. 58 shows that the overall visual change will be low even though the scoured basin is at the very center of most of these scenic vistas. In reality, except during the rainy season, 120 acres or most of the basin will not be green but rather dirt/sand with brown dry non-native vegetation. The final EIR must accurately state the appearance of the basin today (existing conditions) and the truth about the resulting appearance if the proposed project is implemented. The final EIR must answer the following questions:

? Why does the DEIR state that most of the trees in the proposed project site are dead when this assertion is not true?

? Why does the DEIR state that the project site is not a ""designated scenic resource" when the Hahamongna Watershed Park Master Plan has numerous projects, several

already implemented, that were designed specifically to take advantage of the scenic vistas?

? What is the actual impact to aesthetics and to the already established scenic vistas?

B. Air Quality

Although air quality impacts have been determined to be significant and unavoidable, the impacts have been under-assessed and understated in that the only monitoring performed was at two Source Receptor Areas (SRAs), one in Pasadena, and one in Burbank for the years 2006 through 2011 (Table 3.5-2: Ambient Air Quality Monitoring Summary). There was no monitoring for ambient measurements performed on-site or along the transportation routes to sediment placement sites. Since much of the identified air quality impacts are due to exhaust from the trucks and particulate matter (PM) that may be released during transport, monitoring for ambient air quality during the project must be performed for all impacted areas. The DEIR air quality impacts and mitigations are also deficient in the following areas:

1. Degradation of air quality is a serious public health matter. It is essential that accurate and current baseline studies are conducted and that the EIR accurately state the additional project-related air quality degradation so that decision makers and the public will know the environmental cost. Baseline studies for ambient air quality were performed, for the most part, at an SRA in Pasadena five miles from the project site. For particulate matter (PM_{20}) the location for the SRA was in Burbank, eight miles away from the project site and not along the sediment transport route. In order to appropriately assess the ambient air quality, there should have been baseline monitoring at the site location.

2. There is limited discussion on mitigating the particulate matter that can and will be released during excavation, loading, and as the sediment is being transported to sediment placement sites. Although tarps are mentioned as a part of the SCAQMD's Rule 403 standards, there must be a mandate that appropriate quality tarps are used to

cover the truckloads and that best practices for fugitive dust management are implemented. There is also only one water truck proposed for use (p. 87). Water trucks should be used in the areas of excavation and should be used to water down unpaved access routes. Given that the excavation area is very large, and that there will be up to 400 trucks per day driving on mostly unpaved surfaces, there must be significantly more than one water truck used to minimize fugitive dust. All actions proposed for the management of particulate matter and fugitive dust, including the use of tarps and an adequate number of water trucks must be stated as specific mitigation measures in the final EIR.

3. According to Table ES-1 of the DEIR, the proposed mitigations may not be possible. The statement under "*Level of significance after mitigation*" is "*Full implementation of these mitigations could be unachievable. Therefore, impact remains significant and unavoidable*". If mitigation is not possible, it is not mitigation. The feasibility of the mitigations must be determined and documented in the final EIR so that decision makers have an understanding of the full impacts on regional air quality.

4. Neighborhood air quality events, such as wildfires that create smoke or large events at the Rose Bowl can further degrade air quality. There must be continuous monitoring of the air quality when such an events occur and there must be a plan to halt all project-related activities if and when the air becomes unhealthy.

C. <u>Biological Resources</u>

The DEIR states that the removal of habitat will have a less than significant impact. Under the proposed project, the entire 120 acres will be completely and permanently cleared of all vegetation, habitat, and candidate, sensitive or special status species. This cannot be described as anything but significant and unavoidable.

The DEIR does not discuss the fact that Hahamongna Watershed Park is included within the Los Angeles River/Arroyo Seco Corridor, an area the resources of which have been determined "nationally significant through the Rim of the Valley Special Resource Study

(Exhibit 15). The Rim of the Valley Study, spearheaded by Congressmember Adam Schiff, studied the significant natural and cultural resources of the mountains encircling the San Fernando, La Crescenta, Santa Clarita, Simi and Conejo Valleys in California. The study, which is ongoing, analyzed two options: the potential creation of a new unit of the national park system or the potential adjustment of the existing boundary of the Santa Monica Mountains National Recreation Area.

The DEIR also does not address the long-term impacts of removing up to 120 acres of habitat from the last remaining wildlife corridor connecting the San Gabriel Mountains and the San Rafael Hills. Recently, the Arroyo Foothills Conservancy (AFC) announced their on-going efforts to purchase Cottonwood Canyon for $1.6 million, just south of Devil's Gate Dam, in order to preserve wildlife corridors throughout the San Rafael Hills, and the Arroyo Seco Canyon, including Hahamongna Watershed Park. According to the 2012 Los Angeles County Department of Regional Planning's SEA Program the project site is located within the Altadena Foothills and Arroyos Significant Ecological Area (SEA). The Significant Ecological Area (SEA) Program is a component of the Los Angeles County General Plan Conservation/Open Space Element: "*SEAs are ecologically important land and water systems that support valuable habitat for plants and animals, often integral to the preservation of rare, threatened or endangered species and the conservation of biological diversity in the County. While SEAs are not preserves, they are areas where the County deems it important to facilitate a balance between development and resource conservation. Development activities in the SEAs are reviewed closely in order to conserve fragile resources such as streams, oak woodlands and threatened or endangered species and their habitat.*" (http://planning.lacounty.gov/assets/upl/sea/2_Altadena_Foothills__Arroyos_SEA_Spring_2012_GP.pdf).

The Arroyos & Foothills Conservancy has identified wildlife corridors in the area and Hahamongna Watershed Park is a critical segment of the corridor that allows migration to and from the Angeles National Forest. (Exhibit 9). The proposed project would permanently remove these sections of the corridors that pass through Hahamongna Watershed Park.

Since the proposed project will prevent the recovery of any natural vegetation, many species would not return to the area and the wildlife corridor would never recover. Pasadena has made significant investments toward the preservation of unique environmentally sensitive areas. The final EIR must answer the following questions:

? How can the determination for biological resources be less than significant when so much habitat will be destroyed and so many species will be permanently removed?

? How can the determination for biological resources be less than significant when a County designated SEA will be severely impacted, especially as it relates to wildlife corridors?

? Why doesn't the DEIR reference the fact that HWP is included in an ongoing federal study to protect "nationally significant" resources?

? How can the elimination of biological resources in Hahamongna be considered less than significant when these resources are in an area which has been determined to be "nationally significant" in a federal study?

D. Land Use and Planning

The development of the HWP Master Plan was a years-long collaboration between Pasadena and the community. The Executive Summary of the HWP Master Plan clearly states the goals and guiding principles established by the City that will control the future of Hahamongna. They are as follows:

- *To encourage and promote the stewardship and enjoyment of the Arroyo Seco in Pasadena.*
- *To balance and integrate the interrelated issues of water resources, recreation, natural resource preservation and restoration, and flood management in the Arroyo Seco.*
- *To provide a safe, secure and accessible Arroyo Seco for public enjoyment.*

- *To recognize the importance to Pasadena of the history, cultural resources and unique character of the Arroyo Seco, and to conserve and enhance these assets.*
- *To preserve and acquire open space in or adjacent to the Arroyo Seco.*
- *To recognize that the Arroyo Seco in Pasadena is comprised of distinct geographical areas that are interconnected by a number of resources and features including, but not limited to, water, habitat, geology, recreation, and culture; and that it is part of a larger watershed.*

And the stated Goals include:

- *Preserve, restore, and enhance the native habitats*
- *The Devil's Gate flood control basin will be managed to provide protection to the developed and natural downstream areas.*
- *Conserve and protect the water resources of the Arroyo Seco*
- *Provide diverse recreation opportunities for the Pasadena community*
- *Enrich and promote the unique history and culture of Hahamongna Watershed Park*
- *Provide a safe and secure park*
- *Provide adequate circulation, access and parking*

This project conflicts with a number of the stated Guiding Principles and Goals. It appears that LACDPW is planning for only one of the principles to the detriment of all others. The proposed project, which permanently eliminates natural resources, habitat, wildlife, and much of the recreation, is clearly in conflict with the goals and guiding principles established in the HWP Master Plan.

In addition to LACDPW's failure to comply with the HWPMP, the DEIR does not acknowledge the Spirit of the Sage Council Settlement with the City of Pasadena which restricts any new trails in much of the basin. (Spirit of the Sage Council v. City of Pasadena LASC Case No. BS083201). The DEIR must answer:

? Why is the legally binding agreement between the City and the Spirit of the Sage Council not acknowledged or addressed in the DEIR?

The Hahamongna Watershed Master Plan and MEIR cost millions of dollars to complete. Capital Improvement funds, grant funds and in some cases, private funds have been set aside for project implementation. Some of the completed or proposed projects that, with the implementation of the proposed project, will either be destroyed, rendered useless or eliminated are:

1. Flint Wash Bridge restoration – This Master Plan project has been completed but, according to the LACDPW presentation, the bridge and the top of the dam will be closed for the duration of the project, possibly beyond, to accommodate the storage of trucks and equipment. This bridge and the top of the dam are integral parts of the Perimeter Trail.

2. Sunset Overlook – This Master Plan project has been completed but will have no value during and after this project. The aesthetic value of the park for which Sunset Overlook was developed will no longer exist.

3. Berkshire Creek Restoration – This Master Plan project is in the planning process. But, according to the proposed project map, the restoration of the natural stream is located in the excavation area. This project will not be possible if the proposed project moves forward. Some of the project alternatives may allow for the Berkshire Creek Restoration after sediment removal but the area will be significantly degraded as a result of truck traffic through the area during sediment removal.

4. Multi-Benefit, Multi-Use (MBMU) Project - Although the Multi-benefit/multi-use project is now being re-scoped by the City of Pasadena, the Perimeter Trail is still an anticipated project as acknowledged in DEIR Table 2.9-1, Cumulative Projects. The City of Pasadena has received considerable grant funding toward the project, including a $789,440 Proposition 50 grant from the California River Parkways Program as well as funding from several other sources (Exhibit 10). Part of the MBMU project is the west-

side perimeter trail restoration but portions of this trail are in the project area and will be permanently eliminated.

In the Aesthetics section, p, 67, the DEIR states that Pasadena's Multi-Benefit Multi-use Project (MBMU Project) will be screened from the sediment removal project by mature vegetation reducing the potential for cumulative impacts to less than significant. Since the Initial Study for the MBMU Project is being redone, the specifics are not available about the boundaries of the project, or the number of trees to be removed. The final EIR must answer the following questions:

? How can the MBMU project be properly included in cumulative impacts if the project description and boundaries are not yet known?

? Why is the environmental impact of eliminating portions of the Perimeter Trail not evaluated in the DEIR?

? Since the MBMU Project as it was proposed involves the removal of trees and vegetation, how can the DEIR state that the potential for cumulative impacts is less than significant?

5. Perimeter Trail – This trail encompasses several projects in the Master Plan, some are completed, and some are in the planning phase. The City has already received a $789,440 in grant funding (Proposition 50) toward the completion of the Westside Perimeter Trail. For all the alternatives, sections of the Westside Perimeter Trail, especially in the south-west area of the basin, will be closed or severely impacted by noise and dust for the duration of the sediment removal project. It is clear in the DEIR that the Perimeter Trail and several other trails and access points will be closed during the project. In the case of the proposed project, portions of the Perimeter Trail are in the excavation area and, as a result, the trail will be permanently lost and all projects related to restoration must be cancelled.

   In the Recreation Trails section (3.4) of the HWPMP, the Perimeter Trail is define as:

> *"an all-weather, permeable surface roadway will loop around the entire basin providing hikers and equestrians an internal recreational trail with links to connecting trails in the Angeles National Forest, the Central Arroyo, and the County-maintained trails to the east and west of the park. The Perimeter Trail will serve as a delineator, separating the stream and its associated restored habitats at the center of HWP from areas of concentrated recreation activity on the westside and water resources facilities on the east side. This delineation helps preserve the streambed and sloped banks as a wildlife corridor."* (P.3-42).

And, on page 3-11 of the HWPMP the following statement is made about City "designated" trails in the HWPMP, showing that there are "designated" trails in the project area:

> *There are no designated recreation trails inside this [Perimeter Trail] loop with the exception of one trail, just north of the flood management/water conservation pool that crosses the widened stream corridor at elevation 1027 to connect the east and west recreational areas.*

The westside perimeter trail restoration, although partially funded, cannot be completed during the proposed sediment removal project. The Dam Observation Trail will be closed during of sediment removal and on-going maintenance activity. There will be no designated trail in or around the basin that allows for crossing from the east side to the west side. In addition, trail closures will include designated trails that allow access from La Canada Verdugo Road, the tunnel that leads to trails in the Central Arroyo and the Flint Canyon trail that provides access to the southern half of the La Canada Flintridge trail system. For the duration of the sediment removal project and during maintenance activities, there will be no way to get from the Central Arroyo trails to either the Flint Wash Bridge, the Altadena Crest Trail, the remnants of the Perimeter Trail or the Angeles National Forest.

According to mitigation measure MM LAN-1, "Temporary impacts to designated recreational facilities and trails shall be minimized through advance communication and redirection to the nearest facility in the vicinity of the Proposed Project". First, this

mitigation measure does not address permanent impacts to portions of the trail that are within the proposed project excavation/maintenance area and will be permanently lost. Second, some of the trail uses such as equestrian trail use cannot be "redirected" elsewhere and connections of several designated trail systems that are defined projects in the HWPMP will be closed during the project period and beyond.

Eliminating trails in Hahamongna has a wider impact than upon the park alone. The trails in the park are of vital importance, tying together an excellent regional trail network which includes the trails of La Canada Flintridge, Pasadena, Altadena, South Pasadena and the Angeles National Forest. Within the past decade, La Canada Flintridge has completed extensive trail repairs and new trail construction to make a great trail system even better. After 40 years, the La Canada Loop Trail has been completed. Los Angeles County and the Altadena Crest Trail Restoration Working Group have been working to reconnect the historic Altadena Crest Trail to the rest of the trail network. Pasadena is upgrading the trails in Hahamongna as well as those trails farther south in the Arroyo. The trails are an important and highly valued recreational resource in our region.

The project as proposed will cut off access for trail users coming to the park from Pasadena, from Altadena and from La Canada Flintridge for the nine month duration of the project each year for five years or more. Trail closures such as the Altadena Crest Trail are not necessary and should be temporarily rerouted. Every effort should be made to allow weekend access to all the trails during the project and to make sure the trails are accessible during the months when work is not taking place.

6. Establishment of riparian habitat – Implementation is not possible, especially if the proposed project moves forward.
7. Establishment of willow and sycamore habitat – Implementation is not possible, especially if the proposed project moves forward.

8. Establishment of several woodlands - Implementation is not possible, especially if the proposed project moves forward.

9. Construction of the westside spreading basins - The boundaries of the proposed Project will prevent the City of Pasadena from building the westside water spreading basins which have been approved in the Hahamongna Master Plan. The final EIR must answer the following questions:

   ? Why does the DEIR not discuss the impacts to Pasadena's abilities to percolate water within the basin?

   ? How many acre feet of water per year will not be recovered within the basin because of the implementation of the sediment removal part of the project?

10. Organizations currently using the park - Tom Sawyer Camps (TSC), the Rose Bowl Riders (RBR) club and charitable services to the community like Move A Child Higher Therapeutic Riding (MACH I) have made significant improvements to the park to support their activities. MACH I is not mentioned in the DEIR except as "*a small special-needs population*" (p. 211) that is a part of the Rose Bowl Riders membership. LACDPW clearly does not understand that MACH I is a PATH-certified <u>therapeutic</u> riding program that is currently a sub-tenant of Rose Bowl Riders <u>and not</u> recreation. MACH I recently completed the construction of a new facility in Hahamongna Watershed Park which involved significant private investment and grant monies as well as hundreds of hours of volunteer work. Tom Sawyer Camps, Rose Bowl Riders and MACH I will experience significant disruption to their operations, at least during the projected 5 year project, and possibly permanently. Relocation for these equestrian organizations is not practical. According to the DEIR, there are two other stables within a 15-mile radius of Hahamongna (p. 211). While it is true that individual horses could be moved to these facilities, Rose Bowl Riders, Tom Sawyer Camp and MACH I, all community organizations, could not.

    Not mentioned in the DEIR s the rich equestrian heritage and active equestrian community in neighboring Altadena, northwest Pasadena, and La Canada Flintridge

that rely on Hahamongna. The DEIR does not acknowledge that Rose Bowl Riders moved to the Park at the invitation of the City of Pasadena in the early 1950s and has been a unique recreational resource for the community ever since. The DEIR does not recognize that the facilities of the Club, currently used for boarding, lessons, and horseshows, are an active social gathering place for horse lovers from all over greater Los Angeles. The final EIR must properly recognize the unique organizations that MACH I, Tom Sawyer Camps, and Rose Bowl Riders are and must also properly evaluate the environmental impacts upon them.

E. Noise

The DEIR states that Pasadena and Los Angeles County exempt public agencies from the Municipal Code noise requirements, p.201. La Canada Flintridge does not have an ordinance setting maximum noise levels during the proposed construction hours. According to the DEIR, “the Proposed Project will comply with all local noise ordinances, and roadway noise impacts will be less than significant”. Given the massive size of the project, LACDPW owes it to the community to provide a frank and forthright assessment of the environmental impacts of five years of construction and traffic noise. The final EIR must answer the following questions:

? In addition to diesel engine noise, why doesn’t the DEIR evaluate the backup warning beeps on construction equipment?

? Shouldn’t the community, particularly those who live on the edge of the Arroyo, be informed that they will be subjected to this intrusive beeping noise six days a week, up to twelve hours a day, for five years or more?

? Why is the LACDPW citing ordinances rather than disclosing the facts?

? How can this been considered less than significant?

F. Recreation

The DEIR is deficient in its assessment of the environmental impacts of the project upon recreation, which is one of the primary goals of the HWPMP as adopted by the Pasadena

City Council in 2003. Numerous inaccurate and/or inadequate statements are made regarding the impacts to recreational activities in the park and the impacts resulting from this project. For example:

1. The DEIR states "*During project sediment removal, most of the Proposed Project site will be closed to public use from the dam face to the edge of the Proposed Project's excavation limit boundaries*." With the proposed project, this encompasses all of the areas used recreationally today within the basin except the trail that runs north along the JPL fence line. However, trail along the JPL fence line is currently closed and unavailable for use indefinitely due to construction for a new JPL parking structure.

2. The DEIR *states "The majority of the maintenance roads will be closed during sediment removal; however these roads are not officially designated for recreational uses and are often not available for unofficial recreation use due to reservoir water levels or maintenance activities"*. First, the statement that the maintenance roads are often not available is untrue. They are only unavailable for a short time after major rain falls. Second, the evaluation of recreational and/or land use impacts, including trails, should not be limited by whether the County believes they are designated. The trails are used extensively today, will not be useable at all during and possibly after the project and the current users will be displaced. The impact to trails and trail use is greatly minimized due to this arbitrary distinction between "designated" and "non-designated" trails. In the final EIR, the trails maps must be redrawn to include ALL proposed and existing trails, including the Perimeter Trail.

3. The DEIR states "*As detailed below, implementation of sediment removal will result in temporarily restricted access to portions of designated trails and indirect impacts to existing recreation uses associated with construction activities. These impacts may increase the use of other area parks and recreational facilities such as those listed in Table 3.15-1, Area Recreational Facilities*. There are recreational activities that will not be able to be relocated or make use of existing recreational facilities. First, there is no alternate location for the disc golf course half of which is in the proposed project boundaries. Second, Table 3.15-1 includes the Rose Bowl area as an alternate

recreational location. The EIR for the NFL's temporary use of the Rose Bowl Stadium states that recreation around the Rose Bowl will be displaced and lists Hahamongna Watershed Park as alternate location for much of that recreational activity (Temporary Use of the Rose Bowl Stadium by the NFL, July 1012, Section 3.6 Recreation). Both of these projects, if implemented, will occur at the same time, displacing all recreation from both project sites.

4. The DEIR states "*The Oak Grove area of Hahamongna Watershed Park and the associated facilities including Oak Grove Disk Golf Course will remain open during sediment removal and will continue to provide active recreational facilities to the area. Sediment removal activities will not limit the use of the Oak Grove area of Hahamongna Watershed Park by individuals or by organizations such as the Oak Grove Disc Golf Club, the Rose Bowl Riders, or Tom Sawyer Camp"*. First, the historic Disc Golf Club will lose use of much of their playing area. Second, Tom Sawyer Camp conducts much of its activity, including horseback riding and exploring nature, within the project area. Third, the statement that the sediment removal activities will not limit use of the area is incorrect. Use of the area will, in fact, be eliminated for most recreational activities. Fourth, MACH I is not mentioned in this statement. MACH I currently subleases a portion of Rose Bowl Riders but is a separate non-profit organization with special needs clients. These statement errors must be correct in the final EIR.

The final EIR must answer the following questions regarding impacts to recreation:

? Who determined and where is the documentation for which trails are "designated" and why only "designated" trails need to be considered in the EIR?

? If these trails are listed as "designated" by the City of Pasadena, why do the alignments and trail names not all correspond with the Trail Plan as adopted in the HWP Master Plan (Exhibit 11)?

? Why aren't all existing trails, including those within the basin, shown on the existing trails map in the DEIR (Figure 3.15-3) since their elimination will have just as much of an impact upon recreation as will the elimination of the "designated trails"?

? How will the final EIR address the fact that this project along with the NFL use of the Rose Bowl create a cumulative impact on recreation and each project site plans to redirect recreation to the other project site?

? Why is there no baseline study of the recreational use of the area?

G. Transportation/Traffic

Although traffic has been determined to be a significant and unavoidable impact at the project site, and at Pasadena, La Canada and Altadena intersections, the impacts have been severely understated in the following areas:

1. The Mobility Element of Pasadena's General Plan (http://cityofpasadena.net/Planning/CommunityPlanning/General_Plan/) includes the goal of protecting neighborhoods by discouraging traffic from intruding into community neighborhoods. Commuter vehicles attempting to avoid the truck traffic, especially in and around the 210 South to 210 east interchange tunnels will exit the freeway and drive through the neighborhoods.

2. In its scoping letter, Caltrans stated that haul trips should be limited to off-peak commute hours. Mitigation measures TRA-1 and TRA-2 propose to prohibit delivery to Boulevard and Vulcan sediment placement sites during PM peak hours. Peak PM hours start at 2pm. Peak AM hours will be from 6am until 9am yet there are no mitigation measures proposed for inbound truck traffic from Irwindale. The PM mitigation proposed will likely extend the hours per day trucking will occur or extend the number of years that the project will take.

3. The DEIR does not discuss the cumulative impacts to traffic resulting from this project in conjunction with the Devil's Gate Water Conservation (pipeline) project. The proposed location for the pipeline to Eaton Wash is under Woodbury Street and New York Drive. These streets are currently alternate routes for east-west traffic trying to avoid congestion on the 210 freeway. These two streets are also key access routes to all Altadena residential areas. The Water Conservation Project must be defined in the final EIR and the cumulative impacts must be considered in the final EIR

4. The DEIR is deficient in that traffic patterns within the park are not delineated. Access routes are shown only in the extreme southern area of the park. The public was advised that there would be no particular haul routes within the basin. The DEIR indicates otherwise, however, stating that vehicular activity will be limited to established unpaved roads and unpaved parking lots (p.86). The final EIR must clarify where the access/haul routes will be within the basin. In addition, the final EIR must state how wide the access routes within the park will be. At the project information meetings, County staff indicated the access roads will be 16 feet wide and used for one way traffic only. This needs to be confirmed in the final EIR. The environmental impact of the haul routes and parking lots within the park cannot be accurately assessed when the locations and dimensions have not been fully disclosed. The final EIR must provide a map showing the maintenance roads/trails, parking lots and any other facility that will be used as the haul routes and staging areas within the basin.

5. In an article in the Altadena Patch, Kerjon Lee, spokesman for County Public Works was quoted as stating the County might use a road the City of Pasadena was looking at building on the west side of the park ("Devil's Gate Dam Project Could Be Larger than Expected," Altadena Patch, September 26, 2011, www.altadena.patch.com). Since there has been vehement, decades-long community opposition to any new roads in Hahamongna, this quote raised questions which were never adequately answered about how the proposed sediment removal project might be used as a pretext to build new roads in and around the basin. Any discussions between County Public Works and the City of Pasadena staff concerning construction of roads in the basin before, during and after this project must be disclosed now so that the cumulative environmental impacts can be evaluated by the public and the decision makers.

   The final EIR must answer the following questions regarding impacts to transportation and traffic:

   - Why is there no discussion of impacts to all neighborhoods along the 210 corridors, including East Pasadena, Arcadia, and Monrovia?

? How long would the proposed project take if haul trips are only during the off-peak commute hours as suggested in mitigation measures TRA-1 and TRA-2? Why is there no mitigation measures proposed for inbound trucks from Irwindale during AM peak hours?

? What will be the cumulative impact when this project is combined with the Water Conservation Project that will shut down a major east-west freeway traffic alternative?

? Where are the access routes within the basin and how do these impact the trails and other recreational uses?

? Have there been discussions between County Public Works and the City of Pasadena staff concerning road building and/or expansion in Hahamongna?

H. Incomplete Statements of Impacts and Inadequate Mitigations

1. The County was aware of and given the opportunity to comment on the Hahamongna Watershed Park Master Plan (HWPMP). According to the response matrix, the LACDPW submitted two comment letters. The concerns raised by the County were related to the liner to be used in the water conservation pool, the need to adhere to seismic ordinances and codes, concerns about the Superfund Site, the City's need to get County permits for construction, some project costs and sediment removal frequency and quantity. For the most part, the LACDPW was supportive of the projects planned in Hahamongna. (http://www.ci.pasadena.ca.us/PublicWorks/AS_MEIR, Arroyo Seco Master EIR V3 Section 13 Responses to Comments

   The City of Pasadena was put in a position of detrimental reliance when it moved forward with the cost of planning and implementing numerous projects in the HWPMP. The proposed project, as described in the DEIR, is in direct conflict with the stated guidelines, goals, numerous projects and land use in Hahamongna Watershed Park. Conflicts with the HWPMP are detailed below under "Land Use and Planning".

? Why hasn't LACDPW described in detail the impacts to ALL projects listed in the HWPMP?

2. The proposed project and most of the alternatives have environmental impacts which cannot be mitigated to a level of less than significant. Given the size and extent of this project and the environmental impacts, the list of 18 mitigation measures presented is an amazingly short list and, for the most part, ineffective. Essential to the legal adequacy of mitigation measures is that there is a real effort to identify feasible, performance-based mitigations that do not rely on future planning. And, per CEQA, maximum effort needs to be made to present alternatives that allow most if not all mitigation measures to be performed on-site. As discussed above, the actual amount of sediment proposed to be removed should be reduced to what is actually necessary to meet this project's objectives, not to accommodate other projects or to meet other unstated County goals. The amount of sediment to be removed should not exceed the amounts stated in other County documents such as the Devil's Gate and Eaton Storm Water Flood Management Project grant application. It is likely that a smaller amount of sediment and excavating only 50 acres or less immediately behind the dam would allow for much more on-site mitigation. It is clear that slowing the project down and down-scaling the project would reduce the need for mitigation and improve mitigation opportunities.

   As described, the proposed project would excavate and keep permanently cleared 120 acres, including riparian habitat, a major wildlife corridor, 50+ acres of willows, hundreds of other trees, and endangered and protected species. There is no mitigation for the restoration of wildlife corridors, and several protected species might never return to the area. Since the proposed project will scour 120 acres, mitigation for trees and riparian habitat would certainly have to be primarily offsite. Further, the DEIR suggests for mitigation replacement at a ratio of 1:1. This is less than the standards generally used by the City of Pasadena which, for trees, often uses a ratio of 3:1 in order to insure that at least one tree survives for every 3 planted.

The County may not approve or carry out a project for which an EIR identifies one or more significant effects on the environment unless all of the adverse environmental effects have been mitigated to a level of insignificance *or* all feasible mitigations and alternatives have been adopted *and* that project benefits outweigh the significant effects on the environment. Project benefits cannot be mischaracterized and must be supported by substantial evidence. The County must mitigate properly if they want to pursue any statements of overriding consideration as required by CEQA.

Some inadequacies in the mitigation measures are:

- The DEIR does not discuss where the off-site mitigation measures will be.
- MM BIO-8: The DEIR states that mitigation for tree removal is going to be a combination of onsite and offsite habitat restoration at a replacement ration of 1:1 and that ruderal habitats within the park are to be used whenever possible. But, there will be few ruderal habitat opportunities since the 120 acres will be scoured.
- MM AQ-1: The mitigation measure states trucks that meet EPA's emission standards for model year 2007 <u>as reasonably feasible</u>. This is not an effective mitigation measure if it is not feasible.
- MM BIO-7: This mitigation measure references trees within the project area "that can be avoided". But, with the proposed project all vegetation will be removed and kept out of the project area. The DEIR does not address how they will obtain the necessary permits for tree removal from the City of Pasadena and what the oversight will be to assure all City regulations are complied with. The mitigation measure references additional measures that will be implemented to protect the root zone of oak trees but does not state what these additional measures will be.
- MM LAN-1: The mitigation measure addresses "temporary" impacts to recreational facilities and trails. The DEIR does not propose any mitigation

measures for “permanent” impacts to recreational facilities such as the disc golf course and the numerous trails that will be lost.

The final EIR must address these inadequacies and answer the following questions:

? Where will all off-site mitigation occur?

? What percentage of habitat mitigation will be on-site and what percentage off-site?

? How much of the off-site mitigation will be at locations within the City of Pasadena?

? How can LACDPW propose a project of this size and not guarantee the EPA emissions standard will be met? Who will determine what a feasible effort for meeting the standard is? Who will monitor this mitigation to assure that the standard has been met?

? How is it possible to use ruderal habitats within the park for mitigation if the 120 acres of the park are scoured as is stated in the proposed project? What is the acreage of ruderal habitat that would remain in the park to be used for mitigation under the proposed project and each of the alternatives?

? What mitigation measures are proposed for “permanent” impacts to recreational facilities such as the disc golf course and the numerous trails that will be lost?

? How will trees within the project area be “avoided” when all 120 acres will be scoured? At what point will LACDPW obtain the necessary permits for tree removal from Pasadena? Who will oversee that all City regulations are complied with? What “additional” measures will be implemented to protect the root zone of oak trees

IV. Errata and Necessary Clarifications

A. The LACDPW Sediment Management Strategic Plan (2012-2032) has specific information on the remaining capacity of the reservoir. However, a search of the DEIR for the word

"strategic" did not turn up a single reference to the County's Strategic Plan. In addition to the specific information about Devil's Gate Dam, the Strategic Plan is relevant to the decision makers and the public trying to gain an understanding of the County's entire sediment management plan and how Devil's Gate fits in. The final EIR must include all relevant information from the Strategic Plan concerning Devil's Gate Dam and Reservoir.

B. The trails map in the DEIR, Figure 3.15-2 Devil's Gate Area Designated Trails, is drawn incorrectly. It does not correspond with either the trail alignments shown in the trail plan adopted in the HWP Master Plan or the existing Hahamongna trails as shown on the City of Pasadena Arroyo Seco Guide to Public Trails and Recreation, revised 3/23/2010 (Exhibit 12).

C. The alignments of the West Rim Trail in the vicinity of the Oak Grove Sports Field do not correspond with those in the adopted HWP Master Plan Trail Plan. Since the West Rim Trail is not even depicted in the Arroyo Seco Guide to Public Trails and Recreation, the source of the alignments in the DEIR is in question. The final EIR must disclose source(s) used for the trail alignments and the alignment of the West Rim Trail must be changed to correspond with that in the adopted HWPMP.

D. The DEIR states that maintenance roads in the park are used as "unofficial trails when reservoir water levels and conditions permit," p.211. This is inaccurate. The Perimeter Trail as proposed in the adopted Park Master Plan would utilize the park maintenance roads as part of the official trail network. The most recent version of the Perimeter Trail in Pasadena's Multi-benefit multi-use Project includes a bridge which would raise the trail out of the inundation area. In the final EIR, the trails map must be redrawn to include all proposed and existing trails, including the Perimeter Trail. And, the analysis of impacts must be corrected to reflect the environmental impacts of this project upon all existing and proposed trails in the park as indicated in the park Master Plan adopted by the Pasadena City Council.

E. The DEIR states on p.35 that, after the Station Fire, most of the vegetation and trees on the Proposed Project site were dead, washed out, or buried under sediment…". The 2003 picture of the project area was taken in May (Figure 3.4-1). The 2010 picture of the project

area (Figure 3.4-2) and the 2011 picture of the project area (Figure 3.4-3) were taken during the month of February when the willow trees in Hahamongna are dormant. A photo taken on November 7, 2010 (Exhibit 13) shows that the willow trees behind the dam were very much alive. The final EIR must present project area photos that accurately reflect the current state so as to not give the misleading impression that the trees behind the dam are dead. Most of the trees behind the dam, primarily willows, not only survived the Station Fire but flourished.

F. The public's task in understanding the environmental impacts of the sediment removal project has been made much more difficult by conflicting information in County Public Works documents. As stated in section II-A, there are discrepancies related to project storage capacity between the original Devil's Gate sediment removal plan, the 2010 grant application to the CA Department of Water Resources for the Devil's Gate and Eaton Stormwater Flood Management Project, and the County of Los Angeles Sediment Management Strategic Plan 2012 – 2032. These discrepancies need to be resolved and corrected in the final EIR.

G. The DEIR states that Alternative 2, Configuration C will have an increased conflict with bike and pedestrian facilities. The final EIR must clarify this.

H. The DEIR states that Alternative 2, Configuration C, as with the Proposed Project, will occur over 5 years. It does not seem likely that Alternative 2 could be completed in 5 years when it proposes removing 1mcy more sediment than with the proposed project.

I. The list of schools in the immediate vicinity (p.74) is incomplete. It does not include La Canada Junior High School and the Child Education Center which is immediately adjacent to La Canada High School. The latter omission is significant since the school has programs for infant/toddler (as young as 2 months old), preschool, and school age children.

J. In the Air Quality-6 Cumulative Impacts section (p.93), the temporary use of the Rose Bowl by the NFL is not listed as one of the projects which could be going on at the same time as the sediment removal project p.93. This needs to be corrected in the final EIR.

K. The Flint Canyon Trail, one of La Canada Flintridge's main trails, is incorrectly identified in the DEIR as the Flint Wash Trail, p.210

L. In Appendix D, Biological Reports (p.1), the text states "The proposed project will remove 1,671,000 cy of sediment debris from Devil's Gate Reservoir." The Biological Report was apparently done before the Proposed Project was enlarged from its original scope. Figure 3 of the Biological Resources Map is also incorrect in Appendix D. It shows an excavation footprint which corresponds with that of the project as originally proposed rather than the much larger footprint of the DEIR Proposed Project.

M. The Move a Child Higher (MACH I) therapeutic riding program must be accurately define as a stake-holder in and a designated use of Hahamongna Watershed Park. The reference that MACH I is nothing more than "*a small special-needs population*" of Rose Bowl Riders is inaccurate and must be corrected and the impacts to this group need to be analyzed.

V. Conclusion:

After careful study, Friends of Hahamongna believe there are many problems with the proposed project and all the alternatives. We support a sediment removal alternative that would phase the removal of sediment over a much longer period of time, remove only the amount of sediment that is necessary, make more use of sluicing, destroy a much smaller area of Hahamongna and cost far less. We believe there is a far less impactful alternative that meets the project goals. The concepts advocated by the Arroyo Seco Foundation (ASF) should be used as a basis for the development of an environmentally superior alternative. LACDPW must develop a sediment removal plan which would promote the multiple goals of the Hahamongna Watershed Park Master Plan rather than addressing only flood control to the detriment of all other purposes served by the park such as habitat preservation and recreation.

LACDPW should make use of the many community suggestions for an effective yet tolerable solution that does not create such a negative impact on the environment and surrounding communities. It is also important the LACDPW take into consideration and fully respect alternatives presented by Responsible Agencies such as the City of Pasadena.

VI. Exhibits:

Exhibit 1 – LACDPW Presentation to HWPAC – 11/30/2010 – Slide 16

Postfire Sediment Removal Project

Emergency Response to the 2009 Station Fire and 2010 Severe Winter Storms

- Planning to remove 1,671,000 cy (1 DDE) of sediment due to expected 5 year recovery
- Construction to begin September 2011
- Estimated 3 years to complete
- Sediment will be hauled to Manning Pit SPS and Azusa Land Reclamation

2

Exhibit 2 – LACDPW Presentation to HWPAC – 11/30/2010 – Slide 26

Station Fire Effects on Devil's Gate

- 2009-2010 Storms brought in 936,000 cy of sediment after only 1st year
- Estimated Current Capacity: 1,242,000 cy (~17%)

Exhibit 3 – LACDPW Presentation to HWPAC – 11/30/2010 – Slide 33

Project Benefits

- Relieves threat to Devil's Gate Dam outlet works
- Establishes a permanent maintenance area
- Increased capacity = regaining necessary Flood Protection
- Improved Water Conservation
- Opportunity for better Water Conservation in the future (pool)

Exhibit 4 – Sediment Management Strategic Plan – Table 2-1

Table 2-1 Reservoirs in the Flood Control District

Reservoir	Original Capacity (MCY)	Historic Sediment Removal		Conditions as of the Last Survey				
		Sluiced (MCY)	Excavated (MCY)	Date of Last Survey	Sediment Quantity in the Reservoir (MCY)	Available Capacity[a] (MCY)	Percent of Capacity Taken Up by Sediment[b]	Percent of Capacity Available[c]
Big Dalton	1.7	0.0	1.6	Jul 2008	0.0	1.7	0%	100%
Big Tujunga	10.1	3.1	10.4	Aug 2011	2.0	8.1	20%	80%
Cogswell	19.8	1.3	4.4	Aug 2011	3.9	16.8	20%	80%
Devils Gate	7.4	2.2	5.9	Mar 2011	3.9	3.7	53%	47%
Eaton	1.5	0.0	3.3	May 2010	0.5	1.1	33%	67%
Live Oak	0.4	0.0	0.6	Nov 2008	0.008	0.4	2%	98%
Morris	52.1	2.6	0.0	Dec 2010	13.1	36.4	25%	75%
Pacoima	9.8	2.2	0.0	Sep 2010	5.1	4.7	52%	48%
Puddingstone	28.1	0.0	0.0	Sep 2004	1.7	26.4	6%	94%
Puddingstone Diversion	0.2	0.0	1.5	May 2005	0.0	0.4[d]	0%	100%
San Dimas	2.4	0.2	4.4	Aug 2009	0.0	2.5[d]	0%	100%
San Gabriel	86.1	11.8	24.3	Dec 2010	14.4	71.7	17%	83%
Santa Anita	2.2	1.9	0.8	Dec 2010	0.3	1.2	14%	86%
Thompson	1.0	0.0	0.4	Jun 2004	0.2	0.8	20%	80%

Notes

a. Available Capacity = Original Capacity – Sediment Quantity in the Reservoir, or as determined based on the surveys.
   Example: San Gabriel Reservoir's Available Capacity = 86.1 MCY – 14.4 MCY = 71.7 MCY

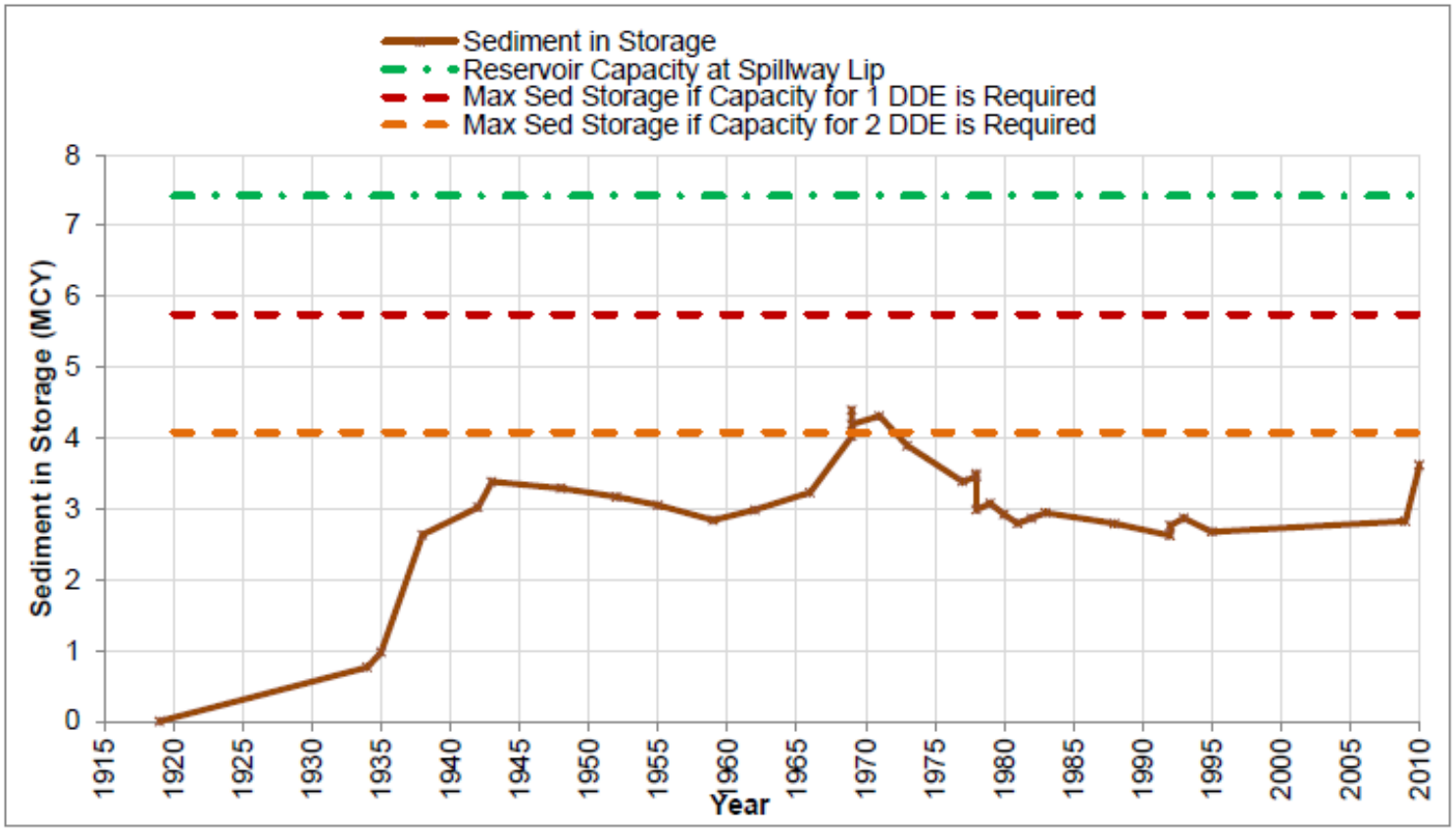
b. Percent of Capacity Taken up by Sediment = Sediment Quantity in the Reservoir / Original Capacity.
   Example: San Gabriel Reservoir's Capacity Taken Up by Sediment = 14.4 MCY / 86.1 MCY = 17%

c. Percent of Capacity Available = 100% - Percent of Capacity Taken Up by Sediment
   Example: San Gabriel Reservoir's Percent of Capacity Available = 100% - 17% = 83%

d. When a reservoir's available capacity is greater than the original capacity, it could be that the reservoir was overexcavated at some point. Alternatively, it could be a reflection of the inaccuracy of bathymetric surveys, which are used to determine sediment quantities in reservoirs.

Exhibit 5 – Sediment Management Strategic Plan – Figure 8-27

Figure 8-27 Graph of Historical Sediment Storage at Devil's Gate Reservoir



Sediment has been removed 32 times in the 92-year life of the reservoir as shown in Table 8-12. Table 8-12 shows that both excavation and sluicing have been used to remove sediment from Devils Gate Reservoir in the past. The majority of the sediment (73 percent) has been removed through excavation.

Exhibit 6 – Flood Hazard Warning and Contingency Plan for the Arroyo Seco Channel Map

Exhibit 7 – Arroyo Seco 50-Year Frequency Rainfall Bulked Flows and Superelevation Map (partial)

Exhibit 8 – Sediment Management Strategic Plan – Devil's Gate Reservoir Historical Sediment

Table 8-12 Devils Gate Reservoir historical sediment accumulation and removal

Survey Date		Reservoir Capacity @ Elevation 1,054 ft (MCY)	Quantity Sluiced (MCY)	Quantity Excavated (MCY)	Sediment Accumulated Between Surveys (MCY)	Sediment in Storage (MCY)
October	1919	7.42	-	-	-	-
September	1934	6.66	-	0.08	0.84	0.76
June	1935	6.45	-	-	0.21	0.98
June	1938	4.79	-	-	1.66	2.64
January	1942	4.40	1.04	0.04	1.46	3.02
December	1943	4.04	0.10	0.03	0.50	3.38
Fall	1948	4.13	0.12	0.07	0.10	3.29
July	1952	4.25	0.41	0.14	0.43	3.17
September	1955	4.37	-	0.12	-	3.05
December	1959	4.58	-	0.28	0.07	2.84
May	1962	4.44	-	0.70	0.84	2.99
September	1966	4.19	0.08	0.60	0.92	3.23
February	1969	3.40	-	0.03	0.83	4.03
March	1969	3.02	-	-	0.37	4.40
November	1969	3.23	0.19	0.01	-	4.19
December	1971	3.11	-	0.23	0.35	4.31
October	1973	3.53	-	0.47	0.06	3.90
March	1977	4.04	-	0.75	0.24	3.39
March	1978	3.97	-	0.24	0.31	3.45
July	1978	3.93	-	-	0.04	3.50
December	1978	4.43	-	0.51	-	2.99
February	1979	4.34	0.25	0.12	0.47	3.08
March	1980	4.50	-	0.45	0.30	2.92
July	1981	4.63	-	0.32	0.19	2.79
September	1982	4.55	-	0.10	0.18	2.87
April	1983	4.48	-	0.05	0.13	2.95
June	1988	4.63	-	0.20	0.05	2.79
February	1992	4.80	-	0.17	-	2.62
July	1992	4.66	-	-	0.14	2.77
April	1993	4.68	-	-	0.10	2.87
November	1995	4.94	-	0.19	-	2.68
April	2009	4.79	-	0.02	0.18	2.83
April	2010	3.99	-	-	0.79	3.62
March	2011	3.72	-	-	0.27	3.89

Exhibit 9 - Wildlife Corridors – Cottonwood Canyon Through Hahamongna Watershed Park (AFC Website)

Exhibit 10 – HWP Perimeter Trail Project Grants (Information compiled from publicly available sources as of 8/8/2012)

NAME and/OR LOCATION	GRANT SOURCE	ENVIRONMENTAL
Trail and Bikeway (Component 7) Upper Arroyo Seco Trail Hub Project	Requested from the CA River Parkways Program, CA Natural Resources Agency (Prop. 84)	Grant denied
Westside Perimeter Trail Improvements – from the northern limits of Sycamore Grove field to the northern limit of Hahamongna Annex	State Environmental Enhancement Mitigation Grant 2010-11 for habitat restoration and trail improvements ($100,000)	Environmental compliance, coordination with LA County and regulatory agencies, and design to be completed in FY 2012
Funds obtained for Westside Perimeter Trail	Los Angeles River Parkway Program (established by the Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Act of 2002) Riparian and Riverine Habitat Program $400,000 RR-17-003 (Funds obtained in 2002)	Completion due date 3/31/2013?
Trail improvements to the Westside Perimeter Trail (CIP 77507) Project includes the southernmost portion of the Westside Perimeter Trail and the Spur Trail to the expanded parking lot	FEMA $8465 Prop 50 789,440 (Grant R81745-00) Prop A '92 80,000	Environmental compliance and coordination with Los Angeles County and other regulatory agencies and final design to be completed in FY 2013 Hahamongna MBMU Project Initial Study
Berkshire Creek Restoration (including trail)	CA Dept of Water Resources Urban Streams Restoration Program Final Prop 84 Grant Awards – April 2012 Sponsor/cosponsor – Pasadena and the Arroyo Seco Foundation 638,410	

Exhibit 11 – Hahamongna Watershed Park Master Plan – Trail Plan Ex. 3-8

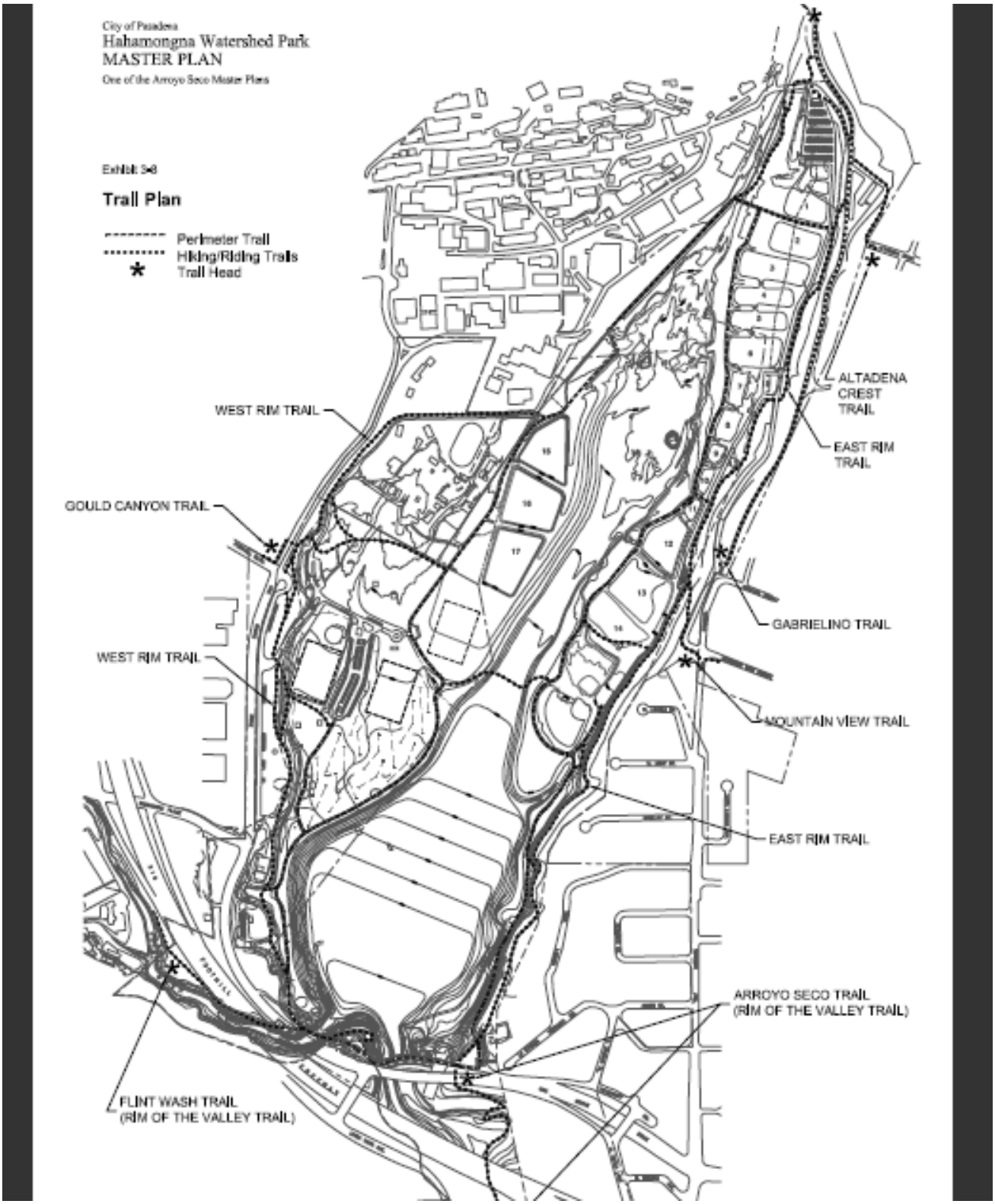


Exhibit 12 – City of Pasadena Arroyo Seco Guide to Public Trails and Recreation (Page 1)

Exhibit 13 – Photo of Hahamongna Watershed Park – November 7, 2010 – Courtesy of Petrea Burchard

Exhibit 14 – LACDPW Presentation to HWPAC – 11/30/2010 – Slide 27

Excavation Site

- Excavation Area: < 50 acres
- Willow Tree Removal (permanent) : ≤ 15 acres
- Avoidance of sensitive species

VEGETATION COMMUNITY

- Alder Woodland
- Alluvial Fan Sage Scrub
- Black Willow Series
- Coast Live Oak Woodland - Disturbed
- Coastal Sage Scrub
- Mule Fat Scrub - Disturbed
- Peppergrass Series
- Posion Hemlock Series/ Mule Fat Scrub - Disturbed
- Riparian Herbaceous
- Stream
- Ephemeral Pond
- Disturbed
- Ornamental

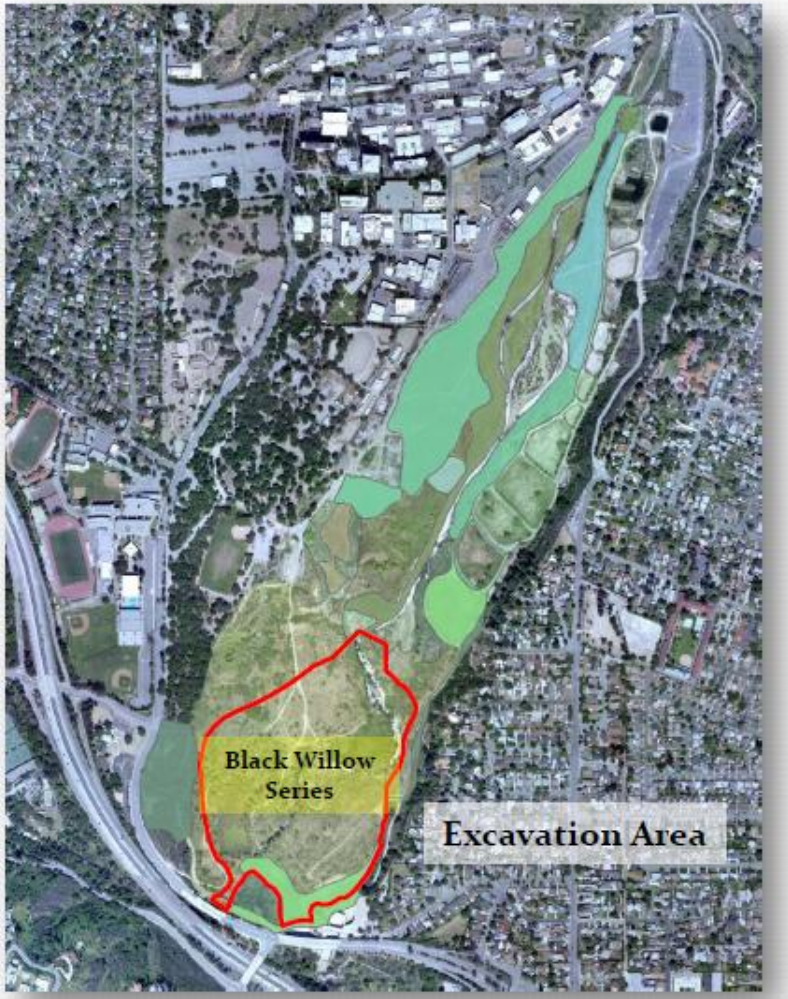
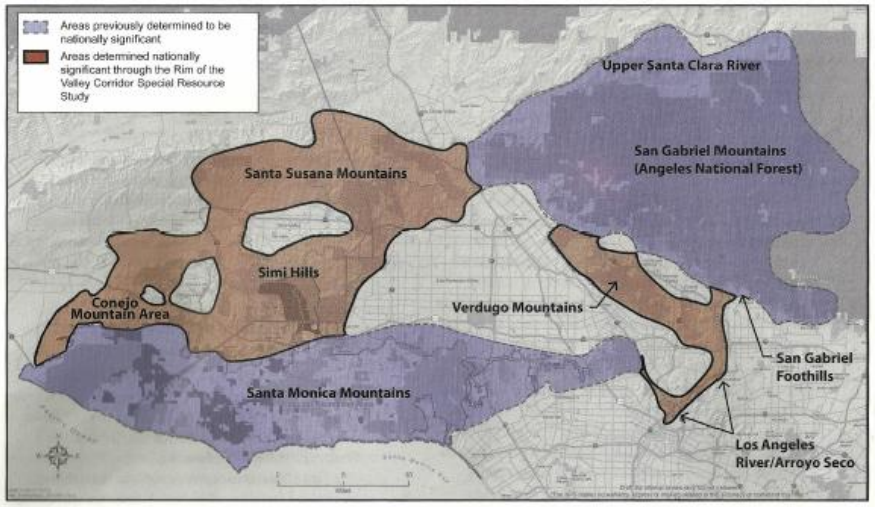


Exhibit 15 – Geographic Areas within the Rim of the Valley Corridor



Map to the left: Two geographic areas within the Rim of the Valley Corridor study area have previously been found by the NPS to contain nationally significant resources: the Santa Monica Mountains National Recreation Area and the San Gabriel Mountains.

Special Resource Study Criteria Preliminary Findings (New Park Unit)

National Significance - *Does the study area contain nationally significant resources?*

Two geographic areas within the Rim of the Valley Corridor study area have previously been found by the NPS to contain nationally significant resources: Santa Monica Mountains National Recreation Area (SMMNRA), and the San Gabriel Mountains.

The purpose and national significance of SMMNRA was established by Congress through its enabling legislation (Public Law 95-625). It recognizes the Santa Monica Mountains and adjacent coastline as an area of national significance because of its combination of natural, cultural, recreational, and aesthetic resources, and further states that, "… there is a national interest in protecting and preserving these benefits." Through the San Gabriel Watershed and Mountains Special Resource Study process, the NPS has determined the San Gabriel Mountains to be of national significance for its geologic resources and high biodiversity. The Rim of the Valley Corridor study is not revisiting the significance of these two areas. However, the previously identified nationally significant resources are incorporated into the summary provided below.

The remaining portions of the Rim of the Valley Corridor study area are being evaluated through this study to determine the extent of nationally significant resources. The NPS preliminary findings indicate that the remainder of the study area contains nationally significant resources, including outstanding examples of geologic and paleontological resources, high biodiversity, as well as a culturally rich, long history of human use. The following summary describes how the study area resources, including the Santa Monica and San Gabriel Mountains, meet the national significance criteria.