R. Rhoads (Rody) Stephenson

Comments on Devil's Gate DEIR 12/1/2013

1. This project needs to be coordinated with four other activities going on in and around the Arroyo.
    a. Pasadena's West side project (Flint Canyon and the West trail).
    b. Pasadena's Arroyo water intake project (up the Arroyo near the ranger station.)
    c. The reclamation of the JPL East Parking lot.
    d. The JPL parking garage – including restoration of West side trail by the JPL fence.
    e. The CEQA process requires looking at cumulative impacts.
2. Is 2.0 DDE of sediment removal really required? Try to minimize this.
    a. 2.0 DDE seems to have been pulled out of the air without an analysis of flood probabilities.
    b. Do a careful analysis of flood flow statistics and debris statistics and try to minimize the amount of sediment that must be removed. See Appendix A.
    c. 1.0 DDE (or 1.5) would be better than 2.0
3. Limit the annual removal to 200,000 cu yards or less per year.
    a. Take longer to get to the target reservoir capacity.
4. Hours of operation
    a. Start trucks AFTER school starts for grades 7 and 8 and High School
        a.i. An 8:30 AM start would be much better than 7 AM.
    b. Consider JPL traffic patterns as well
    c. Consider 12 hours days on Saturday and Sunday and shorter days during the week
        c.i. You might survey residents on this.
    d. Consider the timing of traffic jams on the 210 – especially the 2 lane connections both Eastbound in the afternoon (through the tunnel) and Westbound in the morning.

d.i. Travel times to Irwindale will be much longer after 3 PM

d.ii. The 210 doesn't need any additional traffic during rush hours.

e. Question: What is the estimated round trip time at various times of the day? Consider doing an experiment.

f. Question: How many trucks will be required?

g. Question: Where will the trucks be parked at night?

h. Question: What will you do to prevent long queues of trucks waiting to be loaded? Prevent idling.

5. Use the Alternate Haul Route back across Woodbury

    a. Do not allow trucks on Berkshire in either direction.

6. Use low-emission trucks

    a. EPA 2007 is not good enough. Use at least EPA 2010.

    b. Use latest EPA or CARB emissions standards – whichever is more stringent

        b.i. Should include SCR and DPF at a minimum

    c. Or use the emission standards that have been implemented at the ports.

    d. Require Natural Gas or other Low emission fuels.

7. Noise considerations:

    a. Ban Jake Brakes on the downhill road into the Arroyo

    b. Plan routes in the Arroyo to avoid the need for the trucks to back-up

        b.i. That will avoid the "beep" "beep" "beep" warnings

8. The mitigation measures are wholly inadequate. 6 of 7 items do zero mitigation.

    a. Activities like "plan" "survey" "monitor" provide useful baselines but do not accomplish actual mitigation.

    b. Use configuration C – with habitat left in the middle

9. Consider reducing the number of settling ponds on the East side in order to mitigate the loss of habitat from the sediment removal area.

    a. Can you find 70 acres to offset the loss of habitat in the removal area?

b. Work with Pasadena to let some of the existing or new settling ponds revert to natural habitat.

c. Consider keeping the sediment in Johnson Field and letting it revert to natural habitat.

10. Consider a permanent shallow lake near the dam

    a. This will greatly improve the aesthetics.

    b. This will attract waterfowl.

11. Consider a conveyor system (horizontal transport) plus two lifting portions so that trucks can be loaded on the Woodbury Bridge.

    a. This will reduce dust, noise, and air pollution going uphill.

    b. Will keep most trucks out of the Arroyo

    c. Will alleviate the invasive species problem on tires

12. Question: Will sluicing (FAST) damage the only soft bottom part of the Arroyo South of the Rose Bowl?

    a. Isn't the rest of the channel to the LA River convergence all concrete?

    b. Will sluicing result in the need for more sediment removal downstream?

13. For the Eastern access road into the Arroyo, try to save the large Oak trees on Woodbury

14. We have a choice of a small surface area and deep versus a large area and shallower.

    a. I prefer small surface area and deep – 70 acres or less

15. Do not pump water from the Arroyo to Eaton Canyon. Pump the water into the Pasadena settling ponds and keep it in the Arroyo.

Summary:

1. Reduce volume that must be removed
2. Reduce acreage that is denuded
3. Try to find areas that can be converted to native habitat – true mitigation
4. Use natural gas or other low emission trucks
5. Do not start trucks before 8:30 AM. Reduce hours of operation.
6. Stretch out removal period to 10 or 20 years.
7. Use alternative haul route – stay off Berkshire.
8. Use configuration C.

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Appendix A

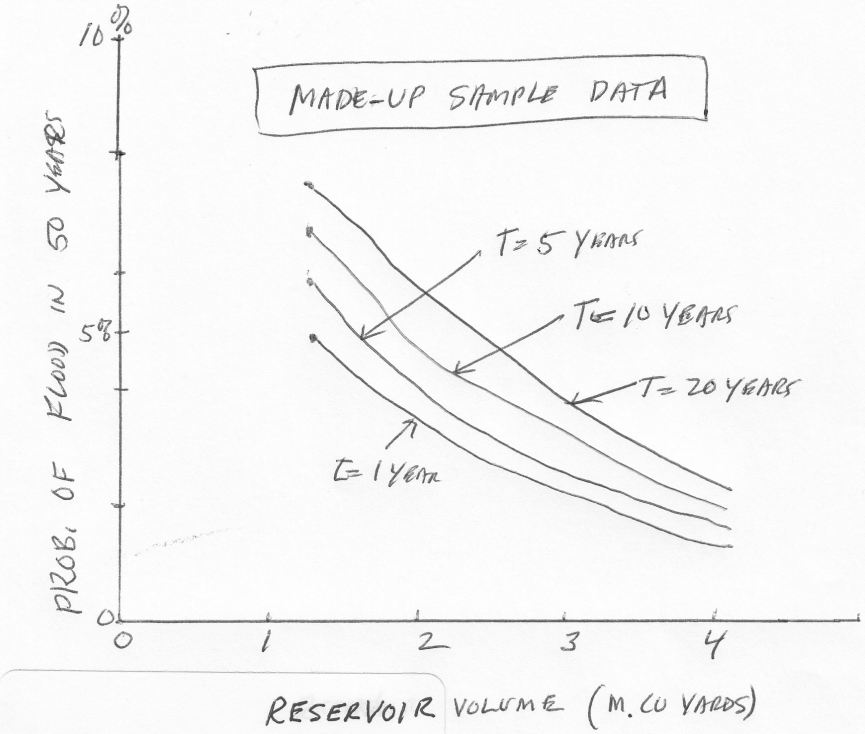
1. The whole purpose of the dam and this project is to reduce the probability of downstream floods.
2. The Draft EIR does not present any analysis for the amount of reservoir capacity needed.
3. 2.0 DDE was arbitrarily selected. You may be able to do with less removal.
4. I suggest you do an in-depth analysis and prepare a graph similar to the attached sketch on Page 5.
    a. Y-axis – Probability of flood over the next 50 years.
    b. X-axis – Reservoir capacity in million cu yards
    c. Plot 4 different lines depending on how long you take to remove the sediment
        c.i. One-year – as if the sediment could magically be removed in one year (2015).
        c.ii. 5 years starting in 2015
        c.iii. 10 years
        c.iv. 20 years
    d. A Monte Carlo simulation may be useful
    e. The attached sketch is sample data – just a guess what the curves will look like.
        e.i. Please replace with real statistical analysis results.
5. Assumptions
    a. "Flood" should be defined as over-topping of the concrete channel somewhere between the dam and the LA River Convergence.
    b. The target reservoir capacity will then define how much sediment needs to be removed.

c. You can include additional sediment additions from year to year.

d. Consider the UCLA regional climate study for future temperatures and precipitation projections.

6. Pick an annual removal rate and then dig each year until you reach the target reservoir volume.

7. This is the kind of data that the Board of Supervisors can use to determine the risk versus environmental impact trade-off.


MADE-UP SAMPLE DATA
10%
5%
0
PROB. OF FLOOD IN 50 YEARS
T = 5 YEARS
T = 10 YEARS
T = 20 YEARS
T = 1 YEAR
0
1
2
3
4
RESERVOIR VOLUME (M. CU YARDS)