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ALTADENA, CALIFORNIA 91001**

2014 January 21

County of Los Angeles
Department of Public Works
Water Resources Division
Attn: Reservoir Cleanouts Program
P.O. Box 1460
Alhambra, California 91802-1460
reservoircleanouts@dpw.lacounty.org

Re: Comments on *Devil's Gate Reservoir Sediment Removal and Management Project Draft Environmental Impact Report (DEIR)*, State Clearinghouse No. 2011091084, October 2013.

Dear Department of Public Works Personnel,

Please accept for the official record my comments and questions as follows regarding the subject report and the proposed Project it describes. In general, I find the proposed Project dramatically over-scoped beyond what is necessary for safety. The DEIR manifests an insularity on the part of the Department through its promotion of a long-used but unsustainable method of trucking sediment at great expense from one place to another. At the same time other County budgets are being sought to restore sand to beaches that are eroding, and exposing coastal structures to their own set of hazards, precisely because an early 20th-Century "solution" to what was then a much smaller sediment removal problem is being offered in the 21st Century in answer to a scale of problem never envisaged when the trucking practice was begun. Further, contrary to CEQA requirements, the subject DEIR does not cover the entire scope of relevant actions, because the proposed pipeline to carry water from the Arroyo Seco drainage to the Rubio Canyon drainage is not considered in sufficient detail, even though the depth of excavation proposed, and the volume of sediment to be removed, appears to be driven in part by the latter action, which itself is poorly considered.

Therefore I conclude that the proposed Project as described is seriously flawed, and I conclude that the DEIR as a document describing the proposed Project is also seriously flawed. Many other commentators have taken up these issues and more. My detailed comments and questions concern the following three topics, of which I have some personal knowledge:

1. Lack of notice to park users.
2. Trail closure and home value impact.
3. Assessment of impact at sediment destinations, and points in between.

1. Lack of Adequate Notice to Park Users.

An informal survey was conducted by Lori Paul and Robert Staehle visiting the proposed Project area within Hahamongna Watershed Park (hereafter "HWP" or "Park") on a number of days

during 2013 November and December, and 2014 January, entirely within the period during which comments on the draft EIR were solicited from the affected public. Park users who were encountered at random were asked if they had heard of the proposed sediment removal project. Of >120 people encountered and asked, all were surprised at mention of the project, and zero were aware of the proposed project before being asked if they knew about it. These results included my most recent excursions in the Park on January 10, and January 20, both after the DEIR comment period was extended, and the latter being one day before the extended comment due date. (These results are cited for days exclusive of the December 14 “Hands Across the Dam” event sponsored by Save Hahamongna.org. By definition, anyone coming to that event knew about the proposed project, and most, if not all, were there to protest its anticipated scope and/or impact.)

Under CEQA, users of the Park and the land proposed for sediment removal are considered an impacted group, so it is surprising to find so few (in fact none) of those surveyed aware of the project described in the DEIR. Why might this be?

A survey of some of the more popular park entrances and traverse routes conducted on January 10 and 20 offers at least a partial explanation. There was no signage at the following entrances, features, and trail intersections making any mention of the proposed Project (see photos on pages 5 – 14 below keyed to these location numbers):

1. West end of Altadena Drive trailhead.
2. Intersection of the trail that descends from the west end of Altadena Drive with the paved service road above the JPL east parking lot (identified in Google Maps and other places as both the Gabrielino Trail and N. Arroyo Blvd).
3. Intersections of the trail that crosses the JPL east parking lot with the entering-JPL traffic lane on the east side of the parking lot, and the exiting-JPL traffic lane on the west side of the parking lot.
4. The trail where it leaves the public road to enter the Park from between JPL’s south and west corner and the Los Angeles County Fire Department Camp 2 Air Attack installation.
5. The above trail, where it enters the open area of the Park from between the fence on one side delineating NASA/JPL property and the fence on the other side of this trail delineating the area used by Rose Bowl Riders.
6. The parking area on the east side of the Park located along N Windsor Avenue between W. Mountain View Street and Ventura Street.
7. The top of the trail that descends from the middle of the west edge of the same parking area down toward the middle of the Park.
8. The Gabrielino trailhead, which serves also as a Park trail entrance, just north of the parking area noted above.
9. The Park’s “Sunset Overlook” a few hundred feet north on the footpath west of and parallel to the paved “N Arroyo Blvd/Gabrielino Trail”.

Most of the above locations had general signage when visited. There was reasonably elaborate signage about the Park at locations 6, 8 and 9 above, but nothing at all about the proposed Project described in the DEIR, or even mention of the DEIR comment period, etc. Zero. The accompanying photographs of these locations document the signage there on January 10 or 20, depending on location.

Exactly two signs with a single notice on one sheet of 8.5 X 11 inch paper under scratched plexiglass facing were found in the Park that made mention of the DEIR, but did not describe the scope of the project. One was near the east end of Devil’s Gate Dam, and the second at the

intersection of a north-south and east/west trail near the middle of the Park (see Photos #10 on pages 15-16). A third was said to have been posted in a January 2 email from Edel Vizcarra to Lori Paul and Robert Staehle, but was not found in the Park (it may have been present, as not every possible signage location was examined). While some of those Park users who were encountered and asked if they were aware of the proposed Project appeared to have passed by one or the other of these signs, apparently none of those people had taken any notice. Others, many of whom expressed themselves to be frequent Park users, could have entered and left the Park repeatedly without ever encountering one of the signs mentioning the proposed Project.

The sign mentioned above near the middle of the Park (see photo) does not actually even hint at the scope of the proposed project, and is only a notice of the extension of the deadline to receive comments for an additional 15 days, to January 21.

A sign near the bottom of the trail that leads down from the Windsor/Ventura parking area, photographed on 2013 November 16 (see “Devil’s Gate Dam Interim Measures 2013” sign in photo on next page), refers to a project in which “Public Works will remove up to 5,000 cubic yards of sediment...to again be temporarily placed at Johnson Field,” (which is within the Park) and where “The green waste will be hauled to Scholl Canyon Landfill at a rate of no more than 10 trucks per day to avoid impacts to the neighborhood along the haul route on Windsor Avenue.” Therefore, this sign clearly does not refer to the proposed Project described in the DEIR to which this set of comments is addressed. On November 16, well into the comment period, there was no sign nearby describing or giving notice of said Project or DEIR.

Questions:

By what quantitative measure and methods can DPW assure that an adequate number of Park users were notified about the proposed Project?

When did signs advising of the proposed Project first appear, where, and by what measure were they of adequate format and size, type size, graphic design, and descriptive content to draw adequate attention of Park users? How long did each of these signs remain in place?

Were any of the signs placed in locations accessible to disabled persons? (The sign in photos #10 was hundreds of feet from any wheelchair-accessible location.) With which provisions of the Americans with Disabilities Act were these signs, their locations, and accessibility not compliant?

How can it be explained that out of >120 Park users encountered at random over three months during the comment period, not one of them was aware of the proposed Project, DEIR, or comment period?

Why were prominent signs not placed at sites of other signs frequently seen by Park visitors describing the proposed Project scope, DEIR, and opportunity to comment, for the duration of the comment period? Poor as it was, the “Devil’s Gate Dam Interim Measures 2013” sign photographed 2013/11/16 near the bottom of the trail that leads down from the Windsor/Ventura parking area provided a map and summary description of an earlier project to remove only 5,000 cubic yards of sediment and green waste. Why was it possible to place a sign describing such a small project, with a map included, and yet a descriptive sign could not be placed at the same location, and elsewhere, for the entire comment period, for this Project proposed to be as much as 800 times larger in terms of the volume of sediment removed?



Above: Prior project sign from 2013 November 16 (Lori Paul photo.)

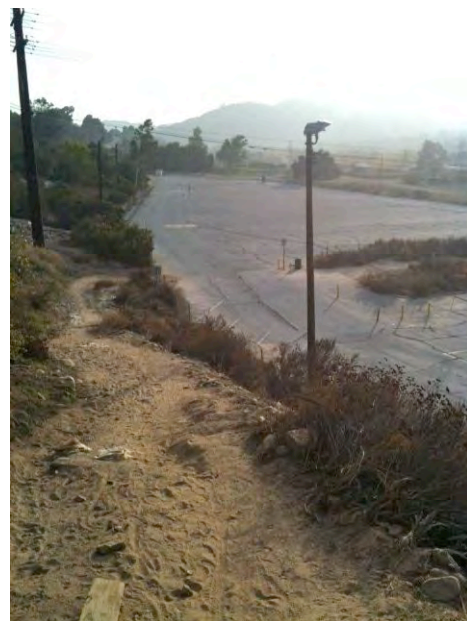
1. a, b, & c: West end of Altadena Drive trailhead. No Project or DEIR sign. 2014 January
10



2. a, b, & c: Intersection of the trail that descends from the west end of Altadena Drive with the paved service road above the JPL east parking lot (identified in Google Maps and other places as both the Gabrielino Trail and N. Arroyo Blvd). No Project or DEIR sign. 2014 January 10



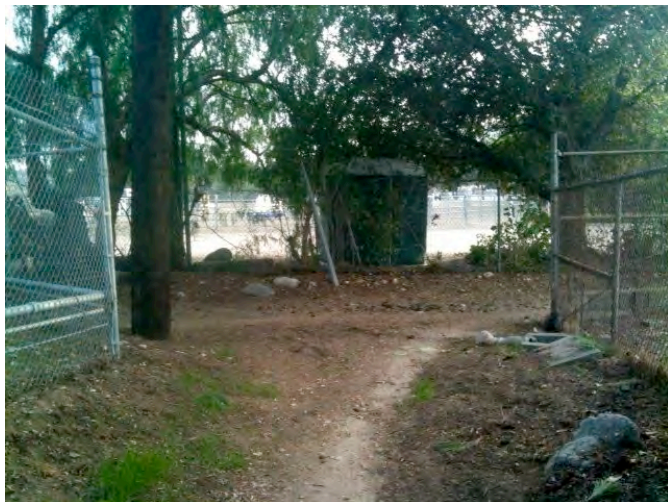
3. a, b, c, d, e, f, g, h, i, j, k, l, m, n: Descent (a, b, c, d) from east to intersection of the trail that crosses the center of the JPL east parking lot with the entering-JPL traffic lane on the east side of the parking lot (e, f, g), and the exiting-JPL traffic lane on the west side of the parking lot (h, i, j, k, l) and ~100 feet west of there (m, n). No Project or DEIR sign. 2014 January 10

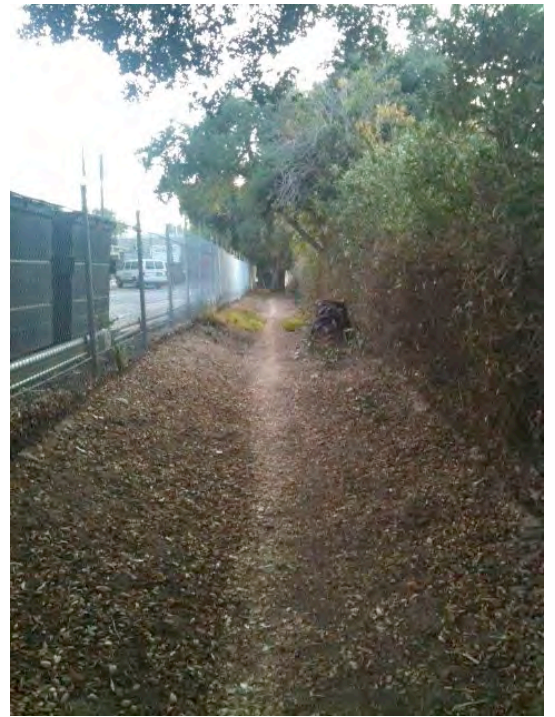






4. a, b, c, d, e, f: The trail near JPL's South Gate, where it leaves the public road to enter the Park from between JPL's south and west corner and the Los Angeles County Fire Department Camp 2 Air Attack installation. No Project or DEIR sign. 2014 January 10



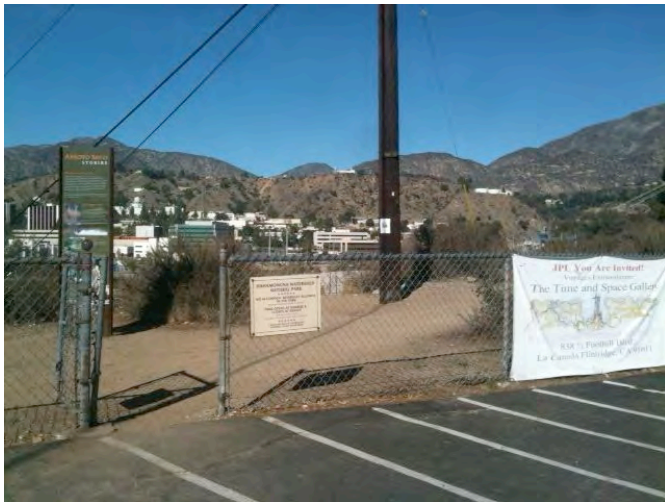


5. a, b, c, d: The above trail, where it enters the open area of the Park from between the fence on one side delineating NASA/JPL property and the fence on the other side of this trail delineating the area used by Rose Bowl Riders. No Project or DEIR sign. 2014 January 10





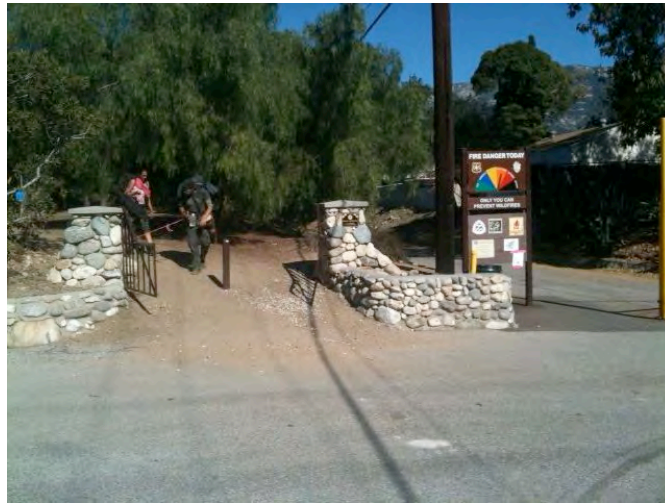
6. a, b: The parking area on the east side of the Park located along N Windsor Avenue between W. Mountain View Street and Ventura Street. No Project or DEIR sign. 2014 January 20



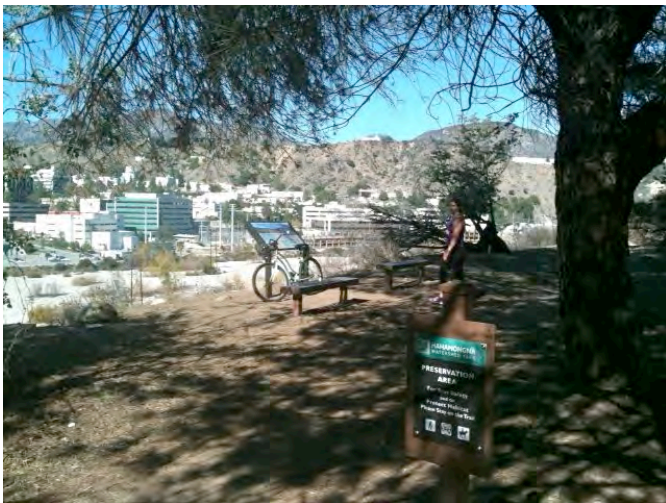
7. a, b, c: The top of the trail that descends from the middle of the west edge of the same parking area down toward the middle of the Park. No Project or DEIR sign. 2014 January 20



8. a: The Gabrielino trailhead, which serves also as a Park trail entrance, just north of the parking area noted above. No Project or DEIR sign. 2014 January 20



9. a, b: HWP's "Sunset Overlook" a few hundred feet north on the footpath west of and parallel to the paved "N Arroyo Blvd/Gabrielino Trail". No Project or DEIR sign. 2014 January 20



10. a, b, c, d: Finally, near the intersection of a north-south and east-west trail near the middle of the Park, is a small sign missed by most who pass it, noting the new due date for comments, but omitting any hint of the proposed Project scope. 2014 January 10



Devil's Gate Reservoir Sediment Removal and Management Project



Devil's Gate Reservoir Sediment Removal and Management Project Draft EIR Comments To Be Accepted Through January 21, 2014

Due to the high volume of content in the Devil's Gate Reservoir Sediment Removal and Management Project Draft EIR and requests for additional time to review the document, we will now be accepting comments for an additional 15 days, 90 days in total, through **Tuesday, January 21, 2014**.

If you have not done so already, comments emailed to reservoircleanouts@dpw.lacounty.gov, mailed, or faxed to LA County Public Works will be included in the official Response to Comments Log that will be attached to the Final EIR.

Please check out the project website at <http://www.LASedimentManagement.com/DevilsGate>

Mail	Email	Fax
County of Los Angeles Department of Public Works Water Resources Division Attn: Reservoir Cleanouts Program P.O. Box 1460 Alhambra, CA 91802-1460	reservoircleanouts@dpw.lacounty.gov	(626) 979-5436

2. Trail Closure and Home Value Impact

In addition to its natural values described by a number of other commentors, Hahamongna Watershed Park is host to a large number of trail users. Such trail use centers on recreation, physical fitness maintenance and training, commuting to and from NASA's Jet Propulsion Laboratory (the region's largest employer), educational field trips by local student and adult groups, bird watching, dog walking, mountain biking, and equestrian use by probably a few thousand users of all ages. Local parking areas are often full on weekends, with many cars coming and going during a single hour of a popular day with good weather. On January 20, for example, at the Windsor/Ventura parking area, there were approximately 40 cars parked in the lot and nearby when I visited in the early afternoon. During a single 15 minute period, approximately 5 cars departed and 5 entered and parked, with some carrying as many as four people. Nearly all the parked cars were empty, indicating that their occupants were almost certainly using trails in the Park. Clearly other Park users simply walked, ran, or rode their bikes from their residences to use the Park, and could be missed in a parking survey.

As Chair of the Steering Committee of the County-chartered Altadena Crest Trail Restoration Working Group (ACTRWG), which holds monthly public meetings at the Altadena Community Center approximately 9 times per year, I can indicate that the topic of connecting the Altadena Crest Trail (ACT) and other Altadena trails with three neighboring trail systems is a priority for many of the trail users who attend ACTRWG meetings, and has been adopted as a goal by the group as a whole, and endorsed by vote on more than one occasion without any opposition. Said connection is precisely within and across Hahamongna Watershed Park, to the La Canada Flintridge trail system to the west, to the Gabrielino Trail into Angeles National Forest to the north, and to trails south down the Arroyo Seco into Pasadena. This multi-system connection increases the value of the trail experience to users of all these trail systems, and increases property values of all nearby residential properties.

The proposed Project would sever this four-way connection and/or make it hazardous during many parts of the year and part or all of many days when intensive digging and trucking operations are going on with attendant traffic hazard, dust, toxic pollutant, and noise impacts. A considerably smaller operation than the favored alternative could be fashioned to reduce these impacts to a level that does not necessitate severing the connection among the four trail systems, while still removing an adequate volume of sediment.

Questions:

What quantitative measures of trail use have been made, using what methodologies, against which the impact of the proposed Project on trail use can be assessed?

What alternatives can be put forward that enable unbroken, or infrequently broken (as perhaps required during flood or fire emergencies) connection among a) the Altadena Crest Trail (ACT) and other Altadena trails with three neighboring trail systems b) to the La Canada Flintridge trail system to the west, c) to the Gabrielino Trail into Angeles National Forest to the north, and d) to trails south down the Arroyo Seco into Pasadena? One would think that the ACT-to-Gabrielino Trail linkage need never be severed by the proposed Project, but what about Altadena-to-La Canada, Altadena to South Arroyo Seco, and La Canada-to-Gabrielino Trail connections? How many trail users does the proposed Project impact, and what activities are curtailed or eliminated? How many birds of how many species will be left to watch, and how does this compare with past Audubon-sponsored bird counts made by qualified observers? What will be the impact to physical fitness in the community, increased emergency room visits from cardiovascular and pulmonary disease, allergies, and other ailments that result from direct impact of the project, and

indirect loss of health because of reduced physical fitness resulting from reduced trail use? What increased medical expenses will result that must be borne by taxpayers and insurance plan members?

What fraction of trail users will divert to other trail areas less convenient, and what will be the impact to those locations in terms of parking, habitat disturbance, and crowding?

How many people use the trails and Park today to walk and bike to and from work at JPL and other employers? What will be the impact on their habits, and on JPL's compliance with average vehicle ridership targets and other parameters set by the South Coast Air Quality Management District (AQMD)? I personally rode my mountain bike between my home in Altadena and JPL, crossing the Arroyo through the Park, and using the west end of the Altadena Crest Trail from the west end of Altadena Drive, 42 times in 2013, starting February 25. I have used this commuting method on many days in most prior years back into the 1990s. This year, I started earlier, on January 9, and expect to ride to/from work ~60 times. I will definitely curtail my riding any time the safe link is severed, e.g., by frequent truck traffic, diesel smoke, dust, toxic ash, and other Project-related hazards or route closures. What will be the impact of the reduction in lowest-impact commuting (e.g., by walking and bicycles) that results from the proposed Project, and how were these quantities measured, estimated, and/or derived? I am clearly not the only commuter using this method near or across the proposed Project Area, but I am unaware of any reliable surveys estimating this population, automobile emissions saved, and other environmentally relevant parameters. What surveys has DWP used in and around HWP, and why should they be considered reliable?

There is significant literature linking public trail proximity, quality and usage to home values, with examples in different parts of the country. Likewise, similar literature exists concerning the impact on home sale prices of nearby large construction projects. For houses sold during the duration of the proposed Project, what is the expected aggregate value lost to sellers as compared to if these houses had been sold during a period without the proposed Project in progress? Clearly such an estimate can only be made on a statistical comparison basis, so what historical records were used, what assumptions applied, and what range of answers emerged? (For example, if 1,000 homes within earshot, downwind dust and traffic impact are estimated to be sold during the proposed period leading up to and during the proposed work, and the average home value is impacted negatively by \$10,000, then the total impact to home sellers would be \$10 million, with some error bars.)

3. Assessment of Impact at Sediment Destinations, and Points In Between.

Questions:

The bulk of the DEIR is focused on impacts in and around the "Project Location" where sediment is to be removed. How thorough and accurate are the assessments of impact where the proposed huge volume of sediment is to be deposited? For example, none of the maps in the DEIR Section E.S.2 Project Summary show the haul routes or destination beyond the immediate areas of Hahamongna Watershed Park. Do not the residents and commuters along those routes and near those destinations deserve some focused attention in the Executive Summary? Surely similar threats exist concerning diesel exhaust, traffic interruption, sediment dust, its toxic components, pulmonary effects on downwind residents and schools, etc.

Has comment been sought in an effective manner from commuters on the 210 Freeway who will be slowed by the ponderous chain of trucks carrying sediment, and their slightly less ponderous

return journey to pick up more? What fraction of these commuters have any idea that this Project is proposed and will directly affect their lives every day that sediment is being hauled? One can expect all the Los Angeles traffic reporters to be prominently noting the slowing effects of a new truck every 70 seconds on traffic flow, especially during “rush hours” in the morning and afternoon. Is another lane needed on the freeway to offset these effects, who will pay for that, and when will its construction start, with what environmental impacts? What is the estimated impact of greater fossil fuel burn, commuter car maintenance expense, increased costly child care hours, and lost work time from the inevitable traffic snarls that will result? What methods were used in making such quantitative assessments, and how can we be sure they are accurate? What are the error bars on these impact quantity estimates, and what error budget and/or statistical analysis backs them up?

Thank you for your consideration of these matters and answers to the questions posed. They are clearly relevant to any complete assessment of the environmental impact of the proposed Project.

Sincerely,

/s/

Robert L. Staehle

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